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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Continue Oversight of Electric Integrated Resource Planning and Procurement Processes.	R.25-06-019

CALIFORNIA COMMUNITY CHOICE ASSOCIATION REPLY COMMENTS ON ADMINISTRATIVE LAW JUDGE'S RULING SEEKING COMMENTS ON ELECTRICITY PORTFOLIOS FOR THE 2027-2028 TRANSMISSION PLANNING PROCESS AND POTENTIAL FOR GEOGRAPHICALLY-TARGETED PROCUREMENT

Leanne Bober,
Director of Regulatory Affairs and
Deputy General Counsel
Lauren Carr,
Deputy Director of Regulatory Affairs

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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SUMMARY OF RECOMMENDATIONS[1]

The Commission should:

- Differentiate load forecast scenarios by their intended use as set forth below, recognizing SCE's point that long-lead-time transmission planning should consider a more forward-looking range of potential load growth than forecasts used for other purposes:
    - Use the 2025 IEPR forecast for the base case as recommended by AReM and CalCCA in Opening Comments, given it is the most up-to-date forecast of anticipated load growth and demonstrates that existing interim GHG targets are achievable under more realistic load growth assumptions; and
    - Use the 2024 IEPR forecast as a sensitivity only to identify proactive, least-regrets transmission solutions that provide value across a range of plausible futures;
- Develop portfolios that prioritize "least-regrets" transmission solutions that remain useful as load and resource assumptions change to address concerns from CAISO and SCE about delayed infrastructure development and unintended consequences; and
- Refrain from adopting location-specific procurement requirements for the Western LA Basin until the Commission and CAISO have sufficiently evaluated the full range of feasible and cost-effective wires and non-wires alternatives, as recommended by Cal Advocates, PG&E, SCE, and SDG&E.

[1] Acronyms used herein are defined in the body of this document.

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California Community Choice Association[2] (CalCCA) submits these reply comments pursuant to the *Administrative Law Judge's Ruling Seeking Comments on Electricity Portfolios for the 2027-2028 Transmission Planning Process and Potential for Geographically-Targeted Procurement*[3] (Ruling), dated August 31, 2026.

I. INTRODUCTION

Party Opening Comments demonstrate broad recognition of the uncertainty facing California's resource and transmission planning processes as load forecasts, resource costs, resource availability, and deliverability estimates continue to evolve.[4] This uncertainty

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[2] 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, 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, Valley Clean Energy, and WestLight Energy.

[3] *Administrative Law Judge's Ruling Seeking Comments on Electricity Portfolios for the 2027-2028 Transmission Planning Process and Potential for Geographically-Targeted Procurement*, Rulemaking (R.) 25-06-019 (Aug. 31, 2026), https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M616/K589/616589361.PDF.

[4] References herein to "Opening Comments" refer to those filed on or about September 28, 2026, in R.25-06-019 in response to the Ruling.

underscores the need for a planning approach that accounts for the different goals and timelines of resource procurement and transmission development, and also preserves flexibility to respond to changing conditions.

CalCCA agrees with recommendations of Southern California Edison Company (SCE) that long-lead-time transmission planning should consider a more forward-looking range of potential load growth than forecasts used for other purposes.[5] CalCCA also agrees with the Alliance for Retail Energy Markets (AReM) that the California Public Utilities Commission (Commission) should use the 2025 Integrated Energy Policy Report (IEPR) forecast for the base case, rather than the 2024 IEPR forecast, consistent with CalCCA's Opening Comments.[6] To balance the need for realistic build rates in the base case, and proactive transmission planning for future needs, the Commission should limit use of the 2024 IEPR forecast to the sensitivity case.

Further, the Commission should develop portfolios that prioritize "least-regrets" transmission solutions that remain useful as load and resource assumptions change to address concerns from the California Independent System Operator (CAISO) and SCE about delayed infrastructure development and unintended consequences.[7] The Commission's portfolios should enable transmission planning decisions to account for a broad range of plausible future load and resource scenarios to ensure new resources can be interconnected to serve load in a reliable and cost-effective manner.

In addition, CalCCA agrees with parties that state it is premature to adopt location-specific procurement requirements for the Western LA Basin without additional analysis of the

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5 *See* SCE Opening Comments, at 3.

6 *See* AReM Opening Comments, at 2-3, CalCCA Opening Comments, at 9-10.

7 *See* CAISO Opening Comments, at 2; SCE Opening Comments, at 13.

costs, benefits, and feasibility of both wires and non-wires alternatives.[8] Before imposing a location-specific procurement requirement, the Commission and the CAISO should evaluate the full range of potential solutions. This evaluation should assess each alternative's feasibility, cost, development timeline, land-use constraints, storage charging capability, interconnection availability, market competitiveness, and other relevant benefits and constraints.

Taken together, these approaches best maintain California's commitment to addressing climate change with rigorous greenhouse gas (GHG) targets by focusing on the long-term need for diverse resources, such as clean firm generation and high-capacity factor wind. They do so by grounding the portfolios in more current and realistic assumptions about future load growth, resulting in more feasible near-term build rates. The Commission should maintain its rigorous carbon targets and develop portfolios that will inform a Transmission Plan to relieve current constraints on transmission, interconnection, and project availability.

Overall, these reply comments recommend steps to help the Commission manage uncertainty without delaying infrastructure likely needed to meet California's long-term reliability and policy objectives or prematurely imposing procurement costs on customers that ultimately prove unnecessary or uneconomic. In summary, the Commission should:

- Differentiate load forecast scenarios by their intended use as set forth below, recognizing SCE's point that long-lead-time transmission planning should consider a more forward-looking range of potential load growth than forecasts used for other purposes:
    - Use the 2025 IEPR forecast for the base case as recommended by AReM and CalCCA in Opening Comments, given it is the most up-to-date forecast of anticipated load growth and demonstrates that existing interim GHG targets are achievable under more realistic load growth assumptions; and

[8] *See* The Public Advocates Office of the California Public Utilities Commission (Cal Advocates) Opening Comments, at 29-31; Pacific Gas and Electric Company (PG&E) Opening Comments, at 14-19; SCE Opening Comments, at 16-21; San Diego Gas and Electric (SDG&E) Opening Comments at 10-11.

    - Use the 2024 IEPR forecast as a sensitivity only to identify proactive, least-regrets transmission solutions that provide value across a range of plausible futures;

- Develop portfolios that prioritize "least-regrets" transmission solutions that remain useful as load and resource assumptions change to address concerns from CAISO and SCE about delayed infrastructure development and unintended consequences; and

- Refrain from adopting location-specific procurement requirements for the Western LA Basin until the Commission and CAISO have sufficiently evaluated the full range of feasible and cost-effective wires and non-wires alternatives, as recommended by Cal Advocates, PG&E, SCE, and SDG&E.

II. LOAD FORECASTS SHOULD BE DIFFERENTIATED BY THEIR INTENDED USE BECAUSE AS STATED BY SCE, LONG-LEAD-TIME TRANSMISSION PLANNING SHOULD CONSIDER A MORE FORWARD-LOOKING RANGE OF POTENTIAL LOAD GROWTH THAN FORECASTS USED FOR OTHER PURPOSES

Opening Comments demonstrate the need for the Commission to differentiate among load forecast scenarios based on the decision the forecast is intended to inform and the lead time associated with that decision. A single forecast likely no longer serves resource procurement, transmission planning, and other planning purposes when those decisions involve different timelines, risks, and consequences of forecast error.

SCE and SDG&E identify the Single Forecast Agreement as a potential constraint on incorporating the 2025 IEPR Forecast into the Integrated Resource Planning (IRP) process.[9] Recent volatility in load forecasts—particularly from large-load interconnection applications, energization assumptions, and transportation electrification—underscores why the joint agencies and CAISO should not allow the Single Forecast Agreement to prevent selection of the IEPR forecast best suited to a particular planning purpose.

For transmission planning, the Commission should use a more forward-looking load outlook that appropriately accounts for plausible future load growth. Transmission projects

[9] *See* SCE Opening Comments, at 10; SDG&E Opening Comments, at 6.

require long development timelines, and insufficient transmission infrastructure is already constraining access to resources. Waiting for uncertain load to reach the level of certainty appropriate for a procurement obligation before planning the transmission needed to serve that load risks perpetuating these constraints.

SCE's comments emphasize the need to make transmission planning more proactive and forward-looking. SCE explains that "insufficient progress on the transmission infrastructure needed to access those resources has continued to constrain their availability for procurement and planning."[10] SCE urges the Commission to avoid repeating this cycle by "aggressively accelerat[ing] transmission projects that provide access to high-value wind, geothermal, and enhanced geothermal resources and maintain optionality for future development, even when those resources are not yet contracted or reflected in procurement plans."[11] SCE therefore recommends that the Preferred System Plan reflect realistic near- and mid-term assumptions while the Transmission Planning Process (TPP) uses a more forward-looking portfolio. CalCCA agrees with SCE's general distinction that long-lead-time transmission planning should consider a more forward-looking range of potential load growth than forecasts used for other purposes.

Accordingly, the Commission should differentiate load forecasts by use case rather than assume that the same forecast scenario is appropriate for every planning decision. While the following sections focus on the load forecasts appropriate for the base and sensitivity cases used in the TPP, it is also important to consider the load forecasts used for resource procurement. Before ordering procurement, the Commission should closely consider when procurement is needed, the confidence that uncertain loads will materialize, the development status of large loads, and the load-serving entity (LSE) responsible for serving that load. CalCCA proposed

[10] SCE Opening Comments, at 3.
[11] *Id.*

mechanisms for doing so in its August 14, 2026, comments on the Reliable and Clean Power Procurement Program.[12] This distinction will allow California to plan infrastructure early enough to preserve future options without prematurely imposing procurement costs on customers for load that may not materialize.

A. AReM's and CalCCA's Recommendation to Use the 2025 IEPR Forecast for the Base Case Should be Adopted As It Is the Most Current And Demonstrates That Existing Interim GHG Targets Are Achievable

The Commission should use the 2025 IEPR forecast for the base case, as recommended by AReM and CalCCA in Opening Comments,[13] because it is the most recently available forecast based on the most current information about sources of load growth. Further, the resulting portfolios based on the 2025 IEPR reflect achievable build rates, demonstrating that the current GHG targets are achievable and do not need to be relaxed under more realistic load growth assumptions.

Some parties support relaxing the interim GHG targets in the base case to achieve realistic resource build rates.[14] CalCCA agrees that portfolio build rates should be feasible, but its analysis in Opening Comments demonstrates that this objective can be achieved without relaxing the interim GHG targets by using a more realistic load forecast in its modeling. The Commission should therefore use the 2025 IEPR forecast for the base case, as AReM

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[12] *See California Community Choice Association's Comments on Administrative Law Judge's Ruling Seeking Comments on Additional Proposal for a Reliable and Clean Power Procurement Program*, R.20-05-003 (Aug. 14, 2026) at 33-34, https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M615/K005/615005837.PDF.

[13] AReM Opening Comments, at 2-3; CalCCA Opening Comments, at 9-10.

[14] *See* Middle River Power, LLC Opening Comments, at 2; PG&E Opening Comments, at 2; SCE Opening Comments, at 2; SDG&E Opening Comments, at 6; and the Western Power Trading Forum Opening Comments, at 3.

recommends,[15] and limit use of the 2024 IEPR forecast to the sensitivity case, while retaining the existing GHG targets in both cases.

B. The 2024 IEPR Forecast Should Be Used in the Sensitivity Case to Identify Least-Regrets Transmission Solutions

While CalCCA generally supports using the most current available forecast for planning decisions, CalCCA agrees with SCE that long-lead-time transmission planning should be more proactive and forward looking.[16] Using the 2025 IEPR forecast for the base case and only relying on the 2024 IEPR for the sensitivity case strikes the right balance between realistic load growth assumptions and proactive transmission planning that supports a range of future outcomes.

Analysis of the sensitivity case using the 2024 IEPR should not be treated merely as a fact-finding exercise. It should provide the Commission and CAISO with a meaningful opportunity to identify transmission investments that perform well across different plausible futures, one with load growth more consistent with the 2025 IEPR and another with more significant load growth. As AReM observes, the sensitivity case may provide important information regarding transmission development from a least-regrets perspective.[17] To obtain this important information, a base case grounded in realistic load growth assumptions and resource build rates should be complemented with a more ambitious sensitivity case to reveal which transmission solutions support both cases.

Where the sensitivity identifies transmission needs beyond those identified in the base case, the Commission should encourage the CAISO to evaluate whether potential upgrades will provide long-term benefits across multiple scenarios. This analysis should consider whether an upgrade can address both base- and sensitivity-case needs, increase access to diverse resources,

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15 AReM Opening Comments, at 2-3.
16 *See* SCE Opening Comments, at 3.
17 *See* AReM Opening Comments, at 5.

provide additional deliverability or reliability benefits, and/or preserve valuable options under plausible future load growth. Such projects may represent prudent investments even when the precise resource or load assumptions driving the sensitivity remain uncertain.

III. TRANSMISSION SOLUTIONS THAT ARE ROBUST ACROSS A RANGE OF PLAUSIBLE FUTURES SHOULD BE PRIORITIZED TO ADDRESS CAISO'S AND SCE'S CONCERNS ABOUT INFRASTRUCTURE DELAYS AND UNINTENDED CONSEQUENCES

The CAISO's and SCE's Opening Comments further demonstrate the importance of evaluating transmission needs across multiple scenarios rather than optimizing the transmission system around a single portfolio. In addition to an uncertain load forecast, technology cost and availability are uncertain, pointing to the need for transmission solutions that are robust across a range of plausible futures. The CAISO explains that changes in this portfolio relative to previous cycles' portfolios can compound uncertainty for resource and transmission planning and ultimately delay infrastructure needed for reliability.[18] This reinforces the value of identifying transmission investments that remain useful as load and resource assumptions change.

SCE raises a similar concern regarding potential "unintended consequences" of removing offshore wind from the Base Case. SCE states that the Commission and CAISO should "carefully evaluate any unintended consequences associated with removing offshore wind from the Base Case portfolio."[19] SCE also recommends "assess[ing] whether removing offshore wind from the Base Case portfolio affects the benefits, utilization, or need for previously approved transmission facilities and whether those facilities could instead support other generation resources, reliability objectives, or future resource development opportunities."[20] CalCCA supports SCE's recommended review, as it will help ensure changes in offshore wind

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18 *See* CAISO Opening Comments, at 2.
19 SCE Opening Comments, at 13.
20 *Id.*

assumptions do not inadvertently limit development of other resources, impede reliability in the Humboldt area, or change deliverability allocations already provided to in-development projects.

To further address the concerns expressed by the CAISO and SCE, the Commission should encourage the CAISO to use the base *and* sensitivity portfolios to identify proactive, least-regrets transmission solutions that perform well across a range of plausible futures. This approach can reduce the risk that changes in load or resource assumptions repeatedly delay needed transmission, while also protecting customers by prioritizing investments with durable benefits rather than infrastructure dependent on a single uncertain forecast outcome.

IV. RECOMMENDATIONS BY CAL ADVOCATES, PG&E, SCE, AND SDG&E THAT THE COMMISSION REFRAIN FROM ADOPTING LOCATION-SPECIFIC PROCUREMENT REQUIREMENTS FOR THE WESTERN LA BASIN SHOULD BE ADOPTED

The Commission should refrain from adopting location-specific procurement requirements for the Western LA Basin, as noted in Opening Comments of Cal Advocates, PG&E, SCE, and SDG&E. These parties demonstrate that it will be premature to do so before completing additional analysis of the alternatives available to address the identified reliability need.[21] As stated by PG&E, no demonstration has been made that such a procurement order is: (1) not duplicative with other Commission-ordered procurement; (2) demonstrably cost-effective relative to alternative solutions; or (3) feasible to implement within the required timeframe.[22]

Despite insufficient evidence to demonstrate that a procurement order is the most cost-effective and viable solution, the CAISO recommends a procurement order for 2,405 megawatts or 12,075 megawatt hours to be online by the second quarter of 2032 to address "a two-year gap

[21] *See* Cal Advocates Opening Comments, at 29-31; PG&E Opening Comments, at 14-19; SCE Opening Comments, at 16-21; and SDG&E Opening Comments at 10-11.
[22] *See* PG&E Opening Comments, at 14.

between the identified 2032 reliability need and the availability of the transmission solution."[23] PG&E estimates that this solution could cost up to $4.9 billion, compared with a new and fourth transformer (*i.e.*, Wires Alternative 1) at $106 million to $126 million.[24] The CAISO recommendation constitutes a significant expense that has not been demonstrated to be feasible at meeting the identified short-term need. In addition, SCE states that the volume of storage necessary to meet the need "cannot be brought online at [the relevant] substations within [the necessary] timeframe" due to limits imposed by "[i]nterconnection capacity, substation capability, land availability, and permitting and construction timelines in a densely developed and geographically-constrained area."[25]

Before imposing a location-specific procurement requirement, the Commission and the CAISO should ensure that the full range of potential solutions has been evaluated, including transmission upgrades, storage, generation, and other feasible wires and non-wires alternatives. That evaluation should consider the feasibility, cost, development timeline, land-use constraints, ability of storage resources to charge, interconnection availability, market competitiveness, and other relevant benefits and constraints associated with each alternative. Parties have long called for Commission and CAISO coordination to develop a process for evaluating wires and non-wires alternatives for local reliability needs and reducing reliance on emitting resources in local areas. Despite including this issue in the scope of the IRP proceeding,[26] the Commission has continually delayed such work. The Commission should not continue to ignore this pressing need by rushing to issue a procurement order that may be infeasible and uneconomic.

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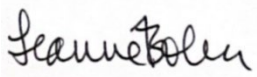
23 CAISO Opening Comments, at 9-10.
24 PG&E Opening Comments, at 17.
25 SCE Opening Comments, at 16.
26 *See Assigned Commissioner's Scoping Memo and Ruling*, R.25-06-019 (Oct. 28, 2025) at 8-9, https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M585/K485/585485746.PDF.

Moreover, additional process is necessary to address the many implementation questions prior to issuing a geographically specific procurement order. For example, wires and non-wires solutions impact LSE cost responsibility differently. As noted by SDG&E, "[w]hile the cost of a wires solution would be allocated to every customer on the CAISO grid, a geographically-targeted procurement order would assign the same cost *solely* to the customers of the LSE(s) subject to the procurement order."[27] This shift in cost responsibility onto a smaller pool of entities, and impacts from other implementation questions such as LSE procurement responsibility, cost containment measures, rate and bill impacts and others, must be more fully evaluated with parties before a procurement order is issued.

V. CONCLUSION

CalCCA respectfully requests consideration of the recommendations herein.

Respectfully submitted,



Leanne Bober,
Director of Regulatory Affairs and Deputy General Counsel

CALIFORNIA COMMUNITY CHOICE ASSOCIATION

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[27] SDG&E Opening Comments, at 10-11 (emphasis in original).