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WPTF Comments on IEPR Draft Forecast

Additional submitted attachment is included below.

December 31, 2025

California Energy Commission
Docket Unit, MS-4
715 P Street
Sacramento, CA 95814
Via docket submission

Re: Docket No. 25-IEPR-03 – Comments on the 2025 IEPR Draft Electricity Demand Forecast

Dear Chair Hochschild, Vice Chair Gunda, and Commissioners,

The Western Power Trading Forum (WPTF) appreciates the opportunity to provide comments on the California Energy Commission's (CEC's) 2025 Integrated Energy Policy Report (IEPR) draft electricity demand forecast. WPTF thanks CEC staff for their continued engagement with stakeholders and for the transparency provided throughout the Demand Analysis Working Group (DAWG) meetings and recent IEPR workshops.

Support for CEC Staff's Best Estimate of the Load Forecast

WPTF strongly supports the Commission adopting CEC staff's best estimate of the 1-in-2 load forecast, including the incorporation of known loads based on utility energization and interconnection data.

The CEC has a long and well-established history of producing objective, technically rigorous, and unbiased load forecasts that serve as the foundation for electricity system planning in California. For years, state agencies, load-serving entities, and market participants have relied on the IEPR forecast precisely because it is developed independently and grounded in data, not policy outcomes or market impacts. Maintaining that credibility is critical.

As staff explained during the December workshop, known loads are based on project-level information, including energization requests and expected in-service dates, and represent a meaningful improvement in near- and mid-term forecast accuracy. WPTF appreciates staff's ongoing work with utilities, particularly PG&E, to refine assumptions and avoid double counting, overstatement, or unrealistic ramp rates. We support staff's efforts to refine the data and encourage the Commission to rely on that technical judgment.

Clear Agency Roles Are Essential for Reliability and Planning

WPTF recognizes concerns raised regarding the potential downstream impacts of higher load forecasts on Resource Adequacy (RA) procurement volumes and prices. However, it is important to clearly distinguish agency responsibilities.

The CEC's role is to produce the most accurate load forecast possible. Decisions regarding how that forecast is used to set RA requirements, procurement targets, or cost mitigation measures appropriately fall within the jurisdiction of the CPUC and, where applicable, the CAISO.

If the IEPR forecast is adjusted or constrained due to concerns about potential market impacts rather than accuracy, it risks undermining multiple planning processes that depend on it, including transmission planning, local reliability assessments, and long-term resource procurement. An artificially suppressed or incomplete forecast increases the risk of under-planning infrastructure and resources, ultimately threatening reliability and increasing long-term costs.

Importance of Known Loads for System and Local Planning

WPTF emphasizes that known loads are particularly important for identifying **both** local and regional reliability needs. Transmission planners increasingly observe load growth, especially from electrification, industrial development, and data-driven facilities, before it appears in the traditional forecasts. Incorporating known loads helps close this gap and improves alignment between distribution planning, transmission planning, and statewide resource adequacy processes.

While WPTF acknowledges that known load data is relatively new to the IEPR process and lacks a long historical record, the solution is not to exclude it, but rather to continue refining assumptions transparently over time. Staff's approach reflects this balance and should be supported.

Consistency with FERC Direction on Large Load Forecasting

Finally, WPTF asks the CEC to consider that state load forecasting processes should remain aligned, to the extent possible, with evolving federal guidance and regional planning practices. In 2025, FERC encouraged the ISO/RTOs to enhance large load forecasting by applying more rigorous and transparent screening of proposed large loads, focusing on realistic expected consumption rather than nameplate interconnection requests, and improving consistency across regions. These principles are directly relevant to statewide forecasting efforts as large, discrete loads increasingly drive system growth and planning needs.

As the CEC's load forecasting process continues to develop, WPTF supports incorporating approaches that are consistent with this FERC direction, recognizing the shared objectives of accuracy, transparency, and reliability. Aligning the CEC's forecasts with ISO/RTO practices where feasible will help ensure coherence between state, regional, and federal planning processes and reduce the risk of misalignment in infrastructure development and resource adequacy planning.

Additional Issues WPTF Continues to Support

WPTF also reiterates its support and thanks for the following ongoing improvements to the IEPR forecasting framework:

- Development of stochastic load and load-modifier datasets to better support reliability modeling and RA planning.
- Improved data access and coordination across agencies, including alignment of assumptions and timelines among the CEC, CPUC, and CAISO.
- Continued refinement of load modifiers, including behind-the-meter resources, transportation electrification, and emerging load types, using observed data where available.
- Transparency around forecast assumptions and updates, which allows stakeholders to better understand changes year-to-year and reduces volatility in downstream planning processes.

Conclusion

WPTF urges the Commission to continue its long-standing practice of relying on staff expertise and technical analysis and to adopt the most accurate representation of expected load growth in the 2025 IEPR final forecast. Doing so will preserve the integrity of the IEPR, support reliable system planning, and ensure that subsequent policy decisions are made using the best available information.

We appreciate the opportunity to comment and look forward to continued engagement with the Commission and staff.

Respectfully submitted,

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Via electronic submission.