



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Continue
Oversight of Electric Integrated Resource
Planning and Procurement Processes.

Rulemaking 25-06-019
(Filed June 26, 2025)

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**COALITION FOR COMMUNITY SOLAR ACCESS
COMMENTS ON LOAD SERVING ENTITIES' INTEGRATED RESOURCE PLANS**

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**COALITION FOR COMMUNITY SOLAR ACCESS
COMMENTS ON LOAD SERVING ENTITIES' INTEGRATED RESOURCE PLANS**

The Coalition for Community Solar Access ("CCSA") respectfully files these comments in response to the narrative descriptions of the August 10, 2026, Integrated Resource Plans ("IRPs" or "Plans") filed by the load serving entities ("LSEs"). These comments are timely filed pursuant to the March 20, 2026, Administrative Law Judge ("ALJ") Ruling.

I. Introduction

CCSA is a national trade association representing more than 100 community solar companies, businesses, and nonprofits working to expand customer choice and access to solar for all American households and businesses. CCSA works with customers, utilities, local stakeholders, and policymakers to develop and implement policies and best practices that ensure successful community solar programs that champion the energy customer.

CCSA appreciates the opportunity to comment on the individual LSE IRPs. Each Plan reflects an LSE's view of how it will procure new and existing resources to meet its greenhouse gas reduction and reliability targets, shaped by local preferences and procurement experience. Together, these Plans inform the Commission's Preferred System Plan ("PSP") and Transmission Planning Process ("TPP") portfolios and provide a valuable touchpoint between top-down state planning and bottom-up LSE procurement.

In the 2026 IRPs, that bottom-up view is surfacing a common problem and solution. Several LSEs state that they want to procure front-of-the-meter ("FTM") distributed energy

resources ("DERs"), but current planning and procurement rules do not recognize the reliability or load-serving value those resources provide. CCSA urges the Commission to act on that signal and take steps now in coordination with the California Energy Commission ("CEC") and California Independent System Operator ("CAISO") to ensure that the load-reducing and load-shifting benefits of FTM DERs can be properly valued.

II. Comments

A. FTM DERs are an under-utilized resource that can help close California's supply gap.

As CCSA has noted previously in this proceeding, FTM DERs are an important but under-utilized resource that can meaningfully advance California's decarbonization, reliability, and affordability goals. They can be built quickly, interconnect without waiting for transmission upgrades, and be precisely controlled and locally dispatched to meet specific grid needs, reducing or shifting peak demand at the circuit and substation level and delivering reliability and emissions benefits in the hours that matter most. When configured as community solar plus storage, they can also deliver direct bill savings to low- and moderate-income customers and provide a low-cost compliance pathway for the Title 24 solar mandate, reducing the upfront cost of new homes and lowering systemwide costs.

As discussed extensively in the August 2026 ALJ Ruling on the 2027-2028 TPP, California faces a growing gap between what the grid needs to meet load growth and decarbonization targets, and the pace at which new clean energy and reliability resources can realistically be developed.¹ Electrification, data center growth, and other emerging load drivers,

¹ *Administrative Law Judge's Ruling Seeking Comments on Electricity Portfolios For The 2027-2028 Transmission Planning Process and Potential for Geographically-Targeted Procurement*. Aug. 31, 2026. Available at: <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M616/K589/616589361.PDF>

combined with near-term greenhouse gas (“GHG”) reduction needs, are increasing near-term procurement needs just as utility-scale projects face mounting transmission, permitting, and interconnection delays, and federal import restrictions targeting bulk-power-system equipment.² Distribution-connected resources in the 1 to 10 MW range can reduce load during net peak periods and offer a practical, complementary pathway to meet these needs. Yet their impacts are not reflected in current planning assumptions, and existing planning tools are not designed to capture their localized effects on transmission, sub-transmission, and distribution systems. FTM DERs that serve distribution-connected load directly can complement utility-scale procurement efforts, increasing the overall pace of solar and storage build and delivering an additional suite of avoided transmission and distribution benefits that provide incremental ratepayer value.

The scale of this opportunity is significant. A recent Kevala analysis found that California's investor-owned utility substations could fully absorb the discharge of approximately 17.5 GW of 5 MW distribution-connected solar-plus-storage systems during 4–9 p.m. summer hours in 2032 without any transmission backfeed, based on each substation's minimum load during that window.³ System-level modeling by Aurora similarly found that 5.4 GW of FTM DERs sited in Local Capacity Areas could save ratepayers approximately \$6.5 billion over 20 years.⁴

B. FTM DERs should be eligible for load modifier treatment, as several LSEs request.

² Executive Order 14421, *Declaring a National Emergency to Secure the United States Bulk-Power System*, 91 FR 55995, Aug. 31, 2026. Available at: <https://www.whitehouse.gov/presidential-actions/2026/08/declaring-a-national-emergency-to-secure-the-united-states-bulk-power-system/>

³ *California IOU Grid Capacity to Fully Serve Local Load with Distributed Solar+Storage Systems during Summer Peak/Net Peak Hours*. Kevala. Aug. 24, 2026. Available at: <https://www.kevala.com/resources/grid-capacity-to-serve-local-load>

⁴ *The value of Community Solar and Storage in CAISO*. Aurora Energy Research. Apr. 2025. Available at: <https://communitysolaraccess.org/wp-content/uploads/CCSA-Aurora-CCSA-final-report-v3.pdf>

FTM DER exports modify local load in the same fundamental way as behind-the-meter ("BTM") DER exports, which are counted as load modifiers in the Integrated Energy Policy Report ("IEPR") demand forecast. Load modifiers reduce or shift the forecasted demand that sets both Resource Adequacy ("RA") and IRP procurement needs. But because FTM DERs are excluded from this treatment, their reliability and GHG-free value goes unrecognized, and LSEs lack a viable path to count them toward compliance.

Several community choice aggregators ("CCAs") highlighted this gap in their Plans and urged the Commission to work with its sister agencies to establish a load modifier pathway for FTM DERs.

WestLight Energy ("WestLight") noted that FTM distribution-connected resources ("DCRs") of approximately 1 to 20 MW "can provide significant benefit not only to local communities (in the form of local environmental and economic benefits) but also to the system as a whole (in the form of transmission and distribution grid benefits)."⁵ However, WestLight is "limited in its ability to develop DCRs because of current market conditions and regulatory treatment leading to a divergence between how resource costs and benefits are measured." WestLight therefore "supports the initiative to study how DCR generation could be measured and recorded as a load modifier in the IEPR and YARA forecast template," explaining that DCRs sited close to load "produc[e] the same effect as BTM load modifiers" and "should be able to receive the same treatment as BTM load modifiers under the CEC's Peak Demand Forecasting process."⁶

⁵ *WestLight Energy 2026 Integrated Resource Plan (Public Version)*, Aug. 7, 2026, at 39. Available at: <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M613/K727/613727768.PDF>

⁶ *Id.* at 116-117

Sonoma Clean Power Authority ("SCPA") includes FTM DERs in its Preferred Conforming Portfolio but notes that existing rules prevent those resources from receiving credit for their reliability value:⁷

SCPA's preferred portfolio is expected to contain 100 MW of local self-build capacity, much of which will be configured as FTM and connected to the distribution network. Due to deliverability constraints in the region, under existing rules these resources would not receive compliance value for their reliability benefits in either the IRP or RA program. SCPA asks the CPUC to coordinate with the CEC to develop an approach to treating FTM distributed resources as a load modifier for the purposes of the RA program. This treatment is consistent with BTM distributed resources, more appropriately recognizes their reliability value, and enables SCPA to see sufficient market value in FTM distributed resource development to achieve its IRP goal.

San Diego Community Power ("SDCP") likewise argues that "[a]s California seeks to meet growing electricity demand and ambitious clean energy goals, FTM DERs may provide a complementary resource pathway alongside utility-scale generation, storage, and transmission development efforts."⁸ Like WestLight and SCPA, SDCP observes that "existing planning and procurement frameworks provide limited ability for these resources to receive recognition for the reliability and load-reduction benefits they may provide... even when they directly serve distribution-connected load and reduce demand on the transmission system."⁹ SDCP therefore recommends:¹⁰

⁷ Sonoma Clean Power Authority's 2026 Integrated Resource Plan (Public Version), Aug. 10, 2026, at 57. Available at: <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M613/K988/613988303.PDF>

⁸ San Diego Community Power's 2026 Integrated Resource Plan (Public Version). Aug. 10, 2026, at 49. Available at: <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M614/K487/614487839.PDF>

⁹ *Id.*

¹⁰ *Id.* at 56

[T]hat the Commission work with the CEC and CAISO to develop transparent criteria through which qualifying FTM DERs can be recognized as load modifiers that reduce net system demand and provide planning and reliability value. Such criteria would improve alignment across demand forecasting, integrated resource planning, transmission planning, and procurement processes while providing LSEs with an additional tool to meet reliability, affordability, and clean energy objectives. SDCP also encourages the Commission to continue evaluating whether existing planning tools and assumptions adequately capture the avoided transmission, distribution, congestion, and reliability benefits of well-sited distributed resources so that distributed and transmission-connected resources can be assessed on a more comparable basis in future planning cycles.

These Plans make clear that the barrier to FTM DER development is not LSE interest but regulatory treatment. SCPA's experience is especially instructive: its FTM resources are sited in a local reliability area where transmission deliverability is unavailable, so they cannot earn RA or IRP procurement credit even though they would serve local load directly and never rely on the constrained transmission system at peak. Requiring CAISO deliverability for resources whose output is consumed downstream of the substation misapplies a framework designed for transmission-connected generation, and it forecloses precisely the resources best positioned to add capacity where transmission is scarce.

C. Recommendations

CCSA recommends that the Commission:

- 1. Coordinate with the CEC and CAISO to establish a load modifier pathway for FTM DERs.** The Commission should support the CEC's ongoing work in Docket 22-OII-01 to study the load modifier potential of FTM DERs, and coordinate with the CEC and

CAISO to establish clear protocols for treating qualifying FTM DERs as load modifiers in future IEPR load forecasts and related planning processes.

2. **Account for LSE-planned FTM DERs in the PSP and TPP.** Energy Division should aggregate the FTM DER capacity LSEs included in their Plans and evaluate an FTM DER load modification sensitivity in the next PSP and TPP portfolios, including its potential to defer or avoid transmission upgrades in constrained Local Capacity Areas.
3. **Update planning tools to capture localized value.** Consistent with SDCP's recommendation, the Commission should assess whether its modeling tools adequately capture the avoided transmission, distribution, congestion, and reliability benefits of well-sited distributed resources, so that distributed and transmission-connected resources can be compared on equal footing.

III. Conclusion

CCSA appreciates the Commission's consideration of these comments and recommendations.

Dated: September 21, 2026

Respectfully submitted,

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