

DOCKETED	
Docket Number:	21-SIT-01
Project Title:	21-SIT-01, SB100 Implementation Planning for SB100 Resource Build
TN #:	242245
Document Title:	Golden State Clean Energy Comments - ON SB 100 RESOURCE BUILD WORKSHOP - ANALYSIS OF LAND USE IMPLICATIONS
Description:	N/A
Filer:	System
Organization:	Golden State Clean Energy
Submitter Role:	Public
Submission Date:	3/10/2022 1:51:22 PM
Docketed Date:	3/10/2022

*Comment Received From: Golden State Clean Energy
Submitted On: 3/10/2022
Docket Number: 21-SIT-01*

**COMMENT OF GOLDEN STATE CLEAN ENERGY ON SB 100
RESOURCE BUILD WORKSHOP “ ANALYSIS OF LAND USE
IMPLICATIONS**

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 TO PLAN FOR SENATE BILL 100
RESOURCE BUILD – ANALYSIS OF LAND USE IMPLICATIONS**

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 February 22, 2022. We want to take the opportunity to acknowledge the incredible effort of staff at the Joint Agencies and all involved in the SB 100 report process for bringing us to this point, as well as the California ISO for its work on the recently completed *Draft 20-Year Transmission Outlook* that complements the SB 100 report analysis.

CPUC Commissioner Rechtschaffen’s opening remarks emphasized the importance of the Joint Agencies moving together on modeling and translating results into an action plan that leads to project development. Panelists similarly made calls for action, notably that California needs to ensure transmission is timely developed so near-term resource needs are not impeded. Panelists also noted that renewable development is becoming more difficult in some places while land use policies suggest certain other areas be prioritized for new renewable development, and that a number of these priority areas are already known but require the Joint Agencies to look beyond existing processes and have a clear conversation about financing transmission to allow these areas to be fully developed.

Based on the presentations by the Joint Agencies at the February 22 workshop, land use will be the primary focus of the SB 100 report process in 2022. This will involve additional interagency planning and coordination and local outreach. As part of the public outreach effort, the Joint Agencies should involve private landholders and developers who can facilitate scalable renewable development in preferred areas, as these stakeholders will also be crucial to moving from studies into action.

GSCE appreciates the benefits of further outreach and continued refinement of land use assumptions. Nonetheless, in 2022, we urge the Joint Agencies to carefully balance this against the need to move beyond studies. We see an opportunity to simultaneously begin formulating plans for orderly development of renewables and transmission in areas where a significant amount of future capacity is expected and represents least regrets development. Namely, numerous studies have identified the San Joaquin Valley as an area that solar development should be targeted (along with storage). However, this area will require significant new transmission to unlock its potential to not only allow for future solar plus storage to be added to

support policy goals, but also to ensure that these projects are deliverable, an essential step for generation and storage resources to qualify to supply resource adequacy and support grid reliability. CAISO's 20-year transmission outlook has begun to identify this, and the *Draft 2021-2022 Transmission Plan* has taken an initial step by approving of the new Manning Substation, but this type and level of development is needed year-after-year for the foreseeable future.

The Joint Agencies should ensure there is orderly development each year between now and 2045 so that the resource buildout is efficient, cost effective, timely and meets the dual need of both energy and capacity (including deliverability) for the grid. GSCE believes that this requires existing processes like IRP and TPP to explicitly design for SB 100 report resource buildout. It may also require approval authority within the 20-year transmission outlook process or new, broader and more inclusive processes (i.e., looking at shared financing with public power or public investment in key infrastructure). For instance, the IRP busbar mapping process should be oriented so it actively promotes transmission development that is called for in the 20-year transmission outlook and SB 100 report. Rather than mapping resources to conceptually avoid nearer-term transmission upgrades, the CPUC could use sensitivities to test different land use buildout scenarios with like resource portfolios and bring further consensus to least regrets development areas. This would add certainty to higher-level studies focused on the 2040s and more concretely bring about the vision of the SB 100 report (so long as the IRP explicitly focuses on supporting and promoting the development called for in the SB 100 report and 20-year transmission outlook).

Given the unprecedented build rate contemplated in the SB 100 report (including the need for solar and wind build rates to nearly triple from current build rates¹), we urgently need to keep pace and not backload development. Least regrets options are available to be acted on and expanded, but the Joint Agencies need to act now. GSCE appreciates the significant effort undertaken so far by the Joint Agencies, and we thank you for the opportunity to comment on the workshop.

Dated: March 10, 2022

Respectfully submitted,

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¹ Joint Agency Workshop to Plan for Senate Bill 100 Resource Build – Analysis of Land Use Implications, PDF at 23, Feb. 22, 2022.