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## **CALSSA Comments on Draft 2025 Integrated Energy Policy Report**

*Additional submitted attachment is included below.*



May 15, 2026

California Energy Commission  
715 P Street  
Sacramento, CA 95814

Re: Docket No. 25-IEPR-01—Comments on Draft 2025 Integrated Energy Policy Report

California Energy Commissioners and Staff:

The California Solar & Storage Association (CALSSA) appreciates the opportunity to provide comments in response to the Commission’s Draft 2025 Integrated Energy Policy Report (Draft IEPR). CALSSA appreciates the Commission’s efforts to provide reliable energy forecasting and to help meet California’s clean energy goals. CALSSA focuses its comments on the 7 GW load-shift goal.

CALSSA is concerned that the Commission is not leveraging the existing tools it has to meet the 2030 7 GW load-shift goal. As stated in the Draft IEPR,

2030 projections show that **California may not reach the 7 GW target under the [business as usual] market conditions**, indicating that the state likely needs additional near-term strategies that are cost-effective and support reliability and decarbonization efforts. New IOU initiatives, such as hourly dynamic rates, along with bidirectional charging (or vehicle-to-everything or V2X) and data center load flexibility applications, may improve the outlook.<sup>1</sup>

CALSSA agrees that under business-as-usual conditions, the state likely will not meet its necessary climate, load flexibility, and clean energy goals, and we need new approaches. The Draft IEPR correctly identifies customer batteries as a growing technology that can be used to provide load flexibility, but California should not rely only on “new IOU initiatives” to accomplish the goal.<sup>2</sup> Rather, the Commission should establish a well-defined load modification framework that load-serving entities (LSEs) can use to solicit and procure customer-sited resources, including batteries, to better enable those resources to provide load modification. Doing so would increase customer battery adoption and would greatly assist in meeting the load-shift goal.

Creating a clear load modification framework would allow LSEs to create their own programs and competitive solicitations to procure additional load flexibility. The success of the

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<sup>1</sup> Draft 2025 Integrated Energy Policy Report page 124

<sup>2</sup> Id.

Commission's Demand Side Grid Support (DSGS) program demonstrates the state's ability to quickly mobilize customer batteries and the appetite of customers and battery providers to participate in these types of programs, especially when program rules are administratively simple and designed to scale across hundreds of thousands or even millions of customer sites.

A load modification framework would be a low-cost effective means of achieving the load-shift goal because, unlike programs that rely on ongoing sources of funding to provide incentives, it would not require state funding other than staff resources to develop the framework. It would give LSEs greater opportunities to procure peak capacity at cost-effective prices, helping to bring down costs and provide long-term stable programs for customer batteries. Developing a load modification framework would fit well under policy recommendation #2 listed in Table C-3, "Encourage rate and program designs that offer incentives for load shifting."<sup>3</sup>

Given that the state is not on course to meet its load-shift goal, that customer batteries are poised to provide increased load flexibility, and that the Commission can create a load modification framework for LSEs to use in procuring load flexibility resources, CALSSA urges the Commission to prioritize developing a load modification framework.

Sincerely,

/s/ Jon Hart

Jon Hart

Policy Director

California Solar & Storage Association

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<sup>3</sup> Id. at page C-4