

The Division of Ratepayer Advocates Additional Comments in response to
Technical Questions on Proposed Scenarios
September 11, 2012
Karin Hieta
415-703-4253

1a. Are any resources double counted or inappropriately left out of the analysis?

Non-Event Based Demand Response

DRA has now confirmed with the California Energy Commission (CEC) that incremental Permanent Load Shifting (PLS) approved in D.12-04-045 has only been partially included in the most recent California Energy Demand (CED) forecast.¹ The CED accounts for 30 MW for PG&E's PLS only in 2014 through 2022. DRA has identified 20 MW for PLS funded between 2007 and 2011² and 53 MW for PLS between 2012 and 2014, approved in the most recent 2012-2014 DR budget cycle decision for all three IOUs.³ DRA recommends that the ED Draft Scenarios update the Non-Event Based DR value to include 43 MW for PLS in 2014, which is not properly reflected in the CED. This is obtained by subtracting the 30 MW already shown in the CED in 2014 from the 73 MW total PLS funded from 2007 to 2014.

Also, the CED does not account for any incremental uncommitted PLS for the three IOUs which is likely to be funded in future DR decisions. DRA recommends that the ED Draft Scenarios account for incremental uncommitted PLS, after 2014, to continue increasing on a linear trajectory through 2022 and beyond.

¹ Please see attached email for details.

² D.12-04-045 at p. 151 (mimeo).

³ Id. at pp. 243-244 (mimeo).

From: Kavalec, Chris@Energy [<mailto:Chris.Kavalec@energy.ca.gov>]
Sent: Friday, September 07, 2012 11:04 AM
To: Ciupagea, Radu
Cc: Gough, Andrea@Energy; Sheridan, Margaret@Energy; Junker, Bill@Energy
Subject: RE: Questions regarding CED 2012-2022 Final Forecast

Radu,

Attached has the DR by program for SCE and PGE. This was based on info we had at the time and does not include the more recently approved programs—this happened too late to incorporate in the forecast. We did not identify any incremental effects for SDGE (although there would be in the newer programs).

As I understand it, PLS of 53 MW is the new total expected, so that the amount incremental to what we included (30 MW) is 23 MW.

We were able to put together expected DR through 2021—2022 is the same as 2021.

If you need more details, please contact Margaret Sheridan:

Margaret.Sheridan@energy.ca.gov

Chris

Chris Kavalec

Demand Analysis Office

California Energy Commission

(916) 654-5184

From: Gough, Andrea@Energy
Sent: Friday, September 07, 2012 8:01 AM
To: Kavalec, Chris@Energy
Cc: radu.ciupagea@cpuc.ca.gov
Subject: FW: Questions regarding CED 2012-2022 Final Forecast

Chris,

Who would be best to answer the following questions from CPUC staff?

Andrea

From: Junker, Bill@Energy
Sent: Thursday, September 06, 2012 11:32 PM
To: Gough, Andrea@Energy
Subject: Fw: Questions regarding CED 2012-2022 Final Forecast

Please assist.

Thanks

In Cortina d'Ampezzo. Italy

From: Ciupagea, Radu [<mailto:radu.ciupagea@cpuc.ca.gov>]
Sent: Thursday, September 06, 2012 06:03 PM
To: Junker, Bill@Energy
Subject: Questions regarding CED 2012-2022 Final Forecast

I work for DRA on the long term procurement planning, and I'm reviewing the Non-Event Based Demand Response in the CED. I'm hoping you can help me with some clarifications. On page 34 of the CED, Table 1-8 shows the Estimated Demand Response Program Impacts Incremental to 2011 (MW).

1. Could you please provide a breakdown, by specific DR programs, of the MW numbers for 2022?
2. Does this table include Permanent Load Shifting of 53 MW approved in D.12-04-045 for the Demand Response 2012-2014 portfolios?
3. Does this table include Time of Use (TOU) rates, or are TOU MW already embedded in previous CED reports?
4. Why is SDG&E excluded from the table?

Thank you for your help,

Radu Ciupagea
Regulatory Analyst
Division of Ratepayer Advocates
California Public Utilities Commission
(415) 703-5235
Radu.Ciupagea@cpuc.ca.gov