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Gallatin Power Partners, LLC Comments - Workshop on the California Energy Demand Forecast, Part II

December 26, 2023
California Energy Commission
Docket: 23-IEPR-03
Electricity and Gas Demand Forecast

RE: Workshop on the California Energy Demand Forecast, Part II

Gallatin Power Partners, LLC (Gallatin Power) is a solar, storage, and transmission developer focused on development in the western United States. The principals of Gallatin Power have extensive experience in project development, financing and construction. The Gallatin team has developed over 20 GW of solar and storage facility projects throughout the United States. Gallatin is a privately held and funded company. Gallatin Power appreciates the opportunity to provide comments on the California Energy Commission's (CEC) Workshop on the California Energy Demand Forecasts (Workshop) held December 19, 2023.

Gallatin Power supports incorporating climate-adjusted projections to account for the additional impacts from climate change into the Integrated Energy Policy Report (IEPR) forecast. Shifting away from using purely historical weather data to using climate-adjusted projections will better enable the California Public Utilities Commission (CPUC) and the California Independent System Operator (CAISO), which rely upon the IEPR forecast, to more proactively plan for the realities and impacts of climate change on California's evolving energy demand.

Furthermore, Gallatin Power urges the CEC to continue incorporating increased electrification scenarios into the IEPR. The inclusion of an Additional Achievable Transportation Electrification Scenario in the 2023 Electricity Forecast Framework is a positive development. Considering increased electrification scenarios is critical to addressing reliability and resiliency concerns associated with the resulting energy demand. Studying increased electrification scenarios enables the CEC, CPUC, and CAISO to align their planning efforts with the evolving landscape of California's energy needs, which will require significant renewable resource integration and transmission expansion.

Gallatin Power also encourages and supports the incorporation of the 2050 long-term demand scenarios as noted in the 2023 IEPR Forecast Overview. The extended planning horizon aligns well with FERC NOPR RM21-17, which when finalized will likely require extending planning horizons to 20-years or longer. The extended planning horizon is beneficial and necessary as it provides developers, utilities and other

stakeholders the necessary time to develop long lead time resources and infrastructure projects required to meet the evolving demand of the system.

In summary, Gallatin Power supports the incorporation of the climate-adjusted projections, increased electrification scenarios and the 2050 long-term demand scenarios. These forecast enhancements will contribute significantly to the robustness and foresight of California's energy planning. Gallatin Power appreciates the opportunity to provide these comments. Please do not hesitate to contact us with any questions or clarifications regarding these comments.

Respectfully submitted,

Kirsten Eliassen
Chief Development Officer
Gallatin Power Partners