

DOCKETED

Docket Number:	21-SIT-01
Project Title:	21-SIT-01, SB100 Implementation Planning for SB100 Resource Build
TN #:	242242
Document Title:	ACWA Comments on Joint Agency Workshop to Plan for SB 100 Resource Build
Description:	N/A
Filer:	System
Organization:	ACWA
Submitter Role:	Public
Submission Date:	3/10/2022 11:32:50 AM
Docketed Date:	3/10/2022

*Comment Received From: ACWA
Submitted On: 3/10/2022
Docket Number: 21-SIT-01*

on Joint Agency Workshop to Plan for SB 100 Resource Build

Additional submitted attachment is included below.

March 10, 2022 Comment letter submitted via electronic commenting system

The Honorable David Hochschild, Chair
California Energy Commission
715 P St,
Sacramento, CA 95814

The Honorable Alice Reynolds, President
California Public Utilities Commission
505 Van Ness Ave,
San Francisco, CA 94102

Mr. Elliot Mainzer, President
California Independent Service Operator
250 Outcropping Way,
Folsom, CA 95630

Re: Association of California Water Agencies' Comments on Joint Agency Workshop to Plan for Senate Bill 100 Resource Build – Analysis of Land Use Implications

Dear Interagency Principals of the SB 100 Report,

The Association of California Water Agencies (ACWA) appreciates the opportunity to provide public comments to the California Energy Commission (CEC), California Public Utilities Commission (CPUC), and California Independent Service Operator (CAISO) [Joint Agencies] on the recent Joint Agency Workshop to Plan for Senate Bill 100 Resource Build – Analysis of Land Use Implications (workshop) held on February 22. ACWA represents more than 460 public water agencies that collectively deliver approximately 90 percent of the water in California for domestic, agricultural, and industrial uses.

Water agencies are key partners as the State works to achieve the framework set in SB 100 and decarbonize California's economy. For decades, local water agencies have been actively contributing to the State's clean energy supply. ACWA members have implemented a wide range of renewable and zero-carbon energy projects, including small and large hydropower, biogas, microturbines, geothermal, wind, energy storage, and photovoltaic solar. In addition, ACWA members have participated in a combination of energy efficiency, demand-side management, and peak-use reduction programs. These projects and programs have helped reduce energy costs for water customers, while contributing to the achievement of the State's greenhouse gas emissions reduction goals. ACWA stands ready to work with the Interagency Principals, staff, and diverse stakeholders on SB 100.

In response to the recent workshop, ACWA submits the following comments for the Joint Agencies consideration:

Comment 1- ACWA encourages further public outreach and opportunities to provide input on land use implications of SB 100.

ACWA encourages and supports additional opportunities for stakeholders, including public water agencies, to provide input into land use planning and transmission planning. The Interagency Principles should hold additional public workshops and workgroup meetings to receive and discuss incorporating stakeholder feedback into land use and transmission planning. At the February 22 workshop, panelists including John White, Dr. Grace Wu, Julia Souder, and Shannon Eddy all identified the value added of providing additional sessions with local agency input, additional opportunities to reiterate the process and timeline for development of new projects to stakeholders to help us in our planning efforts as the grid modernizes.

In past rulemakings, ACWA has provided broad insights on behalf of impacted public water agencies statewide. With additional opportunities for public outreach and input, ACWA is committed to provide beneficial insights on SB 100 efforts moving forward.

Comment 2- ACWA encourages rapid action and input on transmission planning and process to support zero carbon and renewables coming onto the grid.

ACWA encourages the Joint Agencies to remain vigilant in current efforts to streamline land use planning efforts in transmission planning and process to ensure grid reliability. ACWA members' facilities and operations are affected by decisions made on electric distribution system infrastructure and, more recently, on statewide transportation electrification requirements. They rely upon a stable grid to ensure high quality and reliable water conveyance and storage. ACWA supports the approach in the SB 100 Report on natural and working lands as a resilient venue for carbon sequestration. ACWA encourages cost-effective sustainability programs and multi-benefit projects that provide "win-win scenarios" for all stakeholders. ACWA has a vested interest on behalf of its members to engage where possible in the state's transmission and distribution planning to effectively plan for infrastructure upgrades and funding opportunities impacting our members' daily operations. Successful deployment of transmission and distribution infrastructure to support zero carbon and renewable resources has synergy and direct impact on water agency operations of conveyance and storage.

ACWA appreciates the diligent work by staff across the CEC, CPUC, and CAISO. We thank you for the opportunity to comment and look forward to working with you and your staff. We see that as a great continuation of the conversation between the water sector and Joint Agencies. Please do not hesitate to contact me at nickb@acwa.com or (916) 441-4545 if you have any questions regarding ACWA's input.

Sincerely,



Nicholas Blair
Regulatory Advocate II

cc:

The Honorable David Hochschild, Chair, California Energy Commission

The Honorable Siva Gunda, Vice Chair, California Energy Commission

The Honorable Andrew McAllister, Commissioner, California Energy Commission

The Honorable Patricia Monahan, Commissioner, California Energy Commission

The Honorable Kourtney Vaccaro, Commissioner, California Energy Commission

The Honorable Alice Busching Reynolds, President, California Public Utilities Commission

The Honorable Cliff Rechtschaffen, Commissioner, California Public Utilities Commission

The Honorable Genevieve Shiroma, Commissioner, California Public Utilities Commission

The Honorable Darcie Houck, Commissioner, California Public Utilities Commission

The Honorable John Reynolds, Commissioner, California Public Utilities Commission

Mr. Elliot Mainzer, President, California Independent Service Operator

Mr. Drew Bohan, Executive Director, California Energy Commission

Mr. Dave Eggerton, Executive Director, ACWA

Ms. Cindy Tuck, Deputy Executive Director for Government Relations, ACWA