BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

Order Instituting Rulemaking to Develop an
Electricity Integrated Resource Planning
Framework and to Coordinate and Refine
Long-Term Procurement Planning Requirements.

R.16-02-007
(Filed February 11, 2016)

COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON
COMMUNITY CHOICE AGGREGATORS’ LOAD FORECASTS

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Dated:  April 30, 2018
COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON COMMUNITY CHOICE AGGREGATORS’ LOAD FORECASTS

Pursuant to the April 3, 2018 Administrative Law Judge’s Ruling Seeking Comment on Greenhouse Gas Emissions Accounting Methods and Addressing Updated Greenhouse Gas Benchmarks (“Ruling”), Southern California Edison Company (“SCE”) respectfully submits these comments regarding selected community choice aggregators’ (“CCAs”) load forecasts. Comments on these forecasts were authorized per Ordering Paragraph 7 of the Ruling.

I. INTRODUCTION

The Ruling directed six new CCAs that had been registered but were not included in the California Energy Commission’s (“CEC”) 2017 Integrated Energy Policy Report (“IEPR”) to file load forecasts projected out to 2030.1 Four of those CCAs are located within SCE’s service area: Desert Community Energy (“DCE”), Rancho Mirage Energy Authority (“RMEA”), San Jacinto Power (“SJP”), and Riverside County CCA. Three of these four – DCE, RMEA, and SJP – submitted the requested load forecasts in opening comments.2 Riverside County CCA did

1 Ruling at Ordering Paragraph 6.
2 Desert Community Energy Comments at 2; RMEA Comments, Attachment A; SJP Comments, Attachment A.
not provide a forecast, noting that it had notified Energy Division’s Director on April 19, 2018
that it “does not intend to move forward with registering a CCA at this time.”  

SCE has reviewed the load forecasts submitted by DCE, RMEA, and SJP, and has also
reviewed the 2030 load projections in the Ruling for the other CCAs in its service area.  SCE has
very limited information to be able to comment on the three new CCAs’ load forecasts at this
time.  However, SCE urges the California Public Utilities Commission (“Commission”) and the
CEC to work collaboratively to establish a robust process to vet the CCA load forecasts used in
the Integrated Resource Planning (“IRP”) process.  Additionally, the Commission should
recognize the challenges inherent in planning near and long-term resource portfolios in an
environment where the load-serving entities (“LSEs”) serving retail electric load are changing
rapidly and the retail energy landscape is becoming increasingly fragmented.  The IRP process
and outcomes must provide the flexibility to address the uncertainties of resource planning in this
new environment.

II.  
CCA LOAD PROJECTIONS AS COMPARED WITH THEIR MOST RECENT
IMPLEMENTATION PLAN FILINGS

For the three new CCAs that filed load forecasts, SCE finds them generally consistent
with 2030 load departure projections outlined in each CCA’s implementation plan, despite some
changes in the early years of projections.  Riverside County’s recent decision that it “does not
intend to move forward with registering a CCA at this time,” however, is an extreme example of
the uncertainty investor-owned utilities (“IOUs”) face in planning under rapidly changing load
departure scenarios.  This type of change in a potential or existing CCA’s plans affects both the

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3 Riverside County CCA Comments at 1.
5 Riverside County CCA Comments at 1.
short-term planning SCE is required to undertake to ensure Resource Adequacy, as well as long-term resource planning. As Riverside County CCA is under no binding obligation to fulfill the actions outlined in its implementation plan, on the timeline it proposed, SCE now faces uncertainty regarding how to plan for this portion of load.

DCE also modified its early year projections, submitting annual load projections for 2018 that significantly differ from its implementation plan. DCE now projects more than 35% less load in 2018 than originally projected, returning to approximately originally planned levels in the years following.

In addition to these challenges, the CCA load forecasts included in the IEPR, which in turn inform each LSE’s 2030 greenhouse gas (“GHG”) emissions benchmark for IRP, can appear substantially out of date in short order, as CCAs change their load projections. Los Angeles County’s CCA (“Clean Power Alliance” or “CPA”) is a prime example of this rapid change. The Ruling’s assigned 2030 load projections and GHG emissions benchmark are based on the 2017 IEPR, where CPA’s projected load by 2030 was approximately 2.15 terawatt hours (“TWh”), representing 2.7% of load in SCE’s distribution service area. However, in its March 2018 implementation plan update, CPA projects significantly higher load. These frequently fluctuating forecasts put SCE at risk of being required to plan to a load forecast and GHG emissions benchmark in its IRP that is inconsistent with the latest available information on CCA load.

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6 Ruling at 7.
7 Los Angeles Community Choice Energy Implementation Plan Addendum Number 2, March 1, 2018, at 7.
III.

THE COMMISSION AND CEC SHOULD ADOPT A ROBUST PROCESS FOR VETTING THE CCA LOAD FORECASTS USED IN THE IRP AND RECOGNIZE THE UNCERTAINTIES OF PLANNING IN A CHANGING RETAIL ENERGY LANDSCAPE

The examples above raise questions for consideration in the IRP process regarding how parties and the Commission can validate the load projections of LSEs that have no binding requirements to move forward according to submitted plans, and how that affects the IOUs’ long-term resource planning. Fluctuating intra-cycle CCA load projections could introduce a high degree of uncertainty into the IRP process, which in turn could lead an LSE to under or over-procure relative to its need.

The CEC’s IEPR process is the venue in which the state and individual LSE load forecasts are reviewed, vetted by stakeholders, and approved annually. CCAs should be subject to the same process so that the CEC can ensure greater consistency and stability across load projections each year. Full participation in this process will ensure all LSEs use consistent assumptions around economic and demographic drivers, and technology adoption (e.g., distributed energy resource adoption). The CEC should seek to update its CCA forecasts every year through the IEPR proceeding to capture the latest movement in load migration, given the level of uncertainty that currently surrounds departing load. In this context, the IOUs could work collaboratively with the CEC and other LSEs to address forecasting methods and issues through the Demand Analysis Working Group. This full participation is important to stabilize the planning process, and help ensure that LSEs appropriately plan for the load they are expected to serve.

Furthermore, the Commission’s IRP process must recognize the uncertainties in current load projections and a changing environment where the increasing pace and breadth of CCA growth means that IOUs are serving a decreasing percentage of California’s retail electric load.
The IRP process and outcomes should allow maximum flexibility to address these uncertainties, including least-regrets procurement outcomes.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission’s Rules of Practice and Procedure, I have this
day served a true copy of COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY
(U 338-E) ON COMMUNITY CHOICE AGGREGATORS'S LOAD FORECASTS on all parties
identified on the attached service list(s) R.16-02-007. Service was effected by transmitting the copies via
e-mail to ALJ Julie A. Fitch and all parties who have provided an e-mail address.

Executed on April 30, 2018, at Rosemead, California.

/s/ Regina Coburn
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