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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-03 CALIFORNIA ENERGY DEMAND FORECAST, 2025 – 2045

CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S COMMENTS ON THE UPDATED CALIFORNIA ENERGY DEMAND FORECAST, 2025 – 2045

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TABLE OF CONTENTS

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CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S COMMENTS ON THE UPDATED ENERGY DEMAND FORECAST, 2025 – 2045

The California Community Choice Association[1] (CalCCA) submits these comments on the updated California Energy Demand Forecast, 2025-2045[2] (2025 IEPR Forecast).

I. INTRODUCTION

The 2025 IEPR Forecast as presented at the January 5, 2026, California Energy Commission (Commission) Demand Analysis Working Group (DAWG) meeting (DAWG Meeting) strikes a reasonable balance between the objectives of reliability and affordability. Specifically, the exclusion of known loads in the 2025 Planning Forecast, which is the basis for near-term resource adequacy (RA) compliance requirements for California load-serving entities (LSE), gives the Commission additional time to study and refine how to incorporate known loads into the IEPR Demand Forecast. Additional study of known loads can also avoid unnecessary

[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 No. 25-IEPR-03, *Notice of Availability - California Energy Demand Forecast, 2025 – 2045* (Jan. 7, 2026), https://efiling.energy.ca.gov/GetDocument.aspx?tn=268187&DocumentContentId=105237.

near-term RA compliance requirements (and related costs), which ultimately would be borne by customers already facing an affordability crisis. These comments therefore support the recommendation to exclude known loads from the Planning Forecast to ensure that the most accurate and up-to-date information informs procurement planning.

The 2025 IEPR Forecast was revised following the December 17, 2025, workshop[3] (Workshop) and in response to questions from Commissioners at the Workshop, stakeholder comments, and Commission staff analysis. Revisions presented at the DAWG Meeting include: (1) updates to the data center forecast to incorporate new data; (2) updates to the known load forecast to incorporate new guidance from investor-owned utility (IOU) distribution planning teams; (3) Commission staff's decision to exclude known loads from the Planning Forecast; (4) updates to the commercial sector model to incorporate additional achievable energy efficiency and fuel substitution; and (5) Commission staff's recommendation that the 2024 IEPR Planning Forecast should continue to be used for Integrated Resource Planning (IRP) procurement.

On January 9, 2026, the California Coalition of Large Energy Users (CLEU) submitted a letter requesting a full review and delay in adoption of the 2025 IEPR Demand Forecast due to the decision to exclude known loads from the Planning Forecast. CalCCA's comments address the CLEU letter and provide continuing support to the Commission's approach to known loads. Including known loads in the Planning Forecast at this time with the uncertainty associated with this new and untested data input would pose unnecessary risks and impacts on affordability. Commission staff has been considering this change throughout the development of the 2025 IEPR and the ultimate decision to exclude the known loads is not a "political" consideration as

[3] Docket No. 25-IEPR-03, *IEPR Commissioner Workshop on Energy Demand Forecast Results* (Dec. 17, 2025), https://www.energy.ca.gov/event/workshop/2025-12/iepr-commissioner-workshop-energy-demand-forecast-results.

suggested by CLEU. The additional time requested by CLEU is not necessary, and CalCCA urges that the CEC adopt the 2025 IEPR Forecast, which incorporates the Planning Forecast excluding known loads, at its January 21, 2026, meeting.

These comments also address the Commission's recommendation that the 2024 IEPR Planning Forecast continue to be used for IRP. The California Public Utilities Commission (CPUC) has a proposed Decision in its IRP proceeding requiring additional procurement in the 2028-2032 timeframe.[4] Reliability and affordability considerations dictate that any procurement needs identified by the CPUC should incorporate the reduction in the 2025 IEPR Planning Forecast relative to the 2024 IEPR Planning Forecast. Based on this reduction, which reflects the uncertainty in load growth, any procurement order (including the proposed order) should be designed such that a portion of the new resource requirements are contingent on current expected load growth.

II. CALCCA SUPPORTS THE COMMISSION'S DECISION TO EXCLUDE KNOWN LOADS FROM THE PLANNING FORECAST

At the Workshop, the status of whether known loads would be included in the Planning Forecast was still to be determined. The 2025 IEPR Forecast incorporating the Planning Forecast later presented by Commission staff at the DAWG Meeting excludes known loads. CalCCA supports excluding known loads from the Planning Forecast, moderating the risks to affordability of an incorrect forecast.

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[4] *See* CPUC Rulemaking (R.) 25-06-019, Proposed *Decision Requiring 2029-2032 Electric Resource Procurement and Transmitting Portfolios for 2026-2027 Transmission Planning Process* (CPUC IRP Proposed Decision) (Jan. 14, 2026), https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M595/K083/595083681.PDF.

A. Impacts of Known Loads on Peak Load Need Further Consideration

As noted in CalCCA's December 31, 2025, comments on the Workshop: "The Planning Forecast is used to ensure sufficient generation resources to meet the coincident peak load and energy needs of the entire system, through [RA] and [IRP] requirements."[5] Meanwhile, "[t]he Local Reliability Forecast is used to evaluate the need for new transmission and distribution facilities to accommodate load growth."[6] The original purpose of known loads data was not to identify the generation needs of the system. Instead, the known loads data point enables the IOUs to plan for their distribution systems, taking into consideration the specific characteristics of the affected distribution system and the load it supports.[7] While the Commission continues to evaluate the capacity factor of known loads to determine the impact of these loads on total energy required and the effect on coincident peak load, this is the first year known loads have been incorporated in the IEPR Demand Forecast at all. Therefore, this analysis is new and has not been sufficiently developed to immediately include known loads in the Planning Forecast.

An August 6, 2025, presentation by Asish Gautham at an IEPR Commissioner Workshop on Energy Demand Forecast Inputs and Assumptions concluded that the Commission should include known loads only for the Local Reliability scenario while exploring models and tools to develop a more granular forecast.[8] During that presentation, Mr. Gautham noted that staff had used sensitivities to evaluate differing amounts of coincidence of the known loads and their impact on the system. The assumptions on coincidence deserve further consideration prior to

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[5] Docket 25-IEPR-03, *CalCCA Comments on the December 17, 2025, IEPR Commissioner Workshop on Energy Demand Forecast Results* (CalCCA December Workshop Comments) (Dec. 30, 2025), at 3, https://efiling.energy.ca.gov/GetDocument.aspx?tn=268080&DocumentContentId=105105.

[6] *Ibid*.

[7] *Id.* at 8.

[8] Docket 25-IEPR-03, Asish Gautam Presentation, "Incorporating New Load Energization Requests to Utilities" (Aug. 6, 2025), at 5-6, https://efiling.energy.ca.gov/GetDocument.aspx?tn=265229.

adoption for the Planning Forecast. Based on the presentation, it appears that the sensitivities varied the coincidence factor without considering relevant causes to changes in coincidence. For example, applying a system-wide coincidence factor for a load that is in a cooler climate than the average will tend to overstate the coincidence, while a load in a warmer climate than the average would tend to understate the coincidence. While using this forecast for distribution system planning may be relevant, as the IOUs have additional processes to plan for each distribution element based on the characteristics of the proposed improvements, no such process is available for a load forecast that is used for RA. Since the RA process is aimed at meeting the coincident peak load, the selection of the coincidence factor has a significant impact on the overall RA quantity, the costs customers will pay, and the reliability they will receive.

For these reasons, CalCCA continues to recommend that further study be done to evaluate the impact of known loads on system impacts, such as RA and IRP, before the Commission considers including these loads in the Planning Forecast.

B. Party Recommendations to Delay Adoption of the 2025 IEPR Forecast Based on Assertions that Exclusion of Known Loads from the Planning Forecast was Too Late in the Process Should be Dismissed

Contrary to claims by CLEU that the inclusion of known loads was excluded from the Planning Forecast late in the process due to "political consideration[s]", the possibility of incorporating known loads had been under discussion throughout the development of the 2025 IEPR Forecast. For example, during the August 6, 2025, IEPR Commissioner Workshop, Heidi Javanbakht spoke to the potential use of known loads in the Local Reliability Forecast. Ms. Javanbakht called known loads "the largest methodology change that we're making this year, and [stated] we are only considering this change for the Local Reliability scenario so that it does

not impact resource adequacy, which uses the Planning Forecast."[9] In the Workshop, CEC staff listed the use of known loads for the Planning Forecast as "TBD."[10] While the CEC position on inclusion and exclusion from the Planning Forecast varied over time, the CEC repeatedly noted its consideration of the issue. Given that the final disposition of including known loads in the Planning Forecast was identified as TBD in the Workshop, parties were on notice that a final decision on the issue was imminent. There is no need for additional delay for stakeholder review and comment, as recommended by CLEU.

III. THE USE OF THE 2024 IEPR PLANNING FORECAST FOR IRP FORECASTING SHOULD BE EVALUATED MORE COMPLETELY BY THE JOINT AGENCIES[11], INCLUDING THE CPUC

At the January 5 DAWG meeting, Commission staff recommended the use of the *2024* Planning Forecast for future IRP and bulk transmission system planning purposes.[12] Meanwhile, the CPUC identified a need for 6,000 MW of new firm capacity over the period from 2028 to 2032, also based on the *2024* Planning Forecast.[13] However, the CPUC found that the magnitude of the need decreased to below 2,000 MW by 2032 in a reduced load sensitivity scenario.[14] CPUC's reduced load sensitivity "was designed to reflect potential impacts of recent policy

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[9] Docket No. 25-IEPR-03, *Transcript of IEPR Commissioner Workshop on Energy Demand Forecast Inputs and Assumptions* (Aug. 6, 2025), at 19, https://efiling.energy.ca.gov/GetDocument.aspx?tn=266966&DocumentContentId=104148.

[10] Docket No. 25-IEPR-03, Heidi Javanbakht Presentation - 2025 IEPR Forecast Overview (Dec. 17, 2025), at 17, https://efiling.energy.ca.gov/GetDocument.aspx?tn=267941&DocumentContentId=104948.

[11] The California Energy Commission and the California Public Utilities Commission are the Joint Agencies for the 2025 IEPR.

[12] DAWG Meeting, Presentation - 2025 IEPR Forecast - Updated Results (Jan. 5, 2026), at 27, https://www.energy.ca.gov/sites/default/files/2026-01/2026-01-05_DAWG_Mtg_Slides-Combined_ada.pdf.

[13] *See* CPUC Rulemaking (R.) 25-06-019, *Administrative Law Judge's Ruling Seeking Comments on Electricity Portfolios for 2026-2027 Transmission Planning Process and Need for Additional Reliability Procurement* (Sept. 30, 2025) (CPUC Procurement Ruling), at 23-24, 35, https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M582/K082/582082526.PDF.

[14] CPUC Procurement Ruling, Table 9 at 33.

changes, including the OBBBA, potential repeal of the Environmental Protection Agency Waiver from the Clean Air Act potentially influencing electric vehicle adoption, and uncertainty in building electrification and data center load."[15] These same factors identified by CPUC staff largely explain why the *2025* Planning Forecast is significantly lower than the *2024* Planning Forecast in the period 2028 to 2032.[16] The CPUC has now issued a proposed Decision requiring LSEs to procure the 6,000 MW by 2032.[17] However, the proposal to use the *2024* IEPR in IRP and Transmission planning should not preclude the CPUC's consideration of the *2025* IEPR and other factors in its consideration of any procurement order, including that in the Proposed Decision. The CPUC should consider the shift in the forecast between the 2024 IEPR Planning Forecast and 2025 IEPR Planning Forecast in the design of procurement orders and make a portion of the new resource requirements contingent on actual load growth.

More generally, as the CPUC develops rules for future year procurement compliance (*i.e.,* the Reliable Clean Power Procurement Program), there is significant debate about the percentage of new generation procurement needs it will require an LSE to meet in any given forecast year. Typically, these percentages should decrease the further into the future you go to reflect increasing uncertainty and additional opportunities to procure. Having load forecasts that move over time or that do not use the latest information may cause the CPUC to place more importance on the procurement percentages for compliance. For example, if the CPUC believes the forecast is too low, they may adopt a high percentage obligation. Consistency in the forecasting process, including consistently incorporating updates to the forecast, will enable the CPUC to establish procurement percentages that are more likely to remain steady over time.

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15 *Id.* at 32-33.
16 DAWG Meeting, Presentation, at 21.
17 CPUC IRP Proposed Decision.

For these reasons, CalCCA encourages the CPUC and CEC to evaluate all available load forecast data before making decisions in IRP or bulk transmission planning, to ensure that the proposed outcomes are necessary and minimize impacts on affordability to the extent feasible.

IV. IF THE CEC IS GOING TO INCLUDE KNOWN LOADS IN THE LOCAL RELIABILITY FORECAST, A THREE-YEAR RAMPING PERIOD ADDRESSES ENERGIZATION DATE UNCERTAINTY

Based on the relatively new process and the uncertainty surrounding its use and implementation, CalCCA supports the CEC's plan to ramp in the known load forecast to the Local Reliability Forecast over three years.[18] A ramp-in period addresses uncertainty in energization dates while still reflecting known loads in the Local Reliability Forecast.

The ramp-in approach allows the CEC to continue to track and evaluate actual energization dates of known loads. For example and as noted in CalCCA's December 31, 2026, comments, an Ernst & Young report concluded that there is significant uncertainty regarding the timeframe for energizing loads.[19] Notably, the report concluded that Pacific Gas and Electric Company (PG&E) had completed only 48 percent of backlogged energization applications as of June 30, 2025.[20] This statistic calls into question the accuracy of known load energization dates. The three-year ramp period better reflects the reality of PG&E's energization backlog.

Further, by ramping load in the assumptions, the Commission can continue to create best practices for cleaning up the known load data. During the evaluation of known load updates between November and December 2025, the Commission removed 1,500 MW of known loads

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[18] The CEC Staff proposed a three-year ramp of known loads for PG&E Data at the January 5, 2026, Demand Analysis Working Group. See slides 11-12, and 14, https://www.energy.ca.gov/sites/default/files/2026-01/2026-01-05_DAWG_Mtg_Slides-Combined_ada.pdf.

[19] CalCCA December Workshop Comments, at 7.

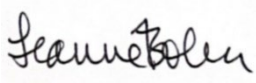
[20] Ernst & Young, "PG&E SB 410 Powering Up Californians Act Assessment," unpublished report, 0-November 26, 2025. To be published at a later date, https://www.cpuc.ca.gov/about-cpuc/divisions/office-of-governmental-affairs/2025-reports-to-the-legislature.

due to the double-counting of data center loads.[21] Before including known load data in the 2025 IEPR Demand Forecast, the Commission should be certain that the data is accurate. A ramped approach allows the Commission to build necessary protections against duplication.

V. 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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[21] CalCCA December Workshop Comments, at 8.