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Comment Received From: Catherine Hackney

Submitted On: 2/10/2017 Docket Number: 17-IEPR-02

Request Extension of Time

Additional submitted attachment is included below.



February 10, 2017

VIA E-MAIL

Mr. Robert Oglesby
Executive Director
California Energy Commission
Re: Docket No. 17-IEPR-02; 17-IEPR-03
1516 Ninth Street
Sacramento, CA 95814-5512
docket@energy.ca.gov

Re: Southern California Edison Company's Request for Extension of Time for Filing

Historic and Forecast Electricity Demand Form 1.6c and Form 1.6d (Docket 17-

IEPR-02)

Dear Mr. Oglesby:

In accordance with CCR Title 20 Section 1345, Southern California Edison respectfully requests an extension of time to submit Historic and Forecast Electricity Demand Form 1.6c Residential Load Shapes and Form 1.6d Non-Residential Load Shapes. Additional time is being requested due to new, more granular, complex reporting requirements described below.

Form 1.6c Residential Load Shapes

Requires reporting average electric demand for residential retail customers for 2014 and 2015 by forecast zone, housing type, space-heating fuel, and usage level.

New requirements include reporting average demand at each 15 minute interval per hour of the year, reporting usage levels by three categories: low, medium, and high, and to map ZIP Code to forecast zone as specified by the commission.

These new requirements will require a new, much larger sample, matching customers in the samples with the population billing files to determine certain attributes (eg all-electric vs basic), and CEC staff to finalize mapping zip codes to forecasting zones.

On February 2, 2017, SCE's load research team, responsible for conducting studies for Form 1.6c, discussed these new requirements, and the need for an extension of time to file Form 1.6c, with CEC staff. CEC staff was supportive of the need for an extension of time.

SCE respectfully requests an extension of time to submit Form 1.6c residential load shapes for the 2015 calendar year by April 15, 2017, and the residential load shapes for the 2014 calendar year by June 5, 2017.

Form 1.6d Non-Residential Load Shapes

Requires reporting average electric demand for retail non-residential customers for 2013, 2014, and 2015 by forecast zone, NAICS category, and utility electric tariff.

New form, new requirements include reporting average demand at each 15 minute interval per hour of the year by NAICS category, rate schedule, and ZIP Code to forecast zone as specified by the commission.

These new requirements will require a new, much larger sample to complete load profiles for 160 segments (8 NAICS groups * 5 zones * 4 rates), and CEC staff to finalize mapping zip codes to forecasting zones.

On February 2, 2017, SCE's load research team, responsible for conducting studies for Form 1.6d, discussed these new requirements and the need for an extension of time to file, with CEC staff. CEC staff was supportive of the need for an extension of time. SCE and CEC staff agreed on a method to condense 100+ rate schedules down to 4, and agreed that it would not be feasible to conduct the studies for 2013 because Smart Meters had not been fully installed at that time.

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SCE respectfully requests an extension of time to submit Form 1.6d non-residential load shapes for the 2014 and 2015 calendar year by June 5, 2017.

Thank you very much for your consideration.

Very truly yours,

Catherine Hackney