

**DOCKETED**

<b>Docket Number:</b>	23-SB-100
<b>Project Title:</b>	SB 100 Joint Agency Report
<b>TN #:</b>	269275
<b>Document Title:</b>	Julian Le Pera Comments - Sierra Club SB 100 Comment
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Julian Le Pera
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	3/20/2026 2:16:47 PM
<b>Docketed Date:</b>	3/20/2026

*Comment Received From: Julian Le Pera  
Submitted On: 3/20/2026  
Docket Number: 23-SB-100*

**Sierra Club SB 100 Comment**

*Additional submitted attachment is included below.*

Hello, my name is Julian Le Pera, I am a California resident. I support California's clean energy goals and I want to ensure that the state achieves a truly clean energy future. As a result of wanting to meet the goal of 100% carbon-free electricity by 2045, I have a number of concerns surrounding the bill itself and how its directives have been carried out so far.

First off, I am concerned that the spirit and letter of the bill is not being followed in the state's interpretation of 100% retail sales. The intent of the SB 100 bill is to reach 100% clean energy statewide. This means 100% of electricity generation needs to come from zero-carbon resources. The state's interpretation of SB 100, which now excludes transmission and distribution losses, as well as storage loss is faulty and unacceptable.

One of my concerns with the SB 100 Bill is the language in section 45.53, which allows for ways to circumvent the overall goal of the bill. The definition of "zero-carbon resources" is left ambiguous, leading to the possibility that companies would use its open interpretation to their benefit. The lack of a clear definition that limits interpretation could potentially allow for companies to reclassify combustion-based energies as "zero-carbon" through the use of lifecycle greenhouse gas accounting and emissions offset technologies. Without an explicit definition that pushes for physical absence of carbon emissions, a refinery or factory that physically emits large amounts of carbon dioxide and other pollutants can technically qualify as a "zero-carbon resource" if those companies pay to offset those emissions later.

A second concern is the lack of enforcement mechanism in preventing resource shuffling. In Sec 45.53 there is a clear intent to prevent resource shuffling in its subsection (a), however there is no mention of a concrete enforcement mechanism. The California Public Utilities Commission currently monitors resource shuffling by requiring utilities to submit descriptions of how their energy procurement adheres to the Bill's stated plan. However, allowing utilities to self-report allows them to continue shuffling resources and exploiting out-of-state carbon accounting loopholes without facing regulatory penalties.

One final concern is that while SB 100 pushes for decarbonization, the Renewables Portfolio Standard (RPS) framework included in section 399.15 has cost limitations designed to protect ratepayers from rate shock, which create a pathway for Investor-Owned Utilities to bypass the bill's regulations. The provisions, in Section 399.15 subdivisions (c) and (d), create a statutory mechanism for IOUs to legally stall renewable procurement and indefinitely stall the state's 100 percent clean energy plan while claiming to be financially responsible in order to not raise costs.

These are some of my concerns with the SB 100 Bill and I would like to thank the California Energy Commission, California Public Utilities Commission, and the California Air Resources Board for working on this plan to help California move towards 100% clean energy and for taking the time to review my comments.