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GSCE comment on SB 100 report July 22, 2021, workshop

Additional submitted attachment is included below.

**BEFORE THE ENERGY COMMISSION
OF THE STATE OF CALIFORNIA**

*SB100 Implementation: Planning for
SB100 Resource Build.*

21-SIT-01
(May 21, 2021)

**COMMENT OF GOLDEN STATE CLEAN ENERGY, LLC, ON
JOINT AGENCY WORKSHOP ON NEXT STEPS TO PLAN
FOR SENATE BILL 100 RESOURCE BUILD – TRANSMISSION**

Golden State Clean Energy (“GSCE”), the developer of the Westlands Solar Park, appreciates the opportunity to submit this comment on the SB 100 report Joint Agency workshop held on July 22, 2021. The Westlands Solar Park is a 20,000+ acre pre-permitted solar and energy storage master planned project capable of generating up to 2,700 MW and located in the southern part of the Westlands Water District in California’s Central Valley. The Westlands competitive renewable energy zone was identified in the Renewable Energy Transmission Initiative as an area with the fewest environmental barriers to renewable energy development because all of the land in the area is drainage impaired and near existing transmission corridors that can deliver power to all parts of the state.

GSCE supports the direction that the SB 100 report workshops have taken this year. We believe the Energy Commission’s approach to resource mapping is a crucial step to enabling transmission planning and studies needed to support the SB 100 report effort. Using existing land use studies to create a geographic breakdown of resources will help move transmission planning along more quickly and support timely generation development to meet the state’s needs. And this coarser resource mapping process is reasonable for the SB 100 report because it provides the California ISO latitude to conduct higher-level studies of bulk transmission and supports more efficient regional transmission solutions. In addition, GSCE supports the stakeholder process for resource mapping, including coordinating with other agencies to achieve other policy objectives like SGMA and agricultural land retirement and fallowing strategies.

Nonetheless, it is still unclear whether the SB 100 report process is intended to directly drive the long-term development needed and to take advantage of the benefits proactive planning can create, or whether the SB 100 report process is intended to indirectly lead to benefits by merely providing market signals and additional information to other planning processes. GSCE believes the former is needed – that the SB 100 implementation plan should direct the development of transmission to the preferred resource areas identified in the report rather than only relying on the existing IRP and transmission planning processes. The Joint Agencies should consider simultaneously accelerating the build-out of least-regrets resource areas that can be online in the next five years while also planning to develop the resources needed to meet California’s SB 100 goals.

Discussion

The CAISO's tariff-based transmission planning process and the generator interconnection process will likely remain the primary drivers of new transmission projects. However, the study and planning process for approving policy-driven projects is reliant on policy direction coming from outside of the CAISO, and thus far that process has resulted in very little new transmission infrastructure to support policy projects, particularly in recent years. In order to meet and accelerate the state's carbon reduction goals, the Joint Agencies must provide policy direction to the CAISO to begin an accelerated process to build new transmission. The Joint Agencies should begin discussing and seeking feedback on the policy direction it can provide the CAISO for immediate assessment in the transmission planning process.

In addition, the Energy Commission should be prepared to exercise its transmission corridor designation authority based on the results of the SB 100 report and transmission analysis conducted by the CAISO in the 20-year outlook and transmission planning process. This will help shorten the lengthy development and approval process associated with transmission projects and increase the likelihood that new infrastructure will be developed in time to help with the climate crisis.

I. The Joint Agencies need to create more policy clarity around the meaning of the SB 100 report and CAISO's 20-year transmission outlook results by providing the CAISO a long-term policy directive for its transmission studies.

For years, the CAISO has conducted transmission studies with a 10-year outlook according to its tariff-based transmission planning process, and now for the first time the CAISO is conducting a 20-year transmission outlook that goes beyond the traditional study timeframe. The tariff-based transmission planning process can lead to transmission project approval and drive development, which includes the policy-driven assessment of transmission infrastructure needed to facilitate California's policy goals. However, the 20-year outlook does not have this approval process or any means of directly translating its outlook into new transmission projects. There is currently a gap in how California will move beyond planning and bring online the transmission projects that are needed for the state to reach its SB 100 goals. The time is now to discuss how the Joint Agencies will address this gap and ultimately make final determinations in the novel SB 100 report planning space.

The Joint Agencies must provide policy guidance for the CAISO's transmission planning process studies that is based on the results of the SB 100 report and the 20-year outlook. This long-term policy directive should state clearly and affirmatively that there is need for transmission projects to be studied for approval as soon as the next transmission planning process cycle. The planning that will have been conducted by the time the CAISO concludes its 20-year transmission outlook should sufficiently support a long-term policy directive, and the urgent need to begin scaling up California's energy infrastructure development means we cannot continue to delay while further iterations of studies are conducted.

The benefit of this approach is it allows the 20-year transmission outlook, which involves higher-level studies, to feed some of the more promising results into the more robust transmission planning process studies and support transmission approval. The existing interrelation of the IRP-IEPR-TPP can continue and be complemented by the long-term policy directive, as longer-term considerations can provide more assurance of efficient transmission solutions found needed in the integrated resource planning's nearer-term planning horizon.

II. The Joint Agencies should start seeking public feedback on whether the economic- and policy-driven assessments in the CAISO's tariff-based transmission planning process can adequately evaluate and make determinations of need based on a long-term policy directive.

During the July 22 SB 100 report workshop, the Public Advocates Office commented on the need to evaluate transmission projects for their social benefits, tax benefits, and other issues relating to the value to California ratepayers of funding new transmission. GSCE supports such a broader, holistic view of transmission and infrastructure development benefits to California ratepayers. With supply tightening throughout the West, California will need more energy in-state and additional transmission infrastructure to support this new generation.

Multi-value transmission planning should also be accounted for when assessing the long-term policy directive so to capture the true benefit of this planning effort. Economic and policy-driven assessments are siloed under today's transmission planning process. FERC's recent Advanced Notice of Proposed Rulemaking in docket RM21-17 also raises this concern of siloed needs analysis.¹ Incremental policy and economic benefits that alone do not suffice for approval under their assessment silo should also be assessed for their joint benefits. California does not need to wait for direction from FERC to address this hurdle.

III. The Energy Commission should use its transmission corridor designation authority to facilitate timely development of transmission.

The Energy Commission should begin discussing with stakeholders how its transmission corridor designation authority can be used to facilitate transmission projects needed for the state to meet its SB 100 goals. The SB 100 report is a critical and comprehensive planning effort that deserves the Joint Agencies exercising their full authority, and the Energy Commission's transmission corridor designation authority can help alleviate development hurdles and address the timing urgency associated with long-lead time construction. The climate crisis is here,² and

¹ *Joint Statement from Chairman Glick & Commissioner Clements on Building Transmission for the Future*, July 15, 2021, available at: <https://www.ferc.gov/news-events/news/joint-statement-chairman-glick-commissioner-clements-building-transmission-future> ("Although the regional transmission planning process considers transmission needs driven by reliability, economics, and Public Policy Requirements, those transmission needs are often viewed in isolation from one another and the cost allocation methods for projects selected to meet those needs are similarly siloed.")

² *'Code red': UN scientists warn of worsening global warming*, The Associated Press, Aug. 9, 2021, available at: <https://apnews.com/article/climate-change-global-warming-un-report-ipcc-1d89d5183583718ad4ad311fa2ee7d83>.

we are out of time. Aggressive steps must be taken to break down the hurdles to new infrastructure that can accelerate the state's progress to a carbon-free energy grid.

Conclusion

We commend the Joint Agencies for the significant effort undertaken so far, but we cannot overstate the urgency for California to move much more quickly in its transition to a carbon-free energy future. We thank you for the opportunity to comment on the workshop.

Dated: August 11, 2021

Respectfully submitted,

/s/ Daniel Kim

Daniel Kim
Vice President, Governmental
and Regulatory Affairs
Golden State Clean Energy
4125 W Noble Ave., Suite 310
Visalia, CA 93277
Phone: (916) 709-9289
dan@goldenstatecleanenergy.com