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*Comment Received From: WPTF AND IEPA  
Submitted On: 1/16/2026  
Docket Number: 25-IEPR-03*

## **WPTF AND IEPA OFFER CONCERNS ON IEPR 2025 FORECAST**

The Western Power Trading Forum (WPTF) and the Independent Energy Producers Association, representing over 125 energy stakeholder member companies that participate in the California energy markets, appreciate the opportunity to present the attached letter of concern to the Commissioners, specific to the IEPR 2025 energy forecast. Please receive the attached letter. We will be following up with a request for a meeting with Commission staff to offer additional color to our concerns. In the meantime, if you have any questions, please contact us directly or Jesus Arredondo with any questions. Email: [jesus@ca-advantage.com](mailto:jesus@ca-advantage.com) Telephone: 916-275-7493

*Additional submitted attachment is included below.*



January 15, 2026

Honorable David Hochschild, Chair  
Honorable Siva Gunda, Vice-Chair  
Honorable Noemi Otilia Osuna Gallardo, Commissioner  
Honorable J. Andrew McAllister, Commissioner  
Honorable Nancy Skinner, Commissioner

Dear California Energy Commissioners,

We write to express our concern about one aspect of the demand forecasts being developed for the 2025 Integrated Energy Policy Report (“IEPR”) update – the issue of excluding “Known Loads” from the Planning and Local Reliability demand forecasts. These important demand forecasts will be used to establish Resource Adequacy requirements for the years 2027 and beyond. We respectfully request that the Commission either restore these Known Loads to the adopted IEPR demand forecast or defer the decision to adopt the IEPR demand forecast that excludes these Known Loads until the implications of and full rationale for excluding these Known Loads are fully understood.

The presentation for the January 5, 2026 Demand Analysis Working Group meeting (“Presentation”) indicates that Known Loads will be excluded in the demand forecasts used to establish system, flexible and local capacity Resource Adequacy requirements (Presentation at slide 27). As the Presentation observes, this exclusion will not only cause the CAISO to use different demand forecasts for its Local Capacity and Local Transmission studies, in contradiction with long standing practice (Presentation at slide 27), but, as Energy Commission staff note, could increase both near-term and mid-term reliability risks (Presentation at slide 26).

In the past, the Energy Commission and its staff have worked diligently to develop demand forecasts using the best possible technical information and processes. We are concerned that considerations other than technical ones are now affecting the quality and reliability of the IEPR’s demand forecasts. We are further concerned that the long-standing perception

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that the IEPR demand forecasts represent the best available information and process will be undermined by the exclusion of these Known Loads.

If the Commission decides to adopt the IEPR demand forecast with the Known Loads excluded, the Commission should publicly acknowledge the risks that doing so will pose, including the development of Resource Adequacy requirements that will not reflect nearly 4,000 MW of Known Loads and will potentially expose Californians to involuntary load shedding under high demand or other high stress system conditions.

In sum, we respectfully urge the Commission to either restore the Known Loads to the demand forecasts that will be adopted at the January 21, 2026 Business Meeting and subsequently used to set Resource Adequacy requirements, or to defer adopting those demand forecasts until the implications of and full rationale for excluding the Known Loads are fully understood.

Respectfully,



Jan Smutny-Jones, Esq.  
Chief Executive Officer, General Counsel  
INDEPENDENT ENERGY PRODUCERS ASSOCIATION



Scott Miller  
Executive Director  
Western Power Trading Forum