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**Public Advocates Office Comments on the 2026 IEPR Update
Commissioner Workshop on Energy Demand Forecast Inputs and
Assumptions**

Additional submitted attachment is included below.



September 15, 2026

Comments on the California Energy Commission (CEC) 2026 Integrated Energy Policy Report Update (2026 IEPR Update) Commissioner Workshop on Energy Demand Forecast Inputs and Assumptions

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) provides these comments on the Integrated Energy Policy Report (IEPR) Commissioner Workshop on Energy Demand Forecast Inputs and Assumptions (Workshop) held on August 20, 2026. Cal Advocates is an independent ratepayer advocate with a mandate to obtain the lowest possible rates for utility services, consistent with reliable and safe service levels and the state's environmental goals.¹

The CEC Should Define the Most Certain Data Center Group, Group 1, as Load that has Final Signed Interconnection Agreement(s).

The CEC should only include data center applications in the CEC's most certain category (Group 1) after the data center customer has signed the final interconnection agreement(s) required before a customer can proceed to energization. In the 2025 IEPR, the CEC grouped data center application load together based on their completion of application milestones and assigned each group a confidence level.² In the Workshop, the CEC presented the application milestones in a typical data center interconnection process.³ The CEC presented that a customer completes an engineering study, signs a Service Agreement, signs a Work Performance Agreement (WPA), and then proceeds to construction.⁴ Pacific Gas and Electric Company (PG&E) presented that after a customer signs a WPA, customers sign Interconnection Construction Agreements (ICA) and then proceed to construction. The CEC should acknowledge that, at least in PG&E's process, there appears to be another step after the signed WPA before the customer begins construction. The last step prior to energization should be the defining criteria for inclusion in the CEC's Group 1.

Limiting Group 1 to more certain projects has a material impact on the load forecast. PG&E presented that it has 3,880 MW of data center load with signed WPAs and 630 MW of data center load with signed ICAs.⁵ Currently, PG&E submits an executed WPA for data center

¹ Public Utilities Code Section 309.5.

² CEC, *2025 IEPR: Preliminary Data Center Demand Forecast*, November 13, 2025, at slide 5.

³ CEC, *Data Center Demand Forecast*, August 20, 2026 (CEC Data Center Demand Forecast Presentation), at slide 7.

⁴ CEC Data Center Demand Forecast Presentation at slide 7.

⁵ PG&E, *Presentation – PG&E Data Center Forecasting*, August 20, 2026 (PG&E Data Center Presentation), at slide 8.

applicants to the CPUC for approval.⁶ So far, PG&E submitted WPAs for about 650 MW of data center load.⁷ This is comparable to the amount of load (630 MW) PG&E presented with signed ICAs.⁸ PG&E suspended two of its data center filings at the CPUC.⁹ It is unclear which agreement, if any, in PG&E's filings with the CPUC is the ICA. PG&E has not made clear why it has not submitted the 3,880 MW of load it states have signed WPAs to the CPUC for review. The CEC should confirm that the applications it groups as being certain to come online (Group 1) have signed the final agreement(s) prior to construction that obligates the customer to provide upfront financing and withdrawal penalties for associated network upgrades.

The CEC Should Clarify if the Signed Service Agreement It Discusses is a Signed Engineering Study.

The CEC presented the energization milestones in a typical data center application process, specifically that customers complete an engineering study, sign a Service Agreement, and then execute a WPA.¹⁰ PG&E explained that data center customers sign the Preliminary Engineering Study Report and then pay an initial advance when they sign the interconnection agreement or WPA.¹¹ It is unclear what 'Signed Service Agreement' the CEC is referring to in its description of energization milestones. The CEC should clarify if it is referring to the Signed Engineering Study or if not, which Service Agreement.

The 2026 IEPR Update Should Exclude Highly Speculative Load Inquiries.

The CEC should exclude highly speculative "Load Inquiries" from its Group 3 demand forecasts and replace it with loads that have met the first meaningful milestone in the interconnection process, specifically, submitting a complete application.¹² The CEC presented that the first milestone a prospective data center customer must complete is a load inquiry.¹³ However, load inquiries are non-binding and do not require a financial commitment. Thus, customers can submit speculative or duplicative requests with little to no consequence and those requests may

⁶ See Attachment 1 to Advice Letter (AL) 7569-E, Attachment 1 to AL 7667-E, Attachment 1 to AL 7635-E, Attachment 1 to AL 7785-E, Attachment 1 to AL 7814-E, Attachment 1 to AL 7853-E, and Attachment 1 to AL 7919-E.

⁷ See AL 7569-E (90 megawatts (MW)), AL 7667-E (49 MW), AL 7635-E (90 MW), AL 7785-E (250 MW), AL 7814-E (30 MW), AL 7853-E (49.5 MW), and AL 7919-E (97.3 MW).

⁸ PG&E Data Center Presentation at slide 8.

⁹ AL 7814-E was suspended on February 3, 2026. AL 7853-E was suspended on August 6, 2026.

¹⁰ CEC Data Center Demand Forecast Presentation at slide 7.

¹¹ Cal Advocates, *Comments on the December 17, 2025, CEC IEPR Commissioner Workshop on Energy Demand Forecast Results*, December 31, 2025 (Cal Advocates 2025 IEPR Comments) at 2 (citing A.24-11-007, Pacific Gas and Electric Company's Opening Post-Hearing Brief, October 24, 2025 at 19, 44-45).

¹² CEC Data Center Demand Forecast Presentation

¹³ CEC Data center Demand Forecast Presentation at slide 7.

never lead to an actual interconnection.¹⁴

It is also unclear what the intervenor-owned utilities' process is for removing load inquiries after a certain amount of time from its internal tracking and reporting to the CEC. The CEC should not incorporate low-certainty load inquiries into the IEPR forecast in any capacity.¹⁵ Instead, the CEC should “anchor its Group 3 demand forecasts to loads that have met the first meaningful milestone in the interconnection process – submitting a complete application.”¹⁶

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Please reach out if you have any questions.

Thank you,

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¹⁴ Cal Advocates 2025 IEPR Comments at 3.

¹⁵ Energy Systems Integration Group, Forecasting for Large Loads Current Practices and Recommendations, December 2025 at 12. (“Preliminary Information; not included in official forecasts.”)

¹⁶ Cal Advocates 2025 IEPR Comments at 3.