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| Docket Number: | 19-SB-100 |
| Project Title: | SB 100 Joint Agency Report: Charting a path to a 100% Clean Energy Future |
| TN #: | 230252 |
| Document Title: | CA Cotton Ginners and Growers Association Comments - CCGGA Comments SB-100 |
| Description: | N/A |
| Filer: | System |
| Organization: | CA Cotton Ginners and Growers Association |
| Submitter Role: | Public |
| Submission Date: | 10/17/2019 9:36:30 AM |
| Docketed Date: | 10/17/2019 |

Comment Received From: CA Cotton Ginners and Growers Association
Submitted On: 10/17/2019
Docket Number: 19-SB-100

CCGGA Comments SB-100

Attached are the comments from CA Cotton Ginners & Growers Association.

Additional submitted attachment is included below.



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October 16, 2019

The Honorable Drew Bohan
Executive Director
California energy Commission
1415 Ninth Street
Sacramento, CA 95814

Re: ***SB 100 Joint Agency Report – Docket Number 19-SB-100***

Dear Director Bohan,

On behalf of the over 800 cotton growers and 23 operating cotton gins throughout California, we are hereby submitting comments for the SB 100 Joint Agency Report. We are extremely concerned with the electricity rate impacts and corresponding cost increases our members will face as a result. In addition, we are concerned about reliability as the state transitions from traditional steady state operations to more variable energy supplies, such as wind or solar.

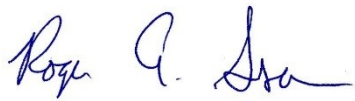
When we look at costs of renewable energy, we are greatly concerned with what the future holds for us. Current California commercial/industrial electricity costs are among the highest in the nation, and in many cases substantially higher. When comparing the operating costs for cotton gins operating in California to other regions throughout the United States, our members pay 45% higher electricity costs than the national average¹. The push to increase renewable energy in the utilities portfolio will only increase these costs higher and worsen this economic disadvantage. According to the National Renewable Energy Laboratory (NREL)² “as more variable renewable energy (VRE) such as wind and solar are integrated into electric power systems, technical challenges arise from the need to maintain the balance between load and generation at all timescales”. This will call for battery storage on a grand scale, and/or increased transmission lines to balance loads with neighboring states. This fact must be considered when moving forward and must be mitigated in every way possible.

¹ The Cost of Ginning Cotton – 2014 Survey Results, Valco et.al., USDA – ARS, May, 2014

² KROPOSKI, B. J. Mod. Power Syst. Clean Energy (2017) 5: 831. <https://doi.org/10.1007/s40565-017-0339-3>

In closing, the cotton industry is seriously concerned about rising electricity costs and questions about grid reliability as we increase the renewable fraction of the energy supply. The agencies must address cost impacts as this effort moves forward in order for business in California to remain economically viable. At the same time we look forward to how bioenergy can play a role in this and the opportunities it may present. Thank you for the opportunity to provide comments and we look forward to seeing how the agencies will address these concerns moving forward.

Sincerely,

A handwritten signature in blue ink that reads "Roger A. Isom". The signature is written in a cursive style with a large initial "R" and "I".

Roger A. Isom
President/CEO