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LSA Comments on 2026 IEPR Forecast Assumptions

Additional submitted attachment is included below.

Large-scale Solar Association Comments on the 2026 IEPR Forecast Assumptions Workshop

Introduction

The Large-scale Solar Association (LSA) appreciates the opportunity to comment on the California Energy Commission's 2026 Integrated Energy Policy Report (IEPR) forecast assumptions workshop. The IEPR demand forecast directly affects what resources California procures and where transmission is built. Solar and storage developers have a particular interest in how the CEC handles load uncertainty because these resources are often called on to meet changing near-term needs.

For example, in the CPUC's most recent draft resource plan, solar was used to help backfill for delayed geothermal and wind resources.¹ When load forecasts change, or when other resources are delayed, solar often serves as part of the flexible supply-side tool that can fill the gap. But even solar needs some level of predictability to make sure there is sufficient time to develop projects successfully. If large-load growth is recognized too late in the IEPR process, the solar industry may not have enough time to plan and build the clean resources needed to serve that load.

For that reason, LSA urges the CEC to adopt a balanced approach. Large-load forecasts should be milestone-based, and the CEC should not automatically count every energization inquiry. At the same time, the standards for recognizing load growth cannot be so restrictive that credible new loads are ignored until supply and transmission planning is no longer possible. As discussed further below, early signals should inform long-term planning and projects with credible energization timing should be incorporated into procurement requirements.

Under-Procurement Would Harm Reliability and Climate Goals

The workshop showed why large-load forecasting is difficult. Utilities are receiving requests from customers that may require service at specific locations, while the CEC must decide how much of that load should be reflected in system-level planning. Some projects will be delayed, resized, or canceled. Others may materialize quickly and create real reliability needs before new generation and transmission can be developed.

LSA understands the concern that overstated load forecasts can increase customer costs. But under-forecasting also has costs. If the forecast does not recognize credible large-load

¹ See [2027-2028 Transmission Planning Process Portfolio Ruling](#) dated August 31, 2026.

growth early enough, procurement may be delayed, transmission upgrades may not be studied in time, and developers may not receive the market signals needed to move solar and storage projects forward. That outcome would make it harder for California to maintain its reliability and climate goals.

Large-Load Forecasting Should Be Milestone-Based with Credible Projects Tied Directly to Procurement Mandates

LSA supports a milestone-based approach to large-load forecasting. The workshop showed that known-load data are still relatively immature, and that many projects expected to energize in 2025 were delayed, canceled, or remained ongoing. It is reasonable for the CEC to avoid treating all known loads as firm load in the planning forecast until there is better evidence about project viability. However, milestone requirements should not become so restrictive that the forecast recognizes new load only when the customer is nearly ready to energize.

Relevant milestones for large loads should mirror existing signals used by CAISO to determine the viability of large generators, including financial commitment, permitting progress, site control, engineering status, utility agreements, equipment procurement, and construction activity. As projects meet these milestones, they should receive greater weight in long-term planning, local reliability scenarios, transmission studies, and eventually procurement requirements. Projects that do not continue to advance should receive lower weight or be removed. The CEC should consider the following framework:

1. **Early warning and strategic planning.** The CEC, CPUC, CAISO, utilities, CCAs, and local governments should use service inquiries, utility queues, city development information, available transmission capacity (see below), and similar signals to identify where large load growth could occur. These signals should influence 15-to-20-year resource and transmission planning (e.g. CAISO's 20-year outlook), even if they are not yet mature enough to drive firm procurement obligations.
2. **Intermediate planning.** As projects reach financial, permitting, land, engineering, and utility milestones, the CEC should increase their probability weighting in 10- to 15-year planning scenarios (e.g. CPUC's Preferred System Plan). Projects that do not continue to advance should be reduced or removed.
3. **Firm procurement.** As projects mature and become credible, the CEC and CPUC should incorporate those loads into LSE procurement requirements through an organized and predictable process. For example, the CPUC's pending Reliable and Clean Power Procurement Process could incorporate a local procurement target tied to mature large load forecasts. An annual or otherwise regular procurement

review process would give LSEs and developers clearer expectations about when changing load forecasts will affect procurement obligations.

This type of framework would provide the clarity that the market needs to be ready to provide resources to serve large loads and avoid over-procurement.

CEC and CAISO Should Coordinate to Identify Grid-Beneficial Locations

The CEC should work directly with CAISO to understand where large loads can be served by the existing or planned grid without triggering major upgrades, and where new large loads could actually provide system benefits. This type of information could inform which large loads are most credible.

For example, CAISO may be able to identify locations where siting large loads would reduce congestion, improve transmission utilization, or relieve deliverability constraints for new generation or storage projects. The lack of need for new transmission, and potential sharing of interconnection facilities with existing or queued generation/storage projects, can also greatly speed the interconnection process for the new loads themselves. In those areas, large loads may help the system and themselves, rather than simply adding new infrastructure needs, which would likely improve the viability of the load project.

The CEC's large-load forecasting process should include this type of collaboration and information gathering with CAISO, so the forecast reflects not only how much load may show up, but where that load would be most efficient and beneficial for the grid. In addition, the agencies and utilities should actively communicate information about these favorable locations to large-load developers, for consideration in their siting decisions; this kind of effort would be similar to the CAISO's recent efforts to communicate favorable locational information to generation/storage developers and encourage them to site projects where the transmission system can better accommodate them.

Conclusion

LSA appreciates the CEC's work to improve how large loads are reflected in the 2026 IEPR forecast. California cannot wait until credible load growth is too far along for clean resources and transmission to keep pace. A milestone-based process, and closer CEC–CAISO coordination on grid-beneficial load locations, would help the state plan for large loads in a way that supports reliability, affordability, and continued solar and storage development.