

DOCKETED

Docket Number:	19-SB-100
Project Title:	SB 100 Joint Agency Report: Charting a path to a 100% Clean Energy Future
TN #:	236045
Document Title:	Center for Energy Efficiency and Renewable Technologies Comments - SB 100 Draft Report Workshop Comments - CEERT
Description:	N/A
Filer:	System
Organization:	Center for Energy Efficiency and Renewable Technologies
Submitter Role:	Public
Submission Date:	12/18/2020 3:27:35 PM
Docketed Date:	12/18/2020

*Comment Received From: Center for Energy Efficiency and Renewable Technologies
Submitted On: 12/18/2020
Docket Number: 19-SB-100*

SB 100 Draft Report Workshop Comments - CEERT

Additional submitted attachment is included below.



December 18, 2020

California Energy Commission Docket
No. 19-SB-100

**Written Comments of The Center for Energy Efficiency and Renewable Technologies (CEERT)
Regarding the SB 100 Draft Report Workshop**

CEERT commends the California Energy Commission (CEC), the California Air Resources Board, and the California Public Utilities Commission (CPUC) in producing this first SB 100 Draft Report. CEERT especially appreciates the high level of transparency and spirit of collaboration in this process and we look forward to the continuing effort towards meeting the goals of SB 100.

One of the key take aways from the draft report, and from the evidentiary record, is that California still has a long way to go if we are to actually achieve the ambitious climate and clean energy targets California has established. To achieve the significant annual buildout of renewables required to meet the targets, as indicated in the SB 100 Modeling Results, California must immediately accelerate clean resource procurement. In addition, as Commissioner Douglas reminded us during the public workshop, we must also pay attention to the land use and planning constraints on siting the large amount of renewables needed, along with related transmission and interconnection infrastructure.

Yet, based on current policies and activities at the CPUC, the chance of meeting our decarbonization goals is slipping away. The Joint Agency Preliminary Root Cause Analysis of the August 14th and 15th Outages underscores the urgent need for immediate and sustained procurement of clean preferred resources, such as demand response, distributed energy resources, and solar + storage hybrids, for maintaining reliability in summer of 2021 and beyond. However, additional proposed gas procurement threatens to lock California into dependence on the natural gas system, prolonging reliability issues at the expense of the State's ratepayers and the well-being of its most vulnerable populations.

Thus, as part of its comprehensive analysis of energy needs and solutions, CEERT recommends the CEC perform a top-down, holistic analysis of the natural gas pipeline, storage, and distribution system in the upcoming 2021 Integrated Energy Policy Report. The State must focus on reducing natural gas demand to facilitate the orderly and just transition away from fossil fuel generation while ensuring both near-term and long-term reliability. The need to reduce pressure on the fragile gas system is especially critical in Southern California, where Aliso Canyon continues to operate at a significant cost to ratepayers and corrosion of the aging system presents serious health and safety issues to surrounding communities.

Interagency commitment is critical to the success of California's clean energy transition. The SB 100 venue provides a unique opportunity to evaluate these interconnecting processes, get external input from other state and local organizations, and overcome regulatory silos. However, given the results of the Report are directional in nature, complete implementation of SB 100 is contingent on the success of related planning and procurement activities. Thus, ongoing collaboration across the agencies' planning venues and thorough analysis of evolving grid needs will ensure California implements its decarbonization goals in a timely, just, and cost-effective manner.

Center for Energy Efficiency and Renewable Technologies

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CEERT greatly appreciates the value of the SB 100 process and believes the SB 100 analysis and report should be produced on an annual or two-year cycle to be most effective. This would accomplish two tasks. First, a one or two-year cycle would better match the planning procedures of the joint agencies and promote a more seamless feedback loop between these operations. Second, the rate of innovation often far outpaces regulatory oversight of technology development. The SB 100 Report Core Scenario Modeling Assumptions include only “commercialized technologies with vetted and publicly available cost and performance data and an anticipated pipeline of development”.¹ Thus, a more frequent Report cycle would ensure the modeling results are updated at intervals consistent with the commercialization of new clean energy technologies, and fully incorporate developments in emerging technologies that will be critical to achieving the SB 100 goals, including offshore wind, geothermal energy, long duration and multi-day storage, green hydrogen, demand response, and other technologies. Furthermore, this positive feedback loop will bolster the wider resource and transmission planning efforts across agencies and create additional incentives for new technology development. Without synergistic interaction between the various moving parts involved in the State’s clean energy transition, the optimal window of opportunity may pass undetected.

CEERT again expresses its appreciation to the SB 100 joint agency team for its dedication to California’s decarbonized future and hopes this spirit of collaboration can carry over into all aspects of modeling, planning, and procurement in the State’s clean energy transition. CEERT sincerely looks forward to working with the agencies in continuing towards creating a healthier, cleaner home for all Californians and setting a precedent for the world yet again.

Sincerely,

A handwritten signature in black ink, appearing to read "V. John White". The signature is stylized and cursive.

V. John White
Executive Director

¹*Draft 2021 Sb 100 Joint Agency Report*, December 2020, at p. 17