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STATE OF CALIFORNIA
CALIFORNIA ENERGY COMMISSION

IN THE MATTER OF: *2025 Integrated Energy Policy Report (2025 IEPR)*	DOCKET NO. 25-IEPR-01 DRAFT 2025 INTEGRATED ENERGY POLICY REPORT

CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S COMMENTS ON THE DRAFT 2025 INTEGRATED ENERGY POLICY REPORT

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The California Community Choice Association[1] (CalCCA) submits these comments pursuant to the *Notice of Availability and Request for Comments on the Draft 2025 Integrated Energy Policy Report*[2] (Notice), seeking public comment on the *Draft 2025 Integrated Energy Policy Report*[3] (Draft Report), dated April 2026.

I. INTRODUCTION

Development of the Integrated Energy Policy Report (IEPR) by California Energy Commission (Commission) staff requires synthesizing an enormous amount of data and evaluating the most pressing energy needs and issues with input from a wide variety of stakeholders. Current fluctuating policy, technological, and market forces further complicate this difficult task. CalCCA appreciates the work of Commission staff in developing the Draft Report.

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[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 Availability and Request for Comments on the Draft 2025 Integrated Energy Policy Report*, 25-IEPR-01 (Apr. 23, 2026).

[3] *Draft 2025 Integrated Energy Policy Report*, 25-IEPR-01 (Apr. 2026).

An increasingly important component of the IEPR is the California Electricity Demand Forecast (Demand Forecast), which serves as an input into many of the state's key energy planning and reliability tools, such as the California Public Utilities Commission (CPUC) Resource Adequacy (RA) and Integrated Resource Planning (IRP) programs, the California Independent System Operator's (CAISO) Transmission Planning Process (TPP), and the investor-owned utilities' (IOU) distribution planning processes. Load forecasting is becoming increasingly uncertain and complex with the emergence of new large loads, such as data centers, electrification, and other drivers of load growth. In addition, the speed at which customers seek energization results in IOUs including customers in the early stages of the interconnection process (*i.e.,* Known Loads) in their load forecasts, when those customers have not previously been included. The Commission has taken a measured approach in the IEPR by managing the uncertainty of data center loads using scenarios with different confidence levels. The Commission also plans for the uncertainty of Known Loads by including them in the scenario for distribution and transmission planning (Local Reliability Scenario), but excluding them from the scenario used for IRP and RA planning (Planning Scenario).

CalCCA supports the approaches taken by the Commission on both data centers and Known Loads. CalCCA also appreciates the Commission's commitment to advance its forecasting capabilities in light of the unprecedented uncertainty load forecasters across the nation face with the introduction of new large loads. To further improve these processes, CalCCA recommends that in future IEPR processes, the Commission should: (1) 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; (2) coordinate with the CPUC to adopt a formal process for allocating RA obligations for data center load based on

actual interconnection information and milestones; (3) reassess the Demand Forecasts' planning areas and forecast zones to ensure they accurately reflect the characteristics of the communities they include; and (4) continue to exclude Known Loads from the Planning Scenario.

The IEPR also evaluates several key issues impacting California's ability to supply affordable, reliable, and clean electricity. To advance these issues going forward, the Commission should continue to explore necessary improvements to the development of the planning portfolios used in the TPP. Mapping resources in commercially viable locations will help provide for sufficient deliverability in the right locations to support investments in new generation capacity. The Commission should also take the time necessary to holistically review load shift strategies to ensure they provide sufficient flexibility to adequately account for market incentives, customer behavior, grid needs, and equitable participation across load shift service providers.

In summary, in future IEPR processes, the Commission should:

- Solicit information on new loads from all informed stakeholders including CCAs to inform the likelihood and timing of large loads, including data centers, before including them in the Demand Forecast;
- Coordinate with the CPUC to adopt a formal process for allocating RA obligations for data center load based on actual interconnection information and milestones;
- Continue to review Demand Forecast planning areas and forecast zones to ensure they accurately reflect the load characteristics of the communities they include;
- 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;
- Continue to explore necessary improvements to ensure sufficient deliverability for resources in the CAISO Balancing Authority Area (BAA) needed to provide system reliability; and
- Holistically review load shift strategies to ensure they provide sufficient flexibility to adequately account for market incentives, customer behavior, grid needs, and equitable participation across load shift service providers.

II. THE COMMISSION SHOULD CONTINUE REFINING ITS FORECASTING TOOLS IN FUTURE IEPR CYCLES IN LIGHT OF UNPRECEDENTED UNCERTAINTY ASSOCIATED WITH THE INTRODUCTION OF NEW LARGE LOADS

Load forecasting has become increasingly uncertain and complex with the emergence of new large loads, such as data centers, along with electrification and other drivers of load growth. CalCCA supports the Commission "continu[ing] to advance its forecasting capabilities as part of its focus on providing science-based planning tools needed in the transition to a clean energy future."[4] In doing so, in future IEPR cycles, the Commission should: (1) solicit information from all informed stakeholders, including CCAs, to inform the likelihood and timing of large loads; (2) coordinate with the CPUC to adopt a formal process for including data center loads in the RA forecast using interconnection milestones; (3) review the Demand Forecast's forecast zones and planning areas to ensure they accurately reflect the regions' expected load; and (4) continue to exclude Known Loads from the Planning Scenario, as described herein.

A. Information From All Informed Parties, Including CCAs, Should Be Solicited to Inform the Likelihood and Timing of Large Loads Before Including Them in the Forecast

CalCCA and its members appreciate the opportunities within the IEPR process to provide feedback to Commission staff. CalCCA also appreciates the openness of Commission staff to evaluate incorporating this feedback in its development of the Demand Forecast. 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. The IEPR's data center forecast is developed "using information from utilities, including project status and requested capacity," to create "three scenarios for data center growth that

[4] Draft Report, at 7.

reflect a range of possible outcomes."[5] In future IEPR processes, in addition to obtaining information from the utilities, the Commission should solicit information from all informed parties, including CCAs, to inform the likelihood and timing of large loads before including them in the Demand Forecast.

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. Each CCA's association with cities and counties will give it unique access and insight into the status of development of the new facilities, including when they are expected to be operational. This insight is valuable, as information received from the customer by the IOUs is often insufficient to inform the IEPR Demand Forecast, as described in the CalCCA 2026 Draft Scoping Order Comments.[6] 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

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5 Draft Report, at 8.

6 *See California Community Choice Association's Comments on the Draft Scoping Order for the 2026 Integrated Energy Policy Report Update*, Docket No. 26-IEPR-01 (Mar. 25, 2026) (CalCCA 2026 Draft Scoping Order Comments), at 3-5. 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 that 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 has 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.

IEPR because it is submitted confidentially. CCAs have observed that once a CCA receives the data, it is often duplicative and/or contains errors.[7] 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.

B. The Commission Should Coordinate with the CPUC to Adopt a Formal Process for Allocating RA Obligations for Data Center Load Based on Actual Interconnection Information and Milestones

A formal process for allocating data center load driven RA obligations based on interconnection milestones is necessary to ensure RA obligations are allocated fairly and not based on speculative loads. 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, as described in Section II.A, above. This data sharing may be sufficient for longer term planning (*e.g.,* transmission planning) for which the specific generation provider need not be known. When it comes to allocating LSE obligations associated with data center load for generation 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 RA proceeding, R.25-10-003, for the unique treatment of data center loads in the RA allocation process.[8] The IEPR Demand Forecast is a key input into the establishment of RA obligations that load-serving entities (LSE)

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[7] 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.

[8] *See California Community Choice Association's Track 1 Proposals*, Rulemaking (R.) 25-10-003 (Jan. 23, 2026) (CalCCA Track 1 Proposal), at 3-7; and *California Community Choice Association's Comments on Track 1 Proposals*, R.25-10-003 (Mar. 6, 2026), at 3-8.

must meet as part of the CPUC's RA program.[9] CalCCA's proposal is intended to maintain the collaborative process between the Commission and CPUC, in which the Commission 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 all other loads. CalCCA recommends that this new process 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 are met, such as having chosen a LSE generation provider, having an executed interconnection agreement, and having begun construction.

Establishment of a formal process is necessary to protect existing customers from absorbing costs associated with data center load by determining when data center load service is reasonably certain, identifying the LSE that will serve the data center load, and allocating RA obligations accordingly. Accounting for data center load on an individual basis for RA allocation purposes can 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.[10]

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[9] Draft Report, at 12 ("The [Commission], CPUC, and California ISO agree to use specific combinations of this forecast set for planning and procurement, which will be documented in the final *IEPR*. The planning forecast is used for [RA] and [IRP].").

[10] 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

C. Electricity Demand Forecast Zones Should be Reviewed to Ensure They Accurately Reflect Regions' Expected Load Changes in Light of the Concentration of Large Loads

The Commission should continue to review the planning areas and forecast zones as part of the 2026 IEPR process to ensure that they accurately reflect regions' expected load changes. The Demand Forecast includes annual electricity consumption and sales forecasts by customer sector for eight planning areas and 20 forecast zones.[11] These planning areas and forecast zones impact LSEs' load allocations used to establish RA requirements and other reliability procurement obligations. The Commission states that during 2025, the Commission sought to "improv[e] the capability to easily change (increase or decrease) … forecast zones… included in the forecast" to be used in the 2026 IEPR update.[12]

CalCCA supports this effort and encourages additional review of how forecast zones and planning areas are mapped to ensure they proportionally reflect both cities' and counties' projected load changes. This review is necessary considering the influx of large loads, which could have disproportionate impacts on communities where they are located, especially if large loads are concentrated in specific areas within planning areas and forecast zones. In addition, certain forecast zones may be incorporated into an area with overall high load growth, even though a portion of that zone has no load growth or even has decreasing load. The Commission should therefore conduct additional review of forecast zones and planning areas and consider

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loads in their territories. In fact, 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 2026 IEPR Update should allow for further discussion around how to develop opt-out assumptions for large loads. For example, the Commission has provided data center load by CCA in gigawatt-hour (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.

[11] *See* GIS map of planning areas and forecast zones, https://cecgis-caenergy.opendata.arcgis.com/datasets/CAEnergy::california-electricity-demand-forecast-zones/explore?location=37.208945%2C-118.876986%2C6.

[12] Draft Report, at 81.

whether further modifications are necessary to accurately reflect projected load changes in specific locations.

D. To the Extent the Commission Considers Including Known Loads in the 2026 IEPR Update, It Should Continue to Exclude Them from the Planning Scenario

The Commission identified Known Loads as a significant source of uncertainty in the draft Report and commits to additional analysis to understand trends in known loads data as part of the 2026 IEPR update.[13] To the extent the 2026 IEPR Update considers Known Loads as defined in the IEPR, the Commission should continue to exclude them from the Planning Forecast, given: (1) the uncertainty of Known Loads; and (2) the Planning Forecast's intended purpose.[14] 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 during the 2025 IEPR process, 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.

The primary use case of Known Loads data is to ensure sufficient distribution and local capacity to maintain reliability. Known Loads therefore may be appropriate to include in the

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13 Draft Report, at 7-8.

14 CalCCA 2026 Draft Scoping Order Comments, at 7.

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 IRP. 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. The Commission should therefore conduct additional data collection and analysis on Known Loads to inform coincidence factors that differ between using Known Loads for local reliability versus system planning. These coincidence factors could then be used to evaluate the appropriateness of the Commission's inclusion of Known Loads in each Demand Forecast produced in the IEPR. Until this analysis is complete, to the extent the Commission considers including Known Loads, as defined in the IEPR, in the 2026 IEPR Update, it should continue to exclude them from the Planning Scenario.

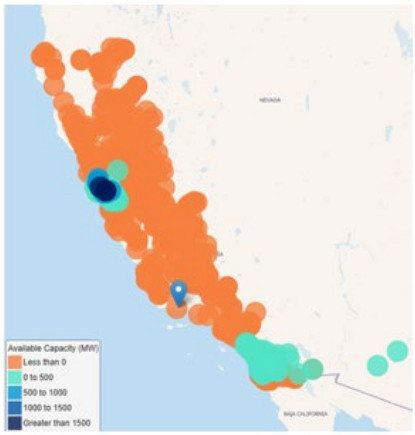
III. THE COMMISSION SHOULD COORDINATE WITH THE CPUC AND CAISO TO ENSURE SUFFICIENT DELIVERABILITY FOR NEW GENERATION

As stated in the IEPR, "California must sustain an unprecedented expansion of clean electricity generation and storage, along with continued electrification of the transportation, residential, and industrial sectors, while controlling costs."[15] The ability for internal and external resources to deliver to CAISO load is a key factor in achieving this objective. The RA and IRP programs generally require resources to be fully deliverable to count towards compliance obligations. Total deliverability on the CAISO system is scarce, as shown below, below, and must be allocated across resources internal and external to the CAISO BAA. In addition, "delays in network upgrades negatively affect the state's ability to meet its resource adequacy needs by

[15] Draft Report, at 86.

hindering the ability of projects to obtain deliverability status, in addition to increasing curtailment."[16]

The Commission, CPUC, and CAISO should ensure their processes enable the interconnection of sufficient deliverable generation to support reliability and policy objectives. The memorandum of understanding (MOU) between these entities ensures resource and transmission planning processes are coordinated to "driv[e] the future infrastructure of the grid, so that the [Commission's] load forecasts and the CPUC's forward-looking resource portfolios remain the key assumptions for [the CAISO's] assessment of transmission needs."[17] The CAISO's recent enhancements to its interconnection process "identifies and prioritizes transmission zones with available or planned capacity, then limits the capacity studied in each zone to 150 percent of available transmission capacity for each zone."[18] CalCCA appreciates the CAISO's efforts to increase the efficiency of and identify the most viable projects in the interconnection queue. However, available transmission capacity is scarce, as shown in Figure 1 below.



Available Capacity (MW)	# of Substations
Less than 0	578
0-500	160
500-1,000	6
1,000-1,500	0
1,500+	3

Figure 1: Cluster Phase 1 Scenario Heatmap[19]

16 Draft Report, at 102.
17 *Id.*, at 95.
18 *Id.*, at 98.
19 https://www.caiso.com/poi-heatmap/.

Without new transmission capacity associated with policy approvals in TPP, the amount of Cluster 16 projects that can enter the interconnection queue may be severely limited when new deliverable generation is needed. The CPUC recently ordered procurement of 6,000 megawatts (MW) of deliverable net qualifying capacity to serve reliability needs between 2029-2032.[20] In addition, RA capacity has been scarce for the last few years, triggering high prices and penalties for non-compliance.[21] While recent build has helped, load growth and other factors may require more RA to be procured. Through the MOU, the Commission, CPUC, and CAISO each play a role ensuring the resource planning portfolios result in sufficient transmission capacity to interconnect new resources in the right quantities and locations to support reliability and policy objectives. These entities should work together to ensure sufficient deliverability to support these objectives.

IV. LOAD SHIFT STRATEGIES SHOULD BE HOLISTICALLY REVIEWED TO ENSURE THEY ADEQUATELY CONSIDER MARKET INCENTIVES, CUSTOMER AND GRID NEEDS, AND EQUITABLE PARTICIPATION

The Commission should carefully and holistically review load shift strategies to ensure they provide sufficient flexibility to adequately account for market incentives, customer behavior, grid needs, and equitable participation across load shift service providers. While the Commission has the difficult task of facilitating seven gigawatts (GW) of load shift by 2030, the complexity of demand management systems and how they interact with customers and markets requires methodical review. It may be tempting to rush to deploy more load shifting technologies into homes and businesses, but a holistic review that allows sufficient time to process and plan will lead

[20] 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).

[21] CalCCA analysis of Federal Energy Regulatory Commission (FERC) Electric Quarterly Report (EQR) data demonstrates that prices for RA reached over $100 per kilowatt (kW) -month in 2024. CalCCA observed three transactions (totaling 92 MW) at prices of $100-101/kW-month for sale of capacity to California LSEs, delivered in 2024. The source of the data is CalCCA analysis of EQRs downloaded from https://eqrreportviewer.ferc.gov/.

to a more sustainable and impactful system of load shifting strategies. The Draft Report acknowledges this, and identifies the remaining challenges for reaching seven GW of load shift.[22]

The Commission's Load Management Standards (LMS) should also be interpreted and applied in a flexible manner to support innovation across LSEs and distributed energy resources (DER) providers in achieving load shift. At its April 8, 2026, Business Meeting, the Commission voted to begin the pre-rulemaking process to re-open the LMS regulations to improve implementation and expand participation.[23] When preparing for potential modifications to the LMS regulations, the Commission should focus on ensuring LMS regulations are interpreted and applied in a flexible and beneficial manner.

Flexibility in achieving state goals has underpinned California's leadership in climate action and should not stop with LMS. While marginal cost-based rates can serve a valuable role in promoting load flexibility, so too can programs that incentivize load shifting, particularly for residential customers. More evaluation and review are needed to parse out optimal approaches to load shifting across electric rate classes. The IEPR acknowledges this in discussing issues with customer incentives, consumer experiences, and equity and affordability considerations.[24] Different sectors may need different approaches to load flexibility to maximize participation and to fairly compensate participants for the value of that load flexibility.

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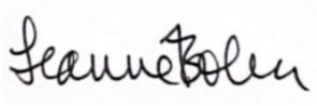
22 Draft Report, at 131 (describing the work needed to achieve seven GW of load shift).
23 26-BUSMTG-01, *April 8, 2026, Business Meeting Agenda*, Item 6, at 5.
24 IEPR, at 129.

V. CONCLUSION

For all the foregoing reasons, CalCCA respectfully requests consideration of the comments herein.

Respectfully submitted,



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