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**Defenders and Center for Biological Diversity Comments on 2025
SB 100 Results Workshop (23-SB-100)**

Additional submitted attachment is included below.



March 19, 2026

California Energy Commission
Docket Unit, MS-4
Docket No. 23-SB-100
715 P Street
Sacramento, California 95814-5512

Delivered via email to: docket@energy.ca.gov

RE: Draft Results & Implementation Challenges Workshop (Docket: 23-SB-100)

Defenders of Wildlife (Defenders) and the Center for Biological Diversity (The Center) respectfully submit these comments in response to the February 19, 2026 Draft Results & Implementation Challenges Workshop for the 2025 SB 100 Report (February 19 Workshop). Defenders is dedicated to protecting all wild animals and plants in their natural communities. The Center is a non-profit environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. Our organizations employ science, public education and participation, media, legislative advocacy, litigation, and proactive on-the-ground solutions to prevent the extinction of species, associated loss of biological diversity, and habitat alteration and destruction. These comments are submitted on behalf of our 2.1 million staff, members and supporters throughout California and the western United States, many of whom live, work and/or recreate in California.

We strongly support the development of renewable energy production. A low-carbon energy future is critical for California's economy, communities, and environment. Achieving this future—and *how* we achieve it—is critical for protecting California's internationally treasured wildlife, landscapes, and diverse habitats. We believe transitioning to a renewable energy future need not exacerbate the ongoing extinction crisis by thoughtfully planning projects while protecting habitat critical to species.

Comments

We appreciate the Joint Agencies' commitment to public engagement on this consequential report and offer the following comments on three matters of

significant concern: (1) the status of the land use and environmental analysis commitments made in the 2021 SB 100 Joint Agency Report, (2) absence of a needed High Distributed Energy Resource (DER) Scenario, and (3) the need for a publicly circulated draft of the 2025 Report prior to finalization.

I. The 2021 Report Made Specific, Unfulfilled Land Use and Environmental Commitments That Must Be Addressed in the 2025 Report

The February 19 Workshop presented a high-level overview of analysis assessing the availability of land in California to meet the total area required to implement SB 100 and stakeholders were told that is the extent of the land use and environmental analysis being conducted for the 2025 SB 100 Report.

The 2021 SB 100 Joint Agency Report made explicit commitments to advance land use and environmental analysis as core work items for the 2025 Report cycle. These commitments appear in the Executive Summary (p. 20), Chapter 4 (pp. 111–115), and Chapter 5 (pp. 133–134), under the heading "*Areas for Further Study in the 2025 SB 100 Report.*"

During the February 1, 2024 SB 100 Land Use Staff Workshop the CEC staff presented the following land use goals for the 2025 SB 100 Report:¹

1. Review progress on SB 100 resource build and land use planning and coordination
2. Explore opportunities to reduce environmental and land use impacts
3. Identify land use implementation challenges to resource build deployment
4. Evaluate land use uncertainties and tradeoffs across scenarios
 - a. Expand and update understanding of the land area and sea space required to achieve SB 100 (i.e., how many acres could be needed for future electricity infrastructure to achieve SB 100?)
 - b. Assess high-level environmental and land use constraints of each scenario to understand uncertainties and potential challenges

Stakeholders and the public have a reasonable expectation that the 2025 Report will deliver on these commitments. We are concerned that the February 19 Workshop did not demonstrate adequate progress and there appears to be a significant

¹ <https://efiling.energy.ca.gov/GetDocument.aspx?tn=254242&DocumentContentId=89603>. Slides 10 and 19

departure from the intended scope of the land use analysis for the 2025 SB 100 Report.

A. Explore Opportunities to Reduce Environmental and Land Use Impacts

The 2021 Report directed the CEC to develop tools to assess: (1) the total land area required to implement SB 100; (2) where new resources could be located across the state; and (3) the relative environmental impacts of different siting decisions. It further directed that this work *"can expand to understand how land use impacts vary across scenarios, assess the relative environmental impacts in different areas, and identify strategies to avoid or mitigate environmental impacts and maximize environmental co-benefits."* (Chapter 5, p. 133)

The 2021 Report also specifically committed to: reviewing methods to include land use impacts in system modeling; assessing whether previous land use studies need updating to reflect SB 100's increased resource requirements; and coordinating future land use findings with the Climate Smart Strategy called for in Executive Order N-82-20 and the AB 32 Scoping Plan. (Chapter 4, p. 112)

The 2021 Report acknowledged that natural and working lands are a critical component of California's carbon neutrality goals — and that electricity policy must account for potential loss of ecosystem carbon storage associated with large-footprint energy resources such as utility-scale solar. (Chapter 4, p. 113) Governor Newsom's Executive Order N-82-20 set a first-in-the-nation goal to conserve 30 percent of the state's land and coastal water by 2030 (30x30). The 2025 Report must demonstrate how SB 100 implementation is being planned in coordination with — not in conflict with — that goal.

In commenting below on the need for the Distributed Energy Resource Focus Scenario, we highlight the value of front-of-meter distribution-connected solar plus storage (FTM S+S) deployed on existing built infrastructure that avoids land use conflicts and offers other benefits identified below.

We call on the Joint Agencies to include in the 2025 Report:

- 1) Opportunities to reduce environmental and land use impacts including a spatial analysis of where resources could be sited consistent with conservation priorities.

- 2) Discussion of land use implementation challenges to resource build deployment and full consideration of how siting development consistent with conservation priorities can accelerate deployment.
- 3) Evaluation of land use uncertainties and tradeoffs across scenarios including:
 - a. Assessment of high-level environmental and land use constraints of each scenario to understand uncertainties and potential challenges
 - b. A clear explanation of how land use impacts were or were not incorporated into the modeling results presented at the February 19 workshop.
- 4) Quantitative estimates, in terms of installed capacity and energy production, of the potential to reduce the need for transmission-connected renewable generation and thereby reduce the environmental and land use impacts of SB 100 compliance by deploying DER and FTM S+S projects on built infrastructure in California.

B. Define and Include Social Costs and Non-Energy Benefits (NEBs) in Future Analyses

The 2021 Report committed to developing tools and metrics to capture the following social costs and NEBs in future SB 100 analyses: land use impacts; public health and air quality; water supply and quality; economic impacts; and resilience. (*Chapter 5, p. 134*) The Joint Agencies acknowledged that this was not feasible in the 2021 modeling round and pledged to develop the necessary analytical capacity by the next report cycle. That cycle is upon us now. NEBs must not continue to be punted to a future analysis.

We are concerned that the February 19 workshop presentations focused exclusively on electricity resource modeling results and air quality without apparent integration of social cost and non-energy benefit metrics for land use impacts; water supply and quality; economic impacts; and resilience. The 2025 Report must fulfill the commitments made to address NEBs.

C. Additional 2021 Report Commitments with Land Use Implications

Two additional commitments from the 2021 Report bear directly on land use in the 2025 Report:

- **Tribal engagement on land use planning:** The 2021 Report directed the Joint Agencies to broaden engagement with tribal governments "*particularly on*

efforts related to land use planning." (Chapter 5, p. 135) The 2025 Report should document the tribal consultation process undertaken and how tribal input shaped land use planning decisions.

- **Permitting and project development bottlenecks:** The 2021 Report directed the agencies to engage stakeholders on barriers including permitting delays and long lead times for transmission projects — matters with direct and significant land use implications. (Chapter 5, p. 137) The 2025 Report's implementation challenges discussion should address how these barriers interact with land use and siting. The 2025 Report should explore how siting consistent with conservation priorities can accelerate deployment and achieving California's 30x30 goals. Simply defaulting to exempting clean energy projects from environmental review and permitting is not planning for a clean energy future.

II. The 2025 SB 100 Report Must Include the DER Focus Scenario that the Joint Agencies Provided During Study Planning

The Analytical Frameworks² and Input and Assumptions³ workshops held in 2023 and 2024 included a "DER Focus" scenario to look at "*Higher levels of distributed energy resources, including BTM and FTM generation and storage resources, and demand flexibility.*" However, a DER scenario appears to be absent from the results provided during the February 19 Workshop. Stakeholders and the public have a reasonable expectation that the 2025 Report will include analysis of a DER Focus scenario. We are concerned there appears to be a significant departure from the intended scope of the land use analysis for the 2025 SB 100 Report.

To give policymakers a complete picture of the pathways available for achieving California's SB 100 goals, the Joint Agencies need to incorporate the DER Focus scenario into the SB 100 modeling framework. Without such a scenario, the current analysis evaluates only pathways centered on transmission-connected generation, providing an incomplete picture of the options available for achieving

² California Energy Commission, *SB 100 Analytical Framework Workshop*, California Energy Commission Docket No. 23-SB-100, TN 252852 (filed Oct. 31, 2023)

³ California Energy Commission, *Presentation for SB100 Inputs and Assumptions Workshop*, California Energy Commission Docket No. 23-SB-100, TN 254504 (filed Feb. 16, 2024)

SB 100. This omission excludes a class of resources that can be deployed through different siting, permitting, and interconnection pathways. DERs offer several crucial attributes toward achieving SB 100's mandate cost effectively while providing local and locational benefits that transmission-connected resources cannot provide. Defenders and others engaged in this proceeding have argued for including this resource type in the SB 100 planning process,⁴ yet it is still being omitted from consideration.

Furthermore, the Joint Agencies specifically included FTM for the DER Focus Scenario. FTM S+S deployed on existing built infrastructure avoids land use conflicts, will generally be located close to load centers to avoid need for transmission interconnections and upgrades, and can offer local resilience and economic benefits to the communities where it is deployed. Including it in the final analysis will ensure the 2025 SB 100 Report considers a broader range of deployment pathways for meeting the state's long-term clean energy targets.

Evaluating this pathway is particularly important given the scale of clean energy deployment the current planning portfolios require. The SB 100 modeling results assume sustained resource build rates that would need to exceed historical deployment levels for multiple decades, making the case for a broader scenario analysis all the more compelling.

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

It is our understanding that the 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 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.

⁴ See: The Climate Center, *Joint Non-Profit Parties Comments on SB 100 2025 Joint Agency Report Kickoff Workshop*, California Energy Commission Docket No. 23-SB-100, TN 252192 (filed Sept. 8, 2023) and The Climate Center et al., *Joint Parties SB 100 Workshop Comments*, California Energy Commission Docket No. 23-SB-100, TN 253118 (filed Nov. 14, 2023).

A. The Distinction Between Workshop Presentations and a Draft Report

A workshop on draft modeling results only 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. The Precedent of the 2021 Report Process

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. (*2021 Report, Chapter 2, p. 52*) That process set an important precedent and was cited in the 2021 Report itself as a best practice to be retained and built upon for future reports. (*Chapter 5, p. 135*)

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.

C. The Stakes Are High

The 2025 SB 100 Report will shape 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.

IV. Summary of Requests

We respectfully request that the Joint Agencies commit to the following in the 2025 SB 100 Report:

- **Land use modeling:** Include a full accounting of the CEC's land use modeling tool development and findings, including updated estimates of the land area required under the modeled SB 100 scenarios.
- **Environmental and siting analysis:** Include a spatial analysis of where resources could be sited consistent with conservation priorities, natural and working lands protections, and EO N-82-20's 30x30 goal.
- **Climate Smart Strategy coordination:** Document how the 2025 Report's land use findings have been coordinated with the Climate Smart Strategy under EO N-82-20 and the AB 32 Scoping Plan, as committed to in the 2021 Report. *(2021 Report, Chapter 4, p. 112)*
- **Social costs and NEBs:** Either incorporate social costs and non-energy benefit analysis into the 2025 Report's modeling or explain why this remains infeasible and provide a specific, binding commitment for the 2029 Report cycle.

- **Tribal consultation:** Document the tribal consultation process conducted for the 2025 Report, particularly regarding land use planning, consistent with the 2021 Report commitment. (*2021 Report, Chapter 5, p. 135*)
- **DER Focus Scenario:** Quantification of potential installed capacity and energy production from DER and FTM S+S facilities on built infrastructure in California, and the benefits of such deployment in reducing the need for transmission-connected renewable generation and thus the environmental and land use impacts of SB 100 compliance.
- **Draft report for public comment:** Issue the 2025 SB 100 Joint Agency Report as a draft for public review and comment, with a minimum 30-day comment period, before the report is finalized and submitted to the Legislature.

Conclusion

We appreciate the Joint Agencies' efforts on the 2025 SB 100 Report and look forward to continued engagement. We are committed to working constructively with agency staff on the land use, environmental, and public process issues raised in these comments. Please do not hesitate to contact Kate Kelly at kate@kgconsulting.net with any questions.

Sincerely,

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