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STATE OF CALIFORNIA
CALIFORNIA ENERGY COMMISSION

IN THE MATTER OF: *Preparation of the 2026 Integrated Energy Policy Report (IEPR) Update*	DOCKET NO. 26-IEPR-01 RE: Scoping Order

CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S COMMENTS ON THE DRAFT SCOPING ORDER FOR THE 2026 INTEGRATED ENERGY POLICY REPORT UPDATE

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The California Community Choice Association[1] (CalCCA) submits these comments pursuant to the *Notice of Request for Comments on the Draft Scoping Order for the 2026 Integrated Energy Policy Report Update*[2] (Notice), dated March 10, 2026.

I. INTRODUCTION

The Draft Scoping Order for the 2026 Integrated Energy Policy Report Update (Scoping Order) puts forth the following scoping items for the 2026 Integrated Energy Policy Report (IEPR) Update: (1) California electricity demand forecast; (2) California geothermal resources; and (3) energy equity and environmental justice. CalCCA supports including these items in the

[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] *Notice of Request for Comments on the Draft Scoping Order for the 2026 Integrated Energy Policy Report Update*, 26-IEPR-01 (Mar. 10, 2026): https://efiling.energy.ca.gov/GetDocument.aspx?tn=268981&DocumentContentId=106175.

scope and appreciates the efforts of the California Energy Commission (Commission) to develop the IEPR each year, which serves as a foundational document for California's energy policy.

The scope of analysis undertaken by Commission staff to develop the IEPR is a significant undertaking under any scenario. Current fluctuating policy, technological, and market forces further complicate this difficult task. To ensure forecasted load growth reflects the best-known information at the time of forecast development, the Commission should seek information from all knowledgeable stakeholders to inform the likelihood and timing of large load interconnections. Community choice aggregators (CCAs) are well-positioned to evaluate new load growth given their unique access to information, either from large load customers or their local permitting agencies. Consulting with CCAs, along with the investor-owned utilities (IOU) and large load customers, will ensure information used to develop the forecast is as accurate as possible.

The Scoping Order indicates that the 2026 IEPR Update will include an assessment of the impacts from utility energization applications (known loads) data and discussion around how to include these loads in the forecast. Given known loads are inherently uncertain, to the extent the Commission considers including known loads in the forecast, the Commission should continue to exclude them from the Planning Forecast. Incorporating known loads is not necessary for the Planning Forecast given its intended purpose.

The Scoping Order also states that the Commission will explore challenges and opportunities for geothermal development in California. Geothermal resources have the potential to play a significant role in the State's clean energy transition by providing clean baseload energy. Despite interest from LSEs and regulators in geothermal procurement, the amount of geothermal projects in the interconnection queue does not reach the levels included in planning

portfolios. The Commission should therefore seek to identify and reduce barriers that may be preventing geothermal development to the levels assumed in planning.

In summary, CalCCA recommends the Commission:

- Solicit information on new loads from all informed stakeholders including CCAs to inform the likelihood and timing of large loads before including them in the forecast;
- Coordinate with the California Public Utilities Commission (CPUC) to adopt a formal process for allocating RA obligations for data center load based on actual interconnection information and milestones;
- To the extent the Commission considers including known loads as defined in the 2025 IEPR process in the demand forecast, continue to exclude them from the planning scenario; and
- Seek to identify and reduce barriers for geothermal development in and delivery to California.

II. INFORMATION ON NEW LOADS INCLUDED IN THE FORECAST SHOULD BE SOLICITED FROM ALL INFORMED STAKEHOLDERS BEFORE INCLUDING THEM IN THE FORECAST TO INFORM THE LIKELIHOOD AND TIMING OF LARGE LOADS

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. CalCCA and its members appreciate the opportunities within the IEPR process to provide feedback to Commission staff and the openness of Commission staff to incorporate this feedback in its development of the Demand Forecast. CCAs can provide insight on and verification of future loads included in the proposed forecasts.

CCAs serve local communities and are well-positioned to evaluate new load growth given their unique access to information, either from large load customers or their local permitting agencies. 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.

This insight is valuable, as information received by the IOUs is often insufficient to inform the IEPR Demand Forecast. For example, IOU energization dates alone are not a sufficient estimate as to when a project will come online, especially in the near term. Data centers with a 2027 energization date but have not started the permitting process would likely be delayed. In addition, energization requests to an IOU do not account for project feasibility. For example, in San Jose, assumed energization timing may be optimistic for data centers in the downtown area, which have additional permitting considerations. Additionally, as CCAs are community-based, CCA staff and local partners have the unique ability to personally observe the progress of any large load construction or build out. What is observed – and verified by local permitting status – may not align with IOU information. Lastly, actual usage of requested capacity may also differ by area, and a single assumption may not adequately reflect these differences. CalCCA urges the Commission to make ample use of the information community-based LSEs such as CCAs can provide.

To ensure all informed parties can provide insight into and verification of proposed forecasts, the Commission should strive to make as much data public as possible before it is relied upon in the IEPR Demand Forecast. Historically, it has not been possible for CCAs and data center customers to validate the information provided by the IOUs before it is used in the IEPR because it is submitted confidentially. CCAs have observed that once they do receive the data, it is often duplicative and/or contains errors. For example, upon notification that five of eight interconnection applications in a CCA service area were expected to be data centers, one

CCA's investigation found that of the five data center applications, three were not in their service area and two were scaled down to smaller, non-data center loads.

The CEC should therefore either require the data be shared with CCAs or request information from both IOUs and CCAs and validate the information for consistency. Given reliability and cost implications of forecasting new loads, ensuring all informed stakeholders can review the data before it is used in the IEPR Demand Forecast is necessary to ensure the forecast is as accurate as possible.

III. A FORMAL PROCESS IS NECESSARY FOR ALLOCATING RA OBLIGATIONS FOR DATA CENTER LOAD BASED ON ACTUAL INTERCONNECTION INFORMATION AND MILESTONES

As described in Section II., increased transparency and data sharing across the Commission, CCAs, IOUs, and data center customers is imperative to informing the likelihood and timing of data center loads. While this data sharing may be sufficient for longer term planning (*e.g.,* transmission planning) where the specific generation provider need not be known, when it comes to allocating LSE obligations associated with data center load for procurement purposes, a formal process is necessary for allocating data center load based upon predefined milestones.

For this reason, CalCCA filed a proposal in the CPUC's R.25-10-003 for the unique treatment of data center loads in the RA allocation process.[3] This proposal is intended to maintain the collaborative process between the CEC and CPUC, in which the CEC continues to forecast peak demand, and data centers' portion of the forecast, and make LSE specific adjustments. For the purposes of allocating RA requirements, the proposal would establish a new process for allocating new data center loads separate from the existing process used to allocate

[3] *See California Community Choice Association's Track 1 Proposals*, R.25-10-003 (Jan. 23, 2026) at 3-7: https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M596/K418/596418487.PDF; and *California Community Choice Association's Comments On Track 1 Proposals*, R.25-10-003 (Mar. 6, 2026) at 3-8: https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M601/K795/601795601.PDF.

all other loads. This new process should include the following components: (1) considering data center load separately from other forecasted load for RA purposes, using actual rather than forecasted load to determine RA obligations; and (2) allocating an RA obligation to an LSE serving a data center when certain milestones, such as having chosen a LSE generation provider, having an executed interconnection agreement, and having begun construction, are met.

Establishing this new process is necessary to protect existing customers from absorbing costs associated with data center load. In particular, a process should be developed to identify the LSE that will serve the data center load and allocate RA obligations accordingly. Accounting for data center load on an individual basis for RA allocation purposes can therefore mitigate the risk of load forecast inaccuracy. By allocating data center load to the correct LSE with a high degree of certainty, as opposed to the "peanut butter" approach, this proposal has the added benefit of reducing potential cost-shifts between LSEs that experience substantial load growth associated with particular data centers (and are thus able to recover capacity costs from those data centers via rates) and other LSEs that are not.

This proposal also avoids the need to assume which LSE will serve the data center load for the purposes of RA allocations. CCAs are default providers, and they are willing and able to serve data center loads in their territories; some already serve these loads. Their intent to serve data center load does not mean that all customers will choose the CCA as their generation provider.

If there is a delay in implementing CalCCA's proposed approach, the Commission should allow for further discussion around how opt-out assumptions should be developed for large loads. For example, the Commission has provided data center load by CCA in GWh, but not by number of customers. Because opt-outs occur based upon number of customers, access to this data by number of customers would be helpful in informing how to best develop opt out assumptions.

IV. TO THE EXTENT THE COMMISSION CONSIDERS INCLUDING KNOWN LOADS AS DEFINED IN THE 2025 IEPR PROCESS IN THE DEMAND FORECAST, IT SHOULD CONTINUE TO EXCLUDE THEM FROM THE PLANNING SCENARIO

To the extent the Commission considers known loads as defined in the 2025 IEPR process in the Demand Forecast, it should continue to exclude them from the Planning Forecast, given the uncertainty of known loads and the intended purpose of the planning forecast. The known loads data is collected from each 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.

Known loads as defined in the 2025 IEPR process should be excluded from the Planning Forecast, given significant uncertainties related to these loads, including their actual energization dates, and the intended purpose of the Planning Forecast. 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. It is also still unclear whether the known loads methodology has been properly adjusted to reflect the coincident peak or to resolve issues of duplication and other errors revealed during the 2025 IEPR process.

Beyond concerns about the quality of the known loads data set, issues about appropriateness of the assumptions for different use cases should be carefully considered. The primary use case of known loads data is to ensure sufficient distribution and local capacity to maintain reliability. Known loads are therefore may be appropriate to include in the Local

Reliability forecast. However, coincidence factors for this local use case are expected to differ from the coincidence factor for a use case based on system-wide demand. The Planning Forecast is applied to use cases driven by system-wide demand, as in RA requirements, bulk transmission planning, or integrated resource planning. As such, it is inappropriate to assume that the contribution of known loads to local reliability requirements would be the same as the contribution of known loads to the Planning Forecast used for system-wide requirements.

V. THE COMMISSION'S EXPLORATION OF GEOTHERMAL CHALLENGES AND OPPORTUNITIES SHOULD SEEK TO IDENTIFY AND REDUCE BARRIERS FOR GEOTHERMAL DEVELOPMENT IN AND DELIVERY TO CALIFORNIA

Geothermal resources have the potential to play a significant role in the State's clean energy transition by providing clean baseload energy. CCAs have already procured and are interested in continuing to procure geothermal resources to support diverse and clean portfolios. For example, Sonoma Clean Power, in partnership with Sonoma and Mendocino counties, is leading the GeoZone initiative to develop 600 MW of next-generation geothermal energy.[4] CCAs and other LSEs are also required to procure clean firm resources to comply with CPUC procurement orders, and the CPUC has included 3.4 GW of geothermal by 2045 in its Preferred System Plan (PSP).[5]

[4] https://sonomacleanpower.org/geozone.

[5] D.26-02-057, *Decision Requiring 2029-2032 Electric Resource Procurement and Transmitting Portfolios for 2026-2027 Transmission Planning Process*, R.25-06-019 (Mar. 5, 2026), at 60: https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M601/K777/601777006.PDF.

Despite strong interest from LSEs and signals from regulators expressing a desire for a diverse resource portfolio in the State, the CAISO's interconnection queue does not reflect this diversity. Projects available for near-term procurement are predominately solar and battery storage.

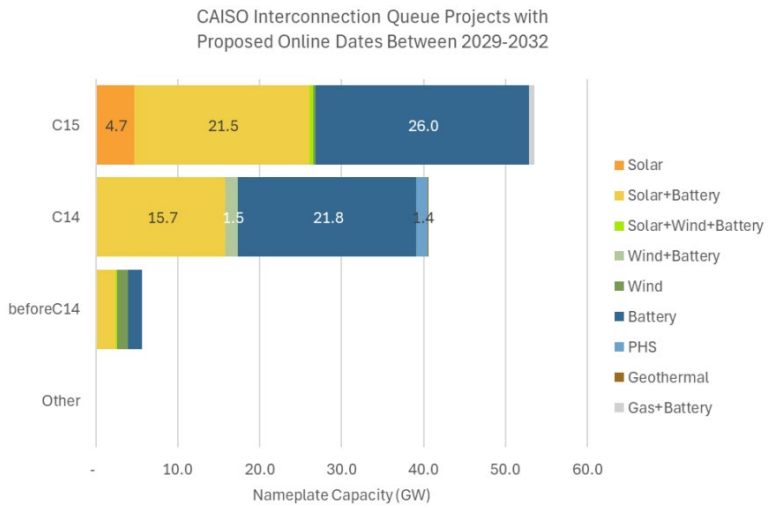

Figure 1. CAISO Interconnection Queue Projects with CODs between 2029 and 2032[6]

The current CAISO queue includes only two geothermal projects, totaling 62.5 MW.[7] Outside of the CAISO, there are 894 MW of active geothermal interconnection requests in IID and another 824 MW in the non-California West.[8] The CPUC's recently adopted PSP includes geothermal levels far exceeding the amounts in the CAISO queue, including 1.2 GW by 2031 and 3.4 GW by 2045.[9] The PSP also includes a significant amount of solar and storage, prompting questions around whether the "massive" amounts of solar and storage are feasible.[10]

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[6] CalCCA analysis of Berkeley Lab's Queued Up dataset (2025) for CAISO, available at https://emp.lbl.gov/sites/default/files/2025-08/LBNL_Ix_Queue_Data_File_thru2024_v2.xlsx

[7] CAISO Public Queue report: https://www.caiso.com/documents/publicqueuereport.xlsx; no geothermal projects are reported in the most recent Cluster 15 studies, available at https://www.caiso.com/documents/cluster-15-interconnection-requests.xlsx.

[8] Based on CalCCA analysis of Berkeley Lab's Queued Up dataset (2025) for non-CAISO interconnections in the West, available at https://emp.lbl.gov/sites/default/files/2025-08/LBNL_Ix_Queue_Data_File_thru2024_v2.xlsx

[8] Based on CalCCA analysis of Berkeley Lab's Queued Up dataset (2025) for non-CAISO interconnections in the West, available at https://emp.lbl.gov/sites/default/files/2025-08/LBNL_Ix_Queue_Data_File_thru2024_v2.xlsx

[9] D.26-02-057, at 60.

[10] D.26-02-057, at 80.

The combination of the lack of diversity in the CAISO queue and heavy reliance on solar and batteries in the CPUC's PSP suggest that investigating further the challenges and opportunities with developing geothermal is worthwhile.

The Commission should consult with relevant stakeholders to identify the magnitude and viability of geothermal opportunities in *and* out of state and investigate whether existing barriers are preventing the timely development of geothermal or other clean resources. *First*, the Commission should consult with LSEs and developers to identify areas of commercial interest within and outside of California to ensure the state is accurately planning to incorporate geothermal at viable locations. This information combined with the Commission's expertise in land use and the CPUC's efforts to map resources in the PSP will provide helpful insight into whether the State's planning processes align with commercial expectations.

Second, the Commission should also consult with developers to identify reasons why geothermal is not showing up in the CAISO queue in numbers consistent with the State's planning portfolios. Identifying root causes will help the Commission, other agencies, and stakeholders to identify solutions necessary to remove barriers. The Commission should also investigate the extent to which developers are seeking to develop geothermal outside the State. This should include the reasons for seeking development outside of California, and whether barriers, such as import capability, would prevent such out-of-state projects from offering that capacity to California LSEs.

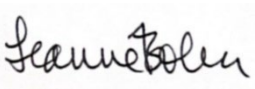
Finally, the Commission should examine siting and licensing requirements of the Commission and local entities to determine if they present any unnecessary barriers to geothermal development and the development of other clean energy resources. These efforts will

help the Commission identify potential solutions to the challenges the State is facing with bringing a diverse set of technologies to the system to support a reliable clean energy transition.

VI. 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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March 25, 2026