| DOCKETED | |
|---|---|
| **Docket Number:** | 23-SB-100 |
| **Project Title:** | SB 100 Joint Agency Report |
| **TN #:** | 269291 |
| **Document Title:** | SoCalGas Comments - SoCalGas Comments on SB 100 Joint Agency Report Draft Results Workshop |
| **Description:** | N/A |
| **Filer:** | System |
| **Organization:** | SoCalGas |
| **Submitter Role:** | Public |
| **Submission Date:** | 3/20/2026 4:50:59 PM |
| **Docketed Date:** | 3/20/2026 |

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

# SoCalGas Comments on SB 100 Joint Agency Report Draft Results Workshop

*Additional submitted attachment is included below.*

March 20, 2026

Mr. David Hochschild, Chair
California Energy Commission (CEC)
715 P Street
Sacramento, CA 95814

Mr. John Reynolds, President
California Public Utilities Commission (CPUC)
505 Van Ness Avenue
San Francisco, CA 94102

Ms. Lauren Sanchez, Chair
California Air Resources Board (CARB)
P.O. Box 2815
Sacramento, CA 95812

*Submitted electronically*

**SUBJECT: Southern California Gas Company's (SoCalGas) and San Diego Gas & Electric Company's (SDG&E) Comments on February 19 Workshop Regarding 2025 SB 100 Joint Agency Report Draft Results (Docket # 23-SB-100)**

Dear Chair Hochschild, President Reynolds, and Chair Sanchez:

Southern California Gas Company (SoCalGas) and San Diego Gas & Electric Company (SDG&E) (collectively referred to as the "Sempra California utilities") appreciate the opportunity to provide comments regarding the February 19 Workshop on the 2025 Senate Bill (SB) 100 Joint Agency Report Draft Results. The Sempra California utilities recognize the importance of a robust and meaningful planning process to identify pathways for achieving the SB 100 goals for decarbonizing the state's electric generating resources.

Our comments focus on (1) the need for the CPUC to take necessary steps to provide regulatory certainty for compliance and resource planning; (2) support for inclusion of diverse resources, including renewable natural gas, carbon capture and sequestration technologies, and clean

renewable hydrogen; (3) support for releasing draft report text for public comment prior to publication of the final report; and (4) additional considerations.

## I. Agency staff's presentation of the draft modeling results raises critical, time-sensitive questions about the next steps needed to provide clear regulatory direction.

While the report provides an important foundation for future resource planning activities, it stops short of providing the regulatory clarity and parameters needed to guide which technologies should be deemed eligible as renewable or zero-carbon resources. Slide 14 of the Joint Agency presentation notes that "SB100 is not a venue for determining resource compliance or other electricity system planning decisions." However, in practice, the Joint Agencies have already been applying a working definition of zero-carbon resources. The CEC's homepage indicates that California is 67 percent of the way toward meeting the 100 percent clean electricity target. This includes non-RPS eligible resources like large hydroelectric and nuclear generation. Further, the SB 423 Report, *Emerging Renewable and Firm Zero-Carbon Resources*, clearly defines the list of eligible resources that meet the definition of firm zero-carbon resources.[1] Those resources include long duration energy storage, hydropower, geothermal, renewable natural gas, hydrogen, small modular reactors, fusion, and carbon capture. The SB 100 Inputs and Assumptions slide deck also lists the full set of expansion candidate resources.[2] Therefore, despite the Joint Agency presentation stating that SB 100 is not a venue for determining compliance, the Joint Agencies have effectively already defined eligibility elsewhere.

Clear delineation of resource eligibility is essential for compliance and system planning, as it provides foundational steps and market signals needed for developers to obtain financing and advance long-lead time projects. What is most needed at this stage is a mechanism to translate these working definitions into actionable and clear criteria that can drive the market and motivate necessary action.

The publicly owned utilities (POUs) are already procuring resources based on the working definition for zero-carbon resources adopted by their governing boards. This is evidenced by LADWP's investments in retrofitting the Scattergood Generating Station and the Intermountain Power Project for hydrogen fuel. In contrast, the CPUC has not yet established a comparable or analogous procurement framework for zero-carbon resources. Public Utilities Code Section 454.53 (d) (1) requires the Joint Agencies to "utilize programs authorized under existing statutes to achieve the policy described in subdivision (a) [eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use

[1] CEC, SB 423 Emerging Renewable and Firm Zero-Carbon Resources Report: Assessment of Firm Zero-Carbon Resources to Support a Clean, Reliable, and Resilient California Grid, available at https://efiling.energy.ca.gov/GetDocument.aspx?tn=262264&DocumentContentId=98778

[2] CEC, SB 100 Inputs and Assumptions, available at https://efiling.energy.ca.gov/GetDocument.aspx?tn=268979&DocumentContentId=106173

customers].” The CPUC’s Integrated Resource Plan (IRP) is the appropriate venue to consider establishing a framework for these resources.

Furthermore, the success of the RPS program offers a compelling example of how clear eligibility and market signals can help drive investment. RPS eligibility is determined by the legislature, and the legislature then grants authority to the energy agencies to comply with the program through RPS power plant certification, generation verification, and procurement planning. However, unlike RPS eligibility, under Public Utilities Code section 454.53, the legislature did not define zero-carbon resource eligibility. Instead, the legislature assigned the responsibility jointly to the CPUC, CEC, and CARB. The CEC has effectively fulfilled its obligation by using the definitions in the SB 423 Report, but direction is still needed from the CPUC to align the state’s planning ambition with action.

With 2030 less than five years away, it is crucial to develop the next step – designing and implementing the compliance criteria to meet the goals post-2030 for the remaining 40 percent of electricity procurement that will be needed to transition to zero-carbon resources by 2045. Hundreds of millions of dollars of investment hinge on certainty that these technologies will comply with SB 100.

The Sempra California utilities believe that this fundamental and pressing need – to translate SB 100’s broad aspirational goals into practical, achievable, and actionable measures – is paramount and requires focused and immediate attention.

## II. The Sempra California utilities support the report’s inclusion of a diverse resource portfolio, including hydrogen, renewable natural gas, and carbon capture and sequestration.

Meeting the state’s long-term energy needs will require a complementary portfolio of resources that leverage the strengths of both the gas and electric systems. Reaching the state’s desired outcome requires alignment of various technological solutions that are available to manage the interconnected and interdependent gas and electric grids. The SB 100 Joint Agency Report process can serve as a roadmap for the magnitude and scale of new energy generation capacity that may be required to meet long-term electricity needs.

Given the large scale of energy needs and associated investments in infrastructure, land-use planning is also essential. The Joint Agencies’ initial assessment of land use impacts was an important step that should be further refined.

We also emphasize the importance of integrated planning for power generation and the infrastructure needed to transport fuels (natural gas today, and potentially hydrogen in the future) to assure deliverability of fuel to power plants in time and under required operational parameters.

Ultimately, implementing the SB 100 goals will require not only comprehensive planning but also timely action to enable investment and market development.

## III. The Joint Agencies should provide opportunities for public review and comment on Draft Report text before finalizing the 2025 SB 100 Report.

During the workshop stakeholders expressed interest in reviewing the modeling inputs and underlying datasets. We appreciate the CEC providing the SB 100 Inputs and Assumptions slide deck, which helps clarify some questions we had on the dataset and methodology, yet it also raises new considerations. The 2025 SB 100 report has been several years in development, due in part to the CEC's efforts to strengthen the analysis around reliability. The Sempra California utilities support the CEC's efforts to incorporate these important parameters so that future resource planning discussions are well-informed by data that incorporates real-world operational constraints. During the workshop, CEC staff indicated that there are no plans to release a draft version of the 2025 SB 100 Report text before a final is released. The Sempra California utilities encourage the Commission to reconsider and include a public comment opportunity before the report is finalized and submitted to the Legislature. While the data and modeling work are central to the report's key deliverables, a clear understanding of the policy framing with which this data is presented is equally important to informing how the information gets used in downstream processes.

## IV. Several other topics were raised during the workshop or subsequently addressed in the Inputs and Assumptions file released by CEC, warranting further clarification in the final Joint Agency report.

- Given that the Joint Agencies' models assume existing natural gas plants will continue to operate, more information is needed about the operational requirements these existing power plants would face, particularly regarding expected increases in start and stop cycles. We request that the report include data on the anticipated annual starts and stops for each plant, including whether and to what extent those power cycles differ from current usage patterns, and the estimated differential costs.

  If existing power plants cannot meet the necessary starts and stops, then the cost of replacing or repowering plants with increased cycling capabilities should be included in the reference scenario. Additionally, it is important to quantify how requirements and operational changes on gas infrastructure may require additional investments to accommodate such changes without affecting system reliability and resiliency.

  During the workshop's afternoon panel, SMUD commented on investments made to reduce an existing plant's "p-min" in order to provide more value to their fleet.[3] This concept is promising and could lead to additional benefits from the existing gas generation capacity.

- The workshop did not clearly indicate whether or when legacy once-through cooling (OTC) power generating units are assumed to retire or be repowered in the modeling. Clarity on the role of these generators will be necessary in understanding new resource

[3] P-min or $P^{min}$ represents minimum power output, the lower limit of a generating plant's operating capacity.

development needs versus the ability to rely on repowered resources in the existing electric generation fleet.

- There appears to be a significant difference between the electricity demand anticipated in the Draft SB 100 Joint Agency Report Results compared to the level assumed in the 2025 California Energy Demand Forecast (CED). The adopted 2025 CED assumes 356 TWh of electric retail sales,[4] whereas the Draft SB 100 Joint Agency Report Results reference case assumes 460 TWh of retail sales. Clarification is needed regarding whether the "SB 100 only" scenario intended to align resource needs with the CEC's demand forecast. If so, what were the assumed electricity retail sales used for that scenario?
- The draft SB 100 report does not appear to be aligned with the hydrogen production pathways proposed under SB 1075. The draft report only includes electrolytic hydrogen production, whereas CARB's SB 1075 workstream recognizes a range of potential hydrogen pathways, including renewable electrolytic hydrogen using clean electricity, hydrogen derived from biomass or biogas, waste- or byproduct hydrogen from industrial processes, and other innovative low-carbon methods. The Sempra California utilities presume that the singular focus on electrolytic hydrogen modeling was to understand electricity demand impacts, rather than an intent to limit eligible hydrogen resources on the supply side.
- Renewable Natural Gas (RNG) is not explicitly identified as an expansion candidate resource, although it is a fuel derived from biomass feedstocks. RNG should be explicitly considered or referenced as an eligible expansion resource within the biomass categories ("Biomass without CO2 capture" and "Biomass with 90% CO2 capture").

Thank you for your consideration of these comments. The Sempra California utilities look forward to continued engagement regarding this important proceeding.

Sincerely,

*/s/ Kevin Barker*

Kevin Barker
Senior Manager, Energy & Environmental Policy
Southern California Gas Company

*/s/ Sarah M. Taheri*

Sarah M. Taheri
Regulatory Affairs Manager
San Diego Gas & Electric Company

[4] CEC, "CED 2025 Baseline Forecast - Total State," California Energy Demand Forecast 2025-2045 Baseline "Mid" Forecast, January 2026, available at: https://efiling.energy.ca.gov/GetDocument.aspx?tn=268179-9&DocumentContentId=105226, at tab 1.1b: "Total State Planning Area."