

DOCKETED

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PG&E Comments on Demand Scenarios Workshop from April 7, 2022

Additional submitted attachment is included below.



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April 21, 2022

California Energy Commission
Commissioners Patty Monahan, Andrew McAllister, and Siva Gunda
517 P Street
Sacramento, CA 95814
Docket Number 22-IEPR-03

RE: Pacific Gas and Electric Company Comments on the Integrated Energy Policy Report Staff Workshop on Demand Scenarios (Docket Number 22-IEPR-03)

Dear Commissioners Monahan, McAllister, and Vice Chair Gunda:

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to comment in response to the California Energy Commission's (CEC) 2021 Integrated Energy Policy Report (IEPR) Staff workshop on demand scenarios held on April 7, 2022.

PG&E applauds the CEC's efforts in organizing this workshop to present inputs, assumptions, and results for the Demand Scenarios Project previously described in the 2021 IEPR, Volume IV: California Energy Demand Forecast. PG&E also appreciates the CEC staff providing a status report on the parallel inter-agency effort to develop a scenario for the California Public Utilities Commission (CPUC) and the California Independent System Operator (California ISO) to use in their resource planning and transmission system planning processes.

PG&E recognizes the tremendous importance of the Interagency Working Group's (IAWG) efforts to model how proposed policies at the California Air Resource Board (CARB) could accelerate adoption of clean energy technologies, especially electric vehicles (EVs) and electric appliances. As PG&E has articulated in previous comments, these and other policies could have transformational impact on transportation and building electrification. Consequently, it is critically important that the State consider a range of scenarios that consider not only firm programs and policies, but also proposed policies when making decisions about how to prepare California's electrical grid and other energy resources to support the State's electrification goals.

PG&E offers the following comments:

- 1. PG&E supports the scope of the IAWG's High-electrification Scenario.**

PG&E applauds the IAWG's decision to include current major policy proposals in the IAWG's High-electrification Scenario. In particular, the inclusion of the Advanced Clean Fleets Rule, Advanced Clean Cars II, and proposed appliance standards at CARB and the Bay Area Air Quality Management District (BAAQMD). PG&E expects these proposed policies could have transformational impact on the electrification of the transportation and building sectors; therefore, it is important that they are included in scenarios for energy planning purposes.

2. PG&E requests additional information to inform our interpretation of the IAWG High-electrification Scenario.

While PG&E understands and supports the overall scope of the IAWG High-electrification scenario, PG&E requests the CEC provide some clarifications, as listed below, to improve our understanding. PG&E asks the CEC the following questions:

- What level of compliance does the IAWG High-electrification Scenario assume with Advanced Clean Cars II, Advanced Clean Fleets, and the proposed appliance standards at CARB and BAAQMD?
- Does the Additional Achievable Fuel Substitution (AAFS) analysis include new cooling load enabled by space heating electrification, and if so, how is that included? This means that for customers currently without air conditioning, installing a heat pump creates the opportunity for space cooling that did not previously exist. Therefore, PG&E expects building electrification would increase space cooling loads.
- Does the CEC plan any improvements for behind-the-meter photo voltaic (BTM-PV) capacity factors for the PG&E planning area? PG&E's internal forecasts show lower energy for similar installed capacity.
- What is the basis for selecting Additional Achievable Energy Efficiency (AAEE) Scenario 4? For a scenario intending to represent high electrification, is there a reason why an energy efficiency higher than the AAEE Scenario 3 is used? The effect of selecting AAEE Scenario 4 mutes the impact of the additional EV and AAFS load that the High-electrification Scenario intends to represent.

PG&E appreciates the opportunity to comment on this IEPR workshop and to share our perspective on the demand scenarios. Please reach out to me if you have any questions.

Sincerely,

Licha Lopez
State Agency Relations