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STATE OF CALIFORNIA
CALIFORNIA ENERGY COMMISSION

IN THE MATTER OF: *2025 Integrated Energy Policy Report (2025 IEPR)* RE: Electricity and Gas Demand Forecast	DOCKET NO. 25-IEPR-03 IEPR COMMISSIONER WORKSHOP ON ENERGY DEMAND FORECAST RESULTS

CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S COMMENTS ON THE DECEMBER 17, 2025, IEPR COMMISSIONER WORKSHOP ON ENERGY DEMAND FORECAST RESULTS

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December 30, 2025

TABLE OF CONTENTS

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The California Community Choice Association[1] (CalCCA) submits these comments on the December 17, 2025, *IEPR Commissioner Workshop on Energy Demand Forecast Results*[2] (Workshop).

I. INTRODUCTION

Under any scenario, synthesizing the enormous amount of data required to develop the Integrated Energy Policy Report (IEPR) is a tremendous achievement by California Energy Commission (Commission) staff. Current fluctuating policy, technological, and market forces further complicate this difficult task. CalCCA appreciates the efforts of the Commission to develop the 2025 IEPR Demand Forecast. Given significant uncertainties related to "Known

[1] 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, Peninsula Clean Energy, 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, and Valley Clean Energy.

[2] Docket No. 25-IEPR-03, *IEPR Commissioner Workshop on Energy Demand Forecast Results* (Dec. 17, 2025), https://www.energy.ca.gov/event/workshop/2025-12/iepr-commissioner-workshop-energy-demand-forecast-results.

Loads," data centers, and electric vehicle (EV) and electrification adoption as described herein, CalCCA recommends the Commission proceed cautiously in its adoption of the final Demand Forecast. Failing to do so will only serve to exacerbate the affordability crisis occurring in California's electric industry that affects the State's citizens.

Commissioner Siva Gunda recognized during the Workshop this year's uncertainties related to the Demand Forecast, and the "balancing act of affordability and reliability" with determining the "cushion" that must be incorporated into the Demand Forecast.[3] Commissioner J. Andrew McAllister, Ph.D., also recognized the risks associated with accurate load forecasting to strike the right balance between reliability and affordability by "flag[ging] that risk … of overestimating. . . we want reliability, but also we don't want to overbuild and … impact customers from an affordability angle."[4] Therefore, accurate load forecasting is paramount.

Given the uncertainties and the need to ensure accuracy in the Demand Forecast, CalCCA recommends the Commission:

- Adopt the draft Demand Forecast's inclusion of both Planning and Local Reliability Forecasts;
- Exclude Known Loads from the Planning Forecast, and refine the estimate of Known Loads prior to its incorporation in the Local Reliability Forecast;
- Continue to refine assumptions related to data center load, including through collaboration with community choice aggregators (CCAs), to verify data center load expectations;
- Adopt the Commission's proposal to moderate the EV and electrification forecasts in light of recent federal policy shifts; and
- Solicit information on loads to be included in the Demand Forecast from all informed stakeholders, including CCAs.

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3 Workshop Recording at 50:56.

4 *Id.* at 01:01.36.

CalCCA appreciates that the Commission must also evaluate Summer Reliability scenarios, which examine cases in which the weather is outside of the norm and the load is higher than what would ordinarily be anticipated. This annual Summer Reliability analysis will help to inform how the state's strategic reserve could be used.

II. THE DRAFT 2025 IEPR'S DEVELOPMENT OF BOTH PLANNING AND LOCAL RELIABILITY FORECASTS SHOULD BE ADOPTED

The draft 2025 IEPR's development of both Planning and Local Reliability Forecasts should be adopted. The two forecasts each serve a different purpose. The Planning Forecast is used to ensure sufficient generation resources to meet the coincident peak load and energy needs of the entire system, through Resource Adequacy (RA) and Integrated Resource Planning (IRP) requirements. The Local Reliability Forecast is used to evaluate the need for new transmission and distribution facilities to accommodate load growth. By nature, the Local Reliability Forecast analysis is a non-coincident peak review, given the build-out in a particular local area must accommodate the peak load for that local area whenever it occurs. Overall, the coincident peak (informing the Planning Forecast) will be lower than the sum of the non-coincident peaks (informing the Local Reliability Forecast). Adopting separate Planning and Local Reliability Forecasts makes sense, given the differing use cases of each.

III. KNOWN LOADS SHOULD BE EXCLUDED FROM THE PLANNING FORECAST AND REFINED BEFORE BEING INCLUDED IN THE LOCAL RELIABILITY FORECAST

The Commission is considering whether and how to incorporate Known Loads, a new category of loads in the 2025 IEPR Forecast, into both the Planning and Local Reliability Forecasts. Known Loads are defined as "[e]nergization requests at the distribution system level, submitted to [the California Public Utilities Commission] as part of distribution system planning in the High

DER proceeding."[5] The Known Loads data is collected from each investor-owned utility (IOU), and reflects customer information regarding project capacity sector, energization data, and load profiles. Significant questions remain regarding the accuracy of the Known Loads information, as well as its appropriateness for inclusion in the Planning Forecast. While the Commission continues to refine its processes of verifying whether the actual energization estimates exceed the forecast, it is still unclear whether the Known Loads methodology has been properly adjusted to reflect the coincident peak. Furthermore, the high rate of duplication and other errors in the Known Load data discussed below suggest that the methodology needs further refinement and accuracy before it will be reliable enough to base large spending decisions on. In light of the uncertainties regarding the Known Loads category at this time, CalCCA recommends the Commission exclude Known Loads from the Planning Forecast. In addition, the Commission should be cautious with the magnitude of Known Loads incorporated in the Local Reliability Forecast.

A. An Overhaul of Forecast Inputs at this Late Stage of the IEPR Process is Unnecessary to Ensure Planning Forecast Reasonableness

A Commission staff presentation from a Demand Analysis Working Group (DAWG) meeting on October 30, 2025 (DAWG WG Meeting), reflects that Known Loads would not be included in the Planning Forecast,[6] a recommendation which was reiterated by Commission staff at the November 13, 2025, IEPR Commissioner Workshop on Load Modifier Electricity Demand

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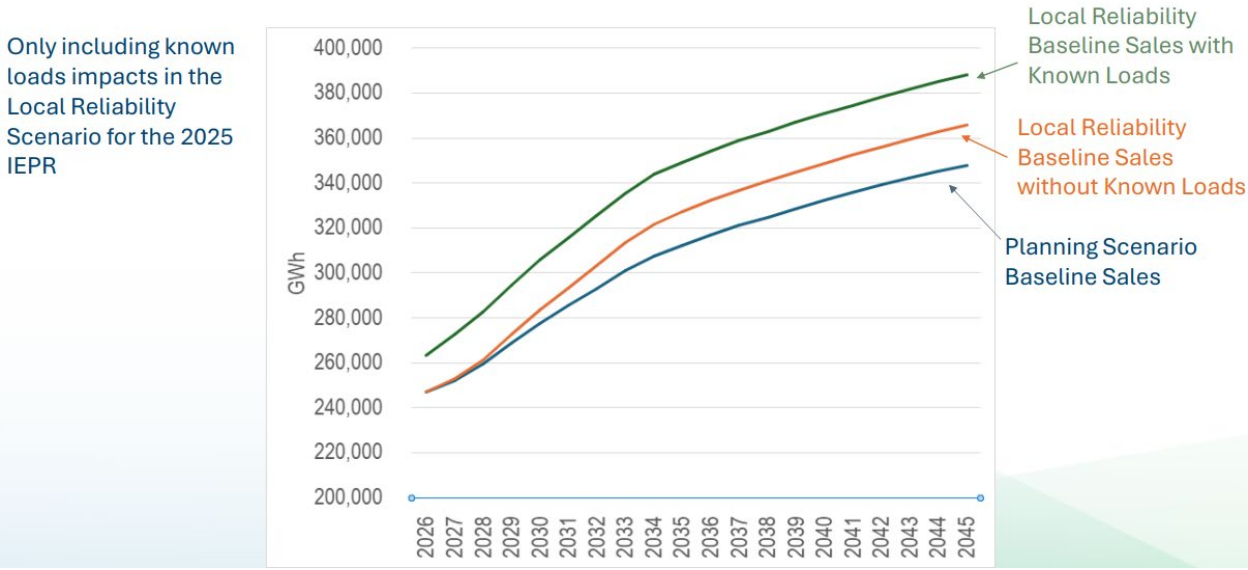
[5] Workshop Presentation, Heidi Javanbakht, "2025 IEPR Forecast Overview" (Javanbakht Presentation), PowerPoint presentation (Dec. 17, 2025), at slide 18, https://efiling.energy.ca.gov/GetDocument.aspx?tn=267941&DocumentContentId=104948.

[6] DAWG WG Meeting, Asish Gautam, "Impacts of Known Loads for the 2025 IEPR Demand Forecast" (Gautam Presentation), PowerPoint presentation at slide 15 ([o]nly including known loads impacts in the Local Reliability Scenario for the 2025 IEPR), https://www.energy.ca.gov/sites/default/files/2025-11/Impacts_of_Known_Loads_for_the_2025_IEPR_Demand_Forecast_ada.pdf.

Forecast Results (IEPR Results WS).[7] Instead, Known Loads would be incorporated in only the Local Reliability Forecast, as reflected in Figure 1, below.

Figure 1. DAWG WG Meeting Presentation on Known Loads October 30, 2025[8]



At the Workshop, the treatment of Known Loads within the Planning Forecast was changed to "TBD."[9] Based on CalCCA's conversations with Commission Staff, this "to be determined" label reflects a reconsideration of whether the Known Loads should be added to the Planning Forecast.

Incorporating Known Loads is not necessary for the Planning Forecast given its intended purpose. In fact, the Commission's incorporation of Known Loads into the Planning Forecast would reflect a variation from recent practices. As Figure 2 below shows, there is no evidence that recent IEPR Planning Forecasts of peak demand have inherently erred on one side or the

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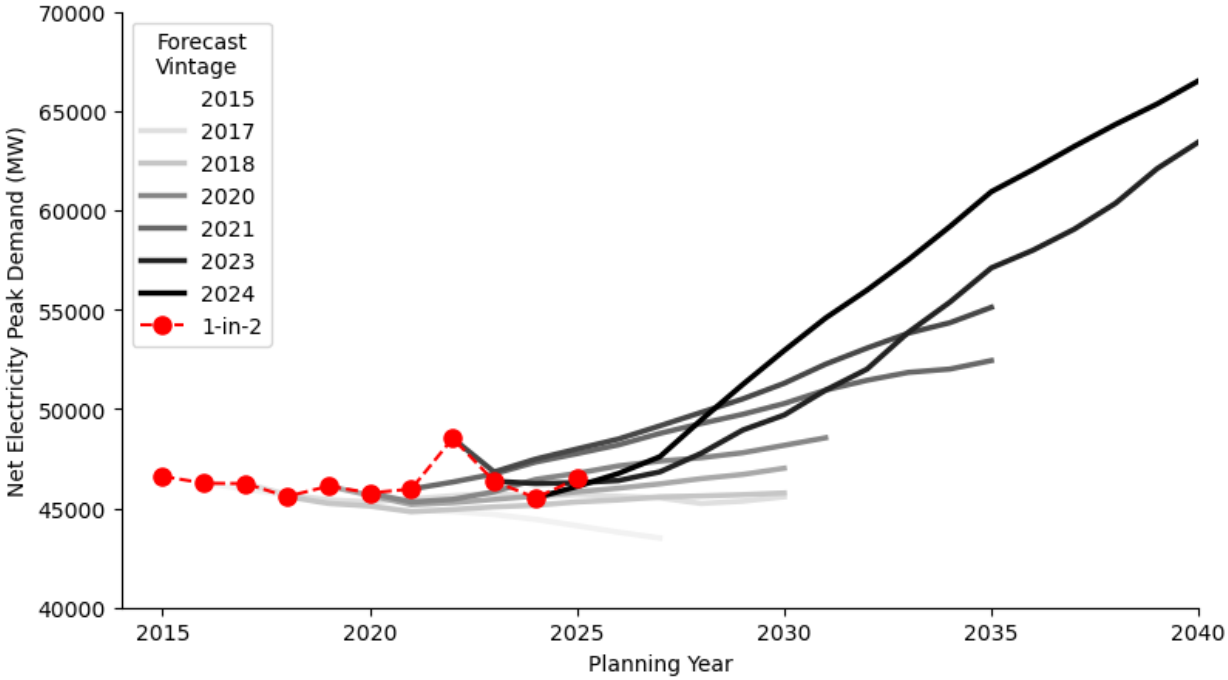
[7] IEPR Results WS_recording at 1:44:15, "And I just want to emphasize that since this is our first time looking at the known loads dataset, we are recommending that the impacts from known loads only be included in the local reliability scenario to limit downstream impacts to other proceedings that rely on the IPER demand forecast as an input." Gautam., A.

[8] *Id.* at slide 15.

[9] Javanbakht Presentation at slide 17.

other, at least in the near term. The case for a new methodology that systematically increases load forecasts has not been thoroughly vetted, given its potentially significant impact on affordability. In fact, if past methodologies have been reasonable , the new Known Loads methodology may introduce errors and over forecasting. CalCCA understands that the initial point for each forecast reflects the Commission's estimate of weather-normalized peak load. This trend suggests a wholesale overhaul in the forecast inputs (i.e., incorporating Known Loads into the Planning Forecast) is unnecessary.

Figure 2.
IEPR Planning Forecasts Compared to Recent 1-in-2 Peak Demand



B. Known Loads Should be Excluded from the Planning Forecast Given Significant Uncertainties Related to the Energization Dates for these Loads

Known Loads should be excluded from the Planning Forecast, given significant uncertainties related to these loads, including their actual energization dates. Many of the Known Loads reported to the Commission by the IOUs include projects that require upstream capacity upgrades that could take several years to complete before a customer load can be energized.

Other project timelines are dependent on customers, permitting agencies, or contractors to complete portions of the work. Other factors, such as supply chain delays and environmental reviews, could further delay energization times.

For example, as reported in a recent Ernst & Young (EY) report (EY Report) of PG&E's energization process, there is significant uncertainty as to when the new loads included in PG&E's Known Loads category will come online.[10] The EY Report, which provides an assessment of PG&E's operational and financial performance towards meeting energization timelines, notes that PG&E has completed only 48 percent of its backlogged applications as of June 30, 2025.[11] EY also assessed PG&E's growth forecast projections, which were developed using a newly implemented bottom-up forecasting methodology. The EY Report highlights several assumptions made by PG&E that could impact the growth projections, including the expectation that it would receive the full amount of requested increases in its 2025 and 2026 energization cost caps. PG&E had asked for an increase of over $3.1 billion in its October 4, 2024, Motion to Revise 2025 and 2026 Energization Cost Caps.[12] The California Public Utilities Commission (CPUC) ultimately approved a lower $1.47 billion increase,[13] casting doubt on PG&E's demand growth forecast assumptions.

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[10] Ernst & Young, "PG&E SB 410 Powering Up Californians Act Assessment," unpublished report, November 26, 2025. To be published at a later date, https://www.cpuc.ca.gov/about-cpuc/divisions/office-of-governmental-affairs/2025-reports-to-the-legislature.

[11] *Id.* at 6.

[12] *Pacific Gas and Electric Company's (U 39 E) Motion to Revise 2025 and 2026 Energization Cost Caps*, Rulemaking (R.) 24-00-018 (Oct. 4, 2024), https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M542/K129/542129086.PDF.

[13] D.25-08-036, *Decision Resolving PG&E's Motion to Revise Its 2025 and 2026 Energization Cost Caps*, R.24-01-030 (Sept. 4, 2025), https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M578/K792/578792385.PDF.

C. Known Loads Incorporated in the Local Reliability Forecast Should be Limited to those Accurately Identified and Calculated

The Known Loads incorporated in the Local Reliability Forecast should be limited to those accurately identified and calculated. The estimates of Known Loads for purposes of the 2025 IEPR Forecast is still being finalized, even at this late stage in the 2025 IEPR process (with approval of the Load Forecast set for the January 21, 2026, Energy Commission Business Meeting). For example, after review of the information provided by the IOUs, and between the November and December updates, the Commission removed 1,500 megawatts (MW) of Known Loads, which represented a double counting of data center load also included in the forecast.[14] The Commission must be confident that duplicative load has been addressed before including these loads in the Local Reliability Forecast.

Further, the Commission is still considering the utilization factors used to convert customer-requested capacity into expected impacts on local distribution and transmission systems. The Commission suggested using the utilization factors employed by PG&E's distribution teams, rather than those derived from Advanced Metering Infrastructure (AMI) data, to maintain consistency with the approaches used by Southern California Edison Company (SCE) and San Diego Gas & Electric Company (SDGE).[15] Utilization factors should be grounded in verifiable data, however. Rather than prioritizing methodological consistency, the Commission should ensure its approaches and conclusions can be vetted.[16] The utilization factors used by SCE and SDG&E should therefore be used in the Local Reliability forecast only temporarily until they can be verified with AMI data.

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14 Javanbakht Presentation at slide 22.
15 *Id.* at slide 21; IEPR Results WS recording at 37:16.
16 Gautam Presentation at slide 5.

IV. DATA CENTER LOAD SHOULD CONTINUE TO BE EVALUATED IN FUTURE LOAD FORECASTS TO ENSURE THE ASSUMPTIONS RELIED ON BY THE COMMISSION ACCURATELY REFLECT UNCERTAINTY IN THE INDUSTRY

Significant uncertainty also exists in data center forecasts informing both the Planning and Local Reliability Forecasts. PG&E acknowledged at the July 16, 2025, DAWG meeting[17] that "[f]or multiple forecast cycles, forecasts will likely be highly uncertain due to the nascency of the data center technology [and] markets and due to the complexity of data center projects."[18] Reflecting this uncertainty, PG&E's data center applications and agreements shrank from 10,000 MW in agreements and applications in September 2025 to less than 8,000 MW in applications and agreements in December 2025.[19] Meanwhile, PG&E's data center inquiries increased from less than 2,000 MW in September to approximately 6,000 MW in December.[20] These fluctuations reflect an industry that is rapidly evolving. The growth of the industry will be shaped by forces including regulatory and statutory actions at the state and federal levels, as well as general market forces.[21] In addition, the forecast currently does not estimate whether data center large loads will be served by co-located resources. If they are, the current forecast methodology would further overstate load growth. While additional data center load is coming to California, these competing forces result in significant uncertainty as to how much data center load and when it will materialize. To protect customers from unnecessary cost increases related to this

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[17] *CA Energy Demand Forecast: Economic & Demographic Inputs; and Data Center Forecasting* (July 16, 2025), https://www.energy.ca.gov/event/meeting/2025-07/ca-energy-demand-forecast-economic-demographic-inputs-and-data-center.

[18] Workshop Presentation, Jenny Conde, "PG&E Data Center Forecasting," (July 16, 2025), at slide 14, https://efiling.energy.ca.gov/GetDocument.aspx?tn=264914.

[19] Workshop Presentation, Matthew Cooper, "2025 California Energy Demand Annual Consumption and Sales Forecasts," (Dec. 17, 2025), at slide 10, https://efiling.energy.ca.gov/GetDocument.aspx?tn=268076&DocumentContentId=105092.

[20] *Ibid*.

[21] Roland Li, "The Bay Area is losing the data center race. Economists say that could be a good thing.," *San Francisco Chronicle*, December18, 2025, https://www.sfchronicle.com/tech/article/ai-data-center-bay-area-21246492.php.

uncertain load, the Commission should exercise caution when incorporating data center load into its forecasts, particularly in the Planning Forecast used to inform procurement activities and RA compliance requirements.

The 2025 IEPR Forecast considered three scenarios (low, mid, and high) for non-Silicon Valley Power data center load growth.[22] The Commission proposes relying on the mid-case scenario for incorporating data center load into the Planning Forecast an the high case in the Local Reliability Forecast.[23] The mid case, used in the Planning Forecast, includes in the forecast 70 percent of load with signed interconnection agreements and 33 percent of active applications for energy service.[24] For the 2025 IEPR, CalCCA is not opposed to the Commission's decision to use the mid-case, but notes the challenges to including data center applications in the Planning Forecast.

As noted above, the Planning Forecast is used, among other purposes, to inform RA compliance requirements for Load Serving Entities (LSEs), and CalCCA is concerned about the RA compliance implications of including a portion of applications for data centers. Data center loads are large, and data center development will not be evenly distributed across California. Data centers will result in significant load growth for some LSEs and none for others. Distributing data center load evenly across the state for purposes of RA will therefore result in inequitable outcomes, requiring customers of LSEs with no data centers to subsidize the reliability needs of LSEs with data centers . To avoid these cost impacts on LSEs without data centers, to the extent possible, data center load should be allocated to individual LSEs for the

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22 DAWG WG Meeting Presentation, Matthew Cooper, "2025 IEPR: Preliminary Data Center Forecast" (Oct. 30, 2025) (Cooper WG Presentation), at slide 9, https://www.energy.ca.gov/sites/default/files/2025-11/2025_IEPR_Preliminary_Data_Center_Forecast_ada.pdf.

23 Javanbakht Presentation at slide 17.

24 Cooper WG Presentation at slide 9.

purposes of setting RA requirements. Provided that the data center has identified its generation provider, and the Commission confirms the timing and size of the load associated with a signed interconnection agreement, the load can be allocated to the LSE that would serve that facility for RA purposes. However, allocation is not as simple for facilities that have not identified its generation provider. This load and load associated with applications for data centers cannot be accurately attributed to a specific LSE, resulting in a pro-rata allocation of the load across all LSEs. The Commission and the state must carefully consider how to allocate such load for RA and other procurement requirements to minimize cross-subsidization and ensure equitable outcomes for ratepayers that minimize affordability impacts.

While there are concerns with including application load for signed interconnection agreements, CalCCA does not object to including only 70 percent of the total load in the planning forecast included as directed by the mid forecast. Even in cases where a data center has a signed agreement, it is not certain that the entire projected load will materialize, and the timing of the load additions can be unclear. For example, system planners at the ERCOT adjust Large Load projections based on patterns observed for recent projects, including the observation that average peak loads were 49.7 percent of the requested interconnection capacity.[25]

The CPUC is considering PG&E's Rule 30 application for a transmission interconnection tariff in Application (A.) 24-11-007. In that proceeding, the CPUC is considering, among other things, whether to adopt minimum demand charges, minimum contract terms and early contract termination fees. Resolution of these and other issues will inform the decision of new data

[25] 2025 Electric Reliability Council of Texas, Inc., *2025 ERCOT System Planning, Long-Term Hourly Peak Demand and Energy Forecast* (Apr. 8, 2025), https://www.ercot.com/files/docs/2025/04/08/ERCOT-2025-Long-Term-Load-Forecast-Report.pdf.

centers to site facilities in PG&E's territory and will provide additional certainty on the load.[26] The Commission's assumptions for data center load certainty as applications move through the pipeline should be reconsidered as more information becomes available, including information as the CPUC's Rule 30 proceeding is resolved. In the meantime, 70 percent signed agreement load is a reasonable interim assumption.

V. THE COMMISSION'S PROPOSAL TO MODERATE ELECTRIC VEHICLE AND ELECTRIFICATION DEMAND IN THE PLANNING FORECAST IN LIGHT OF RECENT POLICY SHIFTS SHOULD BE ADOPTED

CalCCA supports the Commission's proposal to moderate EV and electrification demand in the Planning Forecast in response to federal policy shifts in 2025, including rollbacks of EV adoption incentive programs and national fuel-economy targets.[27] By changing the EV scenario from the Additional Achievable Transportation Electrification (AATE) Scenario 3 to the lower AATE Scenario 2, the revised EV forecast is better aligned with the scale of revisions observed in other forecasts.[28] Figure 3 below compares the light-duty EV forecast in the 2024 IEPR forecast with: (1) the 2025 IEPR Planning Forecast with AATE 2 ; (2) the 2025 IEPR forecast with AATE Scenario 3; and (3) forecasts consistent with the revisions from other forecasters.

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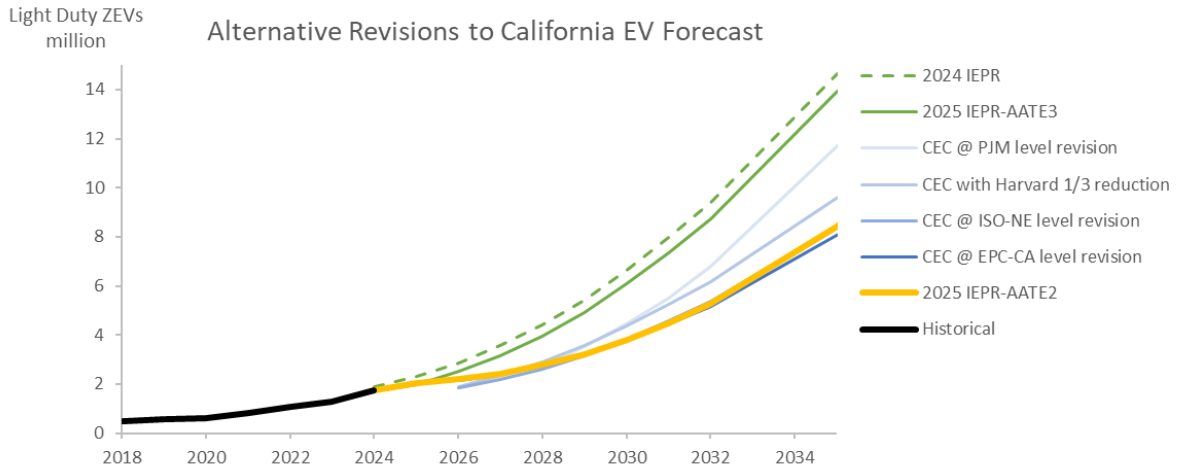
[26] *Pacific Gas and Electric Company's Opening Post-Hearing Brief,* A.24-11-007 (Oct. 24, 2025), at 83-90, https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M584/K972/584972587.PDF.

[27] *See* Robert Walton, "US electric vehicle sales are slowing amid policy shifts, BNEF." *Utility Dive,* June 18, 2025, https://www.utilitydive.com/news/us-electric-vehicle-sales-are-slowing-amid-policy-shifts-bnef/751079/; *see* Javanbakht Presentation at slide 17.

[28] As discussed in CalCCA's comments on the Load Modifier workshop, forecasters other than the Commission are also attempting to answer the question of how policy changes in 2025 should affect the forecasted adoption of EVs relative to previous forecasts. *See* Docket 25-IEPR-03, *California Community Choice Association's Comments on the IEPR Commissioner Workshop on Load Modifier Energy Demand Forecast Results* (Nov. 26, 2025), at 2-4, https://efiling.energy.ca.gov/GetDocument.aspx?tn=267765&DocumentContentId=104790.

Figure 3.
Shift in EV adoption forecasts between 2024 and 2025 is consistent with alternative EV forecasts



The comparison to other forecasts demonstrates the reasonableness of the Commission's approach. For example, the Commission at PJM level revision line represents the expected EV forecast if the change from the IEPR 2024 to IERP 2025 EV forecast were to be proportional to the revision in the PJM Interconnection's revision between the PJM 2024 and PJM 2025 vintage. The amount of EVs in the 2025 IEPR forecast with AATE Scenario 2 is much more aligned with the alternative forecasts than the AATE Scenario 3. CalCCA encourages the Commission to revisit the EV forecast in the 2026 IEPR demand forecast, as additional EV sales data from the fourth quarter of 2025 and early 2026 can inform the response of customers and companies to the shifts in federal policy support for electric vehicles.

Similarly, the Commission proposes to change the Additional Achievable Fuel Substitution (AAFS) scenario in the Planning forecast from AAFS Scenario 3 to AAFS Scenario 2.[29] Commission staff justified this shift based on the California Air Resources Board's decision to develop alternative approaches to a 100 percent new sales requirement for zero-emission

[29] Javanbakht Presentation at slide 17.

space and water heaters.[30] As with the AATE scenarios, CalCCA supports the Commission's proposed shift. CalCCA also encourages the choice of scenarios to be revisited in the 2026 IEPR as new regulations are developed and customer response to the loss of Federal tax incentives for building electrification becomes clear.

VI. INFORMATION ON LOADS INCLUDED IN THE FORECAST SHOULD BE SOLICITED FROM ALL INFORMED STAKEHOLDERS

CalCCA and its members appreciate the opportunities for feedback to Commission staff available in the development of the 2025 IEPR Demand Forecast. Commission staff have worked diligently to seek and incorporate feedback from various parties, and CalCCA appreciates staff's responsiveness. The Commission should capitalize on the knowledge and expertise of CCAs, along with other stakeholders, to verify the information received from IOUs regarding future loads, including data centers.

In addition, given the importance of reliability and the costs impacted by inaccurate load forecasting, the Commission should strive to make as much data public as possible which will allow all interested parties to test the inputs and assumptions of the load forecast. With access to this data and in partnership with the Commission, CCAs can provide insight on and verification of the proposed forecasts. CCAs serve local communities and are well-positioned to evaluate new load growth. Cities and counties have data on land use and building permits that can help inform the load forecast and each CCA's association with cities and counties will give it unique access and insight into where new facilities are in their development and when they will be expected to be operational.

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[30] Workshop Recording, at 00:28:49. "On building electrification, CARB has delayed public deliberation on regulatory concepts and has recently begun alternative approaches to a 100% new sales requirement for zero-emission space and water heaters. So, with that in mind, it makes sense to use scenarios that have slower growth in the near term."

This is particularly true of potential large loads, which require significant infrastructure planning in addition to energy needs. Permit information in combination with the CCA's own relationship with customers can inform the demand forecast. CalCCA has been active in CPUC proceeding A.24-11-007 CPUC considering PG&E's proposed Rule 30. Information sharing is a key issue for CalCCA in the proceeding. CCAs sought the large load information in A.24-11-007 to enable sufficient time for advanced procurement for these new, large loads. Currently under an interim decision, PG&E is directed to provide all applications for transmission interconnection with the impacted CCA.[31] For a permanent solution, PG&E has agreed in testimony to share information with impacted CCAs regarding new interconnection applications in their territory. [32] In addition, PG&E has agreed to share the same information that it provides to the Commission on transmission interconnected load to the CCAs at the same time.[33] While the proceeding's schedule is currently suspended, the CPUC has previously suggested a final decision in the case should be expected in mid-2026. With information gleaned through PG&E's Rule 30, CCAs may be able to provide the Commission with information beyond key details of project certainty and timing. For example, a CCA may have information on the expected facilities and their potential operations profiles and reliance on behind-the-meter generation (beyond reliance on photovoltaics or back-up generation).

In developing the demand forecast, the Commission should solicit all available information on new loads and continue to work with all informed stakeholders to produce the most accurate forecast. CalCCA previously recommended that the Commission develop a

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[31] D.25-07-039, *Decision Partly Granting and Partly Denying Pacific Gas and Electric Company's Motion for Interim Implementation of Electric Rule Number 30,* A.24-11-007 (July 24, 2025), at 52-53, https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M574/K875/574875643.PDF.

[32] *See California Community Choice Association's Opening Brief,* A.24-11-007 (Oct. 24, 2025), at 2, 12-16, https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M584/K972/584972372.PDF.

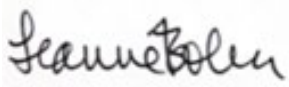
[33] *Ibid.*

dedicated workstream to address the challenges inherent in forecasting new large loads.[34] CalCCA continues to recommend, as the Commission begins work on the 2026 update, that it collaborates with all stakeholders to revisit the assumptions for data center load included in planning and local reliability forecasts. CCAs look forward to relying on their own internal data to collaborate with the Commission on the development of the IEPR forecast in coming years.

VII. CONCLUSION

For all the foregoing reasons, CalCCA respectfully requests consideration of the comments herein and looks forward to an ongoing dialogue with the Commission.

Respectfully submitted,



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December 30, 2025

[34] Docket No. 25-IEPR-03, *California Community Choice Association Comments on the August 6, 2025, IEPR Commissioner Workshop on Energy Demand Forecast Inputs and Assumptions* (Aug. 20, 2025), at 10-11, https://efiling.energy.ca.gov/GetDocument.aspx?tn=265727&DocumentContentId=102581.