

DOCKETED	
Docket Number:	23-SB-100
Project Title:	SB 100 Joint Agency Report
TN #:	269208
Document Title:	GridLab Comments - Comments on the 2025 SB 100 Joint Agency Report Draft Results (Feb. 19, 2026 Workshop)
Description:	N/A
Filer:	System
Organization:	GridLab
Submitter Role:	Public
Submission Date:	3/16/2026 12:28:41 PM
Docketed Date:	3/16/2026

*Comment Received From: GridLab
Submitted On: 3/16/2026
Docket Number: 23-SB-100*

**Comments on the 2025 SB 100 Joint Agency Report Draft Results
(Feb. 19, 2026 Workshop)**

Additional submitted attachment is included below.



2150 Allston Way #420
Berkeley, CA 94704

RE: Docket No. 23-SB-100 – Comments on the 2025 SB 100 Joint Agency Report Draft Results (Feb. 19, 2026 Workshop)

DATE: March 12, 2026

TO: California Energy Commission, SB 100 Joint Agencies

I. Introduction

We appreciate the opportunity to comment on the draft modeling results presented at the February 19, 2026 workshop. As the Joint Agencies finalize the 2025 SB 100 Report, it is critical that the modeling accurately reflects the profound transition occurring on the California grid. We are rapidly moving from a system constrained by peak generating capacity to a system constrained by energy sufficiency.

To ensure compliance with California’s decarbonization mandates, future modeling must look beyond capacity-centric metrics and explicitly assure that the state is procuring enough clean energy to charge its rapidly expanding energy storage fleet.

II. The Phenomenal Growth of Storage Demands a Deeper Focus on Energy Sufficiency

The trajectory of battery storage deployment in California is staggering. The CAISO grid has grown from just 2,595 MW of storage in 2022 to 15,861 MW at the beginning of 2026. Based on CPUC reporting on existing load-serving entity (LSE) contracts, this fleet is projected to nearly double again to 29,431 MW by the beginning of 2030.

By 2030, this storage fleet will be supported with an expected 31,717 MW of solar and 10,881 MW of wind. Balancing this resource mix requires an updated approach to how the state models future reliability. As we approach 2030, the challenge will not simply be having enough batteries, hydro, and gas generation installed to meet the evening net peak; it will need to ensure there are enough zero-carbon megawatt-hours generated earlier in the day or at night to actually fill the batteries for the morning and evening ramps.



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III. The Limitations of ELCC and the Risk of Fossil-Charged Batteries

Currently, CEC and CPUC modeling relies heavily on using Effective Load Carrying Capability (ELCC) to determine resource procurement to assure reliability. ELCC is a "black box" tool that obscures an understanding of the time-sequential energy needs of the grid. The move to the slice-of-day approach for resource adequacy was triggered by an understanding of the importance of time-sequential planning. ELCC alone fails to provide actionable guidance to load-serving entities about whether the overall system has sufficient energy to charge batteries during stressful weather events.

The CPUC is committed to producing new marginal ELCC values for generation and storage technologies by July. SB 100 modelers should review these results and validate that the system in 2030 and beyond will have sufficient charging energy. Future SB 100 modeling needs to explicitly analyze the chronological energy requirements for charging 30 GW of batteries in both the summer and winter. We need to avoid defaulting to excessive reliance on gas plants because we didn't procure sufficient energy for charging batteries.

IV. Unlocking "Energy-Only" Renewables as Battery Fuel

To solve the energy sufficiency challenge, the Joint Agencies should study how procurement of "energy-only" solar, wind and geothermal resources can create zero-carbon fuel for battery charging without increasing transmission costs.

By building energy-only projects, developers can bypass the delays and costs associated with obtaining full deliverability capacity status. These energy-only resources—both at the utility scale and on the distribution system for solar—can act as an available, cost-effective "fuel" for charging the state's battery fleet day-in and day-out. This strategy maximizes the utilization of existing transmission headroom while ensuring that the megawatt-hours stored for the evening peak come from carbon-free resources.



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V. Conclusion

Several parties to the CPUC IRP proceedings requested that a fresh needs analysis be conducted in the coming years as current uncertainties surrounding load growth are cleared up. The final 2025 SB 100 Report should lay the groundwork for further policy action around the concept of energy sufficiency.

We strongly urge the Joint Agencies to supplement traditional ELCC calculations with chronological energy sufficiency modeling, and to advance pathways for energy-only renewable procurement. By doing so, we can leverage California's phenomenal investment in energy storage.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "M. M. O'Connell".

Executive Director
GridLab
2150 Allston Way #420
Berkeley, CA 94704

Joined by:

A handwritten signature in black ink, appearing to read "P. L.", enclosed within a large, hand-drawn oval.

Chief Strategy Officer
Sonoma Clean Power
431 E St.
Santa Rosa, CA 95404