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Docket Number:	25-IEPR-03
Project Title:	Electricity and Gas Demand Forecast
TN #:	265720
Document Title:	CCSA Comments on August 6, 2025 IEPR Commissioner Workshop on Energy Demand Forecast Inputs and Assumptions
Description:	N/A
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Submitter Role:	Applicant Representative
Submission Date:	8/20/2025 12:19:27 PM
Docketed Date:	8/20/2025

August 20, 2025

RE: 25-IEPR-03 (Electricity and Gas Demand Forecast): CCSA Comments on August 6, 2025 IEPR Commissioner Workshop on Energy Demand Forecast Inputs and Assumptions

Dear Chair Hochschild and Vice Chair Gunda:

The Coalition for Community Solar Access (CCSA) appreciates this opportunity to provide comments on the 2025 Energy Demand Forecast Inputs and Assumptions. The presentations by the California Energy Commission (CEC) staff at the August 6 workshop were very helpful in describing the updates to economic and demographic inputs, and the modeling approach staff intends to use for the 2025 Integrated Energy Policy Report (IEPR).

CCSA is pleased that the CEC plans to produce more scenarios for load modifiers and decide in the fall, with stakeholder input, which combination to use in the Planning Forecast and Local Reliability Scenario.[1] We particularly look forward to the August 26, 2025 workshop, which will focus specifically on Load Modifier Inputs and Assumptions. As discussed in prior comments, the CEC's identification of front of meter (FTM) distributed solar+storage as a load modifying resource has become a critical priority in efforts to support and encourage investment in these projects.[2]

In response to a question at the August 6 workshop, staff indicated that the CEC is internally discussing the implications of incorporating front of meter resources into the forecast. CCSA encourages that discussion—and ultimate incorporation—and urges the CEC to include this scenario in its 2025 forecast instead of delaying it to 2026. If there are concerns as to how to ensure that FTM resources actually function as a load modifier, the relevant conditions should be identified. If there are questions as to how this scenario interfaces with California Independent System Operator (CAISO) planning and California Public Utilities Commission (CPUC) Resource Adequacy (RA) compliance activities, those questions should be raised and addressed at the August 26 workshop. The CEC can conduct this analysis through a sensitivity scenario, separate from the Planning and Local Reliability Scenarios. Such a scenario would surface and address key questions, enabling a policy determination about whether—and under what conditions—this resource should be treated as a load modifier, while not directly implicating existing CPUC and CAISO processes. Doing this work now, in the 2025 IEPR, will lay the groundwork for potential

[1] See 2025 IEPR Forecast Overview, Slide 4.

[2] See CCSA's December 6, 2024 comments on 2025 SB 100 Report.

inclusion in future scenarios and send an important signal about the RA and load-reduction value of FTM solar+storage.

CCSA agrees with the representatives from Peninsula Clean Energy, Bay Area 350, and Center for Biological Diversity commenting at the August 6 workshop in favor of expediting consideration of this issue. We agree that FTM distributed resources are a key resource at a time when California is facing significant load growth and increasing costs and delays in interconnecting utility scale projects. We also note that challenges for project developers are increasing as federal tax credits for clean renewable resources are reduced and eliminated. Enabling FTM resources that demonstrably modify load to be credited for the RA value they provide to load-serving entities will have an immediate, concrete impact by improving project economics and supporting private investment.

We appreciate your consideration of these comments.

/s/

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