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**on the Joint Agency Workshop on Next Steps to Plan for SB 100
Resource Build - Transmission**

Additional submitted attachment is included below.



**COMMENTS OF THE CALIFORNIA COMMUNITY CHOICE ASSOCIATION TO
THE CALIFORNIA ENERGY COMMISSION ON THE JOINT AGENCY WORKSHOP
ON NEXT STEPS TO PLAN FOR SENATE BILL 100 RESOURCE BUILD:
TRANSMISSION
July 22, 2021**

**Docket Number 21-SIT-01
SB 100 Implementation: Planning for SB 100 Resource Build**

The California Community Choice Association¹ (CalCCA) submits these comments to the California Energy Commission (Commission) in Docket Number 21-SIT-01 on the *Joint Agency Workshop on Next Steps to Plan for Senate Bill 100 Resource Build: Transmission*, held July 22, 2021.

I. INTRODUCTION

CalCCA appreciates the opportunity to comment on the Joint Agency Workshop on Next Steps to Plan for Senate Bill 100 Resource Build: Transmission. Forward planning and coordination between the California Independent System Operator (CAISO), California Public Utilities Commission (CPUC), and the Commission (Joint Agencies) will play a critical role in ensuring California can meet its ambitious climate goals reliably and cost effectively.

¹ California Community Choice Association represents the interests of 22 community choice electricity providers in California: Apple Valley Choice Energy, Baldwin Park Resident Owned Utility District, Central Coast Community Energy, Clean Energy Alliance, Clean Power Alliance, CleanPowerSF, Desert Community Energy, East Bay Community Energy, Lancaster Choice Energy, Marin Clean Energy, Peninsula Clean Energy, Pico Rivera Innovative Municipal Energy, Pioneer Community Energy, Pomona Choice Energy, Rancho Mirage Energy Authority, Redwood Coast Energy Authority, San Diego Community Power, San Jacinto Power, San José Clean Energy, Silicon Valley Clean Energy, Sonoma Clean Power, and Valley Clean Energy.

Transmission planning is a major piece of this coordination, and the Joint Agencies must work together to ensure transmission projects are built far enough in advance to accommodate the influx of clean resources that will come online to meet Senate Bill (SB) 100 targets that require renewable energy and zero-carbon resources supply 100 percent for electric retail sales to end-use customers by 2045.

II. COMMENTS

Collaboration between the Joint Agencies in the Integrated Resource Planning (IRP), SB 100, and Transmission Planning processes will ensure resource procurement and new transmission build aligns. The CPUC noted in their presentation that California is, “Beginning to see a shift from an era of available transmission headroom to one where transmission development will be necessary to accommodate the large amounts of resources expected to come online in the next 10 - 20 years to meet state goals.”² Transmission projects driven by such state goals should be informed by the 20-year Transmission Outlook presented by the CAISO, which looks over a longer horizon than the CAISO’s annual Transmission Planning Process (TPP) which addresses a 10-year planning horizon. Given the time required to develop new transmission, the 10-year look ahead in the TPP can result in transmission projects coming online just in time to meet an identified reliability need. CalCCA is encouraged that the 20-year Transmission Outlook will utilize the SB 100 “No Combustion” scenario for 2040. Recognizing that decarbonization goals necessitate significant resource build, it is prudent to use this scenario to inform potential transmission projects so that new clean resources do not get stranded behind transmission constraints. Considering the large number of resources expected to come online to meet state policies, the TPP, IRP, and SB 100 initiatives could benefit from the insight of a

² CPUC presentation at 19: https://www.energy.ca.gov/sites/default/files/2021-07/July%2022%20Workshop%20SB%20100%20Transmission_Master%20v4.pdf

longer planning horizon provided by the 20-year Transmission Outlook to inform policy-driven transmission projects.

CalCCA is encouraged by the presentations during the workshop on in-state and out-of-state transmission projects that could enhance California's ability to access off-shore and out-of-state wind. The Joint Agencies should consider these transmission projects in the context of IRP and TPP processes to understand how each project enhances California's ability to access clean and renewable resources in the most cost effective and reliable way to meet SB 100 goals. In particular, resource profiles for out-of-state wind appear attractive when looking at potential resource output during critical hours but the Joint Agencies should also consider IRP cost assumptions and individual load-serving entity IRP reporting to determine whether or not such resources are selected in IRP modeling.

CalCCA also supports the Commission's consideration of key environmental and land use impacts in transmission planning. Land use and habitat concerns can create serious delays or project cancellations if not incorporated into site evaluation upfront. By incorporating these considerations into transmission planning, the CAISO and the Joint Agencies can help steer projects to less sensitive areas and avoid potentially serious delays or cancellations of transmission projects needed to integrate future resource procurement.

III. CONCLUSION

CalCCA appreciates Commission staff's efforts in evaluating transmission needs to meet SB 100 goals.

Dated: August 11, 2021

Eric Little
Director of Regulatory Affairs
California Community Choice Association
(510) 906-0182 | eric@cal-cca.org