

DOCKETED

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SoCalGas Comments on Risk of Economic Retirement for California Power Plants

Additional submitted attachment is included below.



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**Subject: Comments on Integrated Resource Planning, Docket Number: 17-IEPR-14,
Opportunity for Power-to-Gas Technology to Increase System Reliability**

Dear Chairman Weisenmiller and fellow Commissioners:

Southern California Gas Company (SoCalGas) appreciates the opportunity to submit comments in response to the California Energy Commission's (CEC) 2017 Integrated Energy Policy Report (IEPR) workshop regarding Risk of Economic Retirement for California Power Plants, held on April 24, 2017.

As the CEC, California Public Utilities Commission (CPUC), the California Independent System Operation Operator (CAISO), and other stakeholders work to understand which power plants are needed and in which locations, we urge you to consider innovative ideas and new technologies, such as Power-to-Gas (P2G), which can assist the state with increasing renewable and traditional energy storage, system flexibility and resiliency, as well as reaching climate change policy goals.

P2G can support system reliability through the management of overgeneration, providing flexible energy storage, resource adequacy and flexibility, identifying local capacity areas, and addressing regional reliability needs.

P2G is explicitly included as an option for consideration in the 2017 IEPR Scoping Order, which asserts that "[t]he state's portfolio of mitigation measures for integrating renewables could also include using excess renewable energy to power desalinization plants or for power-to-gas" (p.4).

SoCalGas has previously submitted comments¹ which include an overview of P2G technology, how/where the technology is already in use, how it can help meet California's air and climate change goals, and how it can help address resource adequacy and system

¹ http://docketpublic.energy.ca.gov/PublicDocuments/17-IEPR-07/TN216668_20170323T130828_SoCalGas_Comments_on_Integrated_Resource_Planning_Opportunity_for_Power-to-Gas_Technology.pdf

reliability needs.

SoCalGas strongly believes that a diverse energy portfolio that includes multiple fuels and technologies is needed to meet California's energy needs and environmental targets in a cost-effective manner. Essential among those technologies is P2G. We encourage the CEC to consider P2G as a tool to help meet energy storage, flexibility, and system reliability needs.

Please do not hesitate to contact us for more information on the opportunity for P2G.

Sincerely,

/s/ Tim Carmichael

Tim Carmichael
Agency Relations Manager
Southern California Gas Company