

DOCKETED

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SCE's Comments on CEC Docket No. 15-IEPR-10: Joint Lead Commissioner Workshop on Inputs and Assumptions for Transportation Energy Demand Forecasts

Additional submitted attachment is included below.

April 2, 2015

California Energy Commission
Docket Office, MS-4
Re: Docket No. 15-IEPR-10
1516 Ninth Street
Sacramento, CA 95814-5512
docket@energy.ca.gov

Re: *Southern California Edison Company's Comments on the California Energy Commission Docket No. 15-IEPR-10: Joint Lead Commissioner Workshop on Inputs and Assumptions for Transportation Energy Demand Forecasts*

Dear Commissioner McAllister and Commissioner Scott:

On March 19, 2015, the California Energy Commission ("Energy Commission") held a Joint Lead Commissioner Workshop on Inputs and Assumptions for Transportation Energy Demand Forecasts ("the Workshop") as part of the 2015 Integrated Energy Policy Report ("IEPR") process. Southern California Edison ("SCE") participated in the Workshop and appreciates the opportunity to provide these written comments. SCE appreciates the Energy Commission's attention to and analysis of Transportation Energy (TE) Demand and forecast in its Demand Forecast because various state agencies and organizations, including the California Public Utilities Commission (CPUC), the California Independent System Operator (CAISO) and the California Air Resources Board (CARB), as well as the utilities, rely upon it to inform their short- and long-term planning activities.

A. The Energy Commission Should Take Advantage of Other Experts' Research and Analysis to Complement its Transportation Demand Forecast

Given the importance and influence of the Demand Forecast, the complexity of TE, which encompasses 20 unique segments that have never been included in the IEPR demand forecasts before, and that other stakeholders' studies and research are available, SCE recommends that the Energy Commission consult the research and analysis conducted by other agencies, consultants, utilities, and industry experts to complement its own work.

For instance, the Energy Commission should include additional existing forecasts that incorporate Transportation Demand Forecasting, include additional existing forecasts that incorporate TE for light-duty, medium-duty, heavy-duty, and various non-road market segments for its reference case and high case scenarios, in its May workshop. It is appropriate for the Energy Commission to include a reference case that assumes technology advancement or

government regulations or incentives, and a high case that assumes both technological advancement and government regulation or incentives.

SCE also recommends that the Energy Commission include a scenario for achieving California's longer-term greenhouse gas (GHG) goals for 2050,¹ as well as the more difficult to achieve federal air quality requirements for 2023 and 2032.² For those scenarios, SCE recommends that the Energy Commission include assumptions and inputs for light, medium and heavy duty PEVs as well the other TE segments. SCE also encourages the Energy Commission to coordinate with expert stakeholders that already analyzed these specific scenarios, including, but not necessarily limited to, the California Air Resources Board (CARB), the South Coast Air Quality Management District (SCAQMD), the Department of Energy (DOE),³ by, at a minimum, inviting them to present at the May workshop.

In addition, the May workshop and the 2015 IEPR TE forecasts should be informed by the forecasts, assumptions and attributes from ICF International's and Energy + Economics' (E3's) September 2014 California Transportation Electrification Assessment for the California Electric Transportation Association.⁴ SCE, PG&E, SDG&E, and SMUD participated in this study over a more than two year period to provide California agencies with the best available data and low, medium and high forecasts for 20 different TE market segments (units in operation, load shapes, kWh per year, etc.).

When selecting which outside forecasts to incorporate in its final IEPR forecast for each transportation segment for the reference, high and GHG/AQ forecasts, if necessary, the Energy Commission has the option of incorporating elements of the Delphi method, excluding forecasts and assumptions that are outliers, or using a weighted average method.

B. The Energy Commission Should Convene a Dedicated TE Demand Working Group and be the EV Data Clearinghouse

To encourage ongoing collaboration among various stakeholders, including the utilities, universities, national labs, agencies, and charging station companies, SCE recommends that the Energy Commission convene a working group to specifically focus on TE Demand and analysis. This working group could be part of or conduct activities in conjunction with the Demand

¹ See Exec. Order No. S-03-05 (June 1, 2005), available at <http://gov.ca.gov/news.php?id=1861>; see also Exec. Order No. B-16-2012 (March 23, 2012), available at <http://gov.ca.gov/news.php?id=17472>

² "Vision for Clean Air: A Framework for Air Quality and Climate Planning," CARB, SCAQMD, and the San Joaquin Valley Unified Air Pollution Control District, Public Review Draft, June 27, 2012, pp. 16-19, available at http://www.arb.ca.gov/planning/vision/docs/vision_for_clean_air_public_review_draft.pdf

³ In August 21, 2013, SCE presented the Energy Commission with its average of eight light duty PEV forecasts from Energy Commission, Electric Power Research Institute, Pike, Gartner, Boston Consulting Group, Morgan Stanley, Bloomberg and Citigroup. Energy + Environmental Economics, University of California, Davis and national labs such as LBNL, NREL and ORNL are other experts.

⁴ http://www.caletc.com/wp-content/uploads/2014/09/CalETC_TEA_Phase_1-FINAL_Updated_092014.pdf

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Analysis Working Group (DAWG). The Energy Commission should be clearinghouse for the research and analysis conducted by this working group as part of the 2015 IEPR Demand Forecast process and that data could be used to inform the future IEPR Demand Forecasts and satisfy the other data needs discussed in the 2014 IEPR Update.

SCE appreciates the Energy Commission's consideration of these comments and looks forward to its continuing collaboration with the Energy Commission. Please contact me at (916) 441-2369 with any questions or concerns. I am available to discuss these matters further at your convenience.

Very truly yours,

/s/ Manuel Alvarez

Manuel Alvarez