

## DOCKETED

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*Comment Received From: C.C. Song*

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**MCE Comments on Electricity Demand Forecast Workshop**

*Additional submitted attachment is included below.*



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July 7, 2016

California Energy Commission  
Dockets Office, MS-4  
**Re: Docket No. 16-IEPR-1**  
1516 Ninth Street  
Sacramento, CA 95814-5512

**Re: Comments on Workshop on Methodological Improvements to the Energy Demand Forecast for 2017 and Beyond**

Marin Clean Energy (MCE) hereby submits its comments on the workshop on methodological improvements to the energy demand forecast. MCE's comments focus on the need to disaggregate various types of demand forecast at CCA service area level.

**I. Introduction**

MCE is the first of the four operating CCAs in California. The other three are Sonoma Clean Power, Lancaster Clean Energy, and CleanPower SF. One more CCA, Peninsula Clean Power in San Mateo County, will begin its customer enrollment in September 2016. Eighteen more counties have invested resources into exploring the potential of forming their own CCAs or joining nearby CCAs.

MCE currently serves over 171,000 customers throughout Marin County, unincorporated Napa County, and the cities of Richmond, San Pablo, El Cerrito, and Benicia. Later this year, MCE will begin customer enrollment in cities and town of Napa County, and cities of Walnut Creek and Lafayette in Contra Costa County. Inclusion of new communities will increase MCE's customer accounts to approximately 250,000.

MCE is a not-for-profit public agency formed to reduce greenhouse gas emissions by providing communities within its service area the choice to purchase alternative energy products to PG&E's product. Within MCE's service area, customers may choose one of three energy products: PG&E's 27% renewable energy,

MCE's "Light Green" 56% renewable energy, and MCE's "Deep Green" 100% renewable energy.

Currently, approximately 80% of customers within MCE's service area receive generation services from MCE. In addition to electricity generation products, MCE also administers a Net Energy Metering program, and various pilots that explore the viability of controlled charging, demand response, and battery storage.

## **II. Incorporating CCAs into demand forecast to appropriately reflect their impacts on the electricity generation system**

Although the original statute that enabled CCA did not obligate CCAs to reduce Greenhouse Gas (GHG) emissions, all operational and emerging CCAs have adopted the mission to deploy more renewable energy resources to combat climate change. Understanding that various distributed energy resources can have impacts on grid reliability, MCE believes that future demand forecast should be disaggregated to reflect the impacts of resources procured by CCAs whenever appropriate. The disaggregation would help CCAs better plan for resource procurement and tariff design that would optimize the deployment of various distributed energy resources.


As existing CCAs continue to grow and new CCAs are expected to come online, they can implement policies and deploy clean energy technologies to support the State's long-term GHG goals, and increase the resiliency of the energy system to climate impacts. Almost all operational CCAs are providing, or exploring, customer-facing demand-side programs in addition to electricity generation services. For example, MCE has been administering an energy efficiency program approved by the CPUC since 2013 to supplement Pacific Gas and Electric Company's (PG&E) program. Sonoma Clean Power is exploring a controlled charging pilot, and Lancaster Choice Energy has partnered with the Antelope Valley Transit Authority to replace their existing fleet with electric buses.

As these analyses can impact future energy policies that would affect resource procurement and customer program design for CCAs, MCE urges the CEC to include various CCAs and their programs in applicable forecasts. As the CEC staff develops the demand forecast, MCE is willing to collaborate with the staff to provide appropriate information for various analyses.

## **III. Conclusion**

MCE respectfully requests that the CEC include CCA electricity load and other customer programs into the IEPR. MCE looks forward to robust participation in the 2016 IEPR Update and thanks CEC staff for addressing this important issue.

Sincerely,

A handwritten signature in blue ink, appearing to read 'C.C. Song', with a long vertical line extending downwards from the end of the signature.

C.C. Song  
Regulatory Analyst