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Comments of the California Municipal Utilities Association

Additional submitted attachment is included below.

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

In the matter of:)	Docket No. 24-IEPR-02
)	
2024 Integrated Energy Policy Report)	
Update)	
_____)	

**COMMENTS OF THE CALIFORNIA MUNICIPAL UTILITIES ASSOCIATION ON
THE PROPOSED ELECTRICITY RESOURCE PLAN SUBMISSIONS**

The California Municipal Utilities Association (CMUA) respectfully provides the following comments to the California Energy Resources Conservation and Development Commission (Energy Commission) regarding the Energy Commission’s draft Forms and Instructions for Submitting Electricity Resource Plans and Transmission Information (Draft Instructions)¹ and the related draft supply and transmission forms,² as discussed at the May 8, 2024, CEC staff workshop.

CMUA is a statewide organization of local public agencies in California that provide essential public services including electricity, water, and wastewater service throughout California. CMUA membership includes publicly owned electric utilities (POUs) that operate electric distribution and transmission systems that serve approximately 25 percent of the electric load in California. California’s POU are committed to, and have a strong track record of, providing safe, reliable, affordable, and sustainable electric, service.

CMUA recognizes the need to collect information to inform the biennial Integrated Energy Policy Report (IEPR) but remains concerned about increasing the administrative burden on California’s POU. Specifically, CMUA recommends that the Energy Commission maintain the current biennial reporting schedule for POU resource plans and eliminate the proposed

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>.

requirement to report on 30 kV or greater facilities. Additionally, the Energy Commission should confirm that transmission-related reporting applies solely to transmission facilities.

The Energy Commission Should Maintain the Current Biennial Reporting Schedule

The Energy Commission has indicated that it proposes to increase the reporting frequency for electricity resource plans from biennially to annually. CMUA remains concerned that the additional administrative burden this would impose, and the ultimate increase in electricity rates, is not justified. For most POU, there is not a significant change in resource planning data within a two-year period. Further, given that this data is used to inform the IEPR, which is a biennial report, the benefit of annual reporting is not apparent. The current biennial reporting schedule produces the information needed for the biennial IEPR. As a result, CMUA recommends that the Energy Commission maintain the existing biennial reporting schedule.

The Energy Commission Should Confirm That Transmission-Related Reporting Applies Solely to Transmission Facilities

The Draft Instructions expand the reporting requirement for transmission owners to include information on any facilities 30 kV or greater. While Energy Commission staff indicated that this expansion is designed to allow the Energy Commission to better track transmission projects, CMUA notes that most transmission owners designate transmission facilities to be those at or above 100kV. CMUA recognizes that some POU may consider facilities as low as 69kV as performing transmission functions. However, CMUA recommends that such a designation should not be applied statewide. Additionally, the Energy Commission's definition of a transmission facility should remain consistent with the North American Electric Reliability Corporation's (NERC's) definition of the bulk electric system.³ Different classifications and reporting standards not only cause increased administrative burden for the POU, they also risk creating inconsistent public reports that do not consistently inform planners and policymakers. For this reason, CMUA recommends that the Energy Commission should remove the 30kV reporting threshold. Further, the Energy Commission should confirm that transmission owners report on new or planned upgrades to facilities that they consider performing the transmission function for reliability purposes, based on the NERC definition for a transmission function.

³ The bulk electric system generally includes all voltages at or above 100 kV (refer to <https://www.nerc.com/pa/RAPA/Pages/BES.aspx>).

The Benefits of Additional Reporting Must Justify the Administrative Burdens

CMUA recognizes the important role of transmission in facilitating California's clean energy goals. However, it remains unclear how the additional reporting outlined in the draft transmission form is necessary to support this objective. Additionally, CMUA is concerned that the Energy Commission intends to leverage existing transmission data collection practices imposed by the California Public Utilities Commission (CPUC) on CPUC jurisdictional utilities. CMUA notes that the data collection requirements imposed by the CPUC on investor-owned utilities (IOUs) are part of the CPUC's statutory authority to regulate the IOU ratemaking process.

While these expanded reporting requirements may not impose additional administrative burdens on IOUs, which are already subject to CPUC reporting, the additional administrative burden imposed on POUs would be significant, and ultimately would increase costs to POU ratepayers.

Conclusion

CMUA appreciates the opportunity to submit these comments and looks forward to continued collaboration with Energy Commission staff on this important issue.

Dated: March 22, 2024

Respectfully submitted,



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