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PG&E Feedback to CEC Proposed Timelines for 2023 IEPR Supply and Demand Forms

Additional submitted attachment is included below.

November 2, 2022

Robert Kennedy
Energy Assessments Division
California Energy Commission
715 P Street
Sacramento, CA 95814-5512

RE: Pacific Gas and Electric Company Feedback on the California Energy Commission's Staff Webinar on Forms and Instructions to Collect Electricity Demand Forecast Data (Docket Number 23-IEPR-02)

Dear Mr. Kennedy:

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to provide feedback on the California Energy Commission (CEC)'s Integrated Energy Policy Report (IEPR) Staff Webinar on Forms and Instructions to Collect Electricity Demand Forecast Data hosted on October 19, 2022 (Webinar).

Proposed Timelines for the 2023 IEPR Filing

During the Webinar, the CEC proposed that Demand Forecast Forms and Resource Plans (Supply) Forms be submitted in alternating years (i.e., the CEC will no longer request Demand Forecast Forms and Supply Forms to be submitted within the same calendar year). PG&E recommends the filing dates should remain aligned in the same calendar year. Certain elements of the Supply Forecast are dependent upon the Demand Forecast, and the Revenue Requirement Forecast is dependent on a Supply Forecast that is linked with the Demand Forecast. Because of these interdependencies, updated Supply Forms must accompany the Demand Forms in order to provide supply data which aligns with the Customer Sales and Revenue Requirement Forecasts.

In addition, the CEC proposes that Historical Demand Data should be filed by the Load Serving Entities (LSEs) on April 14, 2023, and the full data request, including Revenue Requirements Demand Forecast Data (RRQ), should be filed by the LSEs on June 15, 2023. PG&E recommends that the CEC modify the filing dates for the Demand Forecast Forms to the following:

- Non-Revenue Requirement Demand Forecast Data (non-RRQ) submission: June 30, 2023.
- RRQ submission: July 30, 2023.

These proposed dates will allow PG&E to leverage its established demand forecasting schedule and align its modeling schedule with its annual Energy Resource Recovery Account (ERRA) filing with the California Public Utilities Commission (CPUC). Moreover, staggering the non-RRQ submittal and RRQ submittal timelines, as proposed above, is necessary since the RRQ forecasts are prepared based on the finalized non-RRQ data, which is an essential component for developing the RRQ forecast. The schedule proposed

by PG&E provides a 30-day window after submitting the non-RRQ which allows parties to adequately prepare RRQ forecasts from the finalized non-RRQ.

2022 IEPR Update to Supply

In advance of the 2023 IEPR Demand Forecast schedule for Spring 2023, the CEC asked LSEs to provide an Update to the Supply Forms data in the Fall of 2022.

PG&E appreciates the December 1, 2022 Supply Forms filing extension granted by the CEC, which allows PG&E to develop its Supply Forms data based on the data PG&E is submitting to the CPUC on November 1, 2022, as part of its Integrated Resource Plan (IRP). As indicated to the CEC earlier this year, PG&E will also file updated Supply Forms in Spring 2023 to coincide with the RRQ submittal to ensure the CEC has the underlying Supply forecast data that aligns with the RRQ submission.

PG&E thanks the CEC for the opportunity to provide this feedback to the Webinar. Please feel free to contact with questions or to schedule a call with PG&E's Subject Matter Experts for further discussion.

Sincerely,

Isl
Jennifer Privett

Jennifer Privett
State Agency Relations Representative