

DOCKETED

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SCE's Comments on the Notice of Request for Public Comments on the Scoping Order for the Draft 2016 Integrated Energy Policy Report Update

Additional submitted attachment is included below.

March 4, 2016

California Energy Commission
Docket Office, MS-4
Re: Docket No. 16-IEPR-01
1516 Ninth Street
Sacramento, CA 95814-5512
docket@energy.ca.gov

Re: Southern California Edison Company's Comments on the Notice of Request for Public Comments on the Scoping Order for the Draft 2016 Integrated Energy Policy Report Update

Dear Commissioner Douglas:

On February 19, 2016, the California Energy Commission (Energy Commission) issued a notice of the proposed scope and general schedule for the 2016 Integrated Energy Policy Report Update (2016 IEPR Update) and invited parties to comment (the Notice). Southern California Edison (SCE) appreciates the opportunity to provide these written comments. Overall, SCE agrees with and supports the energy and environmental policy issues the Energy Commission included in the 2016 IEPR Update. For the Energy Commission's ease of reference, SCE's comments follow the outline of the Notice.

A. Section 1: Natural Gas and Aliso Canyon Storage Facility Gas Lead Response

SCE supports the Energy Commission's leadership role in the development of interagency reliability assessments and action plans in response to the well leak at the Aliso Canyon underground natural gas storage facility to ensure energy reliability in winter 2016, and to maintain reliability of electrical and gas supplies in summer 2016 and winter 2017. Extended limitations on the use and operation of Aliso Canyon could result in significant electrical system operational, market, and reliability risk. Aliso Canyon helps ensure safe and reliable operation of the SoCalGas system by balancing gas flows and pressures in the western LA Basin. Without Aliso Canyon, demands of large electric generators may not be met. SCE appreciates the Energy Commission giving SCE the opportunity to help inform the development of reliability assessments and action plans to ensure safe and reliable gas and electric system operations in the LA Basin.

B. Section 2: Environmental Performance of the Electricity Generation System

SCE recommends that the Energy Commission include transportation electrification and the Energy Commission's and California Public Utilities Commission's (CPUC's) integrated resource plans (IRPs) in the 2016 IEPR Update's exploration of the environmental performance of the electricity generation system.

1. Transportation Electrification

As the Notice acknowledges, California is a national leader in “advancing bold solutions to address climate change, promoting energy efficiency, reducing greenhouse gas emissions, furthering usage of renewable energy, and ensuring the state has a safe and reliable electricity and thermal gas system.”¹

The Energy Commission has also previously recognized that that accelerating transportation electrification is essential to achieving California's bold energy, climate, and air quality goals, policies, and requirements. Essential to achieving these ambitious goals is the widespread adoption of transportation electrification, as well as very substantial pollutant emission reductions in other sections of the economy. SCE therefore appreciates the CEC's continuing recognition in the IEPR 2016 Update of the beneficial impact of the widespread adoption of transportation electrification throughout the state.

2. IRP Rulemakings

SCE also recommends that whenever appropriate in considering new technologies, the 2016 IEPR Update recognize that the Energy Commission's and CPUC's pending IRP Order Instituting Rulemakings (OIRs)² will inform future IEPRs. The IEPR provides an important foundation for the forecasting and planning process. Accordingly, early coordination with the pending IRP OIRs may produce efficiencies for future IEPRs.

C. Section 3: Climate Adaptation and Resiliency

SCE supports the Commission's inclusion of ongoing climate resiliency efforts in the 2016 IEPR. SCE has joined the Department of Energy's Partnership for Energy Sector Climate Resilience and looks forward to sharing the insights we've gained with other utilities and the Energy Commission. While SCE is taking steps to assess and prepare for vulnerabilities in our service territory, there is a clear role for state agencies to convene and perform additional analysis in order to assess the resilience of our shared California grid as a whole.

¹ Notice at p. 1 (discussing, among other things, Senate Bill (SB) 350).

² See CPUC's R. 16-02-007 to Develop an Electricity Integrated Resource Planning Framework and to Coordinate and Refine Long-Term Procurement Planning Requirements; CEC Order No. 16-0013-05 to Develop Regulations, Guidelines, and Policies for Implementing SB 350 and AB 802.

D. Section 4: Electricity Forecast and Reliability Update

SCE appreciates that the CEC has included peak hour shifts and the impact of electric vehicle charging on the electricity forecast in the scope of the 2016 IEPR Update.³ Given that the peak hour shifts and increased electrical vehicle charging paired with the new energy efficiency and Renewable Portfolio Standard mandates will have considerable impact on the electricity forecast, SCE encourages the Energy Commission to convene technical workshops early and often to review and perfect assumptions and methodology.

In conclusion, SCE appreciates the Energy Commission's consideration of these comments and looks forward to its continuing collaboration with the Energy Commission. Please do not hesitate to contact me at (916) 441-3979 with any questions or concerns you may have. As always, I am available to discuss these matters further at your convenience.

Very truly yours,

/s/ Catherine Hackney

Catherine Hackney

³ Notice at p. 5 (“The Energy Commission will also continue to work with the California Independent System Operator and the California Public Utilities Commission to understand potential impacts to the forecast from the traditional hour of peak demand being pushed later in the day by continuing behind-the-meter photovoltaic adoption and increasing electric vehicle charging.”)