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Randall Nicholson  
FERC/CAISO Regulatory Affairs  
San Diego Gas & Electric  
8330 Century Park Court, CP32H  
San Diego, CA 92123

California Energy Commission  
Dockets Office, MS-4  
Re: Docket No. 09-IEP1C  
1516 Ninth Street  
Sacramento, CA 95814-5504

Re: San Diego Gas & Electric's limited comments on the Draft Staff Revised Demand Forecast Publication No. Energy Commission 200-2009-001-SD Docket No. 09-IEP-1C

SDG&E appreciates the opportunity to comment on the California Energy Commission's 2009 Draft Staff Revised Demand Forecast. The report contains the draft revised forecast of 2010 peak demand and was developed by the Energy Commission for the California Independent System Operator's use in its 2010 local area capacity requirements (LCR) study. While the Commission hopes to use the yet completed 2009 *Integrated Energy Policy Report* to establish the 2010 year-ahead resource adequacy requirements, the CAISO's LCR study timeline necessitates a revised forecast prior to the 2009 *IEPR's* completion. SDG&E understands that to the extent this revised forecast differs substantially from the forthcoming 2009 *IEPR* forecast, the CAISO will endeavor to reallocate local capacity requirements among load serving entities prior to the 2010 annual resource adequacy compliance filing deadlines.

SDG&E offers only two limited comments/suggestions on the draft revised demand forecast. First, the revised forecast explains that CDWR's operations going forward are constrained by a 2007 federal court ruling ordering the agency to reduce water exports from the Sacramento-San Joaquin River. The ruling puts legal restrictions on pumping, leading to a revised LCR forecast for CDWR South of 178MW. This revision is correctly reflected in Table ES-1, however, the *unrevised* forecast numbers remain in Table 3. To aid in clarity, SDG&E suggests that Table 3 be amended to correctly reflect the revised forecast.

Second, in the final revised forecast SDG&E requests the Commission add a table outlining the forecast for SDG&E's TAC area 2010 peak demand. This table would be similar in appearance to Table 2 in the draft revised forecast, which outlines PG&E's 2010 peak demand forecast from the 2007 *IEPR* in the draft report. While SDG&E understands that the draft forecast did not deviate from the 2010 forecast contained in the 2007 *IEPR*, this may or may not be the case when the final forecast is adopted. In any event, SDG&E believes the Report will be better served by including specific forecast numbers and summary tables as was done for PG&E and SCE.

Sincerely,

/s/Randy Nicholson

Randy Nicholson

FERC/CAISO Regulatory Affairs

San Diego Gas & Electric