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CALSSA Comments on IEPR Load Modifiers Workshop

Additional submitted attachment is included below.



November 26, 2025

California Energy Commission
Docket Unit, MS-4
715 P Street
Sacramento, CA 95814

Re: Docket No. 25-IEPR-03—Comments on CEC Load Modifier Energy Demand Forecast Results Workshop

California Energy Commissioners and Staff:

The California Solar & Storage Association (CALSSA) appreciates the opportunity to provide comments in response to the IEPR Commissioner Workshop on Load Modifier Energy Demand Forecast Results, held on November 13, 2025.

CALSSA is an association of distributed clean energy providers across the state. Our members have installed the majority of behind-the-meter (BTM) solar PV and storage systems in California and routinely provide us with market and policy insights based on their experiences with manufacturing, distributing, selling, installing, and operating these systems. Especially since the transition from net metering to the net billing tariff and the recent changes to the federal investment tax credit (ITC), CALSSA has been in close contact with member companies to better understand their sales projections and how these changes are impacting or might impact their businesses. Our comments are based on the input we have been receiving from our member companies.

Solar PV and storage installations beginning in 2026 will likely not decrease by as much as is being forecasted

The Behind-the-Meter Distributed Generation Forecast Results project significant decreases in BTM solar and storage installations in 2026, decreasing by 50% and 80% in 2026, respectively. However, this is very inconsistent with what our member companies are currently contracting for and preparing to sell and install next year. While the ITC is ending for solar and storage single family-owned PV systems at the end of 2025, residential third-party owned (TPO) and non-residential PV and storage systems will continue to receive the tax credit through December 31, 2027. Consequently, member companies that have historically not offered TPO systems are currently preparing to do so starting in 2026.

Thus, our member companies are still seeing demand for and selling both PV and storage systems and expect to continue to do so at levels relatively consistent with 2025. While we do not know the exact impact of the ITC changes on PV and storage installations, we do not expect installations to decline as dramatically as the CEC is currently forecasting. We encourage the CEC to re-examine assumptions and the draft forecast results, drawing on current information

about how the market is responding to changes on the ITC and other drivers of solar and storage system adoption.

CALSSA appreciates the CEC's work to forecast trends in adoption of BTM solar and storage. There are many challenges to developing forecasts given multiple variables, and many unknowns. We wish to support the CEC's work by providing information about on-the-ground experience and trends that we and our members observe. It is important to avoid undercounting these BTM resources in the demand forecast, because doing so may lead to unnecessary and expensive procurement of resources to meet anticipated demand that does not materialize. Additionally, we believe that expanding the installation of BTM solar and storage systems is necessary to meeting our climate and clean energy goals. We look forward to continuing to participate in efforts to forecast and expand future adoption of these important clean energy resources.

Sincerely,

/s/ Jon Hart

Jon Hart

Policy Director

California Solar & Storage Association