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**STATE OF CALIFORNIA
CALIFORNIA ENERGY COMMISSION**

In the Matter of:

*2024 Integrated Energy Policy Report
Update*

Docket No. 24-IEPR-03

**CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S
COMMENTS ON IEPR COMMISSIONER WORKSHOP ON
ELECTRICITY LOAD GROWTH AREAS**

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May 30, 2024

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COMMENTS ON IEPR COMMISSIONER WORKSHOP ON
ELECTRICITY LOAD GROWTH AREAS**

The California Community Choice Association¹ (CalCCA) submits these Comments on the May 16, 2024, *IEPR Commissioner Workshop on Electricity Load Growth Areas* (Workshop). The Workshop explored areas of load growth that may be underrepresented in the California Energy Commission's (Commission) electricity demand forecast, including new data centers, electrification in the agricultural sector, manufacturing, and electricity demand for hydrogen production (referred to herein as Load Growth Industry). The presentations from California investor-owned electric utilities (IOU), Load Growth Industry representatives, and the California Governor's Office of Business and Economic Development (GO-BIZ) demonstrate the potential, but as yet unquantified, magnitude of potential energy and capacity needs. CalCCA

¹ California Community Choice Association represents the interests of 24 community choice electricity providers in California: Apple Valley Choice Energy, Ava Community Energy, Central Coast Community Energy, Clean Energy Alliance, Clean Power Alliance, CleanPowerSF, Desert Community Energy, Energy For Palmdale's Independent Choice, Lancaster Energy, Marin Clean Energy, Orange County Power Authority, Peninsula Clean Energy, Pico Rivera Innovative Municipal Energy, Pioneer Community Energy, Pomona Choice Energy, Rancho Mirage Energy Authority, Redwood Coast Energy Authority, San Diego Community Power, San Jacinto Power, San José Clean Energy, Santa Barbara Clean Energy, Silicon Valley Clean Energy, Sonoma Clean Power, and Valley Clean Energy.

appreciates the Commission’s continued interest in identifying methods to ensure the demand forecast accurately demonstrates potential load.

One theme running through the Workshop was the difficulty to timely forecast Load Growth Industry customer needs for the IOUs to be ready for energization consistent with desired customer timelines. The lack of timely data to anticipate Load Growth Industry needs is resulting in delays in energizing customers, and potentially dampening economic development in California. Commissioner Siva Gunda suggested during the Workshop that the Commission can conduct a survey of “key experts” – industry players, IOUs, local governments, permitting entities, business councils – to bring statewide perspectives to near and long-term forecasts for increased loads. Given the uncertainties regarding anticipated load demonstrated at the Workshop, CalCCA supports Commissioner Gunda’s recommendation and urges the Commission to immediately move forward with such a survey. The Commission should consult with load-serving entities and other stakeholders to design the survey to enable robust data collection useful in load growth analysis at state and local levels.

This “increased load potential” survey can provide valuable information in the Integrated Energy Policy Report (IEPR) proceeding to ensure accurate demand forecasts, as well as enable accurate forecasts for required investments in distribution, transmission, and generation necessary to meet energy and capacity needs. The IEPR demand forecast is also used as the basis for the California Public Utilities Commission’s Resource Adequacy (RA) program. This program ensures that sufficient generating capacity is under contract and available to the California Independent System Operator to operate the grid. Inaccurate or untimely forecasts can have a detrimental impact on the amount of RA available and therefore on reliability. CalCCA

urges the Commission to begin the “increased load potential” survey immediately to ensure the IEPR demand forecast can accurately inform future California energy and capacity needs.

CalCCA looks forward to further collaboration on this topic, including in the upcoming workshops in this proceeding on hourly forecast updates, load modifier results, and overall forecast results.

Respectfully submitted,

A handwritten signature in blue ink that reads "Evelyn Kahl". The signature is written in a cursive, flowing style.

Evelyn Kahl,
General Counsel and Director of Policy
CALIFORNIA COMMUNITY CHOICE
ASSOCIATION

May 30, 2024