

**DOCKETED**

<b>Docket Number:</b>	24-IEPR-03
<b>Project Title:</b>	Electricity Demand Forecast
<b>TN #:</b>	260218
<b>Document Title:</b>	Matt VanderZanden - Comments of STACK Infrastructure, LLC Regarding Data Center Load Forecasting
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Matt VanderZanden
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	11/21/2024 5:06:21 PM
<b>Docketed Date:</b>	11/22/2024

*Comment Received From: Matt VanderZanden  
Submitted On: 11/21/2024  
Docket Number: 24-IEPR-03*

**Comments of STACK Infrastructure, LLC Regarding Data Center Load Forecasting**

*Additional submitted attachment is included below.*

November 21, 2024

Via Email

California Energy Commission  
Dockets Office  
California Energy Commission  
715 P Street  
Sacramento, CA 95814

Re: Integrated Energy Policy Proceeding, Electricity Demand Forecast,  
Docket No. 14-IEPR-03  
Comments of STACK Infrastructure, LLC Regarding Data Center Load Forecasting

Dear Commissioner Gunda and Staff of the California Energy Commission:

Thank you for the opportunity to provide comments relating to electricity demand and forecasting in California. STACK Infrastructure, LLC (“STACK”) provides digital infrastructure to scale the world’s most innovative companies. We deliver a comprehensive suite of data center campus, build-to-suit, colocation, and powered shells solutions across the globe and have 37 data centers in 23 markets. In California, in the service territory of Pacific Gas & Electric (“PG&E”), we have completed one data center, are constructing another, and are in the process of obtaining permits for a third data center. In the service territory of Silicon Valley Power (“SVP”) we have recently completed a data center.

STACK understands and agrees that accurate load forecasting is critical to support the significant needed growth in data centers in California and elsewhere. To that end, we have previously participated in this proceeding by contributing to a presentation regarding data center needs which is filed in the docket of the proceeding.<sup>1</sup> As a follow up to that presentation, we closely tracked the CEC workshop on November 7, 2024, which included a presentation regarding estimating data center load.<sup>2</sup> While we thought the presentation on how data center load is estimated was useful, we also noted that it highlighted some of the significant

---

<sup>1</sup> See docket entry 256440 filed on May 17, 2024, at <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=24-IEPR-03>.

<sup>2</sup> See docket entry 259935 filed on November 6, 2024, <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=24-IEPR-03>.



shortcomings that persist in routinely *underestimating* data center load, which risks a perpetuation of the current shortfall in capacity.

STACK is pleased the Commission is working on this issue and the related issue of how to incorporate large load customer information into the transmission planning process and we think our views will help advance those efforts. Including critical stakeholders in the conversation, such as large load users, is an important step in ensuring grid reliability and smart and efficient transmission planning that helps support livability and fuel innovation in California.

We appreciate the State's various actions to accelerate the approval and development of new energy projects and help ensure that California data centers continue to serve as critical infrastructure to drive innovation in the epicenter of technology advancement. Specifically, we support the efforts of the Tracking Energy Development (TED) Task Force, which is a joint effort of staff at the CEC, CPUC, California Independent System Operator (CAISO) and Governor's Office of Business and Economic Development (GO-Biz) to identify barriers and coordinate action to address challenges that may impact energy development throughout the State. Within the scope of TED, we encourage prioritization on addressing the needs of data centers and potentially convening a data center focused working group to address our current capacity shortfalls. This could be a helpful forum to convene the key stakeholders to discuss challenges and opportunities in California, and how we could work collaboratively to resolve the ongoing issues.

During the workshop, it was noted that the CEC is planning to meet with utilities about how to go about estimating data center load. We've appreciated opportunities to connect with the CEC in the past and would like to continue that conversation with representatives of the CEC to provide input and assistance on this issue. A representative of STACK will be reaching out to Commissioner Gunda's office to request a meeting and we look forward to furthering the conversation.

Signed,

/s/ Matt VanderZanden

---

Matt VanderZanden  
Chief Operating Officer  
STACK Americas