

DOCKETED

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California Energy Commission
Docket Office, MS-4
Re: Docket No. 19-IEPR-03
1516 Ninth Street Sacramento,
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August 27, 2019
LEG 2019-0183

Re: Sacramento Municipal Utility District's Comments on the California Energy Commission Docket No.19-IEPR-03: IEPR Commissioner Workshop on 2019 Preliminary California Energy Demand Electricity and Natural Gas Demand Forecast

On Thursday, August 15, 2019, the California Energy Commission (CEC) conducted a workshop to present the Preliminary Electricity and Natural Gas Demand Forecast for the 2019 IEPR.

On August 14, 2019, SMUD staff received a copy of the CEC's baseline sales and system peak forecast from Mr. Cary Garcia. The forecast was based on the CEDU 2019 Baseline Mid-Demand Case Total Sales forecast (Form 1.1b) and Net Peak Demand forecast (Form 1.4), adjusted for additional energy efficiency (Mid-AEE), additional light duty electric vehicles (Mid-LDEV), and additional PV (Mid-AAPV).

We compared the CEC's managed sales and peak forecast with SMUD's current budget forecast and the forecast SMUD is currently developing. SMUD's current forecast is based on a 1 in 2 weather scenario and is comparable to the CEC mid-case scenario.

SMUD's load forecast process is conducted annually, with the forecast completed in the Fall to align with SMUD's budget process. As such, SMUD's load forecast submitted to the IEPR process in April 2019 was based on the Fall 2018 load forecast. SMUD has almost completed its load forecast for this year's cycle, and we would like to provide comments regarding significant changes between this year and 2018.

In late 2018, SMUD adopted an Integrated Resource Plan (IRP) with aggressive decarbonization goals, which includes a significant increase in electric transportation and building electrification investments. Both of these changes will impact the load forecast and are expected to increase demand over time.

With regards to the peak demand forecast, SMUD has successfully implemented Time-of-Day residential rates in 2019 and is seeing very good results in reducing the peak. The data shown in the form for calculating SMUD's peak uses year 2018 as a

base and therefore, the new Time-of-Day rates are not reflected in the forecast. Additionally, the Time-of-Day rates are expected to have an even larger impact in the future as energy storage is added to the system and deployed during peak periods.

In conclusion, SMUD staff appreciates discussing forecasting issues with Mr. Garcia to better understand the CEC's forecast methodology and the adjustments that are made to reflect current trends in energy efficiency, behind the meter solar, electric vehicle battery charging, and building electrification. Despite our differences in the forecast, both the CEC and SMUD unmanaged forecasts are similar. We look forward to continued discussions and collaboration with Mr. Garcia and CEC staff as we work to refine assumptions of future energy impacts.

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