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Comment Received From: The City of Santa Clara dba Silicon Valley Power (SVP)
Submitted On: 12/9/2025
Docket Number: 25-IEPR-03

The City of Santa Clara dba Silicon Valley Power (SVP) Comments on the California Energy Commission Docket No 25-IEPR-03

Additional submitted attachment is included below.

December 9, 2025

California Energy Commission
Docket Office, MS-4
Re: Docket No. 24-IEPR-03
1516 Ninth Street
Sacramento, CA 95814-5512
docket@energy.ca.gov

Re: The City of Santa Clara *dba* Silicon Valley Power (SVP) Comments on the California Energy Commission Docket No. 25-IEPR-03: Commissioner Workshop on the California Energy Demand Forecast Results

Dear Commissioners:

The City of Santa Clara *dba* Silicon Valley Power (SVP) appreciates the opportunity to submit comments for consideration by the CEC as it updates the 25-IEPR Forecast, which will guide policy and planning efforts across state agencies and at electric utilities. SVP's comments are summarized here and expanded further below:

- The CEC should continue to work with other state agencies to develop a process for mid-cycle updates to the IEPR Forecast to better inform short-term planning and the California Independent System Operator (CAISO) Transmission Planning Process (TPP).
- SVP requests that the CEC adopt SVP's updated demand forecast to ensure the rapid load growth being experienced by SVP can be reliably served by the CAISO Controlled Grid which surrounds the SVP transmission system.

I. <u>The CEC should continue to work with other state agencies to develop a process for mid-cycle updates to the IEPR Forecast to better inform short-term planning and the CAISO TPP.</u> While annual updates to the IEPR Forecast drive most long-term planning efforts, the IEPR Forecast is also used to inform short-term planning efforts such as year-ahead Resource Adequacy (RA) planning where mid-cycle updates can provide additional relevant insights. SVP continues to see significant load growth from large scale data center and urban development within its service territory and has regularly engaged the CEC to provide updates regarding these projects as they continue to energize and ramp. The impacts of this rapid growth continue to be closely tracked, studied, and mitigated through projects both internally within SVP's system, and externally through the CAISO TPP process to ensure overall system reliability. SVP applauds CEC staff for continuing to proactively engage with stakeholders to ensure forecasts are accurate and current in a rapidly changing environment.

II. SVP requests that the CEC adopt SVP's updated demand forecast to ensure the rapid load growth being experienced by SVP can be reliably served by the CAISO Controlled Grid which surrounds the SVP transmission system. SVP has continued to remain steadfast in our commitment to providing the CEC and other statewide planning agencies with the latest information regarding our loads and electric system in alignment with statewide planning studies and processes[1]. SVP has realigned its internal forecasting schedules to better align with CEC's forecasting initiatives and have continued to refine and improve our internal assessments of existing, permitted, and planned commercial activity within its service territory. The predominant commercial activity is related to data center development that SVP has broken down into the following four (4) Groups for inclusion in our load forecast.

- Group 1 – Group 1 includes developments with (a) approved building permits from the City of Santa Clara and (b) a substation agreement with the City of Santa Clara for SVP to build electric infrastructure to connect the development to the electric grid. Group 1 developments with backup generation exceeding 49 MW's have also received a Small Power Plant Exemption (SPPE) from the CEC.
- Group 2 – Group 2 includes those applicants with development plans which have been approved by the City of Santa Clara's Project Clearance Committee. This approval means that the development is undergoing environmental review under the California Environmental Quality Act and, if applicable, the CEC's SPPE process. These developments are ready to receive building permits pending completion of requisite processes. These applicants may enter into a funding agreement with the City of Santa Clara allowing SVP to work with the applicant on determining what electric infrastructure is required to serve the new load and when, if at all, its load may be served. These processes are not an SVP commitment to power.
- Group 3 – Group 3 includes applicants which are in the initial stages of planning their development and are working with City of Santa Clara departments. This can include involvement in the City of Santa Clara's Project Clearance Committee (PCC), or initiating system impact studies with the City's storm, sewer, traffic, and/or electric systems.
- Group 4 – Group 4 includes those developers which are actively engaged with SVP, working with engineers to determine, among other things, general site layout. These developments are not in PCC yet.

These four project groups are incorporated into SVP's demand forecast through continuous outreach and monitoring. In support of ongoing statewide planning initiatives, for SVP's 25-IEPR-03 update[2] we have provided the full 15-year horizon (2026-2041) in alignment with SVP's CAISO TPP 26/27 base case model submission per FERC Order 980. Please see the attachment which describes how these groups are incorporated into SVP's updated demand forecast.

[1] ISO CEC and CPUC Memorandum of Understanding, Posted 01/19/2023
[2] Update to TN#260496, Docketed 12/05/2024 in 24-IEPR-03

III. Conclusion

SVP wants to thank the California Energy Commission staff for working with us to gain understanding of the unique situation SVP is experiencing resulting from the load growth caused primarily by large load customers, like data centers. SVP is working tirelessly to responsibly accommodate new load while maintaining a reliable grid. SVP appreciates the CEC for considering the above comments and we look forward to continuing our partnership with stakeholders in the development of the 2025 IEPR Update. Please do not hesitate to contact me at (408) 315-8528 with any questions or concerns you may have. I am available to discuss these matters further at your convenience.

Sincerely,

Eric Shum, P.E.
Senior Electric Utility Engineer
Silicon Valley Power

Attachments:

Attachment 1 – SVP Updated Load Forecast Separated by Project Groups

Attachment 1- SVP Updated Load Forecast Separated by Project Groups

Form 1.5b - SVP

California Energy Demand SVP 1-in-2
SVP Total Load (MW)

Balancing Authority	Agency	2023	2024	2025*	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041
	Silicon Valley Power 1-in-2 Forecast**	**670**	**717**	**754**	**881**	**954**	**1,039**	**1,129**	**1,229**	**1,286**	**1,367**	**1,437**	**1,505**	**1,533**	**1,536**	**1,536**	**1,536**	**1,536**	**1,536**	**1,536**
	Total Group #1 + #2 + #3 + #4 + 12kV Distribution Projects**				**399**	**466**	**550**	**620**	**717**	**791**	**881**	**967**	**1,039**	**1,073**	**1,076**	**1,076**	**1,076**	**1,076**	**1,076**	**1,076**
	Total Group #1 + #2 + #3 + #4				**373**	**428**	**490**	**536**	**610**	**644**	**714**	**780**	**844**	**871**	**874**	**874**	**874**	**874**	**874**	**874**
	Total Group #1***				**373**	**406**	**461**	**504**	**527**	**533**	**535**	**535**	**535**	**535**	**535**	**535**	**535**	**535**	**535**	**535**
	Total Group #2***				**0**	**22**	**29**	**32**	**43**	**51**	**62**	**69**	**74**	**76**	**76**	**76**	**76**	**76**	**76**	**76**
	Total Group #3***				**0**	**0**	**0**	**0**	**15**	**22**	**53**	**83**	**114**	**130**	**131**	**131**	**131**	**131**	**131**	**131**
	Total Group #4***				**0**	**0**	**0**	**0**	**25**	**37**	**65**	**94**	**122**	**131**	**133**	**133**	**133**	**133**	**133**	**133**
	Total 12kV Distribution Projects				**26**	**38**	**60**	**84**	**108**	**148**	**166**	**186**	**195**	**202**	**202**	**202**	**202**	**202**	**202**	**202**
	Data Center				18	12	20	29	34	47	47	51	51	51	51	51	51	51	51	51
	Non-Data Center				8	26	39	55	74	101	119	135	143	151	151	151	151	151	151	151

*Actual recorded Instantanous System Peak CY2025-to-date on 09/23/2025 (<1-in-2 weather) 754.28MW at SVP's CAISO NCP1 Meter.
**No Electrification Load Modifiers applied. Additional known active/upcoming projects with schedules currently under scoping have tentatively been updated for 25-IEPR.
***Customer Groups are presented in aggregate for customer confidentiality.

Form 1.5a - SVP

California Energy Demand SVP 1-in-2
SVP Total Energy to Serve Load (GWh)

Balancing Authority	Agency	2023	2024	2025*	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041
	Silicon Valley Power 1-in-2 Forecast**	**4,588**	**4,700**	**5,267**	**5,986**	**6,502**	**7,117**	**7,740**	**8,449**	**8,862**	**9,472**	**9,960**	**10,459**	**10,686**	**10,767**	**10,767**	**10,796**	**10,826**	**10,885**	**10,915**
	Total Group* #1 + #2 + #3 + #4 + 12kV Distribution Projects**				**2,713**	**3,178**	**3,768**	**4,247**	**4,931**	**5,455**	**6,103**	**6,699**	**7,221**	**7,481**	**7,543**	**7,544**	**7,564**	**7,585**	**7,627**	**7,647**
	Total Group* #1 + #2 + #3 + #4**				**2,535**	**2,916**	**3,358**	**3,673**	**4,189**	**4,436**	**4,951**	**5,409**	**5,868**	**6,072**	**6,127**	**6,127**	**6,144**	**6,160**	**6,194**	**6,211**
	Total Group #1				**2,535**	**2,767**	**3,156**	**3,451**	**3,621**	**3,676**	**3,706**	**3,706**	**3,716**	**3,727**	**3,747**	**3,747**	**3,757**	**3,768**	**3,788**	**3,799**
	Total Group #2				**0**	**149**	**202**	**222**	**294**	**350**	**426**	**476**	**514**	**527**	**530**	**530**	**531**	**533**	**536**	**537**
	Total Group #3				**0**	**0**	**0**	**0**	**103**	**154**	**366**	**577**	**790**	**903**	**921**	**921**	**923**	**926**	**931**	**933**
	Total Group #4				**0**	**0**	**0**	**0**	**171**	**256**	**454**	**650**	**848**	**916**	**929**	**929**	**932**	**934**	**939**	**942**
	Total 12kV Distribution Projects				**178**	**262**	**410**	**574**	**742**	**1,019**	**1,152**	**1,291**	**1,353**	**1,409**	**1,417**	**1,417**	**1,421**	**1,425**	**1,432**	**1,436**
	Data Center				121	85	140	196	234	323	326	357	358	359	361	361	362	363	365	366
	Non-Data Center				57	177	270	378	507	696	826	934	995	1,050	1,056	1,056	1,059	1,062	1,068	1,071

*Estimated- billing and adjustments have not been completed or reported for CY2025.
**2023 & 2024 are actual recorded retail sales including distribution losses. 2026-2041 do not include distribution losses (historically 2-3% for SVP).
***Average weighted load factor by customer rate schedule class applied to each Group. No Electrification Load Modifiers applied.