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VIA CEC Docket Submittal

March 25, 2026

Docket No. 26-IEPR-01
California Energy Commission
715 P Street
Sacramento, CA 95814

RE: CEC Docket No. 26-IEPR-01 Ava Community Energy Comments on 2026 IEPR Update Draft Scoping Order

Ava Community Energy (“Ava”) appreciates the opportunity to comment on the California Energy Commission’s (“CEC”) March 10, 2026 Draft Scoping Order for the 2026 Integrated Energy Policy Report (“IEPR”) Update (“Draft Scoping Order”). Ava is a community choice aggregator (“CCA”) that serves as the default electricity provider in Alameda County and the cities of Tracy, Stockton, and Lathrop, with service extending to Unincorporated San Joaquin County in May 2026. As a load-serving entity (“LSE”), Ava is engaged in the development of the IEPR Energy Demand Forecast and provides critical input to the CEC regarding energy demand trends in its service territory.

Ava appreciates the CEC’s and staff’s collaborative process in developing the 2025 IEPR Energy Demand Forecast, data center forecast, and LSE tables and looks forward to continued collaboration with the CEC in the 2026 IEPR Update. Ava supports the proposed scope as described in the Draft Scoping Order and recommends the following:

- The CEC should establish information sharing pathways for CCAs to receive data center information for validation and provide information to the CEC to inform the IEPR data center forecast.
- The CEC should consider adjustments to the confidence level for data center load, particularly for data center applications for electric service.
- The CEC should consider a methodology to account for data center customers opting out of CCA service based on number of customers, rather than an opt-out percentage.

- The CEC should consider the California Community Choice Association’s (“CalCCA”) comments regarding data center load allocation for the purpose of setting resource adequacy (“RA”) requirements, CCAs’ role in providing and validating data center information, data center opt-out assumptions, and treatment of known loads in the California Electricity Demand Forecast.

Establish Data Center Information Sharing Pathways

Ava urges the CEC to establish pathways for CCAs to receive and verify data center information shared by investor-owned utilities (“IOUs”),¹ as well as provide input to the CEC to inform the data center forecast, in the 2026 IEPR Update and beyond. Ava and other CCAs had insufficient information throughout the development of the 2025 IEPR Energy Demand Forecast to verify data center load forecasts. While Ava receives some application information from the interim PG&E Rule 30 process, the application information shared is often insufficient for Ava to independently verify via direct customer outreach. Additionally, as a CCA, Ava’s relationships with local governments and customers in its service territory can be leveraged to validate and/or augment data center information from IOUs that inform the IEPR forecast. Thus, Ava urges the CEC to establish an information sharing pathway for CCAs to both receive data center information for validation and provide information to the CEC to inform the IEPR data center forecast.

Ava suggests that the CEC could establish a pathway for CCAs to receive data center information by directing all IOUs to publish public data center databases for their respective service territories, similar to those filed by SCE to the 25-IEPR-03 docket on February 3, 2026 and September 12, 2025,² with the following data fields made public: project status, CEC-defined group, city, expected LSE (IOU bundled, direct access, or specific CCA), requested energization year, and requested peak capacity.

Ava notes that SCE makes public several fields of information for which PG&E requests confidentiality treatment,³ including project status (CEC-defined group), total capacity requested, name of CCA serving the area, and project location (CEC-defined forecast zone approximation).

Confidence Level for Data Center Applications

Ava recommends continued discussion regarding confidence levels for data centers, particularly for data center applications (categorized as Group 2 in the 2025 IEPR, with a confidence level of 33%). Conversations between Ava and data center customers in Ava’s territory indicate that customers typically pursue approximately 30% of the applications for electric service that they

¹ California’s three major IOUs are Pacific Gas & Electric (“PG&E”), Southern California Edison (“SCE”), and San Diego Gas & Electric.

² [SCE IEPR25 Data Center Database PUBLIC 20250829](#) (September 12, 2025); [SCE IEPR25 Data Center Database PUBLIC 20260129xlsx](#) (February 3, 2026).

³ [January 2026 - Data Center PGE Request for Confidentiality](#) (February 3, 2026).

submit. Ava has also received information about data center applications through the interim PG&E Rule 30 process where, upon outreach to the customer, Ava found that the customer was unaware of the application that was tied to their name, further accentuating high uncertainty regarding data center applications.

In addition to Ava's experience with data center customer applications in its service territory, Ava's assessment of recent trends suggests that the actual data center load coming online in some LSEs' service territories is much lower than indicated in the 2025 IEPR Form 1.1c forecast. Given the high uncertainty with data center applications, Ava recommends further decreasing the confidence level for Group 2 data center applications in the 2026 IEPR cycle.

Data Center Opt-Out Methodology

Ava recommends continued discussion regarding the opt-out methodology for data center load, which determines the amount of data center load in each CCAs' service territory that will be served by the CCA or the IOU, if a customer opts out of CCA service. As the default electricity provider in its service territory, Ava intends to serve all data center load. However, customers in Ava's service territory (data centers or otherwise) have the ability to choose their generation provider.

Ava appreciates the CEC's receptiveness to incorporate observed historical opt-out rates for large, non-residential customers in the 2025 IEPR data center forecast. In the 2025 IEPR, the CEC ultimately used a percentage opt-out rate assumption of 5% for data centers in PG&E service territory. In the 2026 IEPR Update, Ava recommends the CEC consider the "lumpy" nature of data center load when developing an opt-out assumption—i.e., there are relatively few data center customers, each with relatively large loads. Thus, a percentage opt-out rate may not best reflect the actual allocation of data center load to CCAs vs. IOUs. Instead, Ava recommends the CEC consider a methodology based on the *number* of data center customers, which will more accurately reflect the characteristics of data center load and the ability for customers to choose their generation provider.

Ava Supports CalCCA's Comments

Ava looks forward to continued collaboration with the CEC in the development of the 2026 IEPR Update, both individually and through our trade organization, CalCCA. Ava supports CalCCA's comments regarding data center load allocation for the purpose of setting RA requirements, CCAs' role in providing and validating data center information, data center opt-out assumptions, and treatment of known loads in the California Electricity Demand Forecast.

Thank you for your consideration of our comments. Please contact Claire Huang (chuang@avaenergy.org) if you have any questions.

/s/ Claire Huang

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