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CCSA, SEIA, CESA, PCE, SDCP, TURN, VCE, Vote Solar Joint Comments - 2026 IEPR Update Scope

Additional submitted attachment is included below.

March 25, 2026

California Energy Commission
Docket No. 26-IEPR-01
715 P Street
Sacramento, CA 95814

Re: Docket No. 26-IEPR-01: General Scope

The Coalition for Community Solar Access, the Solar Energy Industries Association, the California Energy Storage Alliance, Peninsula Clean Energy, San Diego Community Power, Valley Clean Energy, and Vote Solar (collectively, the "Joint Commenters") appreciate the opportunity to comment on the *Notice of Request for Comments on the Draft Scoping Order for the 2026 Integrated Energy Policy Report Update* ("Draft Scoping Order") issued on March 10, 2026.

The Draft Scoping Order states that the 2026 IEPR Update will provide updates on the California electricity demand forecast, California geothermal resources, and energy equity. Specifically, the electricity demand forecast update track will include an updated 15-year electricity demand forecast, including scenarios that estimate the potential impacts of the state's decarbonization strategies and other sources of load growth, such as increases in the number of data centers in the state.

The Joint Commenters urge the Commission to explicitly include within the scope of the electricity demand forecast track of 2026 IEPR Update a study of the "load modifier" impacts of front-of-the-meter distributed energy resources ("FTM DERs"). FTM DERs can play an important role in California's decarbonization strategy and help mitigate grid strains created by emerging load growth, including electrification and data center expansion, but their contributions

to serving downstream distribution-connected load must be appropriately reflected in statewide load forecasts.[1]

California is facing a growing gap between forecasted electricity demand and the pace at which new clean energy and reliability resources can realistically be developed.[2] Electrification, data center growth, and other emerging load drivers are increasing near-term demand and procurement needs at a time when large utility-scale projects face mounting challenges related to transmission availability, permitting timelines, and interconnection backlogs. Smaller distribution-connected resources—typically in the 1 MW to 10 MW size range—can reduce net load during peak periods and offer a practical and complementary pathway to help meet these needs. These projects can often be permitted, interconnected, and constructed more quickly than large transmission-connected resources, yet their impacts are not reflected in current planning assumptions. Existing planning tools are not designed to fully capture the localized transmission, sub-transmission, and distribution-level impacts of these resources, reinforcing the need for targeted analysis focused on localized load modification impacts.

The IEPR electricity demand forecast serves as the common planning foundation used across California's energy agencies, including the California Public Utilities Commission (CPUC) and the California Independent System Operator. Examining the load-modifying impacts of FTM DERs within the IEPR forecast would therefore help inform statewide planning efforts, providing state agencies with valuable information that they can use in their respective proceedings to support better alignment across demand forecasting, resource planning, and procurement processes. Without studying and appropriately accounting for these effects, statewide forecasts may overstate future system needs for transmission-connected resources, placing additional pressure on already challenging utility-scale procurement targets and putting upward pressure on Resource Adequacy prices and associated ratepayer costs. By improving visibility into the conditions under which FTM DERs can reliably reduce peak demand, this analysis can also help identify opportunities to reduce overall system costs and mitigate upward pressure on ratepayer bills. This analysis could be structured as an informational sensitivity assessment to inform planning assumptions, while also providing a foundation for the incorporation of FTM DER load-modifying impacts into load forecasting and planning frameworks.

We note that, unlike FTM DERs, behind-the-meter ("BTM") solar and storage project output is currently treated as a load modifier within the IEPR forecast for both the self-generation portion of production (i.e., energy consumed on-site) and exports (i.e., energy production in excess of on-site consumption that is exported onto the distribution grid). Self-consumption serves the load of the host sites where projects are located, and exports serve nearby customer demand on the same distribution feeder or adjacent feeders behind the same substation. In both cases, the energy

[1] In this context, a load modifier refers to resources at the distribution level that reduce net system demand during critical hours by serving load locally or shifting consumption patterns, thereby lowering the amount of electricity that must be supplied by the bulk power system.

[2] As stated in the CPUC's 9/30/25 *ALJ Ruling Seeking Comments on Electricity Portfolios for 2026-2027 Transmission Planning Process and Need for Additional Reliability Procurement*, page 12: "the buildout of [utility-scale] solar, in particular, is so large that it calls into question whether it can feasibly be built in the quantities and timing identified in this round of IRP modeling."

generated reduces the amount of electricity that must be supplied by the bulk power system, effectively lowering net load during the hours of production. From a CEC load forecasting standpoint, DER self-consumption and exports are therefore treated the same and receive the same load modifier accreditation.

FTM DER exports modify load in the same fundamental way as BTM exports — by serving local customer demand on the distribution grid and reducing the amount of energy that must be supplied by the bulk power system. When an FTM DER project injects electricity onto the grid, physics dictate that generation flows to the nearest load on the same distribution feeder or adjacent feeders behind the same substation. In other words, this local load-serving effect means that FTM DER output can reduce the net load seen by the transmission system, just like BTM DER exports.

The grid impacts of BTM DER exports should be compared to the grid impacts of FTM DER exports within the scenario analysis of the 2026 IEPR Update to determine whether there are fundamental differences between the two that warrant differential treatment in the load forecast. If differences exist, the Commission should evaluate whether they can be addressed through siting, operational requirements, or other load modifier protocols that establish the conditions under which FTM DER exports should be treated as load modifiers.

We were encouraged to hear at the December 17, 2025 IEPR Commissioner Workshop on Energy Demand Forecast Results that CEC staff is considering a workshop in 2026 to examine whether FTM DERs and other load-shifting or load-flex resources should be incorporated as new load-modifying resource types.[3] The Draft Scoping Order should be amended to reflect the Commission's intent to further examine this issue as part of its 2026 IEPR Update process.

Incorporating an analysis of the load modifying impacts of FTM DERs into the 2026 IEPR Update will provide policymakers with a more complete understanding of how distributed resources can complement utility-scale development and help ensure that future planning assumptions reflect the full range of available clean energy deployment pathways under conditions that ensure measurable, reliable, and cost-effective load reduction.

Respectfully,

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[3] IEPR Commissioner Workshop on Load Modifier Energy Demand Forecast Results

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