

DOCKETED

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September 15, 2026

California Energy Commission
Docket Office, MS-4
Re: Docket No. 26-IEPR-03
1516 Ninth Street
Sacramento, CA 95814-5512
docket@energy.ca.gov

Re: Southern California Edison Company's Comments on the California Energy Commission's 2026 IEPR Workshops on Energy Demand Forecast Inputs and Load Modifier Assumptions, Docket No. 26-IEPR-03

Dear Commissioners:

Southern California Edison Company (SCE) appreciates the opportunity to comment on the California Energy Commission's (Commission's) August 20, 2026 workshop on energy demand forecast inputs and assumptions and August 31, 2026 workshop on load modifier inputs and assumptions. SCE supports the Commission's transparent, stakeholder-oriented process and continued efforts to improve the analytical foundation of the 2026 Integrated Energy Policy Report demand forecast. SCE particularly appreciates the Commission's focus on economic and demographic inputs, known loads, data-center demand, and load modifier assumptions. As California continues to lead the adoption of electric vehicles, distributed solar, battery storage, and other emerging technologies, robust forecast assumptions remain critical for resource planning, reliability assessments, and long-term grid investment decisions. SCE supports the overall direction presented in both workshops and recommends that the Commission prioritize the following practical actions:

1. Forecast Transparency and Assumption Documentation

SCE appreciates the Commission's ongoing efforts to provide transparent documentation of forecast inputs, assumptions, and methodologies. SCE encourages the Commission to continue publishing key forecast assumptions, forecast drivers, and material changes from prior IEPR forecasts to help stakeholders better understand forecast results and support consistency across planning processes.

2. Known Load Forecasting

SCE recommends that the Commission continue improving the treatment of known loads for local reliability planning by updating energization timing, project status, and expected demand characteristics using the latest available information. SCE also recommends clearly documenting how known loads are incorporated into the forecast and reconciled with underlying sector forecasts to reduce potential double counting and improve consistency across infrastructure and reliability planning efforts.

3. Data Center Demand Forecasting

SCE recommends that the Commission continue improving data center demand forecasts by leveraging emerging data sources, stakeholder feedback, and observed project development trends. Given the rapid growth of data center development across California, incorporating the latest information on deployment, utilization, and load growth can enhance forecast accuracy and support long-term planning decisions.

4. Transportation Electrification Load Shapes

SCE recommends that the Commission continue refining electric vehicle charging assumptions using observed charging data, managed charging participation, time-of-use rate response, workplace charging availability, and public fast-charging utilization. These inputs increasingly influence peak demand timing and hourly load profiles.

5. Customer Behavior and DER Adoption

SCE recommends that the commission continue leveraging observed adoption trends and customer behavior data to better represent distributed solar, battery storage, electrified end uses, and flexible demand technologies within the forecast. Improved characterization of these resources will strengthen managed forecast accuracy and net-load forecasting.

6. Coordination Across Forecasting Efforts

SCE encourages the Commission to continue coordinating with utilities, the California Air Resources Board (CARB), the California Public Utilities Commission (CPUC), the South Coast Air Quality Management District (SCAQMD), transportation agencies, and infrastructure planners to better align electrification and infrastructure planning assumptions. While this effort will likely extend beyond the current IEPR cycle, greater consistency across forecasting activities can support more effective long-term planning and investment decisions.

Conclusion

SCE thanks the CEC for consideration of the above comments. Please do not hesitate to contact me at (916) 551-3624 or Adam.Smith@sce.com with any questions or comments you may have. I am available to discuss these matters further at your convenience.

Sincerely,

/s/

Adam Smith