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**Calpine LLCs Comments on the 2025 SB 100 Joint Agency Report
Draft Results Workshop**

Additional submitted attachment is included below.



March 20, 2026

California Energy Commission
Docket Number 23-SB-100
715 P Street
Sacramento, CA 95814

Re: Comments on the 2025 SB 100 Joint Agency Report Draft Results Workshop

Calpine LLC, a business unit of Constellation Energy Corporation (Calpine), appreciates the opportunity to comment on the February 19, 2026, SB 100 Draft Results Workshop. Calpine values the continued engagement by the state agencies and supports the draft results' inclusion of Carbon Capture and Sequestration (CCS) as an eligible resource for meeting California's Senate Bill 100 goal of serving 100% of retail sales with renewable and zero carbon resources by 2045.

Calpine appreciates that the draft results reflect the role of CCS in achieving the state's decarbonization goals by including 1.6 GW of CCS retrofits in the Reference Case. In addition, Calpine appreciates the inclusion of another scenario with 15 GW of CCS retrofits. Analysis by the Energy Futures Initiative and Stanford University identifies at least 25 units totaling 14 GW of capacity that are well suited for CCS retrofits in California.¹

Calpine alone is actively advancing 2.18 GWs of CCS retrofits in California, including the 550 MW Sutter Decarbonization Project, which is expected to capture up to 1.75 million metric tons of carbon dioxide (CO₂) annually from the Sutter Energy Center near Yuba City.² The project will be designed to capture 95% of CO₂ emissions enabling the Sutter Energy Center to produce firm, dispatchable, low-carbon electricity. Beyond Sutter, Calpine continues to make meaningful progress with several other plants in California such as the 880 MW Delta Energy Center in

¹ See P.49 of Energy Futures Initiative and Stanford University. "An Action Plan for Carbon Capture and Storage in California: Opportunities, Challenges, and Solutions," October 2020.

https://sccs.stanford.edu/sites/g/files/sbiybj17761/files/media/file/EFI-Stanford-CA-CCS-FULL-rev2-12.11.20_0.pdf

² Calpine, *Press Release: Calpine Announces Execution of Full-Scale CCS Demonstration Project Cost Sharing Agreement with the Department of Energy for Sutter Decarbonization Project (Aug. 7, 2024)*,

<https://www.calpine.com/calpine-announces-execution-of-full-scale-ccs-demonstration-project-cost-sharing-agreement-with-the-department-of-energy-for-sutter-decarbonization-project/>

Pittsburg and the 750 MW Pastoria Energy Facility in Kern County.³

While some stakeholders may oppose any continued reliance on gas generation (with or without CCS), Calpine strongly agrees with the California Air Resources Board Deputy Executive Officer Rajinder Sahota’s comment that assuming the retirement of all fossil-fueled plants is not realistic.⁴ CCS retrofits to existing gas generation could reduce electricity sector emissions while maintaining the reliability benefits of the gas generating fleet. In addition, as the SB 100 modeling demonstrates, CCS retrofits would allow gas generation to produce significant volumes of clean energy, obviating the need for large renewables and storage overbuilds. With respect to emissions other than CO₂, the draft results of the SB 100 study show that the power sector contributes relatively little to emissions of criteria pollutants.⁵

Calpine appreciates the inclusion of CCS as an eligible resource in the draft results and welcomes the opportunity to work with staff to further refine the representation of CCS capacity in the modeling.

Sincerely,

/s/Diana S. Gallegos

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/s/Vanesa Perez

Vanesa Perez
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³ Calpine contributed to a Front-End Engineering Design (“FEED”) study sponsored by the Department of Energy (“DOE”) of a CCS retrofit to the Delta Energy Center, and it has commenced a similar study in cooperation with DOE of the Pastoria Energy Facility. Calpine recommends that the CEC include Delta and Pastoria in its base case instead of the Los Medanos Energy Center (LMEC). Calpine has been hosting a pilot at LMEC, but Calpine is not currently planning a full-scale retrofit at LMEC.

⁴ See CEC, *Hybrid Workshop on 2025 SB 100 Joint Agency Report Draft Results – zoom* at minutes 2:00:36-2:01:57 Workshop held February 19, 2026; available at: <https://www.energy.ca.gov/event/workshop/2026-02/hybrid-workshop-2025-sb-100-joint-agency-report-draft-results>

⁵ Calpine has produced its own analysis that demonstrates that specific plants have limited impacts on concentrations of criteria pollutants either close to the plants or more generally.