

DOCKETED	
Docket Number:	25-IEPR-03
Project Title:	Electricity and Gas Demand Forecast
TN #:	267767
Document Title:	Southern California Gas Company Comments - SoCalGas Comments on 2025 IEPR Load Modifier Results
Description:	N/A
Filer:	System
Organization:	Southern California Gas Company
Submitter Role:	Public
Submission Date:	11/26/2025 12:21:13 PM
Docketed Date:	11/26/2025

*Comment Received From: Southern California Gas Company
Submitted On: 11/26/2025
Docket Number: 25-IEPR-03*

SoCalGas Comments on 2025 IEPR Load Modifier Results

Additional submitted attachment is included below.



Kevin Barker
Senior Manager
Energy and Environmental Policy
555 West 5th Street
Los Angeles, CA 90013
Tel: (916) 492-4252
KBarker@socalgas.com

November 26, 2025

Vice Chair Siva Gunda
California Energy Commission
Docket Unit, MS-4
Docket No. 25-IEPR-03
715 P Street
Sacramento, California 95814-5512

Subject: Comments on the IEPR Commissioner Workshop on Load Modifier Energy Demand Forecast Results

Dear Vice Chair Gunda,

Southern California Gas Company (SoCalGas) appreciates the opportunity to provide comments on the California Energy Commission's (CEC) Integrated Energy Policy Report (IEPR) Commissioner Workshop on Load Modifier Energy Demand Forecast Results (Workshop) held on November 13, 2025. The CEC's demand forecast is critical to California's energy planning for its interconnected electric and gas systems. Exploring a broad range of possible futures supports holistic strategies to enable a reliable, resilient, affordable, and adaptable energy system for various potential outcomes in the face of growing uncertainty and evolving risks. However, achieving this goal requires scenarios that capture various potential outcomes and that also provide clarity on how these scenarios should be applied in planning.

California's energy demand forecast faces unprecedented uncertainty, driven by evolving federal and state policies, technology adoption, and market dynamics including rising electricity prices and impacts of climate change. To manage this complexity, planning must incorporate a broad and reasonable range of scenarios that reflect diverse outcomes rather than converging on a narrow range of assumptions that may not be practical. The current Additional Achievable Fuel Substitution (AAFS) scenarios do not fully capture this existing and foreseeable variability—five of six scenarios rely on similar replace-on-burnout assumptions for space and water heating, which risks overstating electrification impacts and underrepresenting alternative futures. A wider spectrum of scenarios would better inform both electric and gas system planning and support resilience of the energy system under multiple feasible regulatory and consumer behavior

pathways. We continue to have the same concerns as expressed in our prior comment letter on this topic dated September 9, 2025. (See SoCalGas’s prior comment letter on the IEPR Commissioner Workshop on Energy Demand Forecast Load Modifier Scenario Updates Workshop for detailed recommendations, available at <https://efiling.energy.ca.gov/GetDocument.aspx?tn=265930&DocumentContentId=102941>)

Additionally, it is SoCalGas’s position that AAFS Scenario 2–6 should not be used for gas planning purposes under any circumstances. These scenarios assume aggressive electrification measures that lack regulatory certainty and legal viability, making them unsuitable for forecasting long-term gas throughput. The interdependence between electric and natural gas is expected to increase as peak electric risk evolves and will require increased coordination and integration between the two systems for statewide energy system safety and reliability. Therefore, we also request clarification on the purpose of the combination of AAFS 2 and AAEE 3 scenarios—whether this pairing is intended solely for electricity planning or whether it has broader implications. To the extent it is intended for broader usage, there must be sufficient opportunity for parties to address such proposals, especially if they will impact system planning or operations and therefore system safety and reliability. Notably, the difference between AAFS 2 and 6 is comparable to the gap between AAFS 1 and 2, underscoring that the current scenario set does not represent a reasonable range of possible outcomes. As risks shift—such as the emergence of winter peak reliability challenges—planning frameworks must evolve to reflect these dynamics and maintain system reliability across both electric and gas systems.

In closing, we urge the CEC to leverage demand forecast scenarios that provide meaningful differentiation and consideration of possible and probable outcomes and include clear guidance for the intended use of these scenarios. Taking a more measured approach—steering clear of strong assumptions without regulatory or market clarity—will enhance the State’s planning process and lower the chance of misguided decisions in gas system planning. By increasing the variety of scenarios, the CEC can produce forecasts that more effectively serve California’s reliability, affordability, and long-term energy objectives.

Respectfully,

/s/ Kevin Barker

Kevin Barker
Senior Manager
Energy and Environmental Policy