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IEPR Commissioner Workshop on Publicly Owned Utilities Integrated Resource Plans

February 23, 2017 – 2:00 P.M.

Discussion Paper Questions

TOPIC 1: Integrated Resource Plan Development and Review

1. Is it appropriate to require that supporting analysis for IRPs be undertaken in the 24 months prior to adopting an IRP? Is there an alternative time frame that is more appropriate?
2. Are there select areas of analysis that should be exempt from meeting this 24-month requirement because of the analysis is not time-dependent?
3. What constitutes an IRP update?
4. SB 350 requires updates "at least once every five years."
    a. Is it appropriate to require IRPs be adopted and submitted to the Energy Commission every four years to consolidate and leverage other similar requirements?
    b. Are there existing reporting requirements that could potentially be combined with the IRP?
5. Stakeholders have requested an optional "informal review" process of an IRP by the Energy Commission prior to an official submittal.
    a. What are the benefits or concerns of including an optional informal process in the guidelines?
    b. What questions, issues, or practices should this informal process address?
    c. What is the scope of the review?
6. Staff requests public input on the following options to address this as well as other potentially duplicative reporting requirements. Below are some options that staff is considering:
    a. Two submission dates:
        i. Adopted IRPs would be due to the Energy Commission by January 31.
        ii. Data forms would be due April 30.
    b. Delay IRP due date until April 30.
    c. Require that the POUs submit their IRPs by January 31 and Electricity Resource Plans by May.

TOPIC 2: Data Reporting

7. What additional guidance or data will POUs need to consistently model and present GHG emissions associated with energy purchased from selected portfolios?

TOPIC 3: Reliability, Storage, and Distributed Generation

8. How should flexibility needs be presented and discussed in the IRP?
9. Overgeneration may present a problem for utility portfolios whose loads are met with a large share of solar energy. How should potential over-generation be quantified and addressed in the IRP?
10. Is the ARB's emissions intensity of 0.428 mt CO_2e/MWh appropriate for spot market purchases and/or energy from unspecified sources under long-term contract? If not, how should a new value be determined?
11. Should staff develop emissions intensities for generic natural gas-fired resources or should this be left to the POUs? For other generic generation resources?
12. Staff would like input from the parties on exactly what data and/or information is most meaningful in understanding the impact of overgeneration.
13. How should potential risks to reliability and resource adequacy caused by climate change be considered in the IRPs?

TOPIC 4: Demand-Side Resources

14. Should POUs be required to use forecasts consistent with the Energy Commission's annual demand forecast or use their own forecast?
15. The Energy Commission's demand forecast incorporated effects of climate change for both energy consumption and peak demand. Should any forecast used in IRPs do the same?

TOPIC 5: Other Integrated Resource Plan Content

16. What input assumptions are appropriate for standardization? Examples might be resource costs and performance characteristics, fuel prices, and demand growth rates.
17. Should staff require a standardized assumption for GHG allowance/carbon costs, and if so, what assumption should be used? Which metric should be used, carbon cost or GHG allowance?
18. Are there possible unintended consequences of various methods for setting the value or cost of GHG emissions?
19. Should a high GHG allowance/carbon cost sensitivity be required? If so, how should cost be established?