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Comments on SB 100 draft modeling results and Joint Agency Report

Additional submitted attachment is included below.



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December 18, 2020

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

Re: Comments on the December 2020 Draft SB 100 Joint Agency Report

Dear Commissioner Hochschild and Commission staff:

The Imperial Irrigation District appreciates the opportunity to comment on the December 2020 Draft SB 100 Joint Agency Report and modeling results. IID supports the clean energy goals of SB 100 and submits the following comments to help create a cohesive and viable plan for a low-carbon energy future.

The goals of SB 100 will require significant financial investment in new and early retirement of existing assets that could increase financial pressures on utilities and could ultimately result in further burden to disadvantaged communities across the state. Therefore, IID strongly believes the cost of transitioning to increased renewable resources and their impacts to energy rates and affordability need to be further considered in determining a final SB 100 model. Additionally, planning parameters will drive the installation of new renewable resources to areas far away from major load centers that will require significant investments in additional transmission capacity. The added costs and permitting of this infrastructure as well their potential impacts to disadvantaged communities should be considered in the SB 100 study by the Joint Agencies.

The geographic areas served by IID also face extreme heat during the summer months unlike other parts of the state. The significant load shift between winter, summer and between peak and non-peak hours has a significant impact on resources. In addition, extreme high temperatures affects transmission and efficiency of all resources. Therefore, it is important to evaluate these variables since they affect local planning and decision-making. The Joint Agencies should further evaluate these factors as it could otherwise lead to underutilized assets with high cost implications to utilities and their customers.

The agencies should incorporate reliability studies as a key component of the SB 100 proceedings. Given the August 2020 outages and anticipated increase in extreme weather events, IID is concerned the production cost modeling does not provide more consideration to supply shortage events associated with weather events. With increased amounts of intermittent resources, IID believes the study should reflect a more diverse and balanced portfolio that prioritizes reliability.

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IID appreciates the agencies' inclusion of geothermal energy and recognition of its evolving role. As you may already know, it is estimated the Salton Sea Known Geothermal Resource Area can produce up to 2,000 megawatts of additional energy supplies. This resource could provide much needed diversity to the energy portfolio while adding grid reliability and system resilience. There is also an exciting and unique opportunity for a new lithium supply from the geothermal brine at the Salton Sea. The increase in energy storage systems and electrification of the transportation sector will require growing supplies of batteries and the lithium required to produce them. This could lead to lower costs associated to the production of this resource while paving the way for a new industry.

Furthermore, new geothermal development in the Salton Sea region would create in-state jobs and spur economic development opportunities in one of the most impoverished areas of the state. The Joint Agencies should take into consideration the added multiple benefits associated with the development of renewable resources as part of the SB 100 modeling and final recommendations.

We appreciate the opportunity to provide comments on the December 2020 Draft SB 100 Joint Agency report. We also appreciate the hard work of the Joint Agencies and their staff in developing the draft report and working with stakeholders. IID is fully committed to the state's renewable energy goals and we look forward to the continued dialogue. If you have any questions, please feel free to contact Antonio Ortega, Governmental Affairs Officer, at aortega@iid.com or 760-604-1092.

Sincerely,

A handwritten signature in black ink, appearing to read "E. Martinez", with a stylized flourish at the end.

Enrique B. Martinez
General Manager