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*Comment Received From: Solar Energy Industries Association  
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## **SEIA Comments on Final 2024 IEPR Report**

*Additional submitted attachment is included below.*



September 30, 2025

California Energy Commission  
Docket Number 25-IEPR-05  
715 P Street  
Sacramento, CA 95814

**Re: Docket No. 24-IEPR-01: Final 2024 Integrated Energy Policy Report Update**

The Solar Energy Industries Association (“SEIA”) appreciates the opportunity to provide written comments on the California Energy Commission’s *Final 2024 Integrated Energy Policy Report Update* (“Update”). SEIA thanks the Commission for the Update’s acknowledgement of the ongoing dialogue between the solar industry and the Commission regarding the modeling of in-front-of-the-meter solar + storage resources as load modifiers and the commitment that Commission Staff will continue to “explore this topic for the 2025 IEPR.”<sup>1</sup> That said, SEIA notes that this commitment is not listed in the “Next Steps” which delineates the updates that staff will be working on “for the 2025 IEPR forecast and subsequent years.”<sup>2</sup> SEIA submits that for full clarity and accuracy this section of the Update should be revised to include:

*Consideration of in-front-of-the-meter, distribution grid interconnected solar with co-located storage as a load-modifying resource.*

SEIA thanks the Commission for the ongoing dialogue on this issue and its willingness to further explore the benefits that these in-front-of-the-meter resources can provide the grid and, concomitantly, California ratepayers.

Respectfully,

/s/ Stephanie Doyle

California Director  
Solar Energy Industries Association

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<sup>1</sup> *Final 2024 Integrated Energy Policy Report Update* (September 2025), pp. 16-17.

<sup>2</sup> *Id.*, p. 53.