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Comment Received From: Nathan Bengtsson

Submitted On: 3/4/2016

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Pacific Gas and Electric Company Comments on the Draft 2016 IEPR Scoping Order

Additional submitted attachment is included below.

March 4, 2016

**ELECTRONICALLY FILED IN
DOCKET 16-IEPR-01**

California Energy Commission
Dockets Office, MS-4
Docket No. 16-IEPR-01
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Docket 16-IEPR-01: Pacific Gas and Electric Company Comments on the Draft 2016 Integrated Energy Policy Report Scoping Order

I. Introduction

The Integrated Energy Policy Report (IEPR) is the leading energy policy report for the State of California and impacts energy policy discussions among elected officials, public agencies, stakeholders, and the public. On February 19, 2016, the California Energy Commission (CEC or Commission) released the Draft 2016 IEPR Scoping Order (Draft 2016 Scoping Order) for topics to be included in the 2016 Integrated Energy Policy Report Update (2016 Update). Pacific Gas and Electric Company (PG&E) appreciates the opportunity to provide comments.

The Draft 2016 Scoping Order identifies five topics to be addressed by the 2016 Update:

- Natural Gas and Aliso Canyon Storage Facility Leak Response
- Environmental Performance of the Electricity Generation System
- Climate Adaptation and Resiliency
- Electricity Forecast and Reliability Update
- Nuclear Energy

PG&E plans to participate actively in the 2016 IEPR Update process and looks forward to additional details on each of the topics outlined in the Draft 2016 Scoping Order. PG&E offers the following preliminary thoughts:

1. Natural Gas and Aliso Canyon Storage Facility Leak Response: PG&E is committed to helping California meet its ambitious climate goals in a safe, reliable, and cost-effective manner, and supports the inclusion of topics related to Aliso Canyon in the 2016 IEPR's scope. The topics enumerated in the Aliso Canyon section of the Draft Scoping Order are appropriate and the proposed workshop sequence is logical. PG&E particularly encourages the proposed effort to document the interagency response to the Aliso Canyon leak, which could help identify areas of potentially problematic regulatory overlap as many state and federal agencies work to develop new regulations regarding natural gas storage.

PG&E suggest a few refinements to this section of the Draft 2016 Scoping Order to ensure that important questions related to electric and gas system reliability presented by the Aliso Canyon leak are adequately discussed.

- **Item two in the list of topics to be considered on Aliso Canyon** will make an interagency assessment and plan to maintain the reliability of electric and natural gas supplies in summer 2016 given the moratorium on gas injections into the Aliso Canyon storage facility. It is critical to address the issue of reliability, and we urge the CEC to plan to examine reliability at both the state *and local* levels, as local reliability concerns may be masked in a broader, system-wide reliability assessment.
- For **item four** regarding long-term reliability solutions in lieu of Aliso Canyon, PG&E recommends that the CEC review any similar or concurrent situational assessments from other state agencies, including the California Public Utilities Commission, California Independent System Operator, and others, to create a comprehensive view of the advantages and disadvantages of potential solutions to address any identified reliability concerns.
- PG&E also urges the CEC to consider the potential short-term and long-term electric market impacts that will result from the various gas storage scenarios in Southern California going forward.

2. Climate Adaptation and Resiliency: As a provider of energy to approximately 16 million Californians, PG&E understands the responsibility to both reduce the company's carbon footprint and address the emerging need to adapt to changing climate conditions. PG&E supports the proposed review of actions to implement Governor Brown's Executive Order B-30-15 in the IEPR Update. PG&E also supports increased interagency collaboration on climate adaptation planning and actions, which will help streamline the flow of information to California's agencies and avoid duplication of effort. Interagency collaboration may also lead to better coordinated research that results in actionable results and clear linkages for how utilities can operationalize the findings. PG&E looks forward to sharing the company's work on climate adaptation with the CEC, and also asks that the CEC recognize that utilities are in some cases limited in publicly sharing infrastructure and planning information for reasons of security.

With regard to the topics not expressly addressed in these comments, PG&E supports their inclusion as part of the 2016 IEPR Update process and looks forward to collaborating constructively with the CEC to address them in more detail. Should you have any questions or need additional information about these written comments, please contact me.

Sincerely,

/s/

Nathan Bengtsson

cc: Commissioner Karen Douglas (Karen.Douglas@energy.ca.gov)

cc: Heather Raitt (Heather.Raitt@energy.ca.gov)