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GSCE comment on SB 100 report Aug 12, 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 – RESOURCE MAPPING

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 August 12, 2021. GSCE continues to support the Joint Agencies' goal of focusing on land use and resource mapping to timely support the California ISO's 20-year transmission outlook. We also appreciate that the resource mapping for the 20-year outlook is only the starting point for mapping resources needed to comply with SB 100 as resource mapping efforts will continue throughout the SB 100 report process.

GSCE believes that these planning efforts must lead to development in the very near future and that the land use planning that has already occurred is significant and can support transmission approval.[1] We strongly support the stakeholder comments during the August 12 workshop that highlighted the urgency surrounding transmission development. It is of the utmost importance that California immediately push for approval of new transmission needed to meet SB 100 goals, given the long lead-time for bringing new transmission online and the urgent need for more infrastructure to accommodate in-state renewable development.[2] This also includes mid-decade transmission upgrades to resource areas that have the opportunity to immediately accelerate their build-out and help provide relief to the capacity shortfalls already appearing in California.[3]

During the public comment portion of the August 12 workshop, stakeholders raised the concept of geographic and resource diversity. Diversity is a laudable goal and can provide needed benefits. Indeed, development in the San Joaquin Valley, including Westlands Solar Park,

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[1] *Comment of Golden State Clean Energy, LLC, on Joint Agency Workshop on Next Steps to Plan for Senate Bill 100 Resource Build – Transmission*, Docket No. 21-SIT-01, Aug. 11, 2021, *available at*: https://efiling.energy.ca.gov/GetDocument.aspx?tn=239272&DocumentContentId=72726.

[2] One of the last major policy-driven transmission projects approved in CAISO's transmission planning process, Ten West (aka DCRT), was approved in the 2013-14 Transmission Plan but is still being contested by the Public Advocates Office in the CPCN approval proceeding (A.16-10-012), illustrating the immense challenge with timely development of transmission needed to support policy goals.

[3] Cal. Energy Comm'n, *Draft Preliminary 2022 Summer Supply Stack Analysis*, Docket No. 21-ESR-01, Aug. 11, 2021 ("The Summer 2022 Stack Analysis identifies the risk of potential energy shortfalls under both average and extreme weather planning reserve margins. This analysis projects an additional 600 MW to 5,200 MW of resources may be required to ensure electric system reliability for peak and net-peak hours during summer 2022 without the use of contingency resources." *Id.* at 3.).

provides geographic diversity to the solar fleet in the California ISO footprint where solar is more concentrated in Southern California.[4]

Priority should be given to full build-out of solar and storage resources in the Central Valley to take advantage of the many benefits afforded by renewable generation development in the northern part of the state. Development in the San Joaquin Valley offers many benefits and complements compliance with other important California priorities like the Sustainable Groundwater Management Act. Solar and storage development in the Central Valley also supports the economy of chronically underserved communities while providing low-risk opportunities to support SB 100 goals. The Commission has noted that over 312,000 acres in the Westlands transmission zone meet the scoring system that is being used to screen for preferential development. We urge the Commission to prioritize full build-out of renewable generation in the Central Valley as an area of "least conflict" solar development. This is consistent with the resource portfolios and modeling efforts that drove the January 2021 SB 100 report.

Finally, the Joint Agencies should use all tools available to them to ensure California reaches its SB 100 goals and resolve barriers that have historically impeded new transmission development. One potential tool for helping address these barriers is the Energy Commission's transmission corridor designation authority. The Commission should use this authority to alleviate development hurdles and address the timing urgency associated with long-lead time construction.

GSCE appreciate the significant effort undertaken so far by the Joint Agencies, and we thank you for the opportunity to comment on the workshop.

Dated: August 20, 2021

Respectfully submitted,

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[4] Cal. Energy Comm'n, *2018 Utility-Scale Solar Electrical Generation (GWh) and Capacity (MW), available at*: https://cecgis-caenergy.opendata.arcgis.com/documents/utilty-scale-solar-capacity-and-electrical-generation-table/explore (The table shows that roughly two-thirds of the utility-scale solar capacity is located in Southern California. The table was last updated in August of 2020. This data table is available on the CEC's Energy Maps of California webpage.).