

DOCKETED	
Docket Number:	23-SB-100
Project Title:	SB 100 Joint Agency Report
TN #:	269279
Document Title:	Ian Kearney Comments - GSCE comment on 2025 SB 100 Report draft results workshop
Description:	N/A
Filer:	System
Organization:	Ian Kearney
Submitter Role:	Public
Submission Date:	3/20/2026 3:20:22 PM
Docketed Date:	3/20/2026

Comment Received From: Ian Kearney
Submitted On: 3/20/2026
Docket Number: 23-SB-100

GSCE comment on 2025 SB 100 Report draft results workshop

Additional submitted attachment is included below.



GOLDEN STATE

C L E A N E N E R G Y

March 20, 2026

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

RE: February 19, 2026 Workshop on 2025 SB 100 Joint Agency Report Draft Results

Golden State Clean Energy (“GSCE”) appreciates the opportunity to comment on the California Energy Commission, California Public Utilities Commission, and California Air Resources Board (collectively the “Joint Agencies”) February 19, 2026, SB 100 Draft Results Workshop (“Workshop”). Developing the SB 100 Report is an essential process for thoughtful consideration of the state’s long-term resource needs, challenges and uncertainties associated with developing those resources, and potential alternatives to achieving the state’s SB 100 goals considering any challenges and uncertainty. These considerations can help decisionmakers and stakeholders better understand the impacts of resource availability (or lack of availability) and the transmission required to support future resources, both of which necessitate some degree of locational analysis of future resources.

The Joint Agencies’ plan to not issue a draft report for public review leaves stakeholders in the dark as to the exact information, analysis, and recommendations that will be presented to the Legislature in the 2025 SB 100 Joint Agency Report. Based on the Workshop, GSCE is concerned the report will have insufficient locational or land use analysis of future resources and thus be unable to facilitate better long-term resource and transmission planning. If locational or land use analysis is provided in the report, it is critical for stakeholders to have the opportunity to review and provide feedback on the analysis.

GSCE agrees with the comments of the Defenders of Wildlife, the Center for Biological Diversity, and The Nature Conservancy that call attention to the inadequate land use and environmental analysis that is anticipated to appear in the 2025 SB 100 Joint Agency Report.¹ Important commitments were made, and the Joint Agencies have not explained

¹ CEC Docket No. 23-SB-100, joint comment of Defenders of Wildlife and Center for Biological Diversity, at pg. 2-4, March 19, 2026; CEC Docket No. 23-SB-100, comment of The Nature Conservancy, at pg. 2, March 17, 2026.

why they are unable to fulfill these commitments. The 2025 SB 100 Joint Agency Report risks failing to provide the Legislature with the information needed to understand the renewable resource areas the state is expecting to be developed, the relative environmental impacts of different siting decisions, and the associated transmission needed to access these resources. Previous analysis already showed that California has the land space to meet its clean energy goals. The more important question has become, *where will California focus its transmission investments to create interconnection access for future resources*. Proactive resource planning should seek to promote the state's land use policies and reduce environmental impacts, but the Workshop did not address this.

Proactive, land use-focused resource planning would also allow the Joint Agencies to move away from the focus on existing transmission and create more room to analyze where future resources *should* go. A long-term planning document like the SB 100 Report should be less reactive to the existing transmission system. The grid will need more investments to allow the state to meet its SB 100 goals, and resource planning that is limited to existing transmission facilities may mislead decisionmakers.

GSCE agrees with the comment of American Clean Power-California ("ACP-CA"). ACP-CA rightly points out the importance of siting and permitting challenges, and that "access to transmission is a top factor for clean energy developers' assessments of site suitability."² GSCE also emphasizes ACP-CA's statement that, "if California wants clean energy development to happen on-time *and the right places* that maximize resource value and minimize environmental impacts, it needs to dramatically and proactively increase the pace of transmission development to those locations and in areas where transmission resources don't already exist."³

The zonal capacity expansion modelling results should have broad geographic locations associated with this information. At the least, GSCE requests that the Joint Agencies provide a breakdown of the transmission zones the modeling results say resources will come from. However, further analysis is needed to understand the environmental impacts of the modeling results and how the results may be altered to reduce the relative environmental impacts.

Ultimately, when California is looking at adding nearly 100 GW of new solar, proactive land use planning should highlight California's San Joaquin Valley as a critical area for this development, along with the corresponding energy storage and transmission infrastructure. This area avoids many of the land use and environmental conflicts that are associated with renewable development, considering the amount of already environmentally impacted agricultural lands and the significant future land fallowing that is expected to occur. The SB 100 Report can help shape a future that allows more development to occur in the San Joaquin Valley and reduce the relative environmental

² CEC Docket No. 23-SB-100, comment of American Clean Power-California, at pg. 7, March 5, 2026.

³ *Id.*

impacts of renewable development. As it currently stands, the area needs more transmission investments and planning signals from the state to unlock the resource potential in the San Joaquin Valley.

GSCE appreciates Joint Agencies work in preparing the 2025 SB 100 Joint Agency Report. Additional land use and environmental analysis is needed to complete the report, and stakeholders should be provided the opportunity to review and comment on that analysis before the report is finalized and provided to the Legislature.

Sincerely,

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