

DOCKETED

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TID Comments on SB 100 Technical Workshop

Additional submitted attachment is included below.

November 25, 2019

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 19-SB-100
1516 Ninth Street
Sacramento CA, 95814-5512

RE: TID Comments on the November 18, 2019 SB 100 Technical Workshop

Turlock Irrigation District (“TID”) submits the following comments on the California Energy Commission’s (“CEC”) California Public Utilities Commission (“CPUC”) and California Air Resources Board (“CARB”) November 18, 2019, joint workshop discussing future technologies and inputs for technical analysis. TID would advise CEC, CARB, and CPUC Staff to consider the ramifications of excluding firmed and shaped resources that are firmed with unspecified imports having carbon. This conjecture juxtaposed against the energy that is delivered to TID from the Tuolumne Wind Project (“TWP”) is inaccurate. Located in Klickitat County, Washington, along the Columbia River, the TWP distributes roughly 400,000 megawatt-hours of renewable, carbon free generation to TID annually, and represents over 25% of TID retail load. TID built TWP in 2009 prior to RPS mandates encompassing Publicly Owned Utilities (“POUs”). Current Renewable Portfolio Standard (“RPS”) laws recognize past investments such as the TWP and identify the specificity needed for firmed and shaped imports. Specifically, California Public Utilities Code Section 399.16(d) sheds light on this scenario.

(2) Firmed and shaped eligible renewable energy resource electricity products providing incremental electricity and scheduled into a California balancing authority.

(d) Any contract or ownership agreement originally executed prior to June 1, 2010, shall count in full toward the procurement requirements established pursuant to this article, if all of the following conditions are met:

(1) The renewable energy resource was eligible under the rules in place as of the date when the contract was executed.

(2) For an electrical corporation, the contract has been approved by the commission, even if that approval occurs after June 1, 2010.

(3) Any contract amendments or modifications occurring after June 1, 2010, do not increase the nameplate capacity or expected quantities of annual generation, or substitute a different renewable energy resource. The duration of the contract may be extended if the original contract specified a procurement commitment of 15 or more years.

