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STATE OF CALIFORNIA
CALIFORNIA ENERGY COMMISSION

IN THE MATTER OF: *2025 Integrated Energy Policy Report (2025 IEPR)*	DOCKET NO. 25-IEPR-05 RE: Load Shift Goal Update

CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S COMMENTS ON THE IEPR COMMISSIONER WORKSHOP ON CALIFORNIA'S PROGRESS TOWARD THE LOAD-SHIFT GOAL

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The California Community Choice Association[1] (CalCCA) submits these comments on the June 25, 2025, *IEPR Commissioner Workshop on California's Progress Toward the Load-Shift Goal*[2] (Workshop).

I. INTRODUCTION

Shifting load to cheaper and cleaner times of day is an important aspect of California's energy future, both in terms of reliability and maximizing the use and value of renewable resources. It is also a key strategy in minimizing customer bills during an electric rate affordability crisis. CalCCA's members continue to implement and seek additional opportunities for load shifting and support the California Energy Commission's (Commission) load shift goal of 7,000 megawatts by 2030 (Load-Shift Goal).

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[1] California Community Choice Association represents the interests of 24 community choice electricity providers in California: Apple Valley Choice Energy, Ava Community Energy, Central Coast Community Energy, Clean Energy Alliance, Clean Power Alliance of Southern California, CleanPowerSF, Desert Community Energy, Energy For Palmdale's Independent Choice, Lancaster 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] Docket 25-IEPR-05, *IEPR Commissioner Workshop on California's Progress Toward the Load-Shift Goal* (June 25, 2025): https://www.energy.ca.gov/event/workshop/2025-06/iepr-commissioner-workshop-californias-progress-toward-load-shift-goal.

During their presentation on California's progress toward the Load-Shift Goal, Commission staff presented a delineation of resources that fit into the load flexibility ecosystem, which did not include distributed front-of-meter (FTM) resources. By omitting these resources, the state is missing opportunities to count valuable load-modifying resources such as community solar, which, when not properly valued for the local capacity they provide, are difficult to finance. The Commission should create a framework to include such resources with other load-modifying resources, so that all relevant resources can count toward the Load-Shift Goal.

In addition, the Commission should continue improving the accuracy of the Integrated Energy Policy Report[3] (IEPR), as it is an important part of measuring progress towards the Load-Shift Goal. Such accuracy is also crucial to support the needs of the Resource Adequacy (RA) framework and the Integrated Resource Planning (IRP) proceeding's pending Reliable and Clean Power Procurement Program (RCPPP), all of which will benefit from accurate measurement of load flexibility.

CalCCA therefore recommends that the Commission:

- Establish a framework to consider distributed FTM resources as load modifiers that can contribute to the Load-Shift Goal; and
- Focus on increasing the accuracy of the IEPR forecast because it is paramount to the Load-Shift Goal, RA, and RCPPP.

II. A FRAMEWORK FOR CONSIDERATION OF DISTRIBUTED FRONT OF THE METER RESOURCES AS LOAD MODIFIERS SHOULD BE ADOPTED

The Commission should adopt a framework for considering distributed FTM resources as load modifiers that can contribute to the Load-Shift Goal. The Staff's presentation on California's progress toward the Load-Shift Goal describes how FTM resources, such as

[33] Integrated Energy Policy Report – IEPR: https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report-iepr.

community solar and storage, are not currently considered in the load flexibility ecosystem.[4] The absence of FTM resources omits an important part of potential load shifting. For example, many community choice aggregators (CCAs) are actively developing and delivering community solar projects designed to shift or reduce local load, enhance grid reliability, and provide clean, affordable energy to customers in disadvantaged communities. These programs typically use clean FTM resources, including solar, to directly serve customer energy needs from resources located near the customer instead of relying on utility-scale resources and the transmission grid. Moreover, when paired with storage resources, such distributed FTM projects can further enhance reliability by shifting load to meet local demand. In doing so, the need for utility-scale resources can be reduced in some hours, helping to accomplish the Load-Shift Goal. Despite their alignment with the intent of the Load-Shift Goal, these FTM resources are not recognized as part of the load flexibility ecosystem. This disconnect not only discourages investment in valuable load-shifting solutions by not properly crediting projects for the benefits they provide, but also undermines the state's broader decarbonization and reliability objectives.

To address this, the Commission should develop a framework that integrates distributed FTM resources into the peak demand forecast process. In doing so, the Commission can establish a pathway for qualifying these resources under the Commission's load-modifying resource designation.

III. ACCURACY OF THE COMMISSION'S IEPR FORECAST IS PARAMOUNT TO THE LOAD-SHIFT GOAL AS WELL AS RA AND THE POTENTIAL RCPPP

[4] *See California's Progress Toward the 7GW Goal,* IEPR Commissioner Workshop on Load-Shift Goals (June 25, 2025), at slide 3 (diagram with FTM resources outside the Load Flexibility circle of resources, but including demand response, rate-based flexibility, and behind-the-meter resources as load modifiers).

Accuracy and granularity of the IEPR Forecast are paramount for measuring the impacts of load shifting. In addition, the load forecast is under increasing reliance by the California Public Utilities Commission's (CPUC) RA program and potential IRP RCPPP. The entire premise of load-shifting and load flexibility is built on the idea that using the same amount of energy at different times of the day incurs different costs to the grid (i.e., lower) and supports reliability. However, without accurate, granular load forecasts, it is difficult to assess the effectiveness of a load shift program and its ability to meet California's goals. To accomplish accurate prediction and tracking of load shift programs, the Commission will need to accurately evaluate hourly load data at the program level.

In addition to the accuracy of the load shift goals, RA and RCPPP use the IEPR load forecast and need hourly granularity. For the RA program, the forecast is currently one to three years forward, but under the RCPPP, the window will look out at least five years and potentially more. These programs either currently do or are anticipated to set procurement requirements for CPUC jurisdictional load-serving entities (LSE). As such, the accuracy of the hourly load forecast on a system level and on an LSE level has never been more important. These forecasts will establish the resources needed to reliably serve customers and drive procurement and costs for California ratepayers. Whether the IEPR forecast is considering electric vehicles, distributed energy resources, data centers, or other future load changes, forecasting with better hourly precision will drastically affect how California measures up to the Load-Shift Goal.

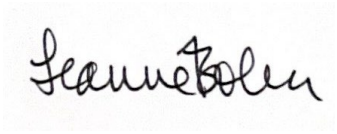
Given that the accuracy of the load forecast impacts the ability to evaluate load shift goals and important procurement proceedings, including RA and RCPPP, the Commission should work with the CPUC, LSEs, and load shift program providers to accurately forecast hourly load needs. This coordinated effort should begin as soon as possible since it is needed

immediately for load shift, and the RCPPP is contemplating changes in procurement based upon the IEPR forecast.

IV. CONCLUSION

For all the foregoing reasons, CalCCA respectfully requests consideration of the comments herein and looks forward to an ongoing dialogue with the Commission.

Respectfully submitted,



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