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VIA CEC Docket Submittal

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Docket No. 26-IEPR-03
California Energy Commission
715 P Street
Sacramento, CA 95814

RE: CEC Docket No. 26-IEPR-03 Ava Community Energy Comments on IEPR
Commissioner Workshop on Energy Demand Forecast Inputs and Assumptions

Ava Community Energy ("Ava") appreciates the opportunity to comment on the California Energy Commission's ("CEC") August 20, 2026 Commissioner Workshop on Energy Demand Forecast Inputs and Assumptions ("August 20 Workshop") and supporting Demand Analysis Working Group ("DAWG") meetings. Ava is a community choice aggregator ("CCA") that serves as the default electricity provider in Alameda County and San Joaquin County. As a load-serving entity ("LSE"), Ava is engaged in the development of the IEPR Energy Demand Forecast and provides critical input to the CEC regarding energy demand trends in its service territory.

Ava appreciates the CEC's collaborative and transparent process in developing and updating forecast methodologies for the 2026 IEPR Update. Ava provides the following comments on the August 20 Workshop and supporting DAWG meetings:

- Ava supports the continued refinement of data center grouping, confidence level, and opt out methodologies as the CEC receives more data, including considering a milestone-based approach.
- Ava supports the CEC's effort to improve visibility on emerging data centers for CCAs and improve information sharing between CCAs and the CEC.
- Ava supports CalCCA's comments regarding data center load allocation for the purpose of setting RA requirements, increased engagement with CCAs in developing the data center demand forecast, and the treatment of known loads in the California Electricity Demand Forecast.

Data Center Forecast Methodology

During the August 20 Workshop, CEC staff stated they are considering incorporating additional data center project milestones beyond the signed service agreement, which may reflect a higher confidence that a project will be completed.¹ Ava supports the CEC's effort to continue refining the data center grouping methodology and associated confidence levels as it receives more information regarding data center load.

Additionally, Ava recommends the CEC re-evaluate and seek stakeholder input on the data center opt out methodology for the 2026 IEPR Update. The opt out methodology determines the amount of data center load in each CCAs' service territory that will be served by the CCA or the incumbent IOU. As the default electricity provider in its service territory, Ava intends to serve all data center load. However, customers in Ava's service territory (data centers or otherwise) have the ability to choose their generation provider.

For the 2026 IEPR Update, Ava recommends the CEC consider the "lumpy" nature of data center load when developing an opt-out assumption—i.e., there are relatively few data center customers, each with relatively large loads. Ava recommends the CEC consider a methodology based on individual data center projects, which will more accurately reflect the ability for customers to choose their generation provider. Specifically, the CEC should consider incorporating project milestones into the opt out methodology and assigning data center load to LSEs only when a data center customer has indicated which LSE will serve its load. This approach is particularly important for the CEC's development of the IEPR Planning Forecast, which directly affects LSEs' procurement obligations.

Data Center Information Sharing and Visibility

Ava commends the CEC's effort to improve visibility on emerging data centers for CCAs and increase engagement between CCAs and the CEC, as presented by CEC staff at the August 20 Workshop.² In support of that effort, Ava recommends the CEC establish data center information sharing pathways that will allow CCAs to receive and verify data center information, which is primarily provided by the IOUs. Ava is heartened to see that the CEC will solicit data center information from a peer CCA, San Jose Clean Energy,³ and encourages the CEC to continue and expand outreach to CCAs to inform the data center demand forecast. As a CCA, Ava's relationships with local governments and customers in its service territory can be leveraged to validate and/or augment data center information from IOUs that inform the IEPR forecast.

As the CEC improves its tracking of data center project milestones, Ava encourages the CEC to share more data with CCAs regarding the magnitude of load and number of customers in each milestone stage and the progression of projects from one stage to the next. The CEC can play a key role in giving CCAs the opportunity to cross-check data center load growth information with

¹ [August 20 Workshop Recording](#), CEC (August 20, 2026), 2:50:48 – 2:51:41.

² Jeremy Smith, [Data Center Demand Forecast](#), CEC (August 20, 2026), p. 8.

³ [Data Center Data Collection and Forecasting](#), DAWG (August 12, 2026), p. 12.

their internal forecasts, serving to both validate the CEC's forecast and enable CCAs to better plan for data center load growth.

Ava Supports CalCCA's Comments

Ava looks forward to continued collaboration with the CEC in the development of the 2026 IEPR Update, both individually and through our trade organization, the California Community Choice Association ("CalCCA"). Ava supports CalCCA's comments regarding data center load allocation for the purpose of setting RA requirements, increased engagement with CCAs in developing the data center demand forecast, and treatment of known loads in the California Electricity Demand Forecast.

Thank you for your consideration of our comments. Please contact Claire Huang (chuang@avaenergy.org) if you have any questions.

/s/ Claire Huang

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