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**Comments of Sierra Club California on the SB 100 Joint Agency Report
Charting a Path to a 100% Clean Energy Future**

Additional submitted attachment is included below.



November 8, 2019

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Docket 19-SB-100
Submitted via electronic comment system

RE: Comments of Sierra Club California on the SB 100 Joint Agency Report: Charting a Path to a 100% Clean Energy Future

Dear Commissioners:

Sierra Club California appreciates the opportunity to provide comments on the SB 100 Joint Agency Report at its early stages of implementation. While we commend the agencies on their collaborative efforts, we urge their consideration of the following recommendations:

I. The plan must have a shorter timeline - 25 years is not soon enough

SB 100 established a process to identify how to achieve zero-carbon electricity statewide by *no later than* 2045. The legislation did not assume that achieving zero-carbon electricity should wait until that date. As the climate science has shown, waiting until 2045 to meet the SB 100 target would be disastrous. As last year's International Panel on Climate Change report noted, we have less than 11 years to take substantial action to transform our energy system from fossil fuels to renewable, clean energy to avoid the worst effects of climate change. California must cut our greenhouse gas emissions at a rapid pace and transform our energy system to clean energy well before 2045.

We are in a climate crisis. Issuing a report in 15 months on how to achieve a zero-carbon future in 25 years does not reflect the urgency with which California must address the climate crisis. Therefore, the agencies must develop a timeline that reaches the SB 100 goal much sooner 2045.

II. Gas resources have no role in California's 100% clean energy grid

Fossil fuels, including methane gas, need to be phased out to minimize the worst impacts of climate change. Gas is not a "bridge" fuel. It is a highly potent climate-forcing pollutant that is detrimental to public health and the environment. It is imperative that California reduces its reliance on gas if our state is going to meet its climate targets and build a cleaner California. Given this, the agencies should assertively promote phasing out gas entirely and shifting to all-electric appliances, homes, buildings and cars. We encourage the agencies to develop an accelerated pathway that rapidly reduces our reliance on gas and enables the expansion of clean resources and options.

III. A clean energy future does not include nuclear power

It is important that policies do not revert back to relying on environmentally harmful resources such as nuclear power, to meet the requirements for a 100% zero-carbon future. History has demonstrated the lack of safety surrounding uranium mining and processing and nuclear energy production. Dependence on nuclear power leads to adverse health and environmental effects, from radiation exposure to water, soil and air pollution. Besides reactor safety, both nuclear proliferation and the required long term storage of nuclear waste (which remains lethal for more than 100,000 years) make nuclear power a uniquely dangerous energy technology. We need to focus on the abundant and truly safe, affordable and clean renewable energy sources.

IV. Conclusion

We understand the importance of developing a pathway to a completely carbon free energy future. That future does not include dependence on dirty resources, such as methane gas. It also does not rely on harmful resources that California has already shown that it does not need, such as nuclear power. In achieving 100% clean electricity, California should be supporting and expanding clean technologies that are available today and technologies that are rapidly advancing to support clean, renewable energy, such as battery storage and advanced energy efficiency.

All of this needs to be done at a speed that reflects the climate crisis. Therefore, Sierra Club California urges you to complete the report sooner and include a plan with a shorter timeline.

We look forward to continuing to work with the agencies throughout this process.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lauren Cullum', with a long, sweeping horizontal line extending to the right.

Lauren Cullum
Policy Advocate