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Joint eNGO Comments on CEC Starting Point Scenario - Docket 21-SIT-01

Additional submitted attachment is included below.

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California Energy Commission
Dockets Office, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

Submitted via electronic comment system

RE: Docket 21-SIT-01 – Comments on September 13, 2021 Starting Point for the CAISO 20-year Transmission Outlook

On behalf of Defenders of Wildlife (Defenders), Sierra Club, California Native Plant Society, and Center for Biological Diversity, we respectfully submit these comments in response to the September 13, 2021, SB 100 Starting Point for the CAISO 20-year Transmission Outlook (SPS). Our organizations are committed to achieving a low carbon energy future that centers on the health of California communities, our economy and the environment. We are pleased to see the resource planning and geospatial analysis come to life on a 20-year horizon and appreciate the thoughtful and hard work of Commissioner Douglas and the Energy and Infrastructure Policy team.

As we have noted in previous comments, energy planning is land use planning. Consideration of land use and environmental opportunity and constraints is foundational to enable effective energy planning that reduces risks of unintended impact, conflict and disputes, and ensures timely build-out. We offer the following comments, observations and recommendations for the continued development of the SPS and the integration of planning efforts for CAISO's 20-year Outlook.

1. Benefits of Starting Point Scenario

The SPS is the needed step forward to look at SB 100 implementation on a 20-year horizon with environmental sensitivity screens and the active retirement of 15 GW of natural gas built into the analysis as the baseline. We support data-driven and realistic consideration of:

- Increasing geothermal generation at the Salton Sea
- Reducing expectations of in-state wind for sensitive/high conflict areas such the Marin/Sonoma coastline, portions of the Sacramento Valley, around the San Luis Reservoir and Grasslands Ecological Area, Los Padres National Forest, and NE California
- Pulling out new and expanded solar in Carrizo Plain

We appreciate the continued efforts of Scott Flint and your team to incorporate and expand the use of the environmental sensitivity screens. It has been a while since our groups have had a chance to walk through those screens to better understand the details of the information better. We would like to meet with the mapping team soon to review the screens and provide input.

2. Next Steps for Starting Point Scenario

The CPUC has been relying on the CAISO interconnection queue to determine commercial interest. As Defenders has repeatedly commented in the Integrated Resource Planning proceeding, the CAISO interconnection queue is given too much weight in the IRP analysis.[1] A project in the queue that lacks permits from land use authority or is not in an LSE plan is aspirational at best and not something that could or should be built. The SPS analysis provides the opportunity to move beyond the interconnection queue to more clearly consider appropriate locations for generation and future transmission investments that drive forward public policy and take "…*into full consideration the economic and environmental costs and benefits of renewable energy and zero-carbon resources*."[2]

Similarly, we are interested in learning more on how the SPS analysis will integrate "…the social costs and on-energy benefits of land use impacts, public health, air quality, water supply and quality, economic impacts and resilience." (per page 2 of the Starting Point document).

[1] https://apps.cpuc.ca.gov/apex/f?p=401:56:0::NO:RP,57,RIR:P5_PROCEEDING_SELECT:R2005003

[2] CA Public Utility Code Section 454.53(b)(2)

Future analysis should also include transmission and distribution upgrades needed to support significantly higher amounts of community solar, distributed generation (small and mid-scale solar with storage), standalone community storage, and microgrids. Distributed energy resources and, more specifically, distributed solar-and-storage need more affirmative support from the state. Necessary support includes ensuring needed transmission and infrastructure upgrades are targeted to the built environment and funding equitable access to distributed solar, storage, and electric vehicles. Additionally, the responsible agencies should remove artificial barriers such as the Transmission Access Charge on local generation, which is unfairly levied on resources that do not utilize the transmission grid.

Distributed renewable resources and storage provide direct energy services, a pathway for expanding transportation electrification, and critical resiliency and reliability at a lower cost (when factoring in large-scale transmission costs) and with far less impact to the environment than utility-scale solar and wind installations, gas peakers, and utility-scale pumped storage projects. The state should increase support for distributed solar and storage for single family homes, multi-family dwellings, and community facilities (including schools, medical facilities, and others) and associated parking lots to meet the SB 100 goals equitably and with the fewest unintended consequences. Distributed resources are a critical component of the resources needed to attain the SB 100 goals. With the proper planning and support, the state can provide far more to meeting those goals than the limited targets currently modeled by the state agencies.

Microgrids provide even greater benefits to communities in terms of long-term sustainability, reliability and resiliency. These projects are critically important to sustaining emergency services during grid failures. The state should plan for transmission pathways that support efforts to increase the use of microgrids, particularly in existing low wealth and other historically disadvantaged communities. The Commission should particularly identify projects where microgrids and other non-wires alternatives might avoid the need for transmission.

Finally and importantly, to avoid unnecessary land burden, the CEC, CPUC and CARB must ensure the state achieves the forecasted baseline Energy Efficiency, all Additional Achievable Energy Efficiency (AAEE), and SB 350's required doubling of AAEE, which together *reach a total of over 80,000 gigawatt-hours annual electricity savings through 2030*. Given transmission line losses, this translates to nearly 90,000 GWH of avoided generation. This in turn translates to avoiding over *35,000 MW of new large-scale solar projects which, absent achieving energy*

efficiency goals, would unnecessarily industrialize a quarter million acres of land. To ensure the state meets all these efficiency goals, the agencies need to track progress on all these efficiency measures, reduce the role of big utilities so there can be more focus on community energy programs, and significantly increase the current efficiency budgets.

3. Collaborative Energy Planning

Our organizations have long advocated for closer coordination between the CEC and the CAISO to incorporate environmental and land use screens into transmission planning. We appreciate the effort by the CEC team and, now, the CAISO staff to integrate the SPS into the process. Moving forward, we recommend regular joint CEC/CAISO stakeholder workshops to provide ongoing consideration of data sets and analysis assumptions to validate planning outcomes.

4. San Joaquin Solar

The stakeholder-led process in the San Joaquin Valley least-conflict study identified over 470,000 acres of disturbed, degraded and contaminated land in California's San Joaquin Valley suitable for solar energy development.[3] The SPS should prioritize these areas for generation development and transmission investment. Future SPS analysis should consider the timing for Sustainable Groundwater Management Act retirements, the demand for land to meet regional housing needs and local governments' tax base needs.

5. Desert Renewable Energy

With the DRECP in effect, solar, wind and geothermal Development Focus Areas have allocated the appropriate amount of federal public land, and no additional public land within the DRECP area should be made available. In the absence of renewable energy zoning in the Antelope Valley portion of Kern County and Kern County's reluctance or refusal to require Swainson's hawk mitigation recommended by the CEC and CDFW, there is an immediate need to implement a Swainson's hawk conservation plan for the greater Antelope Valley (currently under development) before any of the current 14 nests and associated foraging habitat are lost due to ongoing solar energy development.

[3] https://sjvp.databasin.org/galleries/3b9ed1d995424b1e94fa4ae3fb2502a6/

Solar development in the Kramer Junction area has the potential to sever habitat linkages for the desert tortoise and Mohave ground squirrel, and several projects are in process by San Bernardino County and Kern County. Further development in this area could sever habitat connecting Edwards Air Force Base with China Lake and Fort Irwin.

The Pisgah area has relatively little development acreage due to desert tortoise occurrence and connectivity habitat linking critical habitat units to the north and south.

6. In-State Wind Resources

Additional analysis is needed on the potential for in-state onshore wind generation. Locations for viable new wind generation are limited, and project feasibility can be tenuous at best. Can increased generation from repowering onshore wind farms fulfill growing needs for wind generation in the SB 100 modeling? Are there limiting factors such as transmission?

Analysis is needed to support least-conflict planning and decision-making for offshore wind. Consideration should be given to expanding the SPS mapping tool into State waters and the outer continental shelf to facilitate implementation of AB 525 and support decision making by the Coastal Commission and the State Lands Commission.

7. Comprehensive Planning to Meet California's Goals

Planning is hampered by a lack of a centralized data repository that holds the data sets used for busbar mapping, 30x30 mapping, water resources, and CNRA, CalEPA and wildfire data sets. The data sets need to be readily available so stakeholders can actively engage and issue spot for potential renewable and storage projects. A centralized data repository and mapping tool will allow uniform mapping analysis and enable agencies and stakeholders to identify salient data gaps. Data Basin could be an ideal host.

Conclusion

Thank you for the opportunity to provide comments on the SPS and mapping. We appreciate the Commissioner's and staff's hard work developing and moving forward with SPS to support the 20 Year Outlook.

Sincerely,

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