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Comments from the City of San Jose

Additional submitted attachment is included below.

January 2, 2025

California Energy Commission
Docket No. 24-IEPR-03
75 P Street
Sacramento, CA 95814

Re: 2024 Integrated Energy Policy Report Update - Electricity Demand Forecast

The City of San José appreciates the opportunity to provide written comments on the draft forecast results for the 2024 IEPR Update. The City of San José supports the CEC’s ongoing efforts to refine assumptions and develop methods for accurately accounting for anticipated data center load growth in the demand forecast. We thank the CEC staff for their proactive approach to collaborate with stakeholders to gather project data and develop various load forecast scenarios utilizing this feedback.

The City of San José supports the selection of the updated Scenario 1 (Mid Case) for the Planning Scenario and Local Reliability Scenario. San José will provide additional information as needed to help identify the load buses for its projects for the forecast scenario transmittal to CAISO. Accurately mapping the new data center loads is especially critical in this planning cycle given the recent approval of a significant expansion of the high voltage grid into the San José /Santa Clara sub area of the Greater Bay Area planning region.

As you know, the 2024 IEPR forecast will be used by the CAISO in the 2025-2026 TPP to determine how best to upgrade the local transmission grid to integrate this new capacity. The CPUC will use the IEPR forecast and the results of the CAISO studies to allow PG&E to determine how to distribute this new capacity to load in its annual Grid Needs Assessment process. This major upgrade plan in a critical location experiencing long standing reliability issues and looming short term capacity shortfalls is a rare opportunity that deserves special consideration.

Further, San José recommends that a high case forecast be considered as a sensitivity for study at the CEC and CAISO to address rising demand from AI-driven data center growth and electrification of buildings and transportation in Silicon Valley. San José appreciates the CEC’s ongoing enhancement of the data center forecast methodologies and looks forward to continuing to work with the CEC staff.

Sincerely,

/s/ Kip Harkness

Kip Harkness
Deputy City Manager
City of San José