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STATE OF CALIFORNIA
CALIFORNIA ENERGY COMMISSION

IN THE MATTER OF: *2025 Integrated Energy Policy Report (2025 IEPR)* RE: Electricity and Gas Demand Forecast	DOCKET NO. 25-IEPR-03 IEPR COMMISSIONER WORKSHOP ON LOAD MODIFIER ENERGY DEMAND FORECAST RESULTS

CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S COMMENTS ON THE IEPR COMMISSIONER WORKSHOP ON LOAD MODIFIER ENERGY DEMAND FORECAST RESULTS

Leanne Bober,
Director of Regulatory Affairs and Deputy General Counsel
Eric Little,
Director of Market Design
Andrew Mills,
Director of Data Analytics

CALIFORNIA COMMUNITY CHOICE ASSOCIATION
1121 L Street, Suite 400
Sacramento, CA 95814
Telephone: (510) 980-9459
E-mail: regulatory@cal-cca.org

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The California Community Choice Association[1] (CalCCA) submits these comments on the November 13, 2025, *IEPR Commissioner Workshop on Load Modifier Energy Demand Forecast Results*[2] (Workshop).

I. INTRODUCTION

Load modifiers have an outsized role in California's demand forecasting as 80 percent of the forecasted increase in retail sales from 2025 to 2030 is from load modifiers, rather than underlying demographic trends.[3] The three largest sources of growth are electric vehicles (EV), data centers, and end-use electrification. In response to the Workshop presentations and discussions, CalCCA recommends that the California Energy Commission (Commission):

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[1] California Community Choice Association represents the interests of 24 community choice electricity providers in California: Apple Valley Choice Energy, Ava Community Energy, Central Coast Community Energy, Clean Energy Alliance, Clean Power Alliance of Southern California, CleanPowerSF, Desert Community Energy, Energy For Palmdale's Independent Choice, Lancaster Energy, Marin Clean Energy, Orange County Power Authority, Peninsula Clean Energy, Pico Rivera Innovative Municipal Energy, Pioneer Community Energy, Pomona Choice Energy, Rancho Mirage Energy Authority, Redwood Coast Energy Authority, San Diego Community Power, San Jacinto Power, San José Clean Energy, Santa Barbara Clean Energy, Silicon Valley Clean Energy, Sonoma Clean Power, and Valley Clean Energy.

[2] Commission Docket No. 25-IEPR-03, *Notice of IEPR Commissioner Workshop on Load Modifier Energy Demand Forecast Results* (Oct. 29, 2025): https://efiling.energy.ca.gov/GetDocument.aspx?tn=266887&DocumentContentId=104073.

[3] CalCCA analysis of the Commission's 2024 IEPR Planning scenario for CAISO demand.

- Benchmark changes in the Commission's EV forecast to other reputable EV forecasts;
- Continue to refine criteria to incorporate data centers in the demand forecast and increase collaboration with all data center stakeholders; and
- Improve data collection on end-use electrification to support forecasting.

II. CHANGES IN THE COMMISSION'S EV FORECAST SHOULD BE BENCHMARKED TO OTHER REPUTABLE EV FORECASTS

Federal policy support for adoption of EVs eroded in 2025 with changes to federal tax credits in the One Big Beautiful Bill Act (OBBBA) and other policy shifts.[4] These policy changes are expected to reduce the adoption of EVs by increasing the cost to consumers and reducing the availability of charging infrastructure. Commission staff stated during the Workshop that federal policy changes were accounted for through a change in the baseline scenario.[5] However, the population of light-duty EVs included in the Commission's draft 2025 Integrated Energy Policy Report (IEPR) forecast for 2030 appears to be only modestly lower (eight percent) than the population in the Commission's 2024 IEPR Update, made prior to the recent federal policy changes.

Forecasters other than the Commission are also attempting to answer the question of how policy changes in 2025 should affect the forecasted adoption of EVs relative to previous forecasts. For example, Elaine Buckberg and Cassandra Cole of Harvard University estimate the impacts of federal policy changes in EV adoption across the U.S., and the resulting emissions and fiscal impact, relative to a 2024 baseline.[6] In addition, PJM Interconnection LLC (PJM

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[4] Harvard University, The Salata Institute for Climate and Sustainability, "Updated for the OBBBA: Quantifying Trump's Impacts on EV Adoption" (Aug. 4, 2025): https://salatainstitute.harvard.edu/updated-for-the-obbba-quantifying-trumps-impacts-on-ev-adoption/.

[5] Workshop presentation, Alan Jian, *Draft Transportation Energy Demand Forecast for the 2025 Integrated Energy Policy Report* (Nov. 13, 2025), slide 7: https://efiling.energy.ca.gov/GetDocument.aspx?tn=267168&DocumentContentId=1043.

[6] *See supra,* n.5.

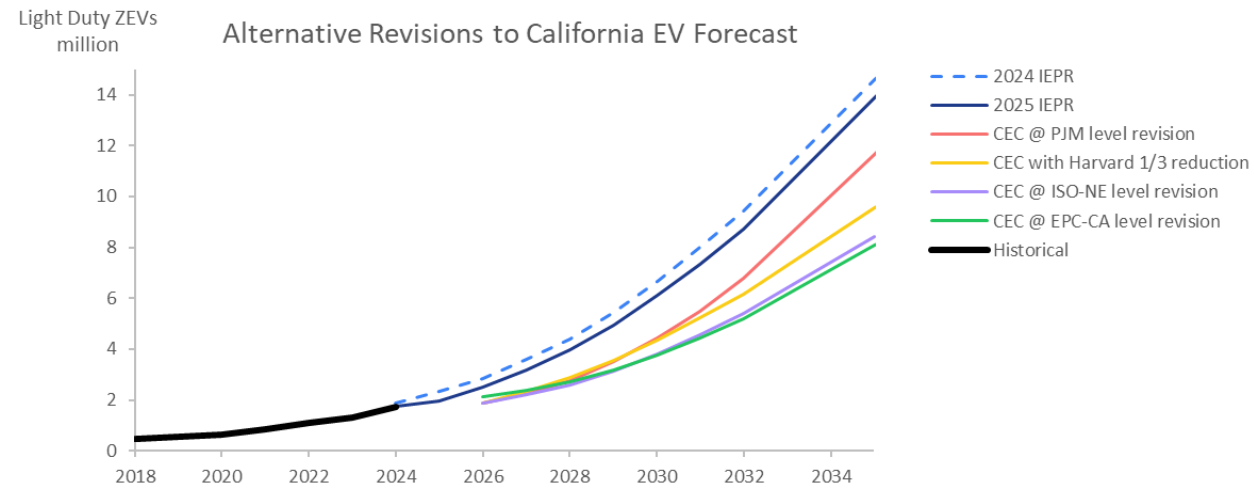
Interconnection) and the Independent System Operator for New England (ISO-NE) both revised EV adoption forecasts between 2024 and 2025.[7] In California, Energy Innovation's Energy Policy Simulator for California (EPS-CA) forecasts EV population growth under two scenarios – first, a scenario in which policies are fixed at their status as of January 2025, and second a scenario in which there is a federal policy rollback, similar to policies adopted in OBBBA.[8]

In each of these four forecasts, the relative decrease in EV adoption between the 2024 and 2025 vintages is significantly larger than the decrease between the Commission's 2024 IEPR Update and 2025 draft IEPR forecast. Figure 1, below, shows how much lower the Commission's 2025 IEPR forecast would be if the change from the 2024 IEPR Update was consistent with the change in the forecast from these four other organizations. The other four forecasts had a 33-43 percent reduction in EV adoption by 2030 between the 2024 and 2025 vintage forecasts in contrast to the eight percent reduction in the Commission's draft 2025 IEPR forecast. The lower forecasts are better aligned with the Commission's moderate EV growth rate in the Additional Achievable Transportation Electrification (AATE) 2 Scenario rather than the high growth rate in the AATE 3 Scenario.

[7] PJM Interconnection, Electric Vehicle Charging Power Demand Forecast: https://www.pjm.com/-/media/DotCom/committees-groups/subcommittees/las/2025/20251028/20251028-reference---spglobal---pjm-ev-forecast.pdf; ISO New England, Final 2025 Electric Vehicle Forecast: https://www.iso-ne.com/static-assets/documents/100023/trans_fx_2025_final.pdf.

[8] Energy Innovation, RMI Energy Policy Simulator: https://energypolicy.solutions/simulator/california/en.

Figure 1. Shift in EV adoption forecasts between 2024 and 2025 if consistent with alternative EV forecasts.



The Commission should compare the assumptions and methods used in these other reputable forecasts relative to those used by the Commission, specifically with regard to how the forecast incorporates the impact of federal policy on consumer costs and availability of charging infrastructure. It is possible that the other studies use similar methods and assumptions, yet come to different conclusions, reflecting inherent underlying uncertainty. In that case, the Commission can still use these insights to assess and communicate the Commission's confidence in the magnitude of future demand from EVs.

III. THE CRITERIA TO INCLUDE DATA CENTERS IN THE DEMAND FORECAST SHOULD CONTINUE TO BE REFINED

The importance of forecasting load growth from data centers is reflected by the national conversation on large load forecasting at the Federal Energy Regulatory Commission.[9] Protecting consumers from paying for grid investments for loads that may not materialize requires a degree of skepticism when deciding how much to increase the load forecast in the

[9] *See* Chairman Rosner's Letter to the RTOs/ISOs on Large Load Forecasting (Sept. 18, 2025): https://www.ferc.gov/news-events/news/chairman-rosners-letter-rtosisos-large-load-forecasting.

early phases of data center expansion.[10] The Commission should work with relevant stakeholders to determine the reasonable criteria for incorporating data center load growth into the forecast.

The Commission's approach of grouping data center interconnection applications based on signed interconnection agreements (Group 1); active applications (Group 2); or inquiries (Group 3) is a good start. However, the decision to estimate that 33 percent of the active applications (Group 2) are likely to materialize is highly subjective but drives up the overall forecast demand.[11] Data centers are incentivized to shop around for the best location for new facilities, and application numbers do not accurately reflect expected data center load.[12] The Commission should be cautious in how applications contribute to loads and should continue to refine the criteria used to include data centers in the demand forecast. Even if 33 percent seems conservative, if that load fails to materialize, California ratepayers will still be on the hook for higher costs.

Rather than its 33 percent assumption, the Commission should expand data collection to incorporate evidence of financial commitment, site control, or permitting progress. Site control information and permit information could come from better collaboration with local permitting agencies. Further, the Commission should work with all relevant parties, including the

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[10] Experience in Georgia has demonstrated a higher rate of data centers underperforming expectations. Staff explains "Data Center project removals are primarily driven by project cancellations, demonstrating that prospective customers are either deciding not to pursue a project in Georgia at this time or pursuing a different project in a different state." *Direct Testimony and Exhibits of Robert L. Trokey, Dylan A. Drugan and Karan A. Pol on Behalf of the Georgia Public Service Commission Public Interest Advocacy Staff*, Docket No. 56298, Docket No. 56310 (Nov. 12, 2025), at 3, 26-28: https://services.psc.ga.gov/api/v1/External/Public/Get/Document/DownloadFile/224483/105760.

[11] Workshop, Raquel Kravitz, Presentation on the 2025 IEPR Preliminary Data Center Forecast: https://efiling.energy.ca.gov/GetDocument.aspx?tn=267165&DocumentContentId=104331.

[12] London Economics International LLC, Analysis Prepared for Southern Environmental Law Center, "Uncertainty and Upward Bias are Inherent in Data Center Electricity Demand Projections" (July 7, 2025), at 13: (https://www.selc.org/wp-content/uploads/2025/07/LEI-Data-Center-Final-Report-07072025-2.pdf).

community choice aggregators regarding potential data center growth. This stakeholder collaboration can be used to identify criteria to substantiate which applications are most likely to materialize into load growth for the state.

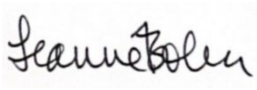
IV. DATA COLLECTION ON END-USE ELECTRIFICATION TO SUPPORT FORECASTING SHOULD BE IMPROVED

As with the EV forecast, changes to federal tax credits and rising electricity prices are likely to reduce customer willingness to electrify end uses. Developing evidence-based forecasts of building electrification is more challenging than forecasts of EV adoption because the Commission lacks high quality building electrification data comparable to the data available on EV sales. CalCCA supports the Commission's efforts to improve data collection on space heating, space conditioning, water heating, and heat pump equipment, as outlined in the Commission's Request for Information on Energy Data Collection Phase 3.[13] Effort spent on improved data collection will support validation and refinements to the Commission's approach for forecasting end-use electrification.

V. CONCLUSION

For all the foregoing reasons, CalCCA respectfully requests consideration of our comments herein and looks forward to an ongoing dialogue with the Commission.

Respectfully submitted,



Leanne Bober,
Director of Regulatory Affairs and Deputy General Counsel
CALIFORNIA COMMUNITY CHOICE ASSOCIATION

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[13] Docket 24-OIR-03, *Request for Information Energy Data Collection Phase 3 – Space Conditioning and Water Heating Equipment Data Tracking* (July 2, 2025): https://efiling.energy.ca.gov/GetDocument.aspx?tn=264545&DocumentContentId=101418.