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**SMUD Comments Re Forms and Instruction for Submitting
Electricity Resource Plan Information - 24-IEPR-02**

SMUD Comments Re: Forms and Instruction for Submitting Electricity Resource Plan
Information - 24-IEPR-02

Additional submitted attachment is included below.

**STATE OF CALIFORNIA
BEFORE THE CALIFORNIA ENERGY COMMISSION**

In the matter of:)	Docket No. 24-IEPR-02
)	
<i>2024 Integrated Energy Policy Report Update</i>)	SMUD Comments Re: Forms and Instruction for Submitting Electricity Resource Plan Information
)	
)	May 24, 2024
)	

**Comments of SACRAMENTO MUNICIPAL UTILITY DISTRICT on the
Proposed Electricity Resource Plan Submissions**

The Sacramento Municipal Utility District (SMUD) appreciates the opportunity to comment on the California Energy Commission’s (CEC) draft *Forms and Instructions for Submitting Electricity Resource Plans and Transmission Information*¹ (Draft Instructions) and the related draft supply and transmission forms,² as discussed at the May 8, 2024, CEC staff workshop. SMUD recognizes the CEC’s authority to collect appropriate data to inform the biennial Integrated Energy Policy Report (IEPR). SMUD encourages the CEC to consider whether additional reporting is necessary to achieve the CEC’s articulated objectives. This is particularly important in light of the resource and cost burden on both utilities and CEC staff compared to the minimal incremental value offered from additional data requirements. SMUD offers the following recommendations for the CEC’s Draft Instructions.

- Maintain the biennial reporting frequency for electricity resource plans consistent with the biennial schedule of the IEPR.
- Revise the proposed requirement to report on facilities 30 kV or greater and clarify that transmission-related reporting applies only to transmission facilities.
- Clarify need for additional transmission-related reporting elements and continue allowing POUs to submit narratives or existing transmission plans.

SMUD’s comments are further described below.

¹ Kennedy, Robert. 2024. Forms and Instructions for Submitting Electricity Resource Plans: Prepared in Support of the 2025 Integrated Energy Policy Report. California Energy Commission. Publication Number: CEC-200-2024-008. Accessed at

<https://efiling.energy.ca.gov/GetDocument.aspx?tn=256264&DocumentContentId=92048>.

² Draft supply forms accessed at

<https://efiling.energy.ca.gov/GetDocument.aspx?tn=256263&DocumentContentId=92049>; draft

transmission form accessed at

<https://efiling.energy.ca.gov/GetDocument.aspx?tn=256261&DocumentContentId=92047>.

Maintain the biennial reporting frequency for electricity resource plans consistent with the biennial schedule of the IEPR.

Based on the discussion at the May 8, 2024, CEC staff workshop, SMUD understands that the CEC proposes increasing the reporting frequency for electricity resource plans from biennial to annual submissions. However, it is unclear how such additional information would be used to support the IEPR, which is only updated biennially. Furthermore, in SMUD's experience, there are not significant changes to resource plan data within a given two-year period, particularly since the demand forecasts that underpin the resource plans are updated biennially. Additionally, large POUs are only required to update their resource plans on a 5-year cycle,³ and the development, contracting and procurement of resources, both supply and demand side, can take years to complete. As a result, SMUD anticipates that annual reporting will provide limited incremental information.

SMUD is concerned that the increased reporting frequency would provide minimal value to the state but would impose an increased reporting burden on limited utility personnel operating under restricted budgets. Absent a clear need for and benefits associated with more frequent reporting, SMUD recommends the CEC maintain the current biennial reporting requirements.

Revise the proposed requirement to report on facilities 30 kV or greater and clarify that transmission-related reporting applies only to transmission facilities.

The Draft Instructions require transmission owners to report information on any facilities 30-kV or greater in order to allow the CEC to better track transmission projects.⁴ SMUD, consistent with industry practice and the North American Electric Reliability Corporation's (NERC) Bulk Electric System (BES) definitions,⁵ designates transmission system facilities as those rated 100-kV and higher. While there may be cases in which some California transmission owners consider some 69-kV facilities as performing a transmission function, this is rare and should not be applied statewide. SMUD's 69-kV system is distribution (sub-transmission) and is operated radially; it is not included in SMUD's transmission system and not subject to NERC BES reliability standards. SMUD strongly recommends replacing the 30-kV threshold from the Draft Instructions. Instead, transmission owners should only be required to report any facilities at or above 100-kV, and for any facilities below that threshold, report on facilities that the transmission owner determines are serving a transmission function.

Clarify need for additional transmission-related reporting elements and continue allowing POUs to submit narratives or existing transmission plans.

The Draft Instructions and the draft transmission form would significantly expand the type and quantity of transmission-related information that transmission owners must

³ Cal. Pub. Util. Code §§ 9621-9622.

⁴ Draft Instructions at 44.

⁵ The Bulk Electric System generally includes all voltages at or above 100 kV (refer to <https://www.nerc.com/pa/RAPA/Pages/BES.aspx>).

report to the CEC. SMUD recognizes the CEC's objective of tracking the progress of transmission projects throughout California, given the important role that transmission will play in facilitating the state's clean energy goals. However, SMUD questions whether the extensive additional reporting outlined in the draft transmission form is necessary to support this objective.

SMUD understands, based on the Draft Instructions, that CEC staff is seeking to leverage existing transmission data collection requirements that the California Public Utilities Commission (CPUC) imposes on CPUC-jurisdictional entities. The CPUC has imposed this extensive data collection requirement on those entities primarily as part of their rate oversight function. However, the Draft Instructions do not provide any specific rationale for the newly added reporting elements, which would also apply to POU's. While the CEC's incorporation of these requirements may have minimal impact on CPUC-jurisdictional entities that are already subject to CPUC reporting, the expansion to POU's creates a significant new administrative burden.

SMUD believes that the benefits of additional reporting must be balanced with administrative impacts. To that end, SMUD encourages the CEC to eliminate any incremental reporting elements that are unnecessary for purposes of tracking the progress of transmission projects and clarify the purpose for any additional reporting elements deemed necessary. Moreover, to mitigate impacts of necessary additional reporting, SMUD strongly recommends that Draft Instructions continue to allow POU's to submit existing transmission plans or narrative information in lieu of completing the draft transmission form.

Conclusion

SMUD looks forward to continued collaboration with CEC staff to develop a robust and well informed 2024 IEPR.

/s/

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Electricity Resource Plan Submissions

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cc: Corporate Files (LEG 2024-0080)