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WPTF Comments on Draft 2024 IEPR

Additional submitted attachment is included below.



January 2, 2025

California Energy Commission
Docket Unit, MS-4
Docket No. 24-IEPR-01
715 P Street
Sacramento, CA 95814
Via docket submission

Re: Docket No. 24-IEPR-01 - Comments on 2024 Integrated Energy Policy Report Update (2024 IEPR Update)

Dear Commission,

The Western Power Trading Forum (WPTF) would like to thank the California Energy Commission (CEC) for its commitment to creating an inclusive and transparent process for the 2024 Integrated Energy Policy Report (IEPR). We appreciate the productive workshops that allowed for meaningful engagement among stakeholders. And we commend the CEC for fostering strong collaboration across agencies, utilities, and other load forecast users. This collaborative spirit has resulted in a more informed and comprehensive load forecasting process, and we encourage the CEC to continue this level of engagement in future IEPR cycles.

We also recognize and appreciate the CEC's ongoing work to update key inputs to the load forecast process in response to the evolving needs of California's energy system. These updates are vital as the state continues to transition to a more dynamic and decarbonized grid. Specifically, we commend the CEC's efforts to improve the accuracy of the Behind-the-Meter Photovoltaic (BTMPV) capacity factors, which have significantly enhanced the impact analysis of BTMPV as a load modifier. WPTF submitted comments on the observable mid-day over-forecasting of BTMPV over the last four years of IEPR forecasts. Over-forecasting impacts peak load and peak ramp requirements. This improvement allows for a more accurate reflection of the resource's contribution and better reflects the ramping needs of the California Independent System Operator (CAISO).

Furthermore, the addition of a new load modifier for data centers and the work to better understand and scale the potential impacts of climate change are both forward-thinking and important for ensuring an accurate load forecast. Data centers are rapidly growing and represent a significant and evolving load in California. We support the CEC's efforts



to address this emerging load category, particularly considering their increasing role in grid reliability and operational planning.

That said, we encourage the CEC to continue to work with stakeholders on the 67% 'utilization factor' applied to data centers. We appreciate the good conversation at the December 21 DAWG meeting and the general agreement from several LSEs that 67% is likely accurate for now. But all agreed this is a value that should continue to be examined and could increase.

In conclusion, we applaud the CEC's efforts to continuously refine the load forecast process and its responsiveness to an evolving electric system. We encourage continued collaboration and data-driven improvements in future IEPR cycles and look forward to the CEC's ongoing leadership in ensuring that California's energy policies are informed by the best available information.

Thank You,

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Via electronic submission.