

DOCKETED

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UCS Comments on SB 100 Technical Workshop

Additional submitted attachment is included below.

December 2, 2019

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

Docket 19-SB-100
Submitted via electronic comment system

RE: Comments of the Union of Concerned Scientists on the SB 100 Technical Workshop on Modeling Analysis and Zero-Emission Generation Technologies

The Union of Concerned Scientists (UCS) appreciates the opportunity to submit these comments on the first SB 100 technical workshop, conducted on November 18, 2019.

UCS is encouraged by the leadership of the California Energy Commission (CEC), California Public Utilities Commission (CPUC), and California Air Resources Board (CARB) in crafting the first SB 100 Joint Agency Report. Before we get too far along in the process, UCS would like to offer suggestions pertaining to the process of crafting the report. In these comments, UCS also offers our reaction to a few of the definitional and accounting issues discussed at the technical workshop.

UCS is pleased that the CEC is planning a series of technical workshops on a broad range of issues, including affordability, equity, reliability, resilience, environmental protection, and infrastructure. However, UCS was surprised to learn that the vast majority of these workshops will not be conducted until after the bulk of the electricity system modeling has been completed. While UCS recognizes that time is of the essence, we are also concerned that conducting the technical workshops after the modeling has been completed may preclude ideas from those workshops from being incorporated into the modeling. UCS asks the CEC to clarify the process for incorporating feedback from the technical workshops. UCS specifically suggests that the CEC remain open to a second round of electricity system modeling so that feedback from other technical workshops can be incorporated into the analysis.

During the technical workshop, a representative from CARB gave a presentation¹ that puts forth two options (for the purposes of discussion) for defining eligible electricity sources under SB 100: 1) “RPS+” which includes all RPS-eligible resources plus large hydro, nuclear, and natural gas with CCS, and 2) “No Combustion” which is identical to “RPS+” except it includes a prohibition on resources that combust fuel, such as biomass, biomethane, and natural gas. Given California’s ongoing struggle to ensure healthy air quality throughout the state, the CEC should strongly consider the “No Combustion” interpretation as a measure to improve air quality, because improving air quality would help achieve other goals of SB

¹ CARB, “Options for Defining Eligible Electricity Resources under SB 100” (November 18, 2019). Available at: <https://www.energy.ca.gov/event/workshop/2019-11/sb-100-technical-workshop>

100. UCS suggests that the CEC explore the air quality implications of adopting the “No Combustion” interpretation as part of the electricity system modeling the CEC is planning to conduct over the coming months.

The CARB presentation² at the technical workshop also put forth greenhouse gas accounting considerations, and the presentation includes a brief comparison of the accounting methodologies used under the Renewable Portfolio Standard (RPS) program and the Mandatory Greenhouse Gas Reporting Regulation (MRR). While UCS does not recommend one specific methodology over the other, UCS believes that the SB 100 greenhouse gas accounting methodology should minimize (if not eliminate) the use of crediting systems that could potentially weaken the SB 100 requirements. For example, crediting systems could weaken SB 100 requirements by allowing renewable generation that is ultimately used to serve out-of-state load to generate credits, and those credits could then be used for SB 100 compliance. Instead, the greenhouse gas accounting methodology adopted for SB 100 should rely on the actual emissions profile of electricity generation resources used to meet California’s load.

Lastly, UCS has observed that neither the CEC, CPUC, nor CARB have raised as an issue the exact application of the 100% clean energy requirement. All three agencies seem to be taking the narrow view that the 100% zero-carbon requirement applies only to retail sales, opening the door to the continued operation of natural gas power plants and millions of tons of global warming emissions even in 2045. The CEC should not close the door on a broader interpretation that applies the 100% zero-carbon requirement to all electric generation. The CEC should, in its upcoming modeling efforts, explore the implications of a 100% zero-carbon requirement applied to all generation – not just retail sales.

In summary, UCS recommends that the CEC:

- Develop a process for incorporating future technical workshop feedback into the electricity system modeling analysis,
- Assess the air quality benefits of the “No Combustion” definition of eligible electricity sources under SB 100,
- Adopt a greenhouse gas accounting methodology that minimizes the use of credits, instead relying on the actual emissions profile of resources used to meet load, and
- Remain open to a broader application of the 100% zero-carbon electricity requirement to all generation, not just retail sales.

UCS looks forward to further participation in SB 100 implementation, and we thank the CEC, CPUC, and CARB for their consideration of these comments.

Sincerely,



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² Ibid.