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California Energy Commission
Docket Unit, MS-4
Docket No. 26-LUEP-01
715 P Street
Sacramento, California 95814

Submitted Electronically

Re: American Clean Power – California Comments on the June 11, 2026 Land Use Screens for Electric System Planning: Proposed Updates Workshop (26-LUEP-01)

American Clean Power – California (“ACP-California”) appreciates the opportunity to comment on the California Energy Commission's (“CEC”) June 11, 2026 Land Use Screens for Electric System Planning: Proposed Updates Workshop.¹ ACP-California's members share a commitment to a diverse, balanced resource portfolio that reliably and affordably meets California's energy demand and environmental goals, while remaining sensitive to land use concerns. We appreciate the CEC's public process to date and offer the following recommendations:

1. Formalize an ongoing, public process — with a published schedule — for reviewing raw data inputs and example mapping outputs, well before the land use screens are used to inform state electricity and transmission planning.
2. Use the land use screens to inform long-term transmission planning, not to gatekeep or prejudge permitting and interconnection outcomes for renewable energy development.
3. Recalibrate the out-of-state land use screens, which are currently too restrictive, in closer coordination with out-of-state developers.

¹ The American Clean Power Association (“ACP”) is the voice of companies from across the clean power sector that provide cost-effective solutions to the climate crisis while creating jobs, spurring massive investment in the American economy, and driving high-tech innovation across the United States. ACP's mission is to transform the U.S. power grid to a low-cost, reliable, and renewable power system. ACP-California is a state project of ACP, representing companies who develop, own, and operate utility-scale solar, storage, land-based wind, offshore wind, and transmission assets to power a clean and renewable economy for California and the West.

4. Reflect the minimal land-use footprint of next-generation geothermal systems in the land use screens so their siting flexibility and transmission-access potential are properly recognized.
5. Coordinate the out-of-state land use screens with the Western Transmission Expansion Coalition (“WestTEC”) roadmap and the Western Governors’ Transmission Permitting Alignment and Coordination Task Force (“PACT”), so California’s screens align with — rather than duplicate or conflict with — the interstate transmission corridors those regional efforts are already advancing.

DISCUSSION

I. Land Use Screens Should Be Developed with Formal Developer Input and Used to Guide Long-Term Transmission Planning, Not to Preclude Development.

The CEC should formalize an ongoing public review process for the state’s geospatial tools, including a published schedule for releasing land use screens well ahead of their use in the California Public Utilities Commission’s (“CPUC”) Integrated Resource Planning (“IRP”) and the California Independent System Operator’s (“CAISO”) Transmission Planning Process (“TPP”) busbar mapping. A predictable schedule would give developers a defined, confidential opportunity to share granular site data before that data is locked into busbar mapping decisions. There should also be coordination between the CEC and the CPUC in order to ensure that workshops and comment opportunities pertaining to land use screens are noticed to the CPUC’s IRP proceeding service lists. This input matters because developers make substantial investments in site evaluation and permitting, and are best positioned to assess the commercial viability of specific locations — insight the land use screens should reflect, not override.

As the state links procurement directives more closely to transmission portfolios,² it is increasingly important that land use screens support rather than substitute for that commercial judgment. Land use screens play a central role in the CPUC’s IRP process and in transmission siting, and should be used to validate longer lead-time transmission choices — for example, “right-sizing” transmission to 20-year needs — not to hamper or prejudge permitting and interconnection processes. We caution the CEC and CPUC against applying screens in IRP/TPP busbar mapping that substantially scale back resource potential identified by techno-economic or interconnection screens, that conflict with demonstrated commercial interest, or that are used to justify deferring near-term transmission upgrades.

² See the June 23, 2026 [*Administrative Law Judge’s Ruling Seeking Comments on Additional Proposal for a Reliable and Clean Power Procurement Program*](#) in the CPUC’s IRP proceeding (Rulemaking 20-05-003).

If, instead, the screens are applied to preclude or prejudice siting decisions — particularly where they are not tied to an existing permitting or regulatory process — the result could be TPP outcomes misaligned with the scale and location of the clean resources needed to meet reliability and greenhouse gas reduction goals, by effectively foreclosing development in high-potential solar, wind, and geothermal areas.

II. The Out-of-State Land Use Screens Are Too Restrictive.

ACP-California understands the CEC’s interest in applying land use screens to out-of-state resources for greater parity with in-state assessments, but the two contexts differ materially and warrant different approaches. For in-state resources, screens should identify areas that are comparatively easy to develop (e.g., fallowed farmland) rather than simply excluding areas that are hard to develop, so that capacity expansion and transmission models do not overestimate the value of existing transmission capacity. For out-of-state resources, developers are better positioned to weigh whether the combined commercial viability of the resource and the transmission needed to reach California justifies the development risk — a judgment the screens should not preempt.

Based on the June 11 workshop materials, the current out-of-state screens exclude far more developable land than is warranted. Because land use screens are applied ahead of commercial interest in the busbar mapping hierarchy, it is critical that they not “map out” resources that are otherwise commercially viable. We recommend the CEC work directly with out-of-state generation and transmission developers to refine these screens before they are applied in long-term transmission models.

This refinement should also account for regional transmission coordination efforts already underway. On June 30, 2026, the governors of eleven western states signed a Joint Statement of Agreement endorsing the WestTEC roadmap for expanding transmission across the Western Interconnection, and establishing the PACT to accelerate multi-state permitting for priority interstate lines. Because WestTEC's roadmap and the PACT Task Force are already identifying and prioritizing the interstate corridors most likely to be built, the CEC's out-of-state land use screens should be developed in coordination with these efforts. Aligning the screens with WestTEC's findings and PACT's priority-line designations will help ensure California's planning processes reflect real, cross-jurisdictional development momentum rather than screening out corridors that regional partners are actively advancing.

III. The Land Use Screens Should Reflect the Minimal Land-Use Footprint of Next-Generation Geothermal Systems.

The land use screens should not understate the development potential of next-generation geothermal systems. Next-generation technologies can access substantial subsurface geothermal

resources — up to 1 MW per acre — with minimal surface impact, allowing continued co-location with agriculture and other land uses. That footprint gives developers real flexibility to select sites with favorable permitting, environmental review, transmission access, and land use conditions, while avoiding areas with greater biological or cultural resource sensitivity. The state's IRP Inputs and Assumptions already recognize this potential, projecting that near-field next-generation geothermal could roughly double the output of existing geothermal resource areas. The land use screens should reflect that same recognition so that transmission access — currently one of geothermal's greatest barriers — is not compounded by an overly conservative land-use assumption.

IV. Incorporate Water Stress into Cropland Screening.

ACP-California supports the CEC's intention to add water stress factors into its Cropland Index Model. We align with Large-Scale Solar Association's comments on this topic.

Conclusion

ACP-California appreciates the opportunity to submit these comments and is available to help the CEC solicit data from the development community, both within CAISO and in other planning regions.

Respectfully submitted,

/s/

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