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**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: RESOURCE MAPPING
August 12, 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: Resource Mapping*, held on August 12, 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: Resource Mapping. 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. Understanding potential resource footprints will help ensure new resource build is sited appropriately and that transmission is available or built far enough in advance to accommodate the influx of clean resources that will come online to meet Senate Bill (SB) 100 targets.

II. COMMENTS

CalCCA supports the Commission's development of potential renewable energy development footprints and consideration of key environmental and land use impacts in SB 100 implementation work. Because renewable resource build and new supporting infrastructure will

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.



likely require large geographic footprints, upfront land-use planning will provide crucial information used to identify viable sites for development of resource and transmission build. Land use, environmental, and habitat concerns can create serious delays or project cancellations if not incorporated into site evaluation upfront. By incorporating these considerations into the SB 100 implementation process, the Joint Agencies can help steer resource and transmission build to less sensitive areas and avoid potentially serious delays or cancellations of projects needed to integrate future resource procurement.

The collaboration taking place early and often between the Joint Agencies in the SB 100, Integrated Resource Planning (IRP), and Transmission Planning processes will aid in ensuring resource procurement and new transmission build aligns. CalCCA supports utilizing resource maps developed in this analysis to inform the CAISO's 20-year Transmission Outlook. Given the time it takes to build generation and transmission, the Joint Agencies should consider how potential projects identified in the 10-year plan will also meet the needs identified in the 20-year Transmission Outlook and support projects that can be built at optimal sites identified in the Commission's land use mapping. This will ensure projects approved in the 10-year process support both short-term needs and long-term policy-driven needs.

III. CONCLUSION

CalCCA appreciates Commission staff's efforts in building a resource map that considers environmental and land use data to examine SB 100 scenarios.

Dated: August 20, 2021

(Original signed by)

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