

## DOCKETED

<b>Docket Number:</b>	16-IEPR-01
<b>Project Title:</b>	General/Scope
<b>TN #:</b>	214388
<b>Document Title:</b>	SCE's Comments on the CEC Docket No. 16-IPER-01: Draft Integrated Energy Policy Report Update
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	SCE/Catherine Hackney
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	11/7/2016 11:41:29 AM
<b>Docketed Date:</b>	11/7/2016

*Comment Received From: Catherine Hackney*

*Submitted On: 11/7/2016*

*Docket Number: 16-IEPR-01*

**SCE's Comments on the CEC Docket No. 16-IPER-01: Draft Integrated Energy Policy Report Update**

*Additional submitted attachment is included below.*

November 7, 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 California Energy Commission Docket No. 16-IEPR-01: Draft Integrated Energy Policy Report Update

Dear Commissioners:

On October 24, 2016, the California Energy Commission (Energy Commission) held a workshop to receive public comments on the recently-issued Draft Integrated Energy Policy Report Update (Draft IEPR Update). Southern California Edison (SCE) has actively participated in the 2016 IEPR Update proceeding, and appreciates the opportunity to provide these written comments. SCE generally supports the policy recommendations set forth in the Draft IEPR Update and thanks the Energy Commission for its efforts in compiling it.

In addition to its brief comments below, which are organized according to the four chapters of the Draft IEPR Update, SCE provides some clarifying edits to language in specific sections of the report relating to the San Onofre Nuclear Generation Station (SONGS) decommissioning, as well as on SCE projects that support the Southern California Reliability efforts. Appendix A includes a redline of proposed edits to the IEPR Update.

## **Chapter 1: Environmental Performance of the Electricity Generation System**

SCE supports the recommendations set forth regarding environmental performance of the electricity generation system, and appreciates the Energy Commissions recognition that transportation electrification as a critical element to the advancement of California's important and ambitious energy and environmental goals. SCE agrees with the Energy Commission that accelerating transportation electrification will have a profound impact on the electricity system, and that adequate planning for this transition will be necessary to ensure greenhouse gas reduction benefits for the electricity sector, as well as the transportation sector.<sup>1</sup>

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<sup>1</sup> See Draft IEPR Update at p. 74.

In Appendix A, SCE offers clarifying edits on items related to the SONGS decommissioning, which is also discussed in this Chapter.

## **Chapter 2: Energy Reliability**

SCE agrees with the Energy Commission's recommendations regarding energy reliability and SCE appreciates the Energy Commission's leadership role in addressing reliability in Southern California in light of the SONGS decommissioning, Once-Through Cooling (OTC) plant phase-outs, and the recent events at Aliso Canyon. In particular, SCE applauds the Energy Commission for its role in developing the interagency reliability assessments and Action Plan response to the well leak at the Aliso Canyon underground natural gas storage facility. SCE submitted comments earlier this year noting its continued support of the Action Plan and the recommendations set forth in it— particularly the Plan's recognition of SCE's concerns for maintaining safe and reliable operation of the natural gas and electric systems in Southern California.<sup>2</sup>

SCE has also offered clarifying edits, reflected in Appendix A, relating to SCE infrastructure in support of the Southern California Reliability effort.

## **Chapter 3: Climate Adaptation and Resiliency:**

As noted in SCE's comments on the IEPR Update Scoping Memo,<sup>3</sup> SCE continues to support including climate resiliency efforts in the 2016 IEPR Update. SCE looks forward to sharing the climate resiliency insights it has gained through its participation in the Department of Energy's Partnership for Energy Sector Climate Resilience. 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. SCE looks forward to continuing to work with the Energy Commissions, agencies and stakeholders in support of the 2016 IEPR Update recommendations for climate adaptation and resiliency.

## **Chapter 4: Electricity Forecast and Reliability Update**

SCE appreciates the Energy Commission's continuing efforts to enhance the electricity forecast and looks forward to engaging in discussions to further improve the forecast. In particular, SCE supports the Energy Commission's recommendations to further refine transportation electrification forecasting capabilities, develop a timely approach to weather normalization, and evaluate the impact of peak shifts, as well as improve behind-the-meter forecasting.

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<sup>2</sup> See SCE Comments on Joint Agency Workshop on Aliso Canyon Action Plan for Local Energy Reliability for Winter 2016 to 2017, filed on September 9, 2016.

<sup>3</sup> See SCE Comments on Scoping Order for the Draft 2016 IEPR, filed March 4, 2016.

November 7, 2016

Consistent with comments that SCE filed on the Energy Commission's Title 20 Data Collection Regulations,<sup>4</sup> SCE recognizes the importance of improving data collection to enhance demand forecasting efforts and inform long-term planning and policy-making. SCE looks forward to collaborating with the Energy Commission and other stakeholders to support this effort by providing data that is technically feasible to obtain, legally permissible, and which improves the efficacy of the demand forecast and related planning efforts.

In conclusion, SCE appreciates the Energy Commission's consideration of these comments and looks forward to its continued collaboration with the Energy Commission and stakeholders. 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

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<sup>4</sup> See SCE Comments on Title 20 Data Collection Regulations, filed Oct. 17, 2016.

## **Appendix A**

# Appendix A

- 1) **On Page 59, second paragraph**, under “U.S. Department of Energy (DOE),” the Energy Commission indicates that the DOE has proposed a consent-based process. This should be corrected to indicate that DOE is currently developing a consent-based process that will be published in December 2016. Also, in the following paragraph, it should be noted that the draft report with public input was issued September 15, 2016 for comment. The comment period ended October 30, 2016. A final report will be issued in December 2016.

## **Proposed Revision:**

“In response to the invitation for public comment, the Energy Commission submitted comments to the DOE on July 29, 2016. The comment letter focused on items that promote a transparent and inclusive public process, address transportation concerns, and support affected entities and equitable participation in the process. ~~The next step in the process will be the release of a draft report later in 2016 that will include~~ DOE released a draft report on September 15, 2016 that includes input from the public meetings and written comments.

The DOE ~~is plans to~~ solicited comments on its draft report to ensure that the contents accurately reflected the input received ~~and provide additional opportunity for comments.~~ The DOE is planning to issue a report on a consent-based siting process in December 2016.”

- 2) **On Page C-4, Table 19 & 20**—the headings should be switched. Table 19 is a “**SONGS 2&3**” table not a “**SONGS 1**” table as indicated, and Table 20 is a “**SONGS 1**” table not a “**SONGS 2&3**” table as indicated.
- 3) **On Page C-5, the last sentence in the first paragraph** should be deleted. No Question A-1 is identified in the report:

## **Proposed Revision:**

~~“The volumes of low level waste (Class A, B, and C) and GTCC are provided in the response to Question A-1 of the data request.”~~

- 4) **On Page C-9, Item 4**, there are no questions labeled “1a” or “2a” in the report. In Item 4, the first sentence, it would be more appropriate to delete “response to Question 1a” and replace it with “discussion on page C-3.”

**Proposed Revision:**

“The status of all of the spent fuel located at San Onofre is provided in the response to ~~Question 1a~~ discussion on page C-3.”

Also, **in Item 4 the last sentence of the first paragraph**, delete “Question 2a” and insert “Table 21 on page C-5.”

**Proposed Revision:**

“By mid-2019, all the spent fuel identified in ~~Question 2a~~ Table 21 on page C-5, with the exception of the San Onofre Unit 1 spent fuel in Morris, IL, will be located on the San Onofre ISFSI in AHSM and UMAX storage modules.”

- 5) **On Page 126, footnote 244** should be revised as follows:

**Proposed Revision:**

“Short circuit duty at the 230/66 kV substations within the LA Basin ~~Alamitos switch yard may result in circuit breakers stressed beyond their exceed equipment~~ rating if both existing and new generating facilities are operated concurrently at Alamitos.”