

DOCKETED

Docket Number:	23-IEPR-01
Project Title:	General Scope
TN #:	249247
Document Title:	PG&E Comments - PG&E Comments on 2023 IEPR Scoping Order
Description:	N/A
Filer:	System
Organization:	PG&E
Submitter Role:	Public
Submission Date:	3/16/2023 3:15:42 PM
Docketed Date:	3/16/2023

*Comment Received From: PG&E
Submitted On: 3/16/2023
Docket Number: 23-IEPR-01*

PG&E Comments on 2023 IEPR Scoping Order

Additional submitted attachment is included below.



Mark Krausse
Director
State Agency Relations

1415 L Street, Suite 280
Sacramento, CA 95814
916-386-5709
Mark.Krausse@pge.com

March 17, 2023

Commissioner, Patty Monahan
Vice Chair, Siva Gunda
California Energy Commission
Integrated Energy Policy Report, IEPR, Scoping Order for 2021
Docket Number 23-IEPR-01
715 P Street
Sacramento, CA 95814

Re: Pacific Gas and Electric Company Comments on the Draft Scoping Order for the 2023 Integrated Energy Policy Report (IEPR) (Docket Number 23-IEPR-01)

Dear Commissioner Monahan and Vice Chair Gunda:

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to provide feedback on the 2023 IEPR Scoping Order released on March 3, 2023.

PG&E supports the collection of data and the technical analyses by the California Energy Commission to identify and address the barriers that the State will face in its accelerated transition to renewable energy.

PG&E appreciates the CEC's explicit mention in their efforts to coordinate with the California Public Utilities Commission (CPUC), the California Independent System Operator (CAISO) and the Governor's Office of Business and Economic Development to help overcome the barriers to new project development. PG&E is committed to timely integrating clean energy technologies into the grid and to collaborate with the respective agencies to meet the State's clean energy policy targets.

PG&E recommends the CEC monitor the Transmission Development Forum initiated in January 2022 by the CAISO in collaboration with the CPUC.¹ The purpose of this Forum, which is held quarterly, is to create a single forum to track the status of transmission network upgrade projects that affect generators and all other transmission projects approved in the CAISO's transmission planning process. PG&E has actively participated in this process as a transmission owner and has provided updates primarily on the status of Generator Interconnection Projects (GIP) and Transmission Planning Process projects that are of the highest priority to immediate generation interconnection.² Currently, PG&E is working closely with the CAISO regarding these projects.

In the work the Commission proposes under the "Potential Growth of Hydrogen" in the 2023 IEPR draft scoping order, PG&E recommends that the analysis – of the potential growth of hydrogen and its role in decarbonizing

¹ [ISO Board Template Memo \(caiso.com\)](https://www.caiso.com/ISOBoardTemplateMemo)

² [Microsoft PowerPoint - PGE Presentation - Transmission Development Forum - Jan 25 2023.pptx \(caiso.com\)](#)

the electricity and transportation – consider both, the potential end uses of hydrogen *and* the potential impacts of the hydrogen supply chain on the state’s energy system. For example, hydrogen produced in-state via electrolysis will have different impacts than hydrogen produced via methane reformation from natural gas within California or hydrogen that is imported from out of state.

This analysis of the potential growth of hydrogen should also include the use of hydrogen for long-duration energy storage. Currently, natural gas supports the electric grid and helps with shifting energy production surplus seasonally. Hydrogen could support this function and the 2023 IEPR analysis should incorporate this use. It is expected that power-to-gas-to-power projects will be a lower-cost solution than battery storage for long-duration storage in week-long renewable shortfall and seasonal shifting scenarios at costs projected in the 2030 to 2035 timeframe.

PG&E appreciates the Commission including analysis and information developed in other proceedings at the CEC and by other agencies, and the opportunity to comment on this. Please do not hesitate to contact me if you have any questions.

Sincerely,
Mark Krausse