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**ACP-California Comments on IEPR Scoping**

*Additional submitted attachment is included below.*



California Energy Commission  
Docket No. 26-IEPR-01  
715 P Street  
Sacramento, California 95814

**RE: Notice of Request for Comments on the Draft Scoping Order for the 2026 Integrated Energy Policy Report Update**

American Clean Power – California (“ACP-California”) appreciates the opportunity to provide the following comments on the Draft Scoping Order for the 2026 Integrated Energy Policy Report (IEPR) Update. The IEPR is the Commission’s leading venue for considering and developing energy policy for the state. ACP-California supports the Commission’s proposal to evaluate geothermal resources within this year’s IEPR. Recent IRP assessments have indicated the need for over 5 GW of geothermal resources by 2036 to achieve affordability and reliability goals.<sup>1</sup> We further support the proposed focus on refinements to demand forecasting, as described below.

**I. California Electricity Demand Forecast**

The proposed forecast update will consider impacts from decarbonization and load growth, including increasing data center development in the state. It will also refine assessments of “known loads” and how to incorporate known loads into forecasts. ACP-California agrees this is a very important area of focus for the 2026 IEPR. Load growth dynamics are changing rapidly, especially with the proliferation of data center proposals and applications for energization. The load forecasts adopted by the Commission determine reliability targets for the major energy planning proceedings of the state, including Resource Adequacy, Integrated Resource Planning (IRP) and transmission planning (TPP). However, getting these load forecasts “right” has become a challenge given evolving inputs on data center and electrification loads.

At the beginning of 2026, the Commission proposed to utilize the 2024 IEPR planning forecast for IRP and TPP, while applying the updated 2025 IEPR planning forecast to RA and

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<sup>1</sup> See CPUC D.26-02-057 p. 60

local studies, in some cases without known loads. Commission staff explained this proposal for maintaining the 2024 forecasts for IRP and TPP as based on “uncertainty with known loads and data centers” and the desire to “promote stability in resource and infrastructure planning currently underway.”<sup>2</sup>

While ACP-California understands and appreciates this rationale, the proposal to utilize different-year forecasts for different CPUC planning processes was unexpected and stakeholders had limited opportunities to engage and understand changes and differences between forecasts. Uncertainty should not be a reason to take more risks in planning for reliability needs; concerningly, we observed parties in the IRP proceeding advocating for a lower procurement order or a reduced transmission plan base-case based on the uncertainty in load forecasting this cycle.<sup>3</sup>

This illustrates the importance of refining the load forecasting approach in the IEPR, with time for stakeholder review and consideration, such that reasonable estimates of both data center growth and known loads are incorporated into the Commission’s demand forecasting and the state can reliably plan to meet these growing demands.

## **Conclusion**

ACP-California appreciates the opportunity to comment on the scope for the 2026 IEPR Update and looks forward to continued engagement with the Commission and staff throughout the IEPR process.

Respectfully Submitted,

Molly Croll  
Senior Policy Director  
American Clean Power - California

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<sup>2</sup> See: [https://www.energy.ca.gov/sites/default/files/2026-01/2026-01-05\\_DAWG\\_Mtg\\_Slides-Combined\\_ada.pdf](https://www.energy.ca.gov/sites/default/files/2026-01/2026-01-05_DAWG_Mtg_Slides-Combined_ada.pdf), slide 27

<sup>3</sup> See CPUC D.26-02-057 p. 22, 55, 64