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**TNC COMMENTS ON THE HYBRID WORKSHOP ON 2025 SB 100
JOINT AGENCY REPORT DRAFT RESULTS**

Additional submitted attachment is included below.



March 17, 2026

California Energy Commission
California Public Utilities Commission
California Air Resources Board

Re: Docket No. 23-SB-100: Hybrid Workshop on 2025 SB 100 Joint Agency Report Draft Results

Dear Commissioners and Staff:

The Nature Conservancy (TNC) appreciates the opportunity to provide comments on the SB 100 Draft Results Workshop and commends the Commissioners and staff for the analysis that has been completed to enable the draft results. TNC supports California's leadership in advancing a clean, reliable, and affordable electricity system, and we recognize the critical role that SB 100 plays in guiding the state toward a 100 percent clean electricity future.

The Purpose of SB 100

The Legislature enacted SB 100 (De León, 2018) to ensure that California evaluates feasible, economy-wide pathways to achieving a 100 percent clean electricity system by 2045.¹ The statute directs the California Energy Commission (CEC), California Public Utilities Commission (CPUC), and California Air Resources Board (CARB) to prepare a joint agency report every four years assessing technology feasibility, resource needs, barriers, and impacts.¹

This statutory mandate is distinct from and additive to the CPUC's Integrated Resource Plan (IRP). While the IRP focuses on procurement and reliability for CPUC-jurisdictional load-serving entities, SB 100 is intended to provide a comprehensive, statewide assessment of the environmental, land-use, technological, and social factors that shape real-world feasibility. Because the IRP does not represent the entire California electricity sector,² SB 100 is the statutory venue where statewide, cross-agency, cross-jurisdictional planning can occur. This makes it even more important that SB 100 fully address the environmental, land-use, and social dimensions of the clean energy transition.

¹ Cal. Pub. Util. Code § 454.53(c).

² The IRP does not cover all load-serving entities (LSEs) or customers, including publicly owned utilities (POUs), Federal and wholesale customers, behind the meter resources, and non CPUC-jurisdictional procurement.

A Draft Report is an Essential Part of the Public Process

SB 100 is a statewide planning effort with significant implications for communities, ratepayers, and California’s natural and working lands. Transparent public engagement is essential to ensure that the report reflects on-the-ground realities. A webinar covering the draft results is not a substitute for a draft report and related comment period. We respectfully request that the agencies release a draft of the report and allow for a comment period before finalizing the 2025 SB 100 Joint Agency Report.

SB 100 Reports Must Include Additional Analysis of Real-World Constraints to Fulfill Its Statutory Purpose

The value of SB 100 lies in its ability to illuminate feasible pathways. In the 2021 SB 100 Joint Agency Report, the agencies identified the need for deeper analysis into the following areas.

Environmental and Land Use Impacts: The 2021 report said the agencies would evaluate environmental and land use impacts in the next cycle: "Analyze projected land-use impacts of the scenario resource portfolios and opportunities to reduce environmental impacts," and the CEC’s SB 100 webpage under “Land Use” says the 2025 report will evaluate this as well, including a high-level evaluation of related constraints.³⁴ Additionally, during the February 2024 SB 100 Land Use Staff Workshop, CEC staff presented several land use goals for the 2025 report that have not be adequately addressed.⁵

Non-Energy Impacts: The 2021 SB 100 report committed to expanding analysis of equity impacts, community siting burdens, workforce and economic impacts noting that, “Emerging cost analysis tools and methods may better integrate social costs and [Non-Energy Benefits].”⁶ Further, the report committed to “define and include social costs and non-energy benefits in future analyses.”⁷ TNC commends staff on the work that has been done to include Non-Energy Impacts (NEIs), including those relating to air quality and social cost of carbon; however, work to incorporate the additional NEIs explored through the NEI Informational proceeding have not been shared as part of this report, including land use and community impact dynamics that staff identified.⁸ A CEC presentation regarding 2025 Report scoping also committed to “[evaluating] the potential land-use impacts of the scenarios (the mix of generation and storage projects), the social costs and non-energy benefits, and opportunities to reduce impacts.”⁹

Impacts and Opportunities for Working Lands: The 2021 SB 100 Joint Agency report also stated that agricultural land conversion should be analyzed in future cycles. Related issues and opportunities associated

³ <https://www.energy.ca.gov/publications/2021/2021-sb-100-joint-agency-report-achieving-100-percent-clean-electricity> 2021 Joint Agencies SB 100 Report Page 20

⁴ <https://www.energy.ca.gov/sb100> SB 100 Webpage: Land Use Section

⁵ [2025 SB 100 Report Land Use Workshop](#). **These stated goals include:** review progress on SB 100 resource build and land use planning and coordination, explore opportunities to reduce environmental and land use impacts, identify land use implementation challenges to resource build deployment, evaluate land use uncertainties and tradeoffs across scenarios, expand and update understanding of the land area and sea space required to achieve SB 100, and assess high-level environmental and land use constraints of each scenario to understand uncertainties and potential challenges

⁶ Joint Agencies SB 100 Report Page 18

⁷ Joint Agencies SB 100 Report Page 20

⁸ [Workshop for the Non-Energy Impacts Informational Proceeding](#) Page 14

⁹ [2025 SB 100 Report](#) Scoping Phase Presentation

with the state's working lands were not addressed, including opportunities to repurpose land facing water restriction, and carbon storage. "It will be important to incorporate land-use planning into electric system planning to consider trade-offs between energy development and conservation of land for agricultural, natural lands, or housing."¹⁰ "As state agencies work to better quantify the carbon stored in natural and working lands, these areas must also be incorporated into electricity land-use planning."¹¹

Barriers to Clean Energy Development: Additionally, the 2021 SB 100 report noted that future SB 100 reports should address barriers to project development, including “lengthy permitting requirements and development times.”¹² Permitting was noted as not incorporated in the draft results.

High DER Scenario: Previous SB 100 workshops identified a potential DER-focused scenario to examine higher levels of distributed resources including community solar;¹³ however, this scenario was not presented as considered or included in the draft results. As SEIA and CCSA note, “Without such a scenario, the current analysis largely evaluates pathways centered on transmission-connected generation resources. This provides an incomplete picture of the range of available options for achieving SB 100 and removes from consideration a class of resources that can be deployed through different siting, permitting, and interconnection pathways and may therefore help address the very high clean-energy build rates and associated implementation challenges implied by the current SB 100 scenarios.”

These topics were not meaningfully addressed in the draft results, despite their central importance to feasibility and prior commitments to expand these areas of analysis. TNC encourages the agencies to incorporate these elements into the final report or to provide a timeline for when they will be completed.

Conclusion

TNC appreciates the agencies’ ongoing work to advance California’s clean energy goals. We respectfully urge the agencies to strengthen the SB 100 analysis by incorporating previously identified research needs and providing opportunity for public engagement on the draft report. Doing so will help ensure that SB 100 fulfills its statutory purpose and provides robust analyses to inform California’s clean energy future.

Thank you for your consideration of these comments.

Sincerely,

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¹⁰ Joint Agencies SB 100 Report Page 111

¹¹ 2021 Joint Agencies SB 100 Report Page 111

¹² 2021 Joint Agencies SB 100 Report Page 19

¹³ The “DER Focus” scenario was presented in the Joint Agency SB 100 Analytical Framework Workshop, 10/31/23. The workshop materials describe a DER Focus scenario that will include “increased adoption of front-of-the-meter distributed resources.” Modeling inputs and assumptions for that scenario were also presented in the Joint Agency SB 100 Inputs and Assumptions Workshop, 2/16/24.

