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**PG&E Comments RE Draft Scoping Order for the 2025 IEPR
2_11_25**

Additional submitted attachment is included below.



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California Energy Commission
Docket Number 25-IEPR-01
715 P Street
Sacramento, CA 95814

RE: CEC Request for Comments on the Draft Scoping Order for the 2025 Integrated Energy Policy Report

Pacific Gas and Electric Company (PG&E) appreciates this opportunity to comment on the California Energy Commission's (CEC) Draft Scoping Order for the 2025 Integrated Energy Policy Report (2025 IEPR).

PG&E's load forecasting teams welcome the CEC's intent to develop "a weather-dependent stochastic hourly electricity load dataset consistent with demand forecast assumptions," as noted in the proposed scope.

Such a dataset would have significant value in establishing a common reference case and a comprehensive statewide picture of load evolution. Even more valuable would be the implied stochastic weather dataset underlying the hourly load. Such a dataset, since it could be developed objectively and independent of proprietary sales data and LSE-specific market views, could be a shared base for forecast development, removing a potential point of disagreement or confusion.

A stochastic dataset which allows for simulation or assignment of probabilities to variations in weather would be even more valuable, providing an agreed-upon basis for 1 in N and peak forecasts.

We have observed in prior public CEC workshops that a library of weather data, or tools to create such a library, appears to be under development. If the 2025 IEPR or the CEC's California Energy Planning Library, were to include a transparent and shareable example of even a preliminary dataset along the lines of previous CEC discussions on demand forecast methodology (e.g. [IEPR Commissioner Workshop on Energy Demand Forecast Methodology Updates](#)), that would help raise the quality and consistency of all stakeholder forecasts.

PG&E commends the CEC for incorporating load flexibility scenarios in its IEPR forecast but recommends sharing DER-specific assumptions and assessing peak demand impact for the various scenarios.

We have previously made comments encouraging the CEC to consider in the load modifier forecasts the potential impact of load flexibility to manage peak demand. PG&E expects that a material share of

customers will use DER flexibility to shift load – especially via electric vehicles and heat pump water heaters – to reduce their energy bills. Specifically, we recommended the CEC consider if it would be appropriate to apply its Additional Achievable framework to load flexibility, for example, to create Additional Achievable Load Flexibility scenarios.

Our understanding from the 2025 IEPR's draft scoping order is that the CEC will create scenarios of the like based on the 2025 forecast in order to assess the potential for increased demand flexibility. Additionally, based on these scenarios, the CEC will consider strategies to achieve the state's load shift goal. PG&E recommends that the CEC: 1) clearly state scenario assumptions regarding DER technology types and operation patterns and 2) consider the impacts of these load-shifting scenarios on the IEPR peak demand forecast.

PG&E appreciates this opportunity to respond to proposed scope for the 2025 IEPR and looks forward to continuing to collaborate with the CEC. Please reach out to me if you have any questions.

Sincerely,

Josh Harmon
State Agency Relations