

<b>DOCKETED</b>	
<b>Docket Number:</b>	23-SB-100
<b>Project Title:</b>	SB 100 Joint Agency Report
<b>TN #:</b>	269277
<b>Document Title:</b>	The California Municipal Utilities Association Comments - CMUA's Comments on the SB 100 Draft Results Workshop
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	The California Municipal Utilities Association
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	3/20/2026 2:55:45 PM
<b>Docketed Date:</b>	3/20/2026

*Comment Received From: The California Municipal Utilities Association  
Submitted On: 3/20/2026  
Docket Number: 23-SB-100*

## **CMUA's Comments on the SB 100 Draft Results Workshop**

*Additional submitted attachment is included below.*

STATE OF CALIFORNIA ENERGY RESOURCES CONSERVATION  
AND DEVELOPMENT COMMISSION

In the Matter of:  
SB 100 Joint Agency Report

Docket No. 23-SB-100

---

**COMMENTS OF THE CALIFORNIA MUNICIPAL UTILITIES ASSOCIATION ON  
THE FEBRUARY 19, 2026, SENATE BILL 100 WORKSHOP**

**I. INTRODUCTION**

The California Municipal Utilities Association (CMUA) appreciates the opportunity to submit these comments on the February 19, 2026, Workshop on the 2025 Senate Bill (SB) 100 Joint Agency Report Draft Results (Workshop). CMUA represents 85 publicly-owned electric, gas, water, and wastewater utilities statewide, which are governed by locally elected boards and are accountable to the communities that they serve. CMUA members provide energy to approximately 25 percent of Californians and are committed to maintaining safe, reliable, and affordable electric service while advancing the state's climate goals.

As it has in the past, CMUA strongly supports California's statutory goals to achieve 100 percent clean electricity while maintaining electricity system reliability and affordability for all customers. The Workshop underscores both the ambition of these goals and the complexity of delivering them on the actual transmission and distribution systems that serve Californians, particularly in public power service territories. Consistent with our prior comments on the SB 100 Kickoff and Analytical Framework Workshops, CMUA's recommendations focus on, improving the evaluation of affordability, reliability and grid constraints, and strengthening

collaboration with Balancing Authority Areas (BAAs) so that SB 100 implementation is both achievable and durable.

## II. COMMENTS

A. The Joint Agencies Should Publish a Draft SB 100 Joint Agency Report for Public Comment, Consistent with Legislative Direction, Before Finalizing the 2025 Report.

In developing the SB 100 report, the Joint Agencies are required to conduct a public process.<sup>1</sup> While the Workshop materials provide a useful overview of the draft modeling framework, scenarios and preliminary results, but they are not a substitute for a written Draft SB 100 Joint Agency Report made available for formal public comment. A significant amount of detail concerning modeling inputs, assumptions, constraints, and tradeoffs emerges only in written reports and technical appendices. Workshops are valuable for initial feedback and clarifying questions but do not permit the kind of careful review that stakeholders require to test the reasonableness of key assumptions (such as resource cost trajectories, import treatments, or reliability metrics) and to suggest targeted refinements. Moreover, the draft modeling results address just one part of the SB 100 report, which also will include context, conclusions, and recommendations.

To align this process with previous SB 100 efforts, the statutory direction for a public process, and transparency, CMUA requests that the Joint Agencies publish a Draft 2025 SB 100 Joint Agency Report with sufficient time for written stakeholder comments before a final report is submitted to the Commission for adoption.

---

<sup>1</sup> Public Utilities Code (PUC) Section 454(d)(2)

B. The Combustion-Retirement Scenario Is Inconsistent with Affordable Retail Rates and Practical Implementation.

The Workshop presentations include a “combustion-retirement” future, which entails the complete retirement of all combustion resources in the state, among the portfolio of scenarios used to illustrate possible pathways to meet SB 100 goals. Specifically, this “combustion-retirement” scenario forces retirement of 35GW of fossil gas plants and 1.5GW of biofuel plants, and requires an additional 200 TWh of total energy production due to efficiency losses and very high intermittent resources penetration. However, there is no analytical assessment of how these retirements would impact electricity affordability or whether the new substitute generation is an acceptable locational substitute to ensure reliability. This scenario cannot be reconciled with the State’s concurrent commitments to affordability and reliability.

CMUA is concerned that the combustion-retirement scenario risks being misconstrued as a presumptively feasible path regardless of its implications for affordability and system performance. The overall cost trajectory of electricity rates already threatens to undermine decarbonization goals by reducing both customer willingness and ability to electrify. Completely removing firm combustion options from the resource set and requiring substantial new investment in substitute resources would exacerbate these pressures, particularly during periods of low renewable output, extended weather events, or unanticipated load growth – at least until firm, zero carbon resource alternatives that can provide the same reliability attributes as thermal power plants exist, are available at scale, and are affordable. From the workshop report, it is not apparent how any of these goals can be met. Any final report should set out in detail cost and reliability implications of a combustion-retirement scenario, including the impacts on electricity rates.

C. The Success of SB 100 Is Critically Dependent on the Active Involvement of California’s BAAs, Which Plan and Operate Their Own Systems and Have Visibility Into Reliability Challenges and Transmission Constraints.

As directed by statute, the CEC, California Public Utilities Commission (CPUC), California Air Resources Board (CARB), and all other state agencies are tasked with working, “in consultation with all California balancing authorities, as defined in subdivision (d) of Section 399.12, as part of a public process” to “issue a joint report to the Legislature by January 1, 2021, and at least every four years after.”<sup>2</sup> The statute requires that the aforementioned agencies work in consultation with the California balancing authorities on a joint reliability progress report to “identify challenges and gaps, if any, to achieving system and local reliability and identify the amount and cause of any delays to achieving compliance with all energy and capacity procurement requirements set by the commission.”<sup>3</sup>

In the almost eight years since passage of SB 100, public power has urged a much closer coordinated efforts between the agencies and balancing authorities to fulfill the mandates of the statute. In prior comments, the POU BAAs and CMUA recommended the formation of agency-led, BAA-focused technical working groups on reliability and transmission modeling to support SB 100 study cycles. Those comments outlined how such groups could help define reliability metrics, evaluate modeling tools and assumptions (e.g., treatment of inverter-based resources, imports, and transmission derates), and bring in current Integrated Resource Plan (IRP) information from utilities that may not be fully reflected in generic data sets for the West. The materials presented at the Workshop acknowledge modeling limitations, including the absence of power-flow analysis and simplified treatment of real-world operational constraints

---

<sup>2</sup> PUC Section 913.11(a)

<sup>3</sup> *Id.*

such as course modeling of generation locations – which a structured collaboration with the POU BAAs could help address.

While there has been occasional outreach to the BAAs as part of the study process, by and large the collaboration with BAAs has not occurred. In addition to being inconsistent with the letter and spirit of SB 100, this lack of collaboration lessens the value of the study work product, and is a missed opportunity to take a truly statewide look at the opportunities and challenges facing our California’s energy transition. CMUA urges the Joint Agencies to commit to concrete steps to better engage the POU BAAs ahead of and through the development of the next SB 100 report. Particularly, drawing on experience from the Renewable Energy Transmission Initiative (RETI) and RETI 2.0, the Joint Agencies should consider a regularized executive and technical committee process to help shape the work around the agency staff efforts and inform future workshops. As CMUA advocated for in prior comments, this could include both Steering Committee (executive) and Technical Committee structures to work through data sets and sensitivities that may be considered as the reliability and other analyses are developed. We are not wedded to this particular project structure, but make this suggestion based on the success of RETI in developing consensus and producing well-supported work products through collaboration across agencies, the California Independent System Operator, and POU transmission service providers. With an underlying support structure, the benefits of collaboration called for in SB 100 could be maximized.

D. Grid Constraints Must be Fully Assessed for all SB 100 Portfolios.

It is past time that the state squarely takes on and assesses the implications of grid constraints when interpreting the SB 100 portfolios. In prior comments, CMUA (as included in the “Joint Commenters”) expressed concern that capacity-expansion and production cost modeling, without accompanying power-flow analysis, can mask transmission bottlenecks, local

reliability needs, and the challenges of delivering power from remote resource areas to load centers.<sup>4</sup> The Joint Commenters also highlighted the risks of using only zonal transmission representations, the disconnect between optimistic resource build assumptions and lengthy permitting and siting timelines, and the importance of realistically modeling imports, derates, and aging infrastructure such as intertie de-rates during heat events. Yet the Workshop Materials failed to provide any information on how any of these potential grid constraints would impact the various scenarios.

CMUA reiterates those concerns and once again urges the Joint Agencies to explicitly describe the principal transmission, siting, and operational constraints that were not fully captured in the modeling and discuss how those constraints could affect the feasibility, timing, and cost of each portfolio within the draft report.

E. The Joint Agencies Should Commit to an Interim “Mid-Cycle” Review Focused on Affordability, Reliability, Transmission, and Resiliency.

Given the rapid pace of change in California’s electric system, CMUA is increasingly concerned that a four-year SB 100 reporting cycle will not be sufficient to keep affordability, reliability, transmission, and resiliency analysis aligned with evolving conditions, including increasing upward pressure on electricity rates. Since the last report, load forecasts have been influenced by emerging drivers such as data centers and AI-related load, and the resource mix has continued to shift toward inverter-based and distributed resources. At the same time, the North American Electric Reliability Corporation and Federal Energy Regulatory Commission have initiated new reliability efforts, and now incorporates inverter-based resource performance standards, and developing reliability standards for large loads/data centers. Given the pace of

---

<sup>4</sup> See CEC Docket No. 23-SB-100, TN #254830; Comments Of The Indicated Public Power Balancing Authority Areas And The California Municipal Utilities Association On The October 31, 2023 Senate Bill 100 Analytical Framework Workshop at 2.

change in these areas, it is clear that energy policy assessments such as that done in response to SB 100 objectives must give full consideration to reliability risk.

Accordingly, the Joint Agencies should include a specific commitment and tentative timeline for a mid-cycle SB 100 review of the outcomes focused on reliability, transmission, and resiliency, to be completed well before the next full report is due. This refresh would not replace the full four-year report, but would provide an essential check-in to validate assumptions and course-correct as needed. This process would parallel how the CEC approaches its Integrated Energy Policy Report, to enable focus on key issues that require regular evaluation.

### **III. CONCLUSION**

CMUA appreciates the Joint Agencies' continued efforts to advance SB 100 implementation and the opportunity to comment on the February 19, 2026, Workshop on draft results. Building on prior CMUA, these recommendations are offered to strengthen the analytic foundation, transparency, and collaborative character of the 2025 SB 100 Joint Agency Report so that California can achieve its clean energy goals while maintaining reliable and affordable electric service for all customers.

Dated: March 20, 2026

Respectfully submitted,

/s/ Tony Braun

Tony Braun

Jessica Melms

Braun Blaising & Wynne, P.C.

Counsel to the California Municipal Utilities  
Association