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Valley Electric Association Comments on Data Collection Straw Proposal

Please find attached comment from Valley Electric Association Inc. to 16-OIR-03 in response to the staff's Data Collection Straw Proposal

Additional submitted attachment is included below.

Comments in Response to CEC's Straw Proposal on Data Collection

Valley Electric Association, Inc.

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October 10, 2016

Valley Electric Association, Inc. (VEA) appreciates the opportunity to submit comments in response to the California Energy Commission's (CEC's) Title 20 – Data Collection Regulations – Proposed Language for Discussion at the September 26, 2016 Staff Workshop (CEC Sept. 26 Discussion Draft). VEA recognizes the intention of the CEC to improve the data collection efforts and raise the quality of the data available to the CEC in order to best support California's SB350 goals. VEA appreciates the staff's early markups of the proposed language and the September 26, 2016 workshop to enable parties to offer comments into the data design processes.

VEA is a small electric cooperative, primarily located in Nevada. VEA has a very small amount of its load in the remote, rural Fish Lake Valley area across the California-Nevada border. This approximately 1 megawatt (MW) of load sits within California. This California load has been for some years, and continues to be, served by Southern California Edison through an energy exchange agreement.

VEA offers limited comments herein on a small number of the CEC proposed changes that would create a burden for VEA given its very small level of California load. Based on the CEC Sept. 26 Discussion Draft and the September 26, 2016 workshop discussion VEA is concerned in particular with proposed changes to code sections 1304 (behind the meter generation, which seemed to include roof top PV), 1306 (further disaggregation of load data for forecasting), 1343 (use of CEC forecasting to the extent it requires further disaggregation of load data), and 1344 (proposing hourly shapes for load and dynamic, hourly shapes for PV).

VEA's provision of interval-level data would require a substantial level of effort for an essentially insignificant quantity of load. VEA encourages the Commission – should it continue to pursue the requirement for interval-level data – to create a mechanism to exempt load serving entities serving a small amount of California load. VEA expects that such exemptions would not significantly undermine the CEC's efforts and would thereby result in an adequate balance between more accurately monitoring to achieve SB350 goals yet managing the rate impact on California's retail electric customers.

VEA appreciates the staff's consideration and looks forward to continue to work with CEC in the policy refinement process.