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San Diego Gas and Electric Comments

Additional submitted attachment is included below.



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California Energy Commission
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Subject: Comments on the Integrated Energy Policy Report Workshop on the 2018 California Energy Demand Forecast Update, Docket No. 18-IEPR-04

San Diego Gas & Electric Company (“SDG&E”) appreciates the opportunity to submit comments in response to the California Energy Commission’s (“CEC”) Integrated Energy Policy Report (“IEPR”) Demand Forecast Update Workshop held December 6, 2018.

I. INTRODUCTION

The CEC’s 2018 California Energy Demand Update (CEDU 2018) provides a forecast for the years 2018 through 2030. It represents an update from the 2017 California Energy Demand (CED 2017) by incorporating additional historical data, updated economic and demographic forecast information, and updated photovoltaic (PV) and electric vehicle (EV) projections.

Given the limited time to review the CEDU 2018, SDG&E provides the following high-level comments and will continue its review and work with the CEC. SDG&E finds the 2018 Update, which reflects an average decrease in annual sales of 2% for the forecasted years of 2020 to 2030, to be reasonable, except for the forecasted increase in sales in 2022. SDG&E’s preliminary review analyzed the SDG&E forecast for 2018 and found that the forecast for system peak (MW) and energy sales (GWh) to be reasonably close to weather normalized actuals (both represented a difference of under 1%). Given the general trend of sales decline as a result of increased energy efficiency and increased solar adoption, further review is required to determine reasonableness of an increase in sales in 2022. SDG&E is still receiving information from the CEC and plans to analyze other aspects of the CEC’s CEDU 2018 forecast. SDG&E plans to continue communication with CEC staff to provide feedback when differences become known.

Sincerely,

/s/ Tim Carmichael

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