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on Draft POU IRP Submission and Review Guidelines

Additional submitted attachment is included below.

BEFORE THE CALIFORNIA ENERGY COMMISSION

In the matter of,

**2017 Integrated Energy Policy Report
(2017 IEPR)**

Docket No. 17-IEPR-07

**JOINT POU COMMENTS ON DRAFT PUBLICLY OWNED UTILITY
INTEGRATED RESOURCE PLAN SUBMISSION AND REVIEW GUIDELINES**

I. INTRODUCTION

The California Municipal Utilities Association (“CMUA”), Northern California Power Agency (“NCPA”), and Southern California Public Power Authority (“SCPPA”), collectively referred to as the “Joint POU,” appreciate the opportunity to provide comments on the *Draft Publicly Owned Utility Integrated Resource Plan Submission and Review Guidelines* (“Draft Guidelines”) issued on May 15, 2017 and the *IEPR Commissioner Workshop on Draft Guidelines for Publicly Owned Utility Integrated Resource Plans* (“Workshop”), held on May 25, 2017.

The Joint POU appreciate Commission staff’s collaborative approach to the development of these guidelines. The POU, and other stakeholders, have provided extensive comments on the previous draft concepts and language, and have actively participated in a number of stakeholder workshops leading-up to the development of this document. The Joint POU commend Commission staff for their hard work on the Draft Guidelines, which generally demonstrate a reasonable framework for POU IRP submittals by clearly articulating the kind of information the Commission deems necessary to support its legislated mandate for review of the POU IRPs for consistency with Public Utilities Code section 9621.

In the following sections, the Joint POU's highlight key elements of the Guidelines, including provisions that contribute to more appropriate recognition of the vast differences across POU's and the many challenges that POU's may face when seeking to comply with the Guidelines and provide the requested data. These comments also suggest modifications intended to address the distinction between the data need to assess an individual POU's IRP versus conducting an analysis of broader, statewide progress towards meeting the state's energy policies.

II. COMMENTS ON THE GUIDELINES

1. Staggered IRP Submissions (Chapter 3, Section A.1)

Staggering the IRP submission process every five years is logical, aligns with statutory requirements, and will contribute to a more effective administrative review process. Commission staff clarified that POU's will be required to submit IRPs every five years versus an earlier proposal that would have required submissions every four years. The Joint POU's strongly support this change.

The Joint POU's also support the related changes to stagger the POU's' submissions of IRPs based on when the POU adopts its IRP. Since the POU's will be required to adopt IRPs by January 1, 2019, the proposed timelines included in the Draft Guidelines make sense, as they acknowledge that POU's may complete their IRPs at different times. The Joint POU's believe that this staggered approach will help ensure that the Commission is receiving current information while reducing the potential for significant increases in POU administrative costs and staffing constraints. This process also supports more robust and timely follow-up discussions amongst POU's and Commission staff, which may prove valuable in responding to potential requests for additional information to support the Commission's review.

2. Administrative Review Process (Chapter 3, Section B)

The proposed administrative review process will promote robust discussion between the POU and the Commission to ensure that the Commission has a full understanding of the information provided in order to assess the IRP's consistency with the provisions of section 9621. The Joint POU appreciate Staff's recognition of the concerns raised by stakeholders in response to the initial proposal, and support the current language related to the administrative review process that the IRPs will undergo upon their submittal to the Commission. The Draft Guidelines acknowledge the iterative process that may be needed during the Commission's review of IRPs.

In addition, the Joint POU suggest further comments below that would specifically address the concept of "non-compliance." The Joint POU believe that the clarifications in the Draft Guidelines will support collaboration between POU and Commission staff as the entities work together toward ensuring that the Commission has the information it needs to fulfill its statutory obligations.

3. Flexibility on Data

With respect to guidance on the type of analyses that may be used to inform a POU's IRP, the Joint POU support the Draft Guidelines allowing for flexibility and customization of the IRPs based on the needs, resources, capabilities, and preferences of each individual POU. The Guidelines must recognize that POU vary dramatically and these variations will be reflected in the IRPs. While the Joint POU support the inclusion of standardized forms to help ensure data is presented in a manner than can be easily analyzed, the Joint POU also appreciate Commission staff's recognition that the POU may need to tailor some of the narratives and analysis to their own unique circumstances. As an example, the Joint POU fully support the

provisions that would encourage, but not require, POU's to use the Commission's demand forecast as a basis for their analysis. An additional example relates to the 24-month timeframe for the underlying analysis used to support POU IRPs. While the Commission has expressed a preference to have data from within 24 months of the time the IRP is adopted, there is flexibility for a POU to use older data if there is a supporting rationale within their IRP.

Furthermore, the Joint POU's support the Draft Guidelines proposed sections related to reporting on the RPS and energy efficiency matters. Because POU's already submit reports to the Commission on these topics, it is logical to streamline the level of data submitted through the IRP process to reduce or eliminate redundancies.

4. Mandatory Elements of IRPs

The Joint POU's agree that many of the reporting elements within the IRP should only be submitted to the extent they are available and have a direct impact on a POU's ability to meet long-term planning goals. In previous comments, the Joint POU's expressed concern with various portions of the proposed guidelines and questioned whether the level of detail requested under certain data reporting provisions would be reasonably provided by all POU's subject to the IRP Guidelines. The Joint POU's very much appreciate the acknowledgement of these concerns, and the inclusion of added flexibility to encourage or suggest that POU's submit certain data components that are not explicitly required by the statutory provisions related to the IRP.

5. Low-Income and Disadvantaged Communities

The Joint POU's agree that it will be important to continue to have a discussion regarding the impacts of POU programs and activities that serve low-income and disadvantaged communities. The Joint POU's support the strong framework set forth in the Draft Guidelines to allow POU's the opportunity to expound upon the work they are doing to serve their

disadvantaged and low-income customers. In particular, the Joint POU's appreciate the flexibility to discuss a broader set of programs and policies that contribute to our efforts to serve the needs of our communities.

6. Integrated Resource Plans versus the Integrated Energy Policy Report

The IRP prepared by a POU in compliance with the provisions of section 9621 is solely focused on how the *individual POU* will achieve the mandates set forth in section 9621(b) and addresses procurement of various resources listed in section 9621(c). Similarly, the Commission's role under section 9622 is focused solely on reviewing the *individual POU IRP* relevant to those requirements, and determining if the POU's IRP is consistent with section 9621. While a collective review of load serving entity and POU IRPs may allow for state policy makers to engage in a comprehensive analysis of trends and actions related to utility procurement on a statewide basis, that is not the purpose of the individual POU IRP. Neither is the Commission's review of the collective POU IRPs intended to serve this purpose. As the Joint POU's have previously noted, the state's policy objectives will be met through a panoply of measures and programs, and the POU's and load serving entities that prepare IRPs will not unilaterally meet all of these objectives; nor are they required to do so. The Joint POU's highlight this distinction because it is important that the role of the individual IRP not be obfuscated or misunderstood, both for purposes of engaging in the Commission's own review of the POU submittals, but also for purposes of informing the public about the scope of that review.

It is likely that interested stakeholders will look to the Commission's guidelines to help gauge their review of the POU submissions, and therefore important to properly frame the purpose and objective of the IRPs and the Guidelines that the Commission has developed to facilitate its review of those submissions. A broader, comparative review of all submitted IRPs

for purposes of assessing statewide activities is properly within the purview of the Commission’s Integrated Energy Policy Report proceedings. Indeed, the 2017 Integrated Energy Policy Report Scoping Order provides “The 2017 IEPR will report on California’s progress in developing integrated resource plans for the electricity sector, a comprehensive approach to identify efficiency and cost effective resource portfolios for achieving the 2030 greenhouse gas reduction goal.”¹ It is this subsequent, comprehensive review of the IRPs collectively that provides insights into policies and measures on a statewide basis that can help inform policy- and decision-makers about various programs and measures. It is important that stakeholders keep in mind the distinction between the *individual* POU IRPs, versus the *statewide* objectives the IEPR is intended to address.

7. Public Review Process (Chapter 3, Section B.2)

The Draft Guidelines contemplate a process for the Commission to post the POU IRPs on its website and accept public comment on the IRPs for 30 days. The Guidelines provide that “Public comments related to the completeness and consistency of the IRPs pursuant to PUC 9621 may be considered by the Energy Commission in reviewing the IRP Filing for consistency with the requirements of PUC Section 9621.” The Joint POU’s have no concerns with posting the IRPs on the Commission’s website for public review and comment. Indeed, the IRPs submitted to the Commission will have already been subject to extensive opportunities for public review and comment prior to its adoption by the POU local governing board. The Joint POU’s, however, offer two comments on this point.

¹ [2017 IEPR Scoping Order](#) at 2.

First, in order to harmonize the Guidelines with the statutory direction and the scope of the Commission's review, the POU's recommend that the text in the Guidelines be modified as follows:

2. Step 2: Review for Consistency with IRP Requirements

Within 120 calendar days of receiving a POU IRP Filing, Energy Commission staff will review IRP Filings to determine whether the IRP is consistent with the requirements of PUC Section 9621.

The Energy Commission will post the IRP Filing on its website and accept public comment on IRPs and IRP Filings for 30 days following electronic filing. Public comments related to the ~~completeness and~~ consistency of the IRPs pursuant with the requirements of PUC 9621 may be considered by the Energy Commission in reviewing the IRP Filing for consistency with the requirements of PUC Section 9621.

Second, because the IRPs submitted to the Commission represent a final plan that has already been the topic of extensive review and deliberation at the local level, the POU's encourage public participation early in the IRP planning process. It is at the local level, when the POU governing board and its constituents are weighing the various options and determining the best course of action for a comprehensive integrated resource plan looking out to 2030, that stakeholder feedback is most valuable. Since the Commission's review of the final IRP is not intended to be a *de novo* review of the POU's underlying planning process or otherwise weigh the merits of the final procurement and planning activities adopted in the IRP, stakeholders interested in weighing in on an individual POU's planning process are encouraged to participate at the local level. Cognizant of the fact that some entities may be interested in the planning processes of more than one POU and would prefer to look to the Commission as a single source of information, the POU's encourage the Commission to take an active role in encouraging and facilitating third party participation in the POU IRP process at the local level.

The Joint POU's believe that a Commission-administered service list could serve this purpose. Since the POU's IRPs will be adopted as part of a public process at the local level, the POU's could add the Commission to its service list for all public notices and deliberations relevant to its IRP; the Commission would be provided with an electronic copy (or applicable url) of the notice and, if applicable, materials that will be presented to the governing board. In turn, the Commission could maintain a service list of parties interested in POU IRPs, which service list could be notified each time a POU sends a public notice to the Commission about IRP deliberations. In that way, whenever materials regarding the IRP are distributed to the governing body for its consideration, the Commission would be able to provide that same information on its website or forwarded to the service list.

The Joint POU's believe that the Commission could initiate such a process right away. While this is not properly part of the POU IRP Guidelines, the Joint POU's offer this suggestion in the context of these comments in order to help inform the process and facilitate stakeholder input in the IRP planning process.

8. Limited Scope of Review (Chapter 3, Section B)

As described above, the Draft Guidelines request information that goes beyond what is necessary for the Commission to complete its review pursuant to section 9622. The Joint POU's recognize the Commission's role in collecting data on statewide energy issues to support its analysis and policy recommendations. Therefore, the POU's do not object to these requests for additional information being included in the Draft Guidelines.

While it is appropriate for the Commission to request this additional data to help assess trends and identify potential risks to the grid or the state's broader energy policies, it is not appropriate for the Commission to perform a deficiency review based on information that is not

mandated. First, this would have a chilling effect on POU willingness to submit this information, because it would expose the POU to an increased risk that an IRP would be found to have deficiencies. Second, such a review would not be consistent with the narrow scope of the Commission review of the IRP under Section 9622.

Therefore, the Joint POU's request that the Commission clarify the Guidelines to expressly state that the scope of its review of consistency with Section 9621 is limited to reporting requirements that are mandatory or support mandatory elements of the IRP. The Joint POU's recommend the following revisions to the Draft Guidelines:

B. Review of IRP Filing

PUC Section 9622 requires the Energy Commission to review POU IRPs for consistency with the requirements of PUC Section 9621. These guidelines identify specific information that must be included in a POU IRP Filing (“mandatory submission”). These guidelines also identify optional information that the Commission would find helpful in informing statewide policies, which is not required in the IRP, but that a POU may provide at its discretion (“optional submission”). The Energy Commission’s review of POU IRPs for consistency is limited to information that is included in and necessary for the mandatory submission. The Energy Commission’s review for consistency will not include a review of the information included in the optional submission. The Energy Commission will use a two-step process.

9. Energy Storage (Chapter 2, Section F.4.)

The Draft Guidelines propose to require POU's to submit information on the POU's assessment of the need for energy storage. In general, the Joint POU's do not object to the submission of this type of information as part of the IRP and agree that an assessment of energy storage is consistent with the requirements of Section 9621(c)(1)(B).

However, the Joint POU's object to the *characterization* of this assessment in the Draft Guidelines:

A narrative assessment of the suitability of multihour storage as a resource to **resolve** overgeneration from the utility’s portfolio given the seasonal profile and frequency of overgeneration, or to meet evening ramping needs.

The amount of multihour storage (MW/MWh range) that might cost- effectively **mitigate** overgeneration and/or contribute to meeting evening ramping needs.²

These two provisions incorrectly describe a POU’s assessment of storage as a tool to “resolve” and “mitigate” overgeneration. Overgeneration or over-supply is not a problem that is measured or addressed on an individual utility basis. The causes of these problems relate to statewide trends and involve actors and circumstances outside the control of an individual POU. The primary consequence of overgeneration to individual utilities is the financial impact associated with negative pricing and curtailment. The potential reliability impacts of overgeneration will primarily be addressed through the actions and requirements of balancing authorities. Further, energy storage is just one option for mitigating the financial risks associated with overgeneration and in some circumstances a POU may face no risk due to its resource mix and operational flexibility.

The Joint POU’s recommend that this section of the Draft Guidelines be revised to more accurately reflect the role of individual utilities and the scope of their energy storage assessment pursuant to section 9621. To facilitate this clarification, the Joint POU’s recommend the following revisions to the Draft Guidelines:

4. Energy Storage

PUC Section 9621 requires IRPs to address procurement for energy storage requirements pursuant to PUC Chapter 7.7 (commencing with PUC Section 2835).

a. Recommendations for Energy Storage Analysis

The Energy Commission provides the following recommendations for addressing procurement for energy storage in IRP Filings. To the extent possible, describe the

² Draft Guidelines at 8 (emphasis added).

following:

1. The possible role that storage can play to address over-generation concerns and meet evening ramps while reducing the need for generation from specific gas-fired generation or market sources. Consider including:

A narrative assessment of the suitability of multihour storage as a resource to ~~resolve address reliability and/or financial impacts associated with overgeneration and meeting overgeneration from the utility's portfolio given the seasonal profile and frequency of overgeneration, or to meet evening ramping needs.~~

~~a. The amount of multihour storage (MW/MWh range) that might cost-effectively mitigate overgeneration and/or contribute to meeting evening ramping needs.~~

2. Any quantitative analyses undertaken by the POU or referenced in the IRP Filing that evaluates the cost-effectiveness of multihour storage compared to other resources that meet evening ramping needs.

10. Revising Flexible Capacity Reporting Requirements (Chapter 2, Section G.1 and 3.)

The Draft Guidelines propose that each POU IRP Filing “must demonstrate that the POU’s resource portfolio contains sufficient flexible, dispatchable resources to address any potential over-generation and meet ramping needs associated with solar generation.” The Joint POU’s agree that there are significant consequences associated with future projections of potential over generation and the associated ramping needs. However, as described above, overgeneration and ramping needs are not measured or resolved on an individual utility basis. Instead, POU’s are currently required to adopt a resource adequacy program that meets the needs of the Balancing Authority in which they operate. Flexibility needs are included in or addressed by these programs.

It is appropriate for individual POU's to include in their IRPs a discussion of the impacts of overgeneration and ramping. However, how each POU addresses reliability planning will differ greatly based on a number of factors. The Guidelines should be amended to correctly situate flexibility needs within the context of reliability and acknowledge the limited role that an individual POU plays in resolving system reliability.

The Joint POU's recommend the following revisions to the Draft Guidelines:

G. System and Local Reliability

PUC Section 9621 requires POU's to adopt an IRP that ensures that the POU meets the goal of ensuring system and local reliability. To support the Energy Commission's review, the IRP Filing must provide the following information.

1. Reliability Criteria

In the CRAT, the Filing POU must include projections of annual peak capacity needs and the contribution of both demand and supply-side resources. Demand side resources include AAEE, demand response, and interruptible load programs. Supply-side resources include generation, electricity storage resources (both utility-owned and under long-term contract), and short-term and spot market purchases.

If the Filing POU uses a planning reserve margin other than 15 percent, in addition to the data reported in the CRAT, the IRP Filing is required to report how the planning reserve margin was determined. The IRP Filing must also include any other planning reserves and reliability criteria that apply to the utility service area. The POU must use the minimum planning reserve and reliability criteria approved by the Board of Trustees of the Western Systems Coordinating Council or the Western Electricity Coordinating Council, which is in effect when the analysis is performed.

Substantial amounts of both customer-side-of-the-meter (or behind-the-meter) and central-station solar generation capacity are being developed throughout the state to meet the RPS. The IRP Filing must demonstrate that each POU is planning to meet all applicable reliability standards that are implicated by the need for increased grid flexibility.

To the extent possible, the Commission recommends that Filing POU's provide an estimate of potential over generation and curtailment of renewables under the operational control of the Filing POU. In addition, the Commission recommends that Filing POU's present in the IRP Filing details of demand and supply conditions (representative daily load profiles and "supply-resource stacks") for periods when over-generation occurs.

2. Local Reliability Area

The IRP Filing must identify any local transmission constrained areas in the POU service territory, where loads can be reliably served only if there is sufficient local dispatchable generation capacity that provides operating reserves and associated energy under high-load conditions. POU's in the California Independent System Operator (California ISO) footprint that meet the local reliability needs must provide in the IRP Filing estimates of the requirements and the resources that may be used to meet the needs -such as utility-owned generation, long-term contracts for generation and storage, and short-term resource adequacy planned contracts for capacity with resources under local resource adequacy contracts.

POU's in other California balancing authority areas must include in the IRP Filing existing or emerging local capacity needs arising from transmission constraints and how they are expected to be met. POU's are encouraged to discuss or refer to transmission solutions to emerging local capacity shortfalls or to reduce local capacity needs in the section of the IRP Filing devoted to satisfying the requirements set forth in PUC Section 9621.

~~3. Flexible Capacity~~

~~Substantial amounts of both customer-side-of-the-meter (or behind-the-meter) and central-station solar generation capacity are being developed throughout the state to meet the RPS. The IRP Filing must demonstrate that the POU's resource portfolio contains sufficient flexible, dispatchable resources to address any potential over-generation and meet ramping needs associated with solar generation.~~

~~IRP Filings must include information regarding estimates of potential over-generation and the disposal (curtailment and market sale) of surplus energy during mid-day hours. In addition, the IRP Filing must present details of demand and supply conditions (representative daily load profiles and "supply resource stacks") for periods when over-generation occurs and when early evening ramping needs are greatest.~~

11. Clarifications on Rates (Chapter 2, Section I).

Maintaining autonomy and local control over ratemaking is one of the highest principles for POU's. Each POU's rates are set by its locally elected governing board in a public process with direct involvement from the community it serves. Any restriction or limitation on this POU ratemaking authority infringes not only on the statutory authority of the local governing board, but on the rights of the POU customers to shape their own rates and the policies and goals of their utility.

Therefore, it is essential that any requirements for reporting on rates to the Commission strictly follow the express requirements of section 9621. As noted above, the POU IRP Guidelines are likely to be used by stakeholders to frame their understanding of the IRP and associated requirements. As such, the Joint POU's recommend the following revisions to Section I, to inform stakeholders and clarify the narrow scope of the Commission's role as it relates to the rates section of the IPRs:

I. Retail Rates

PUC Section 9621 requires POU's to adopt an IRP to ensure the POU achieves the goals of fulfilling its obligation to serve its customers at just and reasonable rates and minimizing impacts on ratepayer bills. In order to align the statutory references in section 454.52 to the applicable authority governing POU ratemaking, the IRP Filing must include, as Supporting Information, a report or study on rate impacts under the IRP scenario, if that report or study was considered and approved by the local governing authority as part of its IRP planning. Filing POU's are also encouraged to identify elements of the IRP or scenarios that result in large ratepayer impacts.

12. Filings By Associations (Chapter 3, Section A.6).

The Draft Guidelines include language that would allow an association to prepare and submit IRPs on behalf of individual POU's. The Joint POU's appreciate this provision and support the flexibility that it provides. In the near term, it is unlikely that CMUA, NCPA, or SCPPA would file an entire IRP on behalf of its members. Instead, it is more likely that one of these associations may prepare and submit individual elements of multiple members' IRPs. For example, an association might submit a joint analysis of energy storage suitability or jointly provide a forecast of transportation electrification for a group of members. To ensure that the Guidelines accurately reflect this more narrow role for associations, the Joint POU's recommend the following amendments:

6. Prepare and Submission of IRP Filing

Filing POU's may choose to have a representative entity, such as an association or contractor, prepare and submit the IRP Filings on their behalf. Such filings may be for the entire IRP or for select mandatory elements. The POU governing board must adopt the IRP or any individual elements to be submitted by the entity before it is filed with the Energy Commission. Information in the IRP Filing must be filed in a manner that allows staff to do a utility-specific review.

13. Non-Compliance with Energy Commission Guidelines (Chapter 3, Section B.4 and 6)

The Draft Guidelines include a section titled “Noncompliance with Energy Commission Guidelines,” which specifies that a POU would be found non-complaint if it failed to submit an IRP on time or if the POU submitted an incomplete IRP. The Joint POU's object to the inclusion of this section because there is no statutory basis for a Commission finding of “non-compliance” in section 9622. Without this, there is no basis for assessing what “non-compliance” means in the context of these guidelines or the means by which to define what the consequences of what such a finding would be.

POU's are required, pursuant to section 9622, to submit a complete IRP to the Commission by the required submission date; as such, there is no need to designate a new “non-compliance” category. Further, the Commission has the authority to contact to POU's that fail to timely submit an IRP, regardless of whether that is specified in the Guidelines. Because the proposed language is unnecessary, the Joint POU's recommend that this language be stricken from the Guidelines:

4. Deficient IRPs

The Energy Commission will find an IRP deficient if it is inconsistent with the requirements of PUC Section 9621.

If Energy Commission staff determines the IRP is deficient, staff will provide recommendations to correct the deficiencies. Staff's recommendations will be part of the initial and final determinations.

5. Determination

The Energy Commission will issue a determination based on findings of the review.

a. Preliminary Determination

Energy Commission staff will make a Preliminary Determination of “consistent” or “deficient.” If deficient, staff will make recommendations to correct deficiencies as described Section B.4. The POU may, at its election, submit a written response to staff’s deficiency determination, within ~~45~~30 calendar days of receiving the determination. Staff may consider and rely on the response, in full or in part, in recommending a final determination to the Energy Commission.

b. Final Determination

Energy Commission will consider adopting a Final Determination of “consistent” or “deficient” within 120 calendar days after staff’s Preliminary Determination at a regularly scheduled Business Meeting. If the final determination is that the IRP is deficient, the Energy Commission will also adopt recommendations to correct the deficiencies, as described Section B.4.

~~6. Noncompliance with Energy Commission Guidelines~~

~~POUs will be notified of IRP Filings found non-compliant with the Guidelines for the following reasons:~~

- ~~1. The POU fails to submit a complete IRP Filing to the Energy Commission by the schedule set forth in the Guidelines~~
- ~~2. The IRP Filing is incomplete.~~
- ~~3. The POU does not submit an updated IRP Filing within five years of adopting an IRP.~~

14. 30 Days Notice Should be Given for Future Changes (Chapter 3, Section b.7).

The IRPs are a major regulatory obligation with significant impacts on the POUs’ planning strategies. Further, the POU IRP development and adoption process will likely take several years for many POUs. This means that any change in the Guidelines relevant to the type of information and data that the Commission is requesting to support its review of the IRP has the potential to disrupt the ongoing IRP process of a POU. The Joint POUs, therefore, recommend that the Commission normally seek to provide a full and robust stakeholder process longer than the statutory minimum any time it contemplates changes to the Guidelines. To

recognize the unique nature of the IRP and to encourage a longer time frame, the Joint POU's recommend the following amendment:

B. Substantive Changes to the Guidelines

The Energy Commission may make substantive changes to the POU IRP Guidelines pursuant to PUC Section 9622(c). Substantive changes will be considered at an Energy Commission Business Meeting with no less than 10 days' public notice. Unless exigent circumstances require otherwise, the Energy Commission shall seek to provide at least 30 days public notice of any proposed modifications to the Guidelines.

III. COMMENTS ON THE STANDARDIZED TABLES AND INSTRUCTIONS FOR POU IRPS

On May 31, 2017, Commission Staff held a *Webinar on Standardized Tables and Instructions for Publicly Owned Utility Integrated Resource Plans* ("Webinar"). The Joint POU's provide the following recommendations on the Standardized Tables:

- The Commission should label any information that is voluntary or discretionary, such as lines 10-11 of the Energy Balance Accounting Table, and lines 9-12 of the Greenhouse Gas Accounting Table.
- The Commissions should provide more guidance on the Capacity Resource Accounting Table, line 3, which requires information on Thermal Energy Storage. The Commission should provide a definition of "thermal energy storage" and provide a representative list of technologies.
- POU's that do not have the requisite historical data or means of analysis for certain items in the tables will be deemed voluntary or discretionary for those items.

IV. CONCLUSION

The Joint POU's appreciate the opportunity to provide these comments to the Commission.

Dated June 15, 2017

Respectfully submitted,



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