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**SCPPA Comments on Apr 13 Workshop on Electricity Resource
Plan Forms and Instructions**

Additional submitted attachment is included below.



Southern California Public Power Authority
1160 Nicole Court
Glendora, CA 91740
(626) 793-9364

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California Energy Commission
Docket Unit, MS-4
Docket No. 22-IEPR-03
715 P Street
Sacramento, CA 95814

RE: April 13th IEPR Staff Webinar on Forms and Instructions to Collect Electricity Resource Plan Data from Load-Serving Entities

The Southern California Public Power Authority¹ (“SCPPA”) appreciates the opportunity to provide feedback on the California Energy Commission’s (CEC) April 13th Integrated Energy Policy Report (IEPR) workshop² on “Forms and Instructions to Collect Electricity Resource Plan Data from Load-Serving Entities.” SCPPA’s Members consist of twelve local publicly owned electric utilities (POUs) that are working diligently toward achieving the state’s clean energy goals while also keeping rates affordable for their communities.

SCPPA recognizes the CEC’s forecasting efforts play a key role in supporting the state’s planning and agrees that certain utility data is necessary to support these efforts. As the CEC considers new and modified reporting requirements for electricity resource plan data, however, SCPPA urges CEC staff to mitigate the reporting burden on POUs and other load-serving entities (LSEs) by minimizing duplicative or nonessential data requests. SCPPA’s Members, along with many other LSEs, already submit a host of energy-related reports to the CEC and other state agencies. The costs and effort needed to compile and provide data to agencies in program-specific reports are ultimately borne by POUs and their customers, so SCPPA supports efficient, streamlined reporting requirements wherever possible.

SCPPA offers the following recommendations for the CEC’s consideration:

- **Avoid duplicative reporting and minimize the reporting burden by leveraging data that is already submitted to state agencies in existing reporting structures or is available from other sources.**

¹ SCPPA is a joint powers authority whose members include the cities of Anaheim, Azusa, Banning, Burbank, Cerritos, Colton, Glendale, Los Angeles, Pasadena, Riverside, and Vernon, and the Imperial Irrigation District. Each Member owns and operates a publicly-owned electric utility (POU) governed by a board of local officials. Our Members collectively serve nearly five million people throughout Southern California. Together they deliver electricity to over two million customers throughout Southern California, spanning an area of 7,000 square miles.

² <https://www.energy.ca.gov/event/webinar/2022-04/iepr-staff-webinar-forms-and-instructions-collect-electricity-resource-plan>

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 1160 Nicole Court
 Glendora, CA 91740
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Some of the data requested in the proposed electricity supply forms may already be accessible to the CEC through reports submitted for other programs. SCPPA recommends that the CEC review the data collected through existing reporting structures and, wherever there are overlapping reporting requirements, obtain data directly from other programs, instead of requiring LSEs to report the same information multiple times. For example, information on unbundled RECs could likely be obtained from the annual reports that POUs already submit for the CEC's Power Source Disclosure and Renewables Portfolio Standard programs or from POU Integrated Resource Plans. In circumstances in which LSEs report the same information to other programs but the CEC is unable to directly obtain it from that program (e.g., due to confidentiality constraints), SCPPA recommends that LSEs be allowed to submit those existing reports to the CEC, in lieu of repeating the same information in their electricity resource plan data filing. SCPPA also recommends the CEC review whether any other elements of the requested information could be obtained directly from other agencies. For example, it is SCPPA's understanding that the CEC may be able to obtain net qualifying capacity (NQC) data directly from CAISO, in lieu of requiring individual LSEs in the CAISO BAA to report this information.

SCPPA is troubled by the idea that LSEs may have to report the same information to multiple programs because it would be too time-consuming for CEC staff to compile the data. As local governments, many POUs have limited budgets, and duplicative or unnecessary reporting requirements may divert their finite resources toward this administrative effort. This can be especially challenging for smaller utilities that more acutely experience operational impacts when resources are reassigned to fulfill numerous data requests. SCPPA urges the CEC to take advantage of existing reporting structures wherever possible to minimize the burden on POUs.

- **Provide LSEs an opportunity to review and comment on the draft transmission forms before the proposed forms are posted for adoption consideration.** At the April 13th workshop, CEC staff explained that the CEC is currently developing new or updated forms for LSEs to report on transmission projects and indicated there may be an additional workshop to present these forms once available. SCPPA requests that the CEC post the draft transmission forms (once available) and then hold the subsequent workshop to go over the proposed reporting requirements. At a minimum, SCPPA asks the CEC to release the draft forms for an informal review period early next month so stakeholders can provide input before the versions of the forms to be considered for CEC adoption are finalized and posted on May 27. Such a review process is important to help ensure that the proposed reporting requirements are clear, practical, and can yield the correct information to support the CEC's objectives.
- **Remove the requirement for LSEs to report resource latitude, longitude, and balancing authority area (BAA).** As one commenter noted at the workshop, data on a specific resource's latitude, longitude, and BAA could likely be obtained directly from the generators. It is SCPPA's understanding, for example, that owners of power plants located in a BAA that serves California end users already submit this

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information as part of their QFER reporting. SCPPA recommends the CEC remove these proposed reporting requirements for existing resources. At a minimum, the instructions should clarify that the requirement applies *only* to those resources located outside of BAAs with California end users.

At the workshop, CEC staff also noted that LSEs should report this information for future resources “if known,” which is consistent with the draft supply form instructions.³ SCPPA appreciates this recognition that precise geographic details may not be available for future projects or generic planned resources. However, SCPPA questions the value of LSEs reporting on future resources that are speculative or are under consideration by the LSE but have not yet been selected to move forward. SCPPA recommends that the CEC remove the requirement to report latitude, longitude, and BAA for future resources. At a minimum, however, the CEC should clarify this requirement only applies to future resources for which the LSE has made a *procurement commitment* and the information is known.

Thank you for the opportunity to provide feedback on the April 13th workshop and the draft electricity resource plan forms. SCPPA looks forward to working with the CEC staff to refine reporting requirements to help ensure the CEC can access the necessary utility data while minimizing the reporting impacts on POUs.

³ Refer to “[Draft Forms and Instructions for Submitting Electricity Resource Plans](#)”, p.22.

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