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LB ACE Comments on SB100 Draft Results

Additional submitted attachment is included below.

LONG BEACH ALLIANCE
FOR CLEAN ENERGY

California Energy Commission
715 P Street
Sacramento, CA 95814

March 20, 2026

Comments of the Long Beach Alliance for Clean Energy
On February 19th Workshop on 2025 SB100 Joint Agency Report Draft Results

Long Beach Alliance for Clean Energy (LB ACE) appreciates the Commission's time and effort on the SB 100 draft report, and the February 19th Workshop that presented draft model results. Thank you for extending the deadline for public comments.

LB ACE was founded in 2017 as an environmental and climate justice non-profit in response to Lead (Pb) being found in the drinking water at California Statue University Long Beach. We have attended and commented on several workshops on the development of SB100 and the Joint Agency Report and weappreciate the opportunity here to comment on the February 19th Workshop and the status of the Joint Agency Report.

Our comments can be summarized as follows:

(1) 100% means 100%!

(2) The Combustion Retirement Scenario must be prioritized in all future SB100 analyses;

(3) Why not model DERs?

(4) Why do the models rely on false solutions for candidate resources?

(5) The Joint Agency Report is currently a Draft, and should be circulated as such;

Taken in turn:

(1) 100% means 100%!

SB100 was passed with the stated intention that by 2045 all retail sales of electricity in the state of California would be sourced from clean energy. 100%. In the view of LB ACE, this not only applies to generation of electricity, but to the life-cycle of electricity production and delivery to end-uses – including transmission, distribution, and storage. California should aim for 100% clean energy in terms of generation, and the Joint Agencies (CEC, CPUC, and CARB) should prioritize model scenarios that demonstrate how that aim can be realized. Moreover, transmission, distribution, and storage – including associated line losses – of electricity should be included in the definitions

and modelling of "clean energy" by the Joint Agencies, so that the fullest picture and scenario planning for grid decarbonization can be realized. In the view of LB ACE, 100% clean energy by 2045 in California means addressing *all* fossil fuels currently online and part of California's energy "mix". By 2045, that mix must exclude all sources that entail significant pollution through the life-cycle, such as oil, gas, coal, and nuclear.

(2) The Combustion Retirement Scenario Must Be Prioritized in All Future SB100 Analyses

LB ACE disagrees with the suggestion that the retirement of all fossil-fueled plants in the State of California is neither realistic nor beneficial.[1] California leads the nation in premature deaths from air pollution caused by burning gas in stationary sources, including from the nearly 200 gas plants located throughout the state.[2] Moreover, the health impacts from natural gas combustion that motivated the passage of SB100 have long been understood to be damaging to human health.[3]

There is currently one scenario envisaged that includes the retirement of all the state's remaining natural gas plants – the Combustion Retirement Scenario. This is the only scenario that includes the major public and environmental health benefits of ending pollution from fossil fueled sources. This is also the only scenario that does not rely on unproven technologies, like direct air capture, to meet SB100's goal of 100% clean energy.

This scenario must be prioritized by the Joint Agencies. It must be the baseline and starting point for all future scenarios – including those that incorporate higher levels of Distributed Energy Resources and Battery Storage discussed in the next section – modeled or reported on by the Joint Agencies. This scenario could be made more robust by including clean sources of electricity, such as offshore wind and geothermal, that are currently missing from the analysis as presented on February 19th. It could also be neatly paired with already existing DER resources Californians are making use of today.

(3) Why Not Model DERs?

It is our understanding that a DER-focused scenario would be included as part of the February 19th workshop. It was not. However, it is still listed on the SB100 website as a potential scenario.[4]

In combination with Combustion Retirement Scenarios (as discussed above), or entirely separate, why hasn't a Distributed Energy Resources (DER) – focused scenario not been modeled or

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[1] Comments of California Air Resources Board Deputy Executive Officer Rajinder Sahota, CEC, February 19th Hybrid Workshop on 2025 SB 100 Joint Agency Report Draft Results, available at: https://www.energy.ca.gov/event/workshop/2026-02/hybridworkshop-2025-sb-100-joint-agency-report-draft-results

[2] See 'Negative Impacts of burning natural gas and biomass have surpassed coal generation in many states', Harvard T.H. Chan School of Public Health, available at: https://hsph.harvard.edu/climate-health-c-change/news/negative-impacts-of-burning-natural-gas-and-biomass-have-surpassed-coal-generation-in-many-states/ Last updated: August 21, 2025.

[3] For a handy overview, there is a wiki from the Global Energy Monitor: 'Health Effects of Gas Plants' available at: https://www.gem.wiki/Health_Effects_of_Gas_Plants Last updated: May 17, 2024

[4] See "DER Focus" http://energy.ca.gov/sb100 under "Scenarios"

presented? If for no other reason than to establish what their potential ceiling could be?

The SB100 Joint Agency Report analysis and process has suffered from a lack of attention on DER's like rooftop solar – over two million roofs across all races/income levels in California and growing! – battery storage, demand response, virtual power plant, vehicle-to-grid and other bidirectional charging options, and other front-of-the-meter resources, and the role they already have been playing in California's efforts to meet SB100 goals.

If Californians are already doing such things to decrease electricity demand and reduce reliance on polluting fossil fuels, why aren't they modeled by the Joint Agency Report?

Why don't we have a full solar-potential atlas of all existing roofs, residential and commercial and institutional, included as part of the analysis and potential scenario options? Why isn't there an atlas of offshore wind potential for the entire state included with the Joint Agency Report? Why isn't there an atlas for battery storage potential – where and how many megawatts technically feasible – for the State of California included in the Joint Agency Report?

If the offshore wind – a proven technology – can help us meet SB100 goals, why is it excluded due to a purported "capacity factor below what is currently considered commercially viable (~20%)"?[5] Why are proven clean energy technologies substituted with things like direct air capture and other forms of carbon capture utilization and storage (CCUS)– completely unproven technologies, and completely not commercially viable to handle 95% of the emissions load from California's extant smokestacks, as some current scenarios – including a highly unrealistic "reference scenario"— depend upon?

(4) Why do models rely on false solutions for candidate resources?

It is a laughable and completely non-serious suggestion that Carbon Capture Utilization and Storage (CCUS) technologies are presently capable of removing 95% of the emissions from a single sub-sector – say combustion from natural gas combined cycle peakers in California – let alone economy-wide throughout the state. For current and future iterations of the Joint Agency Report on SB100, the false solution of CCUS must be excluded. There simply does not exist a working model of CCUS that has successfully captured or removed 50% or more the carbon and other criteria pollutants emitted from any one facility in the state's extant fleet of nearly 200 natural gas plants. Reliance on CCUS in SB100 models is fantasy, and completely belies the intent behind SB100 – 100% clean energy.

Not 100% (scrubbed) clean (dirty-generation) energy. 100% clean energy. That was and remains the legislative intent behind SB100.

LB ACE is also concerned about reliance on Hydrogen production in the scenarios modeled. Incentivizing the development of a polluting, leaky, inefficient, and hard to manage resource like Hydrogen gas – from whatever color or method of production – was never the intent behind SB100.

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[5] Slide 23 of CEC 'Presentation – Workshop on 2025 SB100 Joint Agency Report Draft Results." Available at: https://www.energy.ca.gov/event/workshop/2026-02/hybridworkshop-2025-sb-100-joint-agency-report-draft-results

Every hydrogen molecule produced comes at an electricity cost, and most current schemes are tied to fossil-based generation. Moreover, the current cost of hydrogen production can be 7-10x that of natural gas. Any scenario that includes large quantities of hydrogen to be produced from the existing grid would increase energy demand and risk entrenching resources – like natural gas plants – that SB100 should be actively in the process of eliminating.

Again, the legislative intent behind SB100 was to take California out of the polluting and fossil-fueled electricity business – electrification and decarbonization (and energy efficiency!) should be prioritized over "fuel switching" from methane to hydrogen, which is bulk of the current market.

As an energy storage tool, battery storage and other non-polluting forms of long-duration energy storage, should be prioritized over hydrogen in SB100 scenario models and planning.

(5) The Joint Agency Report is currently a Draft, and should be circulated as such

The presentation slides from the February 19th Workshop do not constitute the Final Report to the Legislature on SB100 – they simply presented some work in progress on some, but not all, of the draft model scenarios. The February 19th workshop was not a public review of a finalized draft report for public comment. This is a good thing, as we along with other commenters have noted above several gaps in the current analysis and modelling. The Joint Agency Report draft should include scenarios that were to be modelled – such as the DER focused scenario – along with those suggested by the public in response to the February 19th Workshop. The Report should be disseminated as a draft – just as the 2021 SB 100 Joint Agency Report was – and include adequate time for public review and comment. At minimum, 30 days for public comment after public dissemination of the Report Draft. Just like the 2021 SB 100 Joint Agency Report established, and itself recommends as a best practice for future reporting.[6]

Thanking you,
LB ACE

[6] See pp.135-136 of CEC, 2021 SB100 Joint Agency Report, available at: https://www.energy.ca.gov/publications/2021/2021-sb-100-joint-agency-report-achieving-100-percent-clean-electricity