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PG&E Comments RE CED Update

Additional submitted attachment is included below.



Josh Harmon
CEC Liaison
State Agency Relations

1415 L Street, Suite 280
Sacramento, CA 95814
(628) 777-4138
Joshua.Harmon2@pge.com

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California Energy Commission
Docket Number 24-IEPR-03
715 P Street
Sacramento, CA 95814

RE: CEC California Energy Demand Forecast Update

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to comment on the California Energy Commission's (CEC) California Energy Demand (CED), 2024-2040, published January 9, 2025.

PG&E commends the CEC for its robust analysis and the effort and resources the CEC invested in making meaningful advancements to all load modifier forecasts and creating a new data center forecast. PG&E specifically appreciate CEC's collaboration with the stakeholders for the data center forecast and its willingness to update the November version of forecast to reflect more recent interconnection application data.

PG&E Recommends the CEC Create Additional High Data Center Adoption Scenarios

The data center forecast is a complex challenge, and we applaud CEC's current forecast given the information available and high uncertainty. For future forecast improvements, PG&E offers the following suggestions:

- For the Planning Forecast and Local Reliability Scenario, PG&E recommends applying similar treatment for PG&E's Group 1 and 2: Group 1 includes all active applications with completed or to-be completed engineering studies and Group 2¹ includes active applications prior to initiating engineering studies. Since the only difference between the two groups is the timing of the interconnection application, both groups have a similar likelihood of materializing. We therefore request the CEC to apply the Group 1 confidence levels to Group 2.
- Create a data center scenario that assumes all data center applications and inquiries materialize. At this time, PG&E does not propose specific use cases, but such a scenario could be useful for illustrating the scale of potential demand.

¹ Group 2 is currently assigned 0% confidence level for Planning Scenario and 50% confidence level for High Scenario.

PG&E Recommends the CEC Update the Data Centers Forecast At Least Annually due to High Uncertainty and High Potential Impact

The data center landscape is changing rapidly. As demonstrated by the increase in interconnection applications between the November and December draft versions and given the impact of the IEPR in statewide planning efforts, PG&E requests the Commission to perform an off-cycle, mid-year adjustment of the data center forecast. This will allow utilities to provide updated information to the CEC and keep the forecast up to date.

PG&E Recommends Data Center Forecast Reflect Seasonal Impacts

For future forecast improvements, PG&E would like to collaborate with CEC to incorporate impacts of seasonality and climate on data center operations. Data center cooling loads are higher in warmer months and in warmer climates. Given the scale of the impact of data centers, climate and seasonality could make a noticeable impact on the overall system level sales and peak forecasts.

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PG&E appreciates the opportunity to respond to the CED and looks forward to continuing to collaborate with the CEC. Please reach out to me if you have any questions.

Sincerely,

Josh Harmon
State Agency Relations