

Southern California Edison
A.23-03-005 – Cal City PTC

DATA REQUEST SET E D - S C E - 0 0 2

To: Energy Division
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Received Date: 7/25/2023

Response Date: 9/14/2023

Question 11:

Planning Processes: The California Energy Commission (CEC)'s California Energy Demand Forecast Update 2022 Baseline Forecast peak load for a 1 in 10-year extreme Temperature Peak Demand shows less than a one percent growth rate for 2023 through 2035 (SCE Planning Area). Please provide the calculations and resulting megawatt values derived from the disaggregation of the CEC's Integrated Energy Policy Report forecast. Include a description (type, size, project status) of any large planned new loads that are not part of the historical local load growth.

Response to Question 11:

SCE's application for the Cal City Substation 115 kV Upgrade Project ("Cal City Project") was filed as a Permit to Construct ("PTC"). Pursuant to California Public Utilities Commission General Order 131-D, Section IX.B.1.f., "an application for a permit to construct *need not include either a detailed analysis of purpose or necessity*... beyond that required for CEQA compliance." (emphasis added) Further, as noted in the Commission's Decision 94-06-014, which adopted General Order 131-D: "The process we adopt for lines between 50 and 200 kV differs from the review that results in the issuance of a [CPCN] for lines over 200 kV. The process will result in a 'permit to construct' and *our review will focus solely on environmental concerns*, unlike the CPCN process which considers the need for and the economic cost of a proposed facility." "Because the [PTC] review focuses solely on environmental issues, the Commission, on the advice of Commission staff, shall issue or deny a permit as soon as it may legally do so following completion of the requisite CEQA review." "[The Energy Division of the CPUC] in conjunction with other parties developed a [PTC] procedure for power lines designed to operate between 50 and 200 kV. *The [PTC] review is meant strictly for environmental review, not economic or 'needs' review.*" (D. 94-06-014, at 2-3, 22, emphasis added.)

To that end, SCE specifically objects to this request under Rule 10.1 of the Commissioner's Rules of Practice and Procedure on the grounds that the requested load growth information is not relevant to the subject matter involved in the pending proceeding. As explained in D. 94-06-014, the scope of the Commission's review in a PTC proceeding specifically excludes project need, and evidence regarding SCE's load growth projections is therefore unlikely to be admissible in this proceeding. This data request is focused entirely on information related to project need but does not state any basis for a conclusion that the evidence requested would be admissible. Nevertheless, in recognition of the authorities related to the rights and obligations of the Energy Division of the CPUC, and without waiving any objection, SCE provides the following response for informational purposes

only:

The megavolt-ampere¹ (MVA) values derived from the disaggregation of the CEC's Integrated Energy Policy Report (IEPR) forecast account for less than one percent of the Cal City Substation and are provided below:

2022	2023	2024	2025	2026	2027	2028	2029	2030	2031
0.073	0.110	0.054	0.072	0.080	0.069	0.126	0.178	0.178	0.155

While the CEC IEPR forecast reflects macroeconomic load growth trends, it does not reflect individual service requests, local load growth trends, or certain unique load growth types (e.g., cannabis cultivation). Nearly all the forecasted load growth in the California City area is attributed to such customer applications for service, and therefore is not reflected in the IEPR forecast. SCE's response to a Public Advocates Office Data Request², attached to this response, summarizes customer applications for service and associated customer-requested load amounts.

Please refer to SCE's 2023 Grid Needs Assessment and Distribution Deferral Opportunity Report³ for information on SCE's disaggregation methodology⁴ for the CEC's IEPR forecast. Specifically, the following sections address the disaggregation process:

- *Section 3.2 Load and DER Disaggregation* explains the process for load disaggregation throughout SCE's service territory.
- *Section 4 In-Depth Forecast Examination & Disaggregation Methods* explains the disaggregation of the System Level DER and Load Forecasts down to the distribution circuits.
- *Section 4.2 Other Forecast Adjustments* describes post-disaggregation load growth adjustments made to reflect Load Growth Projects (LGPs) such as Cultivation, Commercial Electric Vehicle Chargers, and Temporary Power that are not otherwise accounted for in the IEPR forecast.

¹ For this data set, SCE assumes unity power factor and as such MVA values are equivalent to MW values.

² Please see attachment PubAdv-SCE-001 Q.01.PDF and A.2303005-PubAdv-SCE-001-Q1.xlsx.

³ Grid Needs Assessment and Distribution Deferral Opportunity Report of Southern California Edison Company (U 338-E). August 15, 2023. [Microsoft Word - R2106017 SCE 2023 GNA-DDOR, Aug 2023 - Public-Final.docx \(ca.gov\)](#)

⁴ SCE's disaggregation methodology is vetted through the Distribution Forecasting Working Group, pursuant to Commission Decision D.18-02-004 (R. 14-08-013).