

DOCKETED

Docket Number:	15-IEPR-10
Project Title:	Transportation
TN #:	206899
Document Title:	Catherine Hackney Comments: SCE's Comments on CEC Docket 15-IEPR-10: Workshop on the Revised Transportation Energy Demand Forecasts
Description:	N/A
Filer:	System
Organization:	Catherine Hackney
Submitter Role:	Public
Submission Date:	12/8/2015 3:13:09 PM
Docketed Date:	12/8/2015

Comment Received From: Catherine Hackney

Submitted On: 12/8/2015

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SCE's Comments on CEC Docket 15-IEPR-10: Workshop on the Revised Transportation Energy Demand Forecasts

Additional submitted attachment is included below.

December 8, 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: Staff Workshop on the Revised Transportation Energy Demand Forecasts

Dear Commissioner McAllister:

On November 24, 2015, the California Energy Commission (Energy Commission) held a Lead Commissioner Workshop ("Workshop") on the Revised Transportation Energy Demand Forecasts 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 commends the Energy Commission's efforts to engage with stakeholders and to refine and update its Transportation Energy (TE) Demand Forecast in a manner that more closely aligns with other medium case light-duty vehicle expert forecasts. SCE is also pleased that the TE Demand Forecast has been updated to reflect California state policy goals such as the Zero-Emission Vehicles (ZEV) mandate. Although SCE generally supports the revised TE Demand Forecast, SCE is concerned that the current modeling of TE scenarios does not include a scenario that achieves the state's longer-term greenhouse gas (GHG) reduction goals. SCE also believes that the Energy Commission should include more specific Plug-in Electric Vehicle (PEV) attributes and system load in its final Demand Forecast.

A. The Energy Commission Should Model Scenarios that Reflect Achievement of California's 2050 GHG and Other Policy Goals

As noted in previously filed comments, SCE recommends that the Energy Commission model two TE scenarios—rather than a consumer choice model—for both on-road / train and off-road segments. These scenarios should include: (1) a mid-case scenario that incorporates existing and planned governmental regulations and incentives, including, but not limited to,

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existing and planned California Air Resource Board (CARB) regulations, new state legislation as well as federal, state and local incentives; and (2) a high-case scenarios that assumes achievement of Governor Brown's long-term state climate goals for 2050, as well as federal air quality requirements under a variety of fuel and technology mixes, including a high-electrification case in most market segments.

B. The Final Demand Forecast Should Include Specific Plug-In EV (PEV) Attributes and Resulting System Load

SCE encourages the Energy Commission to include light-duty PEV attributes, such as vehicle efficiency (watt-hour per mile) and miles traveled per year in the final 2015 IEPR Report and Demand Forecast. It may have been beneficial to share these attributes and assumptions prior to releasing the final IEPR to allow for stakeholder review and input. Similarly, it would be valuable for stakeholders to have the opportunity to review the resulting annual load projections (GWh) associated with light-duty PEVs. As such, some uncertainty remains in terms of the final outcome of the Energy Commission's forecasting efforts

C. SCE Appreciates and Looks Forward to Anticipated Further Data Refinements and Updates

After discussion with CEC staff, SCE understands that the demand forecast is not final and will be subject to revision. Revisions will include data published in GWH at a regional level before the December 17, 2015 workshop. Consultants' reports, however, will be published at a later date after they are approved by the Energy Commission. SCE appreciates and looks forward to these additional refinements and updates.

In conclusion, SCE appreciates the Energy Commission's consideration of these comments and looks forward to its continuing collaboration with the Energy Commission on how to refine and update the TE forecasting model and on the other issues of concern identified in this letter. Please do not hesitate to contact me at (916) 441-3979 with any questions or concerns you may have. I am available to discuss these matters further at your convenience.

Very truly yours,

/s/ Catherine Hackney

Catherine Hackney