

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Order Instituting Rulemaking to Continue
Electric Integrated Resource Planning and
Related Procurement Processes.

R.20-05-003

**CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S
COMMENTS ON INDIVIDUAL IRP FILINGS**

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SUMMARY OF RECOMMENDATIONS

- The California Public Utilities Commission (Commission) should use a high electric vehicle scenario as the “base” scenario in future planning cycles; and
 - The Commission should not arbitrarily limit load-serving entities’ procurement of existing or candidate resources to load share in the next cycle’s filing requirements; and
 - The Commission should finalize Integrated Resource Plan filing requirements six months before the filings are due, pushing back filing due dates if necessary;
 - The Commission should incorporate the effects of climate change into planning, leveraging existing work at the California Energy Commission; and
 - The Commission should clarify that 2035 new build should be declared in public filings, not redacted as confidential.
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The California Community Choice Association¹ (CalCCA) submits these Comments pursuant to *Administrative Law Judge's Ruling Seeking Comments On Electricity Resource Portfolios For 2023-2024 Transmission Planning Process*, filed October 7, 2022, in response to individual Integrated Resource Planning filings (IRP filings).²

I. THE COMMISSION SHOULD USE A HIGH ELECTRIC VEHICLE SCENARIO AS THE "BASE" PLANNING SCENARIO IN FUTURE INTEGRATED RESOURCE PLAN (IRP) CYCLES

In their IRP filing, Southern California Edison Company (SCE) advocates that the California Public Utilities Commission (Commission) "adopt a high electrification demand forecast, such as the additional TE [Transportation Electrification] Scenario, for base case

¹ California Community Choice Association represents the interests of 24 community choice electricity providers in California: Apple Valley Choice Energy, Central Coast Community Energy, Clean Energy Alliance, Clean Power Alliance, CleanPowerSF, Desert Community Energy, East Bay Community Energy, Energy For Palmdale's Independent Choice, Lancaster Choice 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.

² All references to IRP filings herein refer to the public versions of the materials that load-serving entities (LSEs) submitted to the Commission in Rulemaking (R.) 20-05-003, on or about November 1, 2022.

planning in the IRP proceeding and the PSP [Preferred System Plan].” SCE cites several recent policy developments that would support this approach, including Governor Newsom’s Executive Order N-79-20 (which establishes zero-emission goals for sales of new vehicles) and the recently passed Senate Bill (SB) 846 (which modifies the Public Utilities Code to explicitly include planning for transportation electrification).³ Pacific Gas and Electric Company (PG&E) similarly cites “California’s new rules on zero-emission vehicle sales” and therefore advocates for the use of the additional Transportation Electrification scenario in planning.⁴

CalCCA agrees with PG&E and SCE’s approach and similarly advocates that the additional Transportation Electrification (TE) scenario be used for planning. This scenario is the best reflection of recent policy changes such as SB 846 which were finalized after the 2021 Integrated Energy Policy Report (IEPR) “mid case” forecast was originally released in early 2022.⁵ Adopting the additional TE scenario directionally captures these new developments and avoids California getting “caught on the back foot” by under-forecasting load. This position is in keeping with CalCCA’s earlier comments in this proceeding, which also advocated for reflecting a higher electrification scenario.⁶

³ *2022 Integrated Resource Plan of Southern California Edison Company (U 338-E): Public Version* (SCE IRP Filing), at 10. Located at <https://edisonintl.sharepoint.com/:f/t/Public/regpublic/Ej3CVKSc0HJEn8epuO6SqdcBBDrq1nD3FYcaihLZrs1FA>.

⁴ *Pacific Gas and Electric Company: 2022 Integrated Resource Plan* (PG&E IRP Filing), at 3. Located at https://www.pge.com/pge_global/common/pdfs/for-our-business-partners/energy-supply/integrated-resource-planning/2022-PGE-Integrated-Resource-Plan.pdf.

⁵ SB 846 was chaptered in September 2022, whereas the 2021-IEPR-03 docket (Electricity and Natural Gas Demand Forecast) closed in July 2022. See, respectively, https://leginfo.legislature.ca.gov/faces/billStatusClient.xhtml?bill_id=202120220SB846 for information on the SB 846 timeline, and <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=21-IEPR-03> for the July 2022 Memo to Close Docket.

⁶ *California Community Choice Association’s Comments on Administrative Law Judge’s Ruling Seeking Comments on Proposed Preferred System Plan*, R.20-05-003 (Sept. 27, 2021), at 11. Located at: <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M410/K467/410467139.PDF>.

II. THE COMMISSION SHOULD NOT ARBITRARILY LIMIT LSES' PROCUREMENT OF EXISTING OR CANDIDATE RESOURCES TO LOAD SHARE IN THE NEXT CYCLE'S FILING REQUIREMENTS

SCE states that “in the filing requirements for the next IRPs, the Commission should direct LSEs not to exceed their load share of existing system resources in their IRP portfolios.”⁷ Although it is reasonable for the Commission to check if a given resource type is “oversubscribed” (i.e., that total LSE demand for existing resources exceeds what is physically possible), the Commission should make this determination *after* it has aggregated the plans, not before. Artificially limiting procurement to load share at the filing requirements stage is premature, fails to solve any clear problem, and has nothing to do with IRP goals on emissions, reliability, and cost. Indeed, there are many situations in which an IRP plan would reasonably want to deviate from this “load share” rule. For example, an LSE with a load profile that peaks earlier in the day may want to procure more solar than an LSE whose load profile peaks later. It is perfectly reasonable to allow that first LSE to plan to procure solar beyond its load share if that is the portfolio that best meets its hourly load, along with reliability, greenhouse gas, and cost goals.

Therefore, the Commission should not include rules about load share of existing resources as a filing requirement.

III. THE COMMISSION SHOULD FINALIZE FILING REQUIREMENTS SIX MONTHS BEFORE THE IRP FILINGS ARE DUE, PUSHING BACK FILING DUE DATES IF NECESSARY

San Diego Gas & Electric Company's (SDG&E's) comments propose allotting more time to develop IRPs.⁸ This is a reasonable request that the Commission should grant. In order to

⁷ SCE IRP Filing at 4. CalCCA interprets “load share” to mean a given LSE's percent of total annual system energy.

⁸ 2022 Individual Integrated Resource Plan of San Diego Gas and Electric Company (U 902 E) (SDG&E IRP), at 85. Located at https://www.sdge.com/sites/default/files/regulatory/SDG%26E%202022%20Individual%20Integrated%20Resource%20Plan%20%28PUBLIC%29_0.pdf.

create and submit IRPs, community choice aggregators (CCAs) go through an extensive process of stakeholder engagement and must seek approval of their local governing boards at regularly scheduled Board meetings. This process takes time, and it means that for CCAs to develop robust plans, the filing requirements must be finalized in advance with plenty of lead time to incorporate feedback from stakeholders and the Board. Unfortunately, that did not occur this cycle, with key inputs being introduced late in the process (e.g., finalized effective load carrying capacities were not available until July 29),⁹ and Inputs and Assumptions still not released as of this filing (with a planned release in Quarter 4 (Q4) of 2022).¹⁰

In previous comments, CCAs have proposed timelines to remedy this problem, including six months of lead time between the CPUC finalizing the requirement and the due date for submissions.¹¹ This timeline is in fact shorter than the California Energy Commission (CEC) timeline for publicly owned utilities (POUs), which has over a year from filing requirements being adopted to submission data.¹²

For the forgoing reasons, the Commission should adopt at least this six-month timeline cited above.

⁹ *Reliability Filing Requirements for Load Serving Entities' 2022 Integrated Resource Plans – Results of PRM and ELCC studies*, at 42, 44, 74, 75. This presents Effective Load Carrying Capacity for use in filing. Located at: <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/integrated-resource-plan-and-long-term-procurement-plan-irp-ltpp/2022-irp-cycle-events-and-materials/20220729-updated-fr-and-reliability-mag-slides.pdf>.

¹⁰ *Inputs and Assumptions (I&A) Modeling Advisory Group (MAG) Webinar* at 3: “Request stakeholders' written feedback on these topics to be incorporated in the draft inputs and assumption document to be released in Q4 2022.” Located at: <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/integrated-resource-plan-and-long-term-procurement-plan-irp-ltpp/2022-irp-cycle-events-and-materials/iamag09222022.pdf>.

¹¹ *CleanPowerSF 2022 Integrated Resource Plan Compliance Filing (Public Version)*, at 73. Located at: <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M498/K339/498339141.PDF>.

¹² CEC. *Publicly Owned Utility Integrated Resource Plan Submission and Review Guidelines*. This document was released in September 2017 (at 1), and requests that POUs adopt an initial IRP by January 1, 2019, and submit to the CEC by April 30, 2019 (at 14). Located at: <https://efiling.energy.ca.gov/GetDocument.aspx?tn=221045&DocumentContentId=29351>.

IV. THE COMMISSION SHOULD INCORPORATE THE EFFECTS OF CLIMATE CHANGE INTO PLANNING, LEVERAGING EXISTING WORK AT THE CALIFORNIA ENERGY COMMISSION

Electric system reliability is increasingly at risk from climate change-induced heat events such as the heat waves of September 2022. These “extreme years” can drive substantial need for resources to maintain reliability. Indeed, the Commission has already found that adding 2020 weather increased the planning reserve margin by over one gigawatt, showing the importance of capturing these heat events.¹³ To help California build an electric system that is adequately prepared for these events, the Commission should consider incorporating the following changes into its modeling.

First, add 2021 and 2022 data to the Strategic Energy Risk Valuation Model (SERVM) weather year dataset (which currently spans 1998-2020)¹⁴, when possible. This is crucial to capture increasing heat and “right-tail” events which strain the electric system, such as the West Coast-wide heat events in 2022.

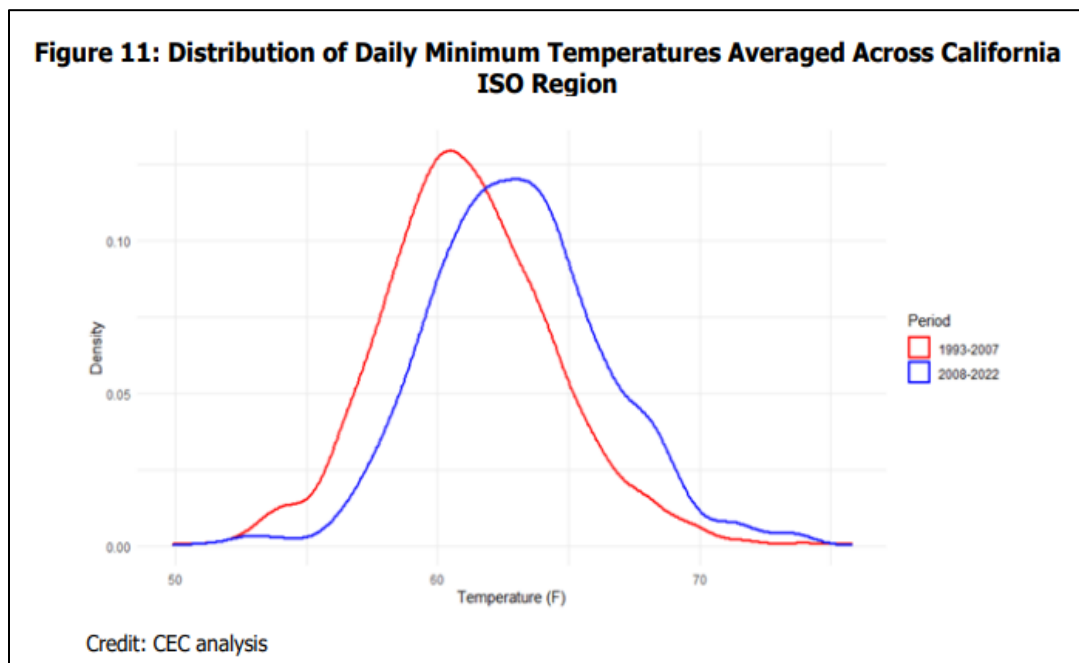
Second, consider changing the weighting of weather years used in modeling. The current dataset spans 1998 through 2020, and weights all these years equally when performing loss-of-load calculations.¹⁵ This distribution understates the amount of high-temperature years expected in the future. Indeed, in its analysis of 1993-2022 temperature data, the CEC found a wholesale upward shift in the temperature distribution over time, a trend likely to continue as the effects of

¹³ *Reliability Filing Requirements for Load Serving Entities 2022 Integrated Resource Plans – Results of PRM and ELCC Studies*, at 30. Located at: <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/integrated-resource-plan-and-long-term-procurement-plan-irp-ltpp/2022-irp-cycle-events-and-materials/20220729-updated-fr-and-reliability-mag-slides.pdf>.

¹⁴ *Id.* at 13.

¹⁵ *IRP Production Cost Modeling with the Reference System Plan and the 2017 IEPR: SERVM Model Results*, at 16: “Each weather year is equally weighted (non-equal weighting can also be assigned)”. Located at: <https://www.cpuc.ca.gov/-/media/cpuc-website/files/uploadedfiles/cpucwebsite/content/utilitiesindustries/energy/energyprograms/electpowerprocurementgeneration/demandmodeling/irp-rsp-2017iepr-servm-results-20180913.pdf>.

climate change deepen. The CEC’s chart below shows that distribution for daily minimum temperatures in CAISO, with a “similar trend” for daily maximum temperatures.¹⁶



The CEC is currently working to more heavily weight recent years in their historical data, as well as using forecast climate model data in planning as part of the 2023 IEPR process.¹⁷ The Commission should adopt a similar approach, sharing information with the CEC and leveraging their existing work as appropriate.

V. THE COMMISSION SHOULD CLARIFY THAT A SUMMARY TABLE OF 2035 NEW BUILD NAMEPLATE BY RESOURCE TYPE SHOULD BE DECLARED IN PUBLIC FILINGS, NOT REDACTED AS CONFIDENTIAL

All 24 of CalCCA’s members and all three of the investor-owned utilities showed a summary of their 2035 new build resources in their publicly accessible IRP plans, as shown in Appendix A of this document. However, multiple energy service providers (ESPs) did not, which

¹⁶ CEC. Draft 2022 IEPR Update Report at 48-49. Located at: <https://efiling.energy.ca.gov/GetDocument.aspx?tn=247338&DocumentContentId=81732>.

¹⁷ *Id.* at 49.

means that system modelers and procurement planners cannot accurately quantify the composition of resources in the future electric system.¹⁸

Modeling parties such as CalCCA, the California Independent System Operator, and the investor-owned utilities cannot meaningfully contribute to the development of the Preferred System Plan without this information. Therefore, in the next IRP cycle, the Commission should clarify that all LSEs must publicly show their 2035 new build resources. There is no legal¹⁹ or practical reason for the Commission to allow energy service providers (ESPs) to redact their 2035 new resources, when all the other LSEs show their resources.²⁰

VI. CONCLUSION

CalCCA respectfully requests consideration of the issues raised above and looks forward to an ongoing dialogue with the Commission and stakeholders.

Respectfully submitted,



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December 2, 2022

¹⁸ For example, Constellation Newenergy redacts all quantitative information from its Conforming and Alternative Portfolios section (see *Constellation Newenergy, Inc, 2022 Integrated Resource Plan Public Version* at 8), and Shell Energy redacts its forecasted incremental 2035 supply (see *Shell Energy North America (US), L.P. D/B/A Shell Energy Solutions 2022 Integrated Resource Plan* at 9).

¹⁹ See D.21-11-029 (*Decision Clarifying and Improving Confidentiality Rules for the Renewables Portfolio Standard Program*) in R.18-07-003, which adopts the updated Confidentiality Matrix in Ordering Paragraph 2. The Confidentiality Matrix states that “Contract summaries [are] public, including counterparty, resource type, location, capacity, expected deliveries, place of delivery, length of contract and online date (Appendix 2, “ESP Matrix”, at 5). Confidentiality Matrix is located at: <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M424/K377/424377996.PDF>.

²⁰ In addition to the official IRP filings, CalCCA publicly posts new build resources on the website. See “CCA Long-Term PPAs and Project Map,” located at: <https://cal-cca.org/cca-renewable-energy-map-and-list-of-ppas/>.

**APPENDIX A
TO
CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S
COMMENTS ON INDIVIDUAL IRP FILINGS**

The table below shows that all CCAs and IOUs included a summary table of new build resources in 2035 in their unredacted public filings.

LSE TYPE	LSE NAME	LINK TO PUBLIC IRP PLAN	PAGE NUMBER
CCA	Apple Valley Choice Energy	https://californiachoiceenergyauthority.com/wp-content/uploads/2022/10/avce_irp_public_v1-Kathy-Wells.pdf	13-17
CCA	Central Coast Community Energy	https://3cenergy.org/wp-content/uploads/2022/11/ccce_irp_public_v1.pdf	8,9
CCA	Clean Energy Alliance	https://thecleanenergyalliance.org/wp-content/uploads/2022/10/cea_irp_public_v1.pdf	11,13,45
CCA	Clean Power Alliance	https://cleanpoweralliance.org/wp-content/uploads/2022/11/cpasc_narrative_public.pdf	17-19
CCA	CleanPowerSF	https://static1.squarespace.com/static/5a79fded4c326db242490272/t/6361826c176e694df49960b5/1667334769081/CPSF_public_v1.pdf	24-30
CCA	Desert Community Energy	https://desertcommunityenergy.org/wp-content/uploads/2022/11/DCE_v1-DCEs-IRP-Narrative-Public-Version.pdf	11-14
CCA	East Bay Community Energy	https://res.cloudinary.com/diactiwk7/image/upload/v1667342459/2022_IRP_EBCE_LSE_Plan_xj6yzo.pdf	12-19
CCA	Energy for Palmdale's Independent Choice	https://californiachoiceenergyauthority.com/wp-content/uploads/2022/10/palmdale_irp_public_v1-Kathy-Wells.pdf	13-17
CCA	Lancaster Energy	https://californiachoiceenergyauthority.com/wp-content/uploads/2022/10/lce_irp_public_v1-Kathy-Wells.pdf	13-17
CCA	Marin Clean Energy	https://www.mcecleanenergy.org/wp-content/uploads/2022/11/MCE-2022-Integrated-Resource-Plan_11012022.pdf	15-19
CCA	Orange County Power Authority	https://www.ocpower.org/wp-content/uploads/2022/11/OCPA_v1.pdf	13-15
CCA	Peninsula Clean Energy	https://www.peninsulacleanenergy.com/wp-content/uploads/2022/10/Attachment-A-pcea_public_v1.pdf	29-32
CCA	Pico Rivera Innovative Municipal Energy	https://californiachoiceenergyauthority.com/wp-content/uploads/2022/10/prime_irp_public_v1-Kathy-Wells.pdf	15-19
CCA	Pioneer Community Energy	https://pioneercommunityenergy.org/wp-content/uploads/2022/11/pioneer_irp_public_v1.pdf	14-18
CCA	Pomona Choice Energy	https://californiachoiceenergyauthority.com/wp-content/uploads/2022/10/pomona_irp_public_v1-Kathy-Wells.pdf	13-17

LSE TYPE	LSE NAME	LINK TO PUBLIC IRP PLAN	PAGE NUMBER
CCA	Rancho Mirage Energy Authority	https://californiachoiceenergyauthority.com/wp-content/uploads/2022/10/Kathy-Wells-rmea_irp_public_v1.pdf	14-18
CCA	Redwood Coast Energy Authority	https://redwoodenergy.org/wp-content/uploads/2022/11/20221101_RCEA_2022_IRP.pdf	25-26
CCA	San Diego Community Power	https://sdcommunitypower.org/wp-content/uploads/2022/11/sdcp_irp_public_v1.pdf	14-19
CCA	San Jacinto Power	https://californiachoiceenergyauthority.com/wp-content/uploads/2022/10/sjp_irp_public_v1-Kathy-Wells.pdf	14-17
CCA	San Jose Clean Energy	https://sanjosecleanenergy.org/wp-content/uploads/2022/11/sjce_irp_public_v1.pdf	12-13
CCA	Santa Barbara Choice Energy	https://californiachoiceenergyauthority.com/wp-content/uploads/2022/11/sbce_irp_public_v1-1.pdf	13-17
CCA	Silicon Valley Clean Energy	https://svcleanenergy.org/wp-content/uploads/svce_irp_public_v1.pdf	12
CCA	Sonoma Clean Power	https://sonomacleanpower.org/uploads/documents/soma_public_v1.pdf	25
CCA	Valley Clean Energy	https://valleycleanenergy.org/wp-content/uploads/VCE-2022-Integrated-Resource-Plan-Narrative.pdf	6
IOU	Pacific Gas and Electric Company	https://www.pge.com/pge_global/common/pdfs/for-our-business-partners/energy-supply/integrated-resource-planning/2022-PGE-Integrated-Resource-Plan.pdf	32-37
IOU	Southern California Edison Company	https://edisonintl.sharepoint.com/teams/Public/regpublic/Regulatory%20Documents/Forms/RIMS%20Doc%20Set%20View.aspx?id=%2Fteams%2FPublic%2Fregpublic%2FRegulatory%20Documents%2FPD%2FCPUC%2F21762%2FR2005003%2DSCE%202022%20Integrated%20Resource%20Plan%2DPUBLIC%2Epdf&parent=%2Fteams%2FPublic%2Fregpublic%2FRegulatory%20Documents%2FPD%2FCPUC%2F21762	57
IOU	San Diego Gas & Electric Company	https://www.sdge.com/sites/default/files/regulatory/SDG%26E%202022%20Individual%20Integrated%20Resource%20Plan%20%28PUBLIC%29_0.pdf	21