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**Joint Organization Requests for 2025 SB 100 Report Process and
Two Week Extension for Draft Results Workshop Comment
Deadline**

Additional submitted attachment is included below.



March 5, 2026

California Energy Commission
715 P Street
Sacramento, CA 95814

RE: Joint Organization Requests for 2025 SB 100 Report Process and Two Week Extension for Draft Results Workshop Comment Deadline

350 Bay Area, California Environmental Justice Alliance, California Wind Energy Association, Center for Biological Diversity, Communities for Better Environment, Defenders of Wildlife, Earthjustice, Environmental Defense Fund, Environmental Protection Information Center, Golden State Clean Energy, Sierra Club, The Energy Coalition, The Nature Conservancy, Union of and Concerned Scientists have been continuously engaged in the SB 100 proceeding since its inception. We strongly support SB 100 and know that proactive and transparent energy planning is fundamental to meeting California’s climate goals and protecting our natural and cultural resources. We appreciate the Joint Agencies and their staff’s years-long efforts to develop the 2025 SB 100 Report. SB 100 Reports are cornerstone documents for energy planning in California. We attended the February 19th Hybrid Workshop on the 2025 SB 100 Joint Agency Report

Draft Results¹ and have the following concerns about the process for developing the 2025 SB 100 Report:

- The underlying modeling assumptions and data for the draft results have not been released yet comments are due March 5, 2026.
- The Final 2025 SB 100 Report is scheduled to be released in April without benefit of a draft Report being made available for public review and comment.

I. Underlying Modeling Assumptions and Data Must be Provided for the Draft Results with a Two-Week Comment Deadline Extension Tied to This Release.

The Commission released the 2025 SB 100 Draft Modeling Results in slide form on February 18, 2026 — just one day before the public workshop. Stakeholders requested the underlying modeling data behind the Draft Results during the workshop but that data has yet to appear on the Docket as of this writing. This is a departure from the process followed for the 2021 SB 100 Report when the modeling assumptions and data were posted to the Docket two days prior to the September 2, 2020 Draft Results Workshop.²

Stakeholders cannot provide meaningful feedback without more data and more time. We reiterate and support Sierra Club’s request that the CEC promptly post the modeling assumptions and data to the public Docket, and to extend the written comment deadline on the SB 100 Draft Results by two weeks from when the underlying modeling assumptions and data are posted.³

Request 1: We request that the CEC (a) promptly post the underlying modeling assumptions and data to the public Docket, and (b) extend the written comment deadline by two weeks from the date such data is posted.

II. The 2025 SB 100 Report Must Be Circulated as a Draft for Public Review and Comment Prior to Finalization

We understand that the SB 100 Joint Agencies do not currently plan to circulate a draft of the 2025 Report for public review and comment before it is finalized. We strongly urge the

¹ <https://www.energy.ca.gov/event/workshop/2026-02/hybrid-workshop-2025-sb-100-joint-agency-report-draft-results>

² <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=19-SB-100>

³ <https://efiling.energy.ca.gov/GetDocument.aspx?tn=268814&DocumentContentId=105969>

Joint Agencies to reconsider this approach. The February 19 Workshop presented *draft modeling results* — but presenting draft results at a Workshop is not a substitute for public review of a draft report. These are fundamentally different forms of public engagement that serve different purposes.

A. The Distinction Between Workshop Presentations and a Draft Report

A Workshop on draft modeling results allows the public to hear and respond to summary findings presented by agency staff. A draft report allows the public to:

- Review the complete analytical methodology, assumptions, and data sources underlying the findings
- Assess whether the findings are accurately characterized and appropriately qualified
- Identify errors, omissions, or inconsistencies in the analysis
- Evaluate whether the recommendations are supported by and proportionate to the findings
- Comment on the framing and completeness of the implementation challenges discussion
- Verify that commitments made in the 2021 Report have been fulfilled or adequately explained

These are substantive analytical and accountability functions that cannot be performed based on a Workshop presentation alone. The public interest is not served by a process in which the first time stakeholders can read and respond to the complete report is after it has already been finalized and submitted to the Legislature.

B. 2021 SB 100 Report Process Set Precedent

The 2021 SB 100 Joint Agency Report was developed through a robust, multi-stage public process that explicitly included a Draft Report Workshop at which the public had an opportunity to review and comment on the Draft Report.⁴ Eliminating the draft report review stage for the 2025 Report would represent a regression from the public engagement standards the Joint Agencies themselves established and committed to uphold. It would be particularly difficult to justify given the significance of the 2025 Report — the first comprehensive update to SB 100 planning since 2021 — and the volume of unresolved commitments from the prior report cycle that stakeholders need the opportunity to assess.

⁴ [2021 SB 100 Joint Agency Report](#). March 15, 2021 at p. 52

C. The Stakes Are High

The 2025 SB 100 Report influences California's clean electricity planning for the next four years. Its findings will inform the CPUC's Integrated Resource Planning, the CEC's Integrated Energy Policy Report, CARB's Scoping Plan implementation, and transmission planning decisions with multi-decade land use consequences. The adequacy of the land use and environmental analysis in this report will directly affect whether California meets its carbon neutrality goals and its 30x30 conservation commitments.

Given these stakes, public review of a draft report is not merely a procedural preference — it is an essential safeguard against consequential errors in analysis, unwarranted findings, and recommendations that may not be supported by the evidence. We urge the Joint Agencies to issue a draft report for public comment with a minimum 30-day comment period before the report is finalized.

Request 2: We request that the Joint Agencies issue a draft of the 2025 SB 100 Report for public comment, with a minimum 30-day comment period, before the report is finalized.

Thank you for your consideration of these concerns and our requests.

Respectfully submitted,

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