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STATE OF CALIFORNIA
CALIFORNIA ENERGY COMMISSION

IN THE MATTER OF: *2025 SB 100 Joint Agency Report*	DOCKET NO. 23-SB-100 RE: Comments on February 19, 2026, Hybrid Workshop on 2025 SB 100 Joint Agency Report Draft Results

CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S COMMENTS ON THE FEBRUARY 19, 2026, HYBRID WORKSHOP ON 2025 SB 100 JOINT AGENCY REPORT DRAFT RESULTS

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The California Community Choice Association[1] (CalCCA) submits these comments pursuant to the February 19, 2026, *Hybrid Workshop on 2025 SB 100 Joint Agency Report Draft Results*[2] (Workshop).

I. INTRODUCTION

CalCCA appreciates the California Energy Commission's (CEC) in-depth analysis of the technical and economic feasibility of achieving the Senate Bill 100 (SB 100) policy requiring that 100 percent of retail electricity be from renewable and zero-carbon resources by 2045.[3] Community choice aggregators (CCA) are an essential partner in achieving SB 100. CCAs

[1] California Community Choice Association represents the interests of 24 community choice electricity providers in California: Apple Valley Choice Energy, Ava Community Energy, Central Coast Community Energy, Clean Energy Alliance, Clean Power Alliance of Southern California, CleanPowerSF, Desert Community Energy, Energy For Palmdale's Independent Choice, Lancaster Energy, Marin Clean Energy, Orange County Power Authority, Peninsula Clean Energy, Pico Rivera Innovative Municipal Energy, Pioneer Community Energy, Pomona Choice Energy, Rancho Mirage Energy Authority, Redwood Coast Energy Authority, San Diego Community Power, San Jacinto Power, San José Clean Energy, Santa Barbara Clean Energy, Silicon Valley Clean Energy, Sonoma Clean Power, and Valley Clean Energy.

[2] *See Notice of Hybrid Workshop on 2025 SB 100 Joint Agency Report Draft Results*, 23-SB-100 (Feb. 4, 2026), https://efiling.energy.ca.gov/GetDocument.aspx?tn=268470&DocumentContentId=105616.

[3] SB 100 (De León, Ch. 312, 2018 Cal. Stat.) (Sept. 10, 2018), amending Public Utilities Code § 454.53(a), https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201720180SB100.

currently serve approximately 27 percent of California's retail electricity sales and are projected to serve 34 percent 2045.[4]

In response to the Workshop and the CEC's modeling, CalCCA recommends that the CEC:

- Ensure coordination by, and direction from, the CEC, the California Air Resource Board (CARB), and the California Public Utilities Commission (CPUC) regarding SB 100 goals and the allocation of the 2045 electric sector greenhouse-gas (GHG) emissions budget to ensure long-term investment signals are consistent and transparent;
- Provide durable policy direction that supports competition, allows sufficient time for procurement and transmission development, and protects ratepayers from unnecessary cost increases;
- Evaluate a broad range of plausible future demand trajectories beyond the higher hydrogen demand scenario to better assess resource fit under uncertain load conditions; and
- Work across the CEC, CARB, and the CPUC to develop an integrated framework that evaluates transmission, generation, storage, demand-side resources, land-use feasibility, and community impacts to reliably and cost-effectively serve local load.

II. CALIFORNIA ENERGY AGENCIES SHOULD COORDINATE AND PROVIDE DIRECTION ON THE INTERPLAY BETWEEN SB 100 REQUIREMENTS AND CARB'S ALLOCATION OF ELECTRIC SECTOR EMISSIONS IN 2045

Achieving the State's clean energy and climate policies in 2045 requires coordination between, and direction from, the CEC, CARB, and the CPUC, each of which plays a distinct role. SB 100 requires that 100 percent of California's retail electricity sales be supplied by eligible renewable and zero-carbon resources by 2045. The CEC and CPUC are responsible for planning and ensuring compliance with SB 100 through electricity system planning and procurement requirements. CARB, on the other hand, establishes the statewide GHG emissions trajectory and sector-level emissions expectations necessary to meet California's broader climate targets. Against this backdrop, a key finding of the CEC's modeling is that a portfolio that reliably achieves SB 100 will result in electric sector GHG emissions in 2045 that *exceed* the

[4] 2025 IEPR Planning Forecast LSE and BAA table, Form 1.1c, https://efiling.energy.ca.gov/GetDocument.aspx?tn=268727.

emissions budget allocated to the electric sector by CARB.[5] As set forth in more detail below, policy implications from this finding must be considered by the CEC, CPUC, and CARB. These include that SB 100 may not be the primary driver of electricity investment decisions given the more stringent CARB requirements, or alternatively that CARB's allocation of the 2045 electric sector emissions budget may be overly stringent.

First, SB 100 may not be the primary driver of electricity investment decisions because reliability requirements and emissions limits already lead to a system that satisfies SB 100. In fact, the results of the CEC's analysis suggest it could have removed the SB 100 constraint from the modeling framework and achieved the same Reference Scenario System Buildout.[6] A similar outcome appears in the CPUC's Base Case of the Renewable Energy Solutions (RESOLVE) model used for the 2026--2027 Transmission Planning Process (TPP).[7] The shadow price of SB 100, which reflects the marginal cost of tightening the policy requirement by 1 megawatt hour (MWh), is $0 per MWh in all modeled years between 2026 and 2045. A shadow price of zero indicates the constraint is not binding and that removing it would not change the results. Instead, investment decisions in both the CPUC's RESOLVE modeling and the CEC's SB 100 analysis appear to be driven primarily by reliability requirements and the electric sector's GHG emissions limit.

On the other hand, CARB's allocation of the 2045 emissions budget to the electric sector may be particularly stringent, since the statute sets the statewide emissions target but does not

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[5] Presentation, Slide 33.

[6] *Workshop on 2025 SB 100 Joint Agency Report: Draft Results*, Docket 23-SB-100, (Feb. 18, 2026), Slide 28, https://efiling.energy.ca.gov/GetDocument.aspx?tn=268689&DocumentContentId=105843 .

[7] *See* CPUC Resolve RV - Proposed Base Case.xlsx, at https://files.cpuc.ca.gov/energy/modeling/LTPP/RESOLVE%20Workbooks_and_Public%20Case%20Results%20Viewers.zip.

prescribe how emissions must be divided among sectors. Assembly Bill 1279 (AB 1279)[8] requires at least an 85 percent statewide reduction in GHG emissions from 1990 levels, resulting in a statewide emissions budget of about 65 million metric tons of carbon dioxide equivalent (MMTCO2e) in 2045.[9] The statute, however, does not specify how that budget must be allocated across sectors. The electric sector allocation is a policy determination reflected in CARB's most recent Scoping Plan, which is updated every five years.[10] CARB's allocation of 2045 emissions to the electric sector is what sets the CEC's Central Scenario assumption of 6.9 MMTCO2e for the limit of electric sector emissions in 2045,[11] not the Assembly Bill (AB) 1279 statute. Given this regulatory flexibility, it may not be entirely accurate to conclude that the SB 100 Only scenario "does not meet state mandates"[12] solely because the emissions exceed 6.9 MMTCO2e in 2045. Rather, the SB 100 Only scenario may help inform CARB's next scoping plan update by evaluating whether the electric sector allocation is properly calibrated. Notably, the CPUC's RESOLVE modeling indicates that the 2045 shadow price of the GHG emissions constraint is nearly $400/ton carbon dioxide in 2024 dollars. At that cost level, policymakers may reasonably ask whether additional reductions in other sectors of the economy could be achieved more cost-effectively.

Overall, the CEC's analysis raises a fundamental question: which policy establishes the operative long-term target for the electricity sector? Is it SB 100's requirement that 100 percent of retail sales come from eligible renewables and zero-carbon resources? Is it CARB's allocation of

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8 AB 1279 (Muratsuchi, Ch. 337, 2021 Cal. Stat.) (Sept. 19, 2022), https://legiscan.com/CA/text/AB1279/id/2606946.

9 *See* https://ww2.arb.ca.gov/ghg-2020-limit.

10 *See* https://ww2.arb.ca.gov/resources/documents/2022-scoping-plan-documents; *see also* https://ww2.arb.ca.gov/sites/default/files/2022-11/2022-sp-PATHWAYS-data-E3_0.xlsx.

11 *See* Workshop Presentation, Slide 27.

12 *See* Workshop Presentation, Slide 34.

the 2045 GHG emissions budget to the electricity sector? Or should these two policies be more closely aligned so that resource planning and emissions limits point toward consistent outcomes?

The CEC's modeling provides valuable insight into these questions. Ultimately, however, policymakers will need to coordinate and provide clear direction. That clarity will guide tens of billions of dollars in clean energy investment over the next two decades.[13,14]

III. A LONG-TERM, STABLE FRAMEWORK FOR ACHIEVING CALIFORNIA'S CLEAN-ENERGY GOALS IS CRITICAL TO KEEPING COSTS LOW

Now is the appropriate time to address these policy alignment issues. A long-term, stable framework for achieving California's clean energy goals is essential to controlling costs. As discussed by Workshop panelists and members of the dais, competition moderates costs. Load serving entities (LSE) require sufficient time to design and conduct competitive solicitations. Developers need access to transmission capacity to participate effectively. Transmission infrastructure itself can take a decade or longer to plan and construct. A reactive policy environment characterized by compressed timelines and periodic procurement directives can create artificial scarcity in the market. That dynamic increases costs and limits competition.

The SB 100 report provides an opportunity to establish a durable framework for achieving long-term goals. The modeling results should not be used to prescribe specific technologies or insulate particular projects from competitive pressures. When afforded flexibility

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[13] *See* Workshop Presentation, at Slide 45 (showing optimized costs roughly in the range of $20 to 50 billion across scenarios).

[14] A related question is how would the compliance mechanism differ if it is SB 100, which focuses on retail sales, or CARB's GHG emission allocation, which focuses on source emissions, that drives clean energy goals. SB 100's framing clearly aligns with allocating responsibility to LSEs through retail sales. Compliance targets are stable, in terms of what portion of retail sales needs to be met with clean generation and whether the LSE expects increasing or decreasing sales. On the other hand, electricity sector GHG emission limits are a fixed quantity that do not vary with electricity sales. How should these emission limits be allocated between LSEs that expect to have rapidly growing load versus LSEs that have declining load? Should an LSE be entitled to a certain share of the 2045 emission budget even if load decreases because customers leave the area? Conversely, should the entitlement to the emission budget increase if new customers move to their area?

within a clear policy framework, LSEs evaluate how both cost and resource options fit to achieve state objectives while protecting ratepayers.

IV. THE CEC SHOULD EXPAND CONSIDERATION OF EVOLVING LOADS IN ANALYZING 2045 PORTFOLIOS

An important component of resource "fit" is the timing and shape of electricity demand. The CEC's analysis of alternative load trajectories should extend beyond the higher hydrogen demand scenario. The higher hydrogen demand scenario introduces additional baseload demand across all hours of the day, which alters the load shape as well as total demand. The modeling results indicate that this change increases the relative attractiveness of geothermal resources, resulting in approximately one GW of additional selected investment.[15]

Future load shapes may evolve in multiple ways due to electric vehicle adoption, building electrification, smart technologies in homes and businesses, data center deployment, and climate change. Although the Reference Scenario may incorporate some of these trends, significant uncertainty remains regarding their magnitude and timing.

The CEC should evaluate a broad range of plausible demand evolution scenarios and assess how different load shapes affect the relative value of resource options. Such analysis can help identify sensitivities that LSEs should consider when procuring long-lived assets.

V. STRATEGIES FOR RELIEVING LOCAL CONSTRAINTS REQUIRE COORDINATION ACROSS THE JOINT AGENCIES TO IDENTIFY FEASIBLE AND COST-EFFECTIVE SOLUTIONS

The Workshop panel raised several important considerations regarding local constraints. Foremost among them was the disproportionate impact that emissions from generating resources located in constrained areas can have on frontline communities. In some cases, local reliability requirements have resulted in continued operation of some of the most emission-intensive

[15] Workshop Presentation, at Slide 37.

generation in the state, which complicates progress towards California's decarbonization and environmental justice goals.

The amount of generation that must be physically located within a locally constrained area depends significantly on the availability of transmission capacity to deliver energy from resources outside that area. Where transmission capacity is limited, generation interconnected within the local area is necessary to maintain reliability. At present, many of these locally required resources are emitting facilities.

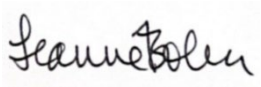
Addressing local constraints will require coordinated action among the CEC, CARB, and the CPUC (Joint Agencies). Solutions should evaluate land use considerations, transmission development, new generation and storage, demand-side strategies, and generator retirements. Because many constrained areas face both transmission and land availability limitations, siting and permitting new generation in those locations can be especially challenging.

Procurement mandates that focus narrowly on local generation without accounting for transmission capability and land use feasibility risk increasing procurement costs and creating market power. Accordingly, the Joint Agencies should prioritize development of a comprehensive framework to determine how local load can be served reliably and cost-effectively. Such a framework should evaluate the relative feasibility and cost of transmission expansion, local generation, storage deployment, and demand-side alternatives in an integrated manner.

VI. CONCLUSION

For all the foregoing reasons, CalCCA respectfully requests consideration of the comments herein and looks forward to an ongoing dialogue with the CEC.

Respectfully submitted,



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