DOCKETED	
Docket Number:	23-SB-100
Project Title:	SB 100 Joint Agency Report
TN #:	269274
Document Title:	350 Bay Area Comments - 350 Bay Area comment on SB 100 Report Draft Results Workshop
Description:	N/A
Filer:	System
Organization:	350 Bay Area
Submitter Role:	Public
Submission Date:	3/20/2026 2:24:42 PM
Docketed Date:	3/20/2026

Comment Received From: 350 Bay Area
Submitted On: 3/20/2026
Docket Number: 23-SB-100

350 Bay Area comment on SB 100 Report Draft Results Workshop

see attached

Additional submitted attachment is included below.

350 Contra Costa
350 East Bay
350 San Francisco
350 Marin
350 Silicon Valley
350 Sonoma
Napa Climate NOW!

March 20, 2026
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
Docket 23-SB 100

Submitted via electronic comment system

RE: Comments of 350 Bay Area on the 2025 SB 100 Report Draft Results

350 Bay Area appreciates the opportunity to submit these comments on the February 19th 2026 workshop presentation of the SB 100 report draft results. We thank the California Energy Commission ("CEC"), California Public Utilities Commission ("CPUC"), and California Air Resources Board ("CARB") for their leadership in crafting the 2025 SB 100 Joint Agency Report, and for all the hard work that has gone into the draft results presented at the February workshop.

We reiterate the request in the March 5, 2026 letter from the Joint Organizations that stakeholders have an opportunity to comment on the actual text of the draft report before it is submitted. A modeling exercise such as that undertaken for the SB 100 report necessarily requires assumptions and simplifications, many of which are acknowledged in the presentation PDF. However, for the SB 100 report to be a useful guidepost to reaching California's ambitious but crucial climate goals, it should incorporate what has been learned from documented experience about what is feasible, as well as how the substantially changed federal policy landscape may affect the costs and timeline of various strategies.

Specific comments:

1) The reference scenario should be as credible and plausible as possible. As an illustration of an issue with the current reference scenario, it assumes 1,600 MW will be available from carbon capture and sequestration. However results from experience with carbon capture and sequestration to date raise major questions about the cost of the technology and the assumed ability to capture 95% of emissions[1] Furthermore subsidies previously available to accelerate this technology have changed so the actual cost may be substantially higher than assumed in the model .

2) We strongly urge that the DER Focus scenario be included in the report. At present the model incorporates behind the meter DER through demand modeling, which undervalues its potential contribution. The model considers it as a static resource rather than incorporating ways in which DER can contribute to a more reliable and lower cost grid, such as demand flexibility and battery storage as part of VPP's. We endorse the comments submitted by Advanced Energy United, expanding in detail on ways in which DER and particularly demand flexibility can contribute to meeting the SB 100 goals in a timely and cost efficient manner. [2] In contrast to the reliance on CCS and hydrogen, DER have a demonstrated record of feasibility and speed of installation.

3) Front of the meter DER should be incorporated into the model as a separate input. The current model structure systematically obscures quantification of how front of the meter DER including solar and storage can accelerate the speed and decrease the cost of meeting the SB 100 solar resource target. Specifically on Slide 28 of the workshop presentation, the input category of "solar" does not differentiate between front of the meter solar located on the distribution grid and solar which requires transmission resources. As well documented, challenges in siting, supply chain constraints, and interconnection times have resulted in substantial delays for resources requiring transmission. SB 100 conceptual planning would greatly benefit by quantifying how front of the meter solar and storage resources could avoid time constraints related to transmission, contribute to grid resilience, support land conservation, save ratepayer costs for transmission, and provide ramping grid capacity. We concur with the

1 Denis-Ryan, Amandine. 2024. CCS hype and hopes sinking fast. Institute for Energy Economics and Financial Analysis. https://ieefa.org/resources/ccs-hype-and-hopes-sinking-fast

2 Advanced Energy United TN268964 March 5th 2026

comments submitted by the Coalition for Community Solar Access on the importance of the DER Focus scenario and the urgency of explicitly incorporating Front of the meter solar and storage[3]

350 Bay Area looks forward to opportunities to continue the stakeholder dialogue with the agencies so that California succeeds in meeting the ambitious clean energy goals of SB 100 as rapidly as possible, while considering affordability and equity for ratepayers.

with regards,

_____/_____

Claire Broome
representing 350 Bay Area
cvbroome@gmail.com
March 20, 2026

3 Coalition for Community solar access andSEIA TN268961 March 5th 2026