

DOCKETED

Docket Number:	12-AFC-02
Project Title:	Huntington Beach Energy Project
TN #:	203261
Document Title:	Jim Stewart, PhD Comments: CAISO Peak Load has been constant for 16 years
Description:	N/A
Filer:	System
Organization:	Jim Stewart, PhD
Submitter Role:	Public
Submission Date:	10/27/2014 1:30:11 PM
Docketed Date:	10/27/2014

Comment Received From: Jim Stewart, PhD

Submitted On: 10/27/2014

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CAISO Peak Load has been constant for 16 years

CAISO Peak Load has been constant for 16 years

The proposed decision makes an erroneous statement on page 8-19: "Current demand-side programs alone are not sufficient to satisfy future electricity needs, although much more aggressive demand-side programs could potentially accomplish this at the economic and population growth rates that are projected for the state. Therefore, although it is likely that federal, state, and local demand-side programs will receive even greater emphasis in the future, both new generation and new transmission facilities are likely to be needed in the immediate future and possibly beyond in order to maintain adequate supplies."

The situation is there is no basis in fact for the above statement. Even though the state has had large economic and population growth over the last 16 years, the attached chart shows that California ISO Peak Load is the same as it was in 1998. It has not increased in 16 years, even though the California population has risen by 17% during that period of time.

Since the peak load was observed in 2006, CAISO Peak Load has declined by 10% even while the California population has risen by 6% during that shorter period of time.

As a result of this erroneous statement, the proposed decision justifies the "need" for this plant, when in fact there is no need. In fact, CAISO reports an excess of generation capacity far beyond the minimum 15-17% required reserve margin.

Data in the attached chart from:

California ISO Peak Load History 1998 through 2011, Compiled by CAISO CommPR, plus 2012 from CAISO OASIS database

2013 is from the CAISO CEO report to the Board of Governors, November 5, 2013

2014 is from the CAISO News Release, 10/20/2014

Additional submitted attachment is included below.

CAISO Peak Load in Megawatts

