Clean Coalition
Making Clean Local Energy Accessible Now

California Energy Commission

Docket No. 14-IEP-1E

Clean Coalition Comments on 2014 Integrated Energy Policy Report (IEPR) Scoping

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I. Introduction

The Clean Coalition is a California-based nonprofit organization whose mission is to accelerate the transition to local energy systems that deliver cost-effective renewable energy, strengthen local economies, foster environmental sustainability, and enhance energy security. The Clean Coalition drives policy innovation to remove barriers to the procurement and interconnection of Wholesale Distributed Generation, integrated with Intelligent Grid solutions, such as demand response, energy storage, and advanced inverters. The Clean Coalition also works with utilities to develop demonstration projects that prove that local renewables can provide at least 25% of the total electric energy consumed within the distribution grid, while maintaining or improving grid reliability. The Clean Coalition is active in numerous proceedings before California agencies and other state agencies throughout the United States.

II. Comments on Section 4: Electricity Update

The Clean Coalition offers the following comments on the scope of the IEPR update of the Demand Forecast. We urge the Commission to develop Demand Forecasts with two projected levels of "load modifier" demand response (DR) [1], including load shifting with time of use rates for charging of alternative fuel vehicles (AFVs).

To comply with the "loading order", the California Public Utilities Commission (CPUC) and the California Independent System Operator (CAISO) need Demand Forecasts that include all "load modifier" demand response the Commission projects will be available. CAISO is currently using a new methodology to evaluate local preferred resources, including demand response, as alternatives to gas-fired generation for meeting local

[1] A "load modifier" is not a resource. It is a type of resource, though a demand side resource. The differentiation is necessary, as demand side resources are applied to reduce the demand forecast rather than as a dispatchable resources to meet demand. (CPUC comments to the California ISO on the Demand Response and Energy Efficiency Roadmap, dated June 17, 2013 (http://www.caiso.com/Documents/CPUC-Comments%E2%80%93DemandResponseEnergyEfficiencyRoadmapJun17_2013.pdf)

reliability needs of the Los Angeles Basin and San Diego. We have recommended in joint comments with the Natural Resources Defense Council and the Environmental Defense Fund to the CAISO on its 2013-2014 Transmission Plan that CAISO work with the Commission to develop Demand Forecasts that reflect (i) new time-of-use (TOU) policies, including default TOU for small commercial customers, and (ii) potential default TOU policies for residential customers after 2018 and for AFVs. In addition, the Clean Coalition urges the Energy Commission to work with the ISO to develop a scenario that accounts for the potential impact on load curves of a future requirement of residential default time of use after 2018, as well as current load reshaped prompted by mandatory time-variant rates imposed in all non-residential classes. New, time-variant tariffs could significantly reshape load, reducing the need for peaking and ramping resources. Similarly, as the AFV population increases, it will provide a means to soak up bountiful clean electricity generated mid-day and provide ramping and peaking resources during the later-afternoon and early evening.

In 2012, California Governor Jerry Brown set a state target of getting 1.5 million zero-emission vehicles on California roads by 2025. Achieving the Governor's target with battery electric vehicles (BEV) would represent an additional load of 10,000 MW on the grid. Coupling the unique usage attributes of plug-in electric vehicles with new business and operational strategies have the potential to mitigate system impacts resulting from the growth of electrified transportation, and in turn, accelerate plug-in electric vehicle adoption and hasten benefits to air quality, reduced GHG emissions, and the development of the industry. [2]

Respectfully submitted,

[2] Vehicle - Grid Integration: A Vision for Zero-Emission Transportation Interconnected throughout California's Electricity System Prepared by the California Public Utilities Commission Energy Division, October 2013. http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M080/K775/80775679.pdf

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