

**DOCKETED**

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April 27, 2022

California Energy Commission  
Docket Office, MS-4  
Re: Docket No. 22-IEPR-03  
1516 Ninth Street  
Sacramento, CA 95814-5512  
docket@energy.ca.gov

Re: Southern California Edison Company's Comments on the California Energy Commission's Integrated Energy Policy Report (IEPR) Staff Webinar on Forms and Instructions to Collect Electricity Resource Plan Data from Load-Serving Entities (LSE)

Dear Commissioners:

On April 13, 2022, the California Energy Commission (CEC) hosted a staff webinar to present and solicit comments on proposed data collection and analyses for the 2022 IEPR relating to electricity resource plans. The webinar included significant changes to the plans, including the collection of monthly data and submission of reports during IEPR update years. SCE supports the CEC's continual efforts to improve the IEPR planning processes and appreciates the opportunity to provide the following comments on the staff webinar.

### **I. Instructions for Peak Hour Forecasts Require Clarification**

As discussed with CEC staff last year, the instructions for the Forecast Total Peak-Hour 1-in-2 Demand line (1) on the S-1\_Requirement tab of the IEPR Electricity Resource Plan (Supply) forms are not clear regarding if Investor-Owned Utilities (IOUs) should be reporting their bundled, retail, or system peak. Depending on what is being asked for this line, specific corresponding resources need to be reported on the forms. In the 2021 Electricity Resource Plan instructions, the instructions read "All LSEs are required to forecast their total demand during their noncoincident peak hour for each year in the forecast period. The noncoincident peak is the peak load of an LSE that occurs at a different time than the system peak load." Instructions for the 2022 forms should specifically state at what level of total demand during their noncoincident peak hour is being specified (i.e., bundled, retail, system). IOUs are better positioned to provide information on total demand for their bundled peak, hence the forms and the instructions should instruct IOUs to provide total demand for their bundled peak.

### **II. Conclusion**

SCE thanks the CEC for consideration of the above comments. Please do not hesitate to contact me at 626-302-0905 with any questions or concerns you may have. I am available to discuss these matters further at your convenience.

Very truly yours,

/s/

Dawn Anaiscourt