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Aquadrio Comments on the Data Center Load Modifier

Aquadrio submits the attached comments in Docket 26-IEPR-03 ahead of the November 12, 2026 workshop on draft load modifier results. The comments address a quantity the data center load modifier does not carry, the water consumed at power plants to generate the electricity data centers use, and recommend reporting it with the forecast load, by basin and hour.

Additional submitted attachment is included below.

Comments on the 2026 IEPR Update Data Center Load Modifier

California Energy Commission, Docket No. 26-IEPR-03, Electricity and Gas Demand Forecast

Aquadrio values the water behind every hour of electricity, down to the building that used it. These comments address the November 12, 2026 workshop on draft load modifier results, and one quantity the data center load modifier does not carry: gridwater. We define gridwater as the volume of water consumed during power generation for the electricity a building used.

Gridwater on CAISO

- On CAISO, generation consumed 310 gallons of water per megawatt-hour generated over 2024 (EIA-860 and EIA-923).
- Every gigawatt of data center load running for one hour on CAISO accounts for about 310,000 gallons consumed at generation, attributed to the basins the plants draw from, the Sacramento and the San Joaquin first among them.
- The water moves hour by hour with the generation mix. In October 2026, Aquadrio's index for CAISO (demand net of rooftop solar) read 224.14 gallons per megawatt-hour, valued at $0.4248 per megawatt-hour, over 744 sealed hours.

Recommendations

- **Report the water with the load.** For each forecast case, the data center load modifier should state the gridwater of the forecast load, in gallons by basin, and its value.
- **Use the hourly profiles.** The forecast already builds hourly load profiles for data centers from interval meter data. Applied to each hour's gallons per megawatt-hour, those profiles give the water behind the forecast load hour by hour.
- **Keep the interval data.** The data center data collection should retain each facility's hourly load, so the water behind every hour can be attributed to the facility that used it.

Data Available to the Commission

- Aquadrio's gridwater index for CAISO is published daily under the Creative Commons Attribution 4.0 license. Each hourly record is sealed so any party can recompute it from the federal data it states.
- Position paper: "Gridwater: The Embedded Water Cost of Electricity" (DOI 10.5281/zenodo.23066822; SSRN DOI 10.2139/ssrn.7545821).

We appreciate the opportunity to comment and look forward to the November 12 workshop.

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