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*Comment Received From: Angie Hacker*  
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## **California Climate and Energy Collaborative (CCEC) Comments on the 2025 SB 100 Report Draft Results**

The California Climate and Energy Collaborative appreciates the opportunity to relay relay insights and perspectives gathered from our network of local practitioners to the California Energy Commission that are relevant to the SB 100 Joint Agency Report Draft Results.

*Additional submitted attachment is included below.*

March 20, 2026

California Energy Commission  
1516 Ninth Street Sacramento, CA 95814-5512  
Docket # 23-SB-100  
Project Title: 2025 SB 100 Report Draft Results



**RE: California Climate and Energy Collaborative (CCEC) Comments on the 2025 SB 100 Report Draft Results**

Dear CEC Leadership and Staff,

The [California Climate and Energy Collaborative \(CCEC\)](#) welcomes the opportunity to provide comments in response to the California Energy Commission's (CEC) SB 100 Joint Agency Report Draft Results which were presented at a workshop on February 19, 2026. Comments and recommendations herein fall under the following topics:

- Engagement & Comment
- Role of Locals
- Role of Efficiency, Electrification and Other Distributed Energy Resources
- Concerns about Continued Reliance on Combustion and CCS
- Beyond Supply Forecasts: CA needs a Comprehensive Clean Energy Strategy
- Implementation Challenges and Solutions

CCEC is a program of CivicWell that supports California local governments and their partners in their efforts to advance community-driven energy efficiency, emissions reduction, and climate action by building the knowledge, partnerships, and tools needed for sustained local capacity and streamlining coordination of state and local practitioners to remove implementation barriers. Our network of local governments and their partners across the state are working to rapidly implement community energy efficiency, clean energy, electric vehicle and other climate actions, in alignment with State goals.

The CCEC network recognizes the importance of the SB 100 Joint Agency report in studying how California will meet the 2045 goal through more new clean energy resources while addressing entwined grid reliability and environmental, social and economic needs. In the last two decades, many of the 4,000 participants of the CCEC network have a strong focus and track record on accelerating progress on decarbonization through public projects and community-facing, locally led programs (e.g. through Regional Energy Networks, Community Choice Aggregation programs, and other collaborative, place-based partnership models) designed to fuel and load shift, increase renewable energy supply, and lower load demand from buildings and transportation in coordination with private property owners and the local workforce. These unique knowledge and perspectives can benefit the state as it seeks to address challenges, which is why we provided [early comments](#) in August 2024 on the SB 100 scenario assumptions. Local and regional organizations regularly confront real world challenges and barriers in their efforts to empower and implement the work that will be needed to meet the state's 2045 carbon neutrality goals. We believe that State and local agencies are natural partners in meeting this goal and collaboration is essential.

CCEC is continuously developing ways to foster better two-way communication between State and

local agencies to more effectively reach mutual energy and climate goals, and we welcome greater collaboration with the State on this matter. In the past three years, we have operated the [State and Local Energy and Climate Coordination](#) (SLECC) statewide and regional meetings with participation across roughly 1,000 attendees from local governments, other place-based stakeholders, and a dozen State agencies. We greatly appreciate that CEC representatives engage with our network regularly through SLECC and various other state-local meetings, including in July 2025 and March 2026 to gather feedback on the SB 100 Report. We would welcome more direct opportunities to update and engage our network on this and other CEC plans and encourage staff to utilize the regular and well-attended communication venues we have available.

### **SLECC Findings**

This year, CCEC released [a working draft of the 2025 SLECC Report](#) summarizing a large volume of input generously provided by over 1,000 state and local participants at nearly 20 statewide and regional (in person and virtual) convenings since 2023. The report shares what SLECC has learned about how California can deliver state and local solutions that really address the biggest barriers to accelerating place-based energy and climate progress. SLECC's work to date has identified 32 barriers to place-based progress under 7 topic areas, including 12 barriers specifically on the topic of Clean Energy & Building Decarbonization, as well as other related barriers on the topics of Funding Access & Capacity Building, Community Resilience and Clean and Active Transportation. The barriers most applicable to SB 100 are flagged below in the table on pages 4-9.

The SLECC Report, and corresponding online [dashboard](#), detail nuanced examples of how communities are experiencing these barriers, provide initial local and state solution opportunities, showcase success already being made, and propose where pathways to further progress currently exist within agencies, including through important state plans like this. Given how relevant our findings are to the content and purpose of the SB 100 Joint Agency Report, we respectfully submit these comments and the associated SLECC report and dashboard into the record for CEC consideration.

### **Comments on SB 100 Joint Agency Report & Alignment with SLECC Findings**

CCEC would like to thank CEC staff for the many years of analysis and work necessary to conduct the 2025 SB 100 Joint Agency Report, and for extending this comment period and releasing additional details.

#### **General**

**Engagement & Comment:** The [SB 100 website](#) states that the CEC will “provide external engagement that is early, often, and meaningful.” It also commits that “external engagement is underway with balancing authorities, load-serving entities (IOUs, POU, CCAs), local governments, tribal governments, environmental justice organizations, and interested public parties through workshops, working groups, consultations, and regional meetings both in-person and virtually.”

We appreciate that CEC has been available for conversations directly with our network. However, the process is difficult to interact with. In this comment period we are only able to comment upon a slide deck, rather than a full draft of a report. Without a draft, our network has no way to understand what information CEC has compiled on critical areas of the report like the implementation challenges and opportunities, and therefore no way to comment on it. Instead we will comment on slide deck information and outline the relevant barriers and ideas we have compiled via SLECC (see below). CCEC recommends releasing the full draft and allowing for another comment period.

**Role of Locals:** SB 100 Joint Agency Report is largely designed at the transmission level and does not incorporate consideration of local generation or impacts. CEC's recently released Building Energy Action Plan recommends that the state should — "strengthen alignment across agencies and levels of government" — and explicitly calls for empowering local governments. We know that CEC values the critical role that local actors play in implementing the build out of clean energy resources and hope the report recognizes this role and clarifies how local and regional bodies can be better supported to help meet mutual state and local goals and coordinate to overcome barriers to place-based progress (described below).

### **Role of Efficiency, Electrification and Other Distributed Energy Resources**

While we understand the importance of utility scale solar and storage to meet 2045 goals and agree with the focus on building out those sources, we'd like to understand the role energy efficiency and electrification (fuel switching) is expected to play in the scenarios outlined. CEC's recently released Building Energy Action Plan recently stated that "Energy efficiency must remain a key strategy to make the clean energy transition affordable and cost-effective."

A key solution that arose in SLECC engagements recommends that the state "Protect and scale energy efficiency and demand-side solutions as core affordability strategies. The state should protect and reinvest in energy efficiency and demand-side programs that reduce consumption, lower bills, and avoid costly infrastructure buildout, rejecting false affordability narratives that frame efficiency and electrification cuts as bill solutions." Our network believes inclusion of place-based and community-scale distributed energy resources would support energy affordability.

During our March 5 meeting, CEC staff let us know that some demand-side resources are factored into the demand side of the model, mainly through decisions that customers are making for themselves. Our network reflected that communities are excited about a future of energy sovereignty that includes decentralized renewable energy and battery powered buildings and vehicles. CCEC recommends that CEC create a demand scenario that reflect significant growth in residential and commercial efficiency, electrification, storage, rooftop solar, and other distributed energy resources. Locals are working hard on buildout of these preferred energy resources and are succeeding, despite barriers addressed below, which CCEC would like to work with the state to overcome.

### **Concerns about Continued Reliance on Combustion and CCS**

Members of our network relayed questions and concerns during a CEC presentation of results at our March 5th SLECC meeting related to the ongoing reliance on combustion and CCS built into the projected supply models. Some expected to see a more significant push away from combustion to meet the State's 2045 carbon neutral goals, and are disappointed to see assumptions that may overrely on the effectiveness of CCS technology.

### **Beyond Supply Forecasts: CA needs a Comprehensive Clean Energy Strategy**

Our network regularly states that California needs a "comprehensive clean energy strategy" with a roadmap outlining specific actions that the State will take over time (and through which sectors and partners) to address the many barriers and opportunities involved in reaching carbon neutral energy supply by 2045. SLECC would appreciate participating in a coherent state-led discussion on what the

future energy system looks like that delivers carbon reductions, resilience and affordability with specific attention to how we get there.

A key solution that arose in our SLECC engagements recommends that the state “Establish a coordinated statewide clean-energy transition authority or strategy that aligns affordability, reliability, and decarbonization goals across CPUC, CEC, IOUs, and related agencies. This unified framework would address fragmented decision-making, manage system cost drivers, protect households from rising energy bills, and prevent redundant or conflicting infrastructure investments while advancing an equitable energy transition.”

SLECC participants emphasize the need for the state to lead on breaking down silos and integrate energy efficiency, electrification, and DER programs to leverage synergies and improve outcomes. We would welcome the opportunity to engage with CEC in developing such a plan.

### Implementation Challenges and Solutions

In general, SLECC is aligned with the goals of SB 100 and envisions an “integrated, distributed, and flexible future energy system that offers zero emission, reliable, and affordable power for all and is implemented by a knowledgeable workforce and just transition.” But as detailed below there are significant barriers holding back place-based progress to achieve this desired future state. Below we share the most applicable SLECC Report findings derived from extensive local engagement. Many of these challenges were shared with CEC during and after a listening session we held with CEC on SB 100 Implementation Challenges and Opportunities in San Jose during the CCEC Forum, but are now available in more detail in the [2025 SLECC Report](#).

BARRIERS OUTLINED IN THE SLECC REPORT	RELATED COMMENTS SPECIFIC TO SB 100
<b>Clean Energy &amp; Building Decarbonization</b>	
<p><b>Barrier 1: Grid Infrastructure</b>            Insufficient and aging energy infrastructure cannot adequately support or optimize growing energy demand (e.g. to EVs, VPPs, AI, data centers, housing), the rapid transition to renewables, abundant day-time energy, and reliability as climate impacts increase.</p>	<p>Key opportunities raised by SLECC participants include “Pursue aggregated, multi-jurisdiction clean-energy projects to improve interconnection feasibility and cost-effectiveness.” and “ Increase planning reserve margins / reliability planning allowances to reflect extreme events and compounding risks.”</p>
<p><b>Barrier 2: Interconnection and Energization Processes:</b>            Transitioning vehicles and buildings to clean electricity is challenging due to electrical capacity constraints, delayed load studies, long interconnection and energization queues, and process inconsistency managed by the utilities.</p>	<p>The scenarios outlined in the SB 100 Results show a significant reliance on solar and storage, systems which are naturally built “in place” with significant roles for local governments. Our network shares that there is significantly more room for reform (queue transparency, timelines, backlogs blocking EV charging infrastructure as well as renewable energy and other types of development). We recommend reviewing the nuanced challenges and solution ideas we’ve captured in the SLECC Report and</p>

	<p>dashboard. A key solution suggested is to “accelerate and standardize interconnection timelines and requirements” and “Strengthen or refine existing interconnection mandates to ensure predictable timelines, transparent queue management, and consistent cost estimates across utilities.”</p>
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<p><b>Barrier 3: Energy Affordability &amp; Rates:</b> California faces rapidly rising electricity rates driven by escalating system costs creating significant affordability challenges for many households and businesses, and undermining the financial feasibility of building energy and electrification upgrades.</p>	<p>Our network would like more information in SB 100 Report on the economic impact of the scenarios on energy affordability. Many participants feel that we will not meet the 2045 goals if we do not get a handle on affordability.</p> <p>CCEC recommends specific actions to address the real drivers of bill increases such as system cost drivers (e.g. wildfire liability and rate structures). We recommend reviewing the nuanced challenges and solution ideas we’ve captured in the SLECC Report and dashboard.</p>
<p><b>Barrier 4. Retrofit Feasibility:</b> Building retrofits including efficiency, electrification, solar and storage upgrades are often difficult for property owners and renters across the state to install at scale due to high upfront costs, old building stock, contractor and market dynamics, and confusing, complex, unreliable, or hard-to-stack incentive and financing programs.</p>	<p>SLECC encourages the state to work through trusted community-based organizations (CBOs), CCAs, RENs, and other local intermediaries to deliver outreach and programming for retrofit, electrification, and resilience programs.</p> <p>We also encourage the state to expand state retrofit funding and incentive systems to be integrated, flexible, and predictable, enabling incentive stacking behind the scenes, covering pre-condition repairs, expanding eligibility, allowing adaptive use of funds over project lifecycles, and providing stable, rolling funding so residents and contractors can proceed with confidence.</p>

<p><b>Barrier 5: Codes &amp; Standards (*):</b> While California has one of the nation’s strongest statewide energy codes, weak enforcement and limited local capacity undermine its impact. Efforts to go further through local reach codes can be highly political and result in legal challenges and are now constrained by a legislated moratorium.</p>	<p>We suggest the plan should acknowledge barriers and opportunities related to recent legislative and judicial threats to local governments ability to adopt reach codes which further efficiency and electrification requirements, such as CA’s local code moratorium, the Berkeley 9<sup>th</sup> circuit ruling, and H.R. 3699 at the federal level.</p>
<p><b>Barrier 6: Utility Structure</b> Investor-owned utilities’ concentrated control over energy infrastructure limits public power and community solutions, creating legal and procedural hurdles for municipalization and keeping many projects unnecessarily under utility purview.</p>	<p>The exclusive focus of the SB 100 report on utility scale build out demonstrates the limitations locals face in being recognized and uplifted as important players in the state’s clean energy transition.</p>
<p><b>Barrier 7: Investment Decisions:</b> Despite state goals related to distributed, localized energy resources, investments, regulatory decisions, and policies often discourage or hamstring clean energy deployment or favor centralized utility infrastructure.</p>	<p>We recommend addressing disproportionate investments specifically in DERs within the plan as it inhibits localized building decarbonization.</p>
<p><b>Barrier 8: Workforce:</b> The market of qualified workers necessary to construct and install clean energy projects and retrofits is not large enough, especially outside of major urban centers.</p>	<p>We appreciate the focus on building local workforces through training and job opportunities, as this is consistent with local perspectives. The plan could identify opportunities to better empower and coordinate with and across the many local and regional agencies (e.g. RENs) providing long standing workforce programs in the contractor and building trades.</p>
<p><b>Barrier 9: Siting &amp; Permitting</b> Siting, planning, and deciding on utility-scale energy infrastructure projects lacks transparency and alignment with societal needs, and faces community resistance in some areas, often those most remote.</p>	<p>The CCEC network recognizes the important role of coordination between state and local governments in streamlining siting and permitting for energy infrastructure that must be built out to meet SB 100 goals.</p>

<p><b>Barrier 10: Data Access (*):</b> California lacks consistent access to data about consumption, energy supply infrastructure, and other information that can inform CAPs, capital projects, and cost affordability impact analyses.</p>	<p>We hope the SB 100 Report will discuss joint agency roles in data standardization and sharing. Local governments often share the need for state support on data access and share that they specifically need aggregated, anonymized data at census tract or zip code level for planning purposes, not just individual building data.</p>
<p><b>Barrier 11: Community Microgrid Deployment</b> Community-scale microgrids remain financially and technically difficult to deploy due to restrictive utility rules, undervaluation of battery reserves, and high coordination needs for EV fleets and other DERs. These challenges, compounded by PSPS outages and slow permitting, prevent microgrids from delivering reliable and cost-effective community resilience.</p>	<p>Community microgrids can support the clean energy transition while protecting reliability. The CCEC network suggests the state should reform CPUC and utility rules to allow multi-site community microgrids, enable power transfer across parcels and public rights-of-way, streamline interconnection, and support electrification of buildings and transportation using locally produced electricity.</p>
<p><b>Barrier 12: Supply Chain</b> Global dependencies and geopolitical risks slows progress towards clean energy goals.</p>	<p>A significant risk to the build out clean energy and grid infrastructure at both the transmission/utility and the place-based scale are supply chain disruptions and price volatility. SB 100 appears to have taken these factors into account, however recent foreign affairs may require a remodeling of projections. CCEC network plans to approach procurement more collaboratively and regionally where possible to pool demand and secure better access to scarce clean energy equipment, and suggests the state diversify supply chains, including through more domestic sourcing.</p>
<p><b>Funding Access and Capacity Building</b></p>	
<p><b>Barrier 1: Insufficient Investment:</b> Significant budget and funding constraints at local, state and federal levels prevent adequate investments and capacity in needed energy, climate and land use strategies.</p>	<p>While this is likely to be a constraint everyone can agree on, CCEC's network would like to see emphasis on investment options beyond financing, including protecting existing energy efficiency investments and identifying more flexible non-rate-payer allocations for place-based clean energy needs beyond efficiency through recurring sources like the recently reauthorized Greenhouse Gas Reduction Fund.</p>

<p><b>Barrier 3: Application Burden &amp; Accessibility:</b> Competitive public grant applications are overly complex, confusing, and inflexible pass/fail processes that are oversubscribed with little standardization, extracting limited organizational capacity that could be used for action while creating prohibitively high costs and low success probabilities that discourage resource constrained organizations from attempting to apply.</p>	<p>SLECC surfaced that local jurisdictions often know the state programs exist but lack capacity, templates, or technical assistance to integrate them into local building codes, reach codes, or community programs. Barriers and suggestions related to deploying funding more readily and strategically for place-based energy, climate, and other related needs have attracted the most urgency and consensus among SLECC participants.</p> <p>The plan should address the challenges related to local accessibility of programs and funding to support place-based clean energy efforts, including supporting pre-development capacity for technical assistance and grant applications, and multiagency application standardization and coordination.</p>
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<h3>Clean &amp; Active Transportation</h3>	
<p><b>Barrier 1: Transportation Electrification</b> Lack of coordination between vehicle electrification, charging infrastructure, building systems, and the grid limits the resilience and energy benefits of transportation decarbonization, leaving communities unable to fully realize the potential of clean mobility investments and emission reductions.</p>	<p>Despite California's aggressive ZEV policies and targets and record 29.1% ZEV adoption in Q3 2025, communities face persistent infrastructure gaps. Charging stations remain inconsistent and poorly distributed, with low-income and rural areas particularly underserved. Without coordinated planning, supportive policies, and integration with buildings and stationary storage, communities remain unable to fully realize the resilience and emissions benefits of transportation electrification investments. SLECC participants suggest targeted state funding for place-based EV charging research, planning, implementation and technical assistance.</p>

<h3>Community Resilience</h3>	
<p><b>Barrier 3: Energy Resiliency</b> Outdated, centralized energy infrastructure, increasing capacity demands, and limited local authority, funding, and coordination – leave communities increasingly vulnerable to outages, heat, wildfire, and flooding, undermining resilience, safety, and affordability.</p>	<p>CCEC understands that a primary goal of the SB 100 report is to ensure energy reliability and resiliency. Members of our network emphasize the role of place-based planning and infrastructure in protected communities from inevitable outages as we transition towards clean energy. Many of these solutions, like microgrids, solar and storage, and behind-the-meter batteries, and EV based back storage at critical community facilities can buffer the impact on communities. While some programs do exist to help local organization build out these systems, the state overall lack sufficient and effective investment and assistance.</p>

## **Conclusion**

We recommend that the State prioritize the concerns, ideas, opportunities and successes shared by communities across California and transmitted by CCEC through its SLECC initiative and comments. We encourage CEC to meaningfully integrate the barriers and solutions into the final version of the SB 100 Joint Agency Report and its subsequent implementation.

Thank you for the opportunity to relay comments from our statewide network and add these important matters to the record in relation to the SB 100 Joint Agency Report. We hope your agencies will continue to participate in our SLECC meetings and welcome an opportunity to help CEC more formally gather and share local experiences for future analyses. CCEC remains committed to coordinating with State and our extensive network of local governments and their partners and look forward to ongoing collaboration. Please do not hesitate to reach out to Angie Hacker at [ahacker@civicwell.org](mailto:ahacker@civicwell.org) if you have any questions. Please contact us if CCEC can be helpful in distributing information or coordinating listening sessions with our network.

*Respectfully submitted by Angie Hacker, CCEC's Statewide Best Practices Coordinator, on behalf of the California Climate and Energy Collaborative (CCEC).*