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**SCPPA Comments on February 22 Workshop to Plan for SB 100  
Resource Build**

*Additional submitted attachment is included below.*



Southern California Public Power Authority  
1160 Nicole Court  
Glendora, CA 91740  
(626) 793-9364

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California Energy Commission  
Docket Unit, MS-4  
Docket No. 21-SIT-01  
715 P Street  
Sacramento, CA 95814

**RE: February 22<sup>nd</sup> SB 100 Workshop on Analysis of Land Use Implications**

The Southern California Public Power Authority<sup>1</sup> (“SCPPA”) appreciates the opportunity to provide feedback on the February 22<sup>nd</sup> joint workshop on the analysis of land use implications as part of planning for the Senate Bill (SB) 100 resource build. SCPPA supports the efforts of the California Energy Commission (“CEC”), California Public Utilities Commission (“CPUC”), and California Independent System Operator (CAISO) (collectively, the “joint agencies”) to address and incorporate land use in SB 100 planning efforts.

As recognized in last year’s SB 100 Joint Agency Report,<sup>2</sup> California will need to significantly increase the build rate for renewable generation and energy storage to achieve the 100 percent clean energy policy by 2045.<sup>3</sup> The state will also need to significantly expand transmission capacity into and within the state, particularly for constrained regions like the LA basin. However, as noted throughout the February 22<sup>nd</sup> workshop, “models are not plans, and plans are not projects,” and there are many practical barriers to address that would better position the state to achieve the clean energy policy while also balancing cost and affordability, electricity reliability, environmental impacts, community impacts, and more. Some of the practical considerations raised at the workshop that are not fully captured in existing modeling are land availability, long lead times for transmission development, complex permitting and environmental review processes, lengthy generator interconnection processes, and community preferences. Working to address the aforementioned items would help support the higher build rates required to achieve the SB 100 clean energy policy.

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<sup>1</sup> SCPPA is a joint powers authority whose members include the cities of Anaheim, Azusa, Banning, Burbank, Cerritos, Colton, Glendale, Los Angeles, Pasadena, Riverside, and Vernon, and the Imperial Irrigation District. Each Member owns and operates a publicly-owned electric utility (POU) governed by a board of local officials. Our Members collectively serve nearly five million people throughout Southern California. Together they deliver electricity to over two million customers throughout Southern California, spanning an area of 7,000 square miles.

<sup>2</sup> CEC, California Public Utilities Commission, California Air Resource Board, *Achieving 100 Percent Clean Electricity in California: An Initial Assessment* (“SB 100 Joint Agency Report”), <https://efiling.energy.ca.gov/EFiling/GetFile.aspx?tn=237167&DocumentContentId=70349>

<sup>3</sup> Individual utilities may set goals to achieve 100% clean energy even faster than required by SB 100. For example, the Los Angeles Department of Water and Power is planning to achieve 100% clean energy by 2035.

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Southern California Public Power Authority  
1160 Nicole Court  
Glendora, CA 91740  
(626) 793-9364

SCPPA appreciates the joint agencies holding this workshop and offers the following recommendations for the joint agencies to consider as part of future SB 100 planning:

- **Facilitate efforts to streamline permitting and siting of transmission and generation resources.** As noted in the SB 100 Priority Actions Report, major infrastructure investments require long lead times, including intensive permitting and public review processes.<sup>4</sup> While timing may vary based on the specific project, some SCPPA Members estimate that building a new transmission line generally takes at least 10 years. The theme of long lead times was brought up several times at the February 22<sup>nd</sup> workshop. SCPPA encourages the joint agencies to explore ways to shorten these processes while still preserving the necessary environmental reviews, such as by facilitating increased coordination between the local, regional, state, and/or federal authorities having jurisdiction, and working with the relevant agencies to eliminate excessive regulatory barriers. SCPPA also encourages the joint agencies to begin outreach to other states in the region and federal agencies to facilitate the development of regional or interregional transmission that may be needed to import renewable resources.
- **Focus on “no regrets” transmission while prioritizing cost containment and equitable cost allocation in the CAISO balancing authority.** SCPPA agrees with panelists that achieving the state’s clean energy goals may require a more coordinated, proactive approach to transmission development. However, affordability and cost containment must also remain overarching principles, and decisions for near- and mid-term transmission needs should prioritize “no regrets” investments that are informed by utility resource plans.

SCPPA appreciates CAISO’s work on the draft 20-Year Transmission Outlook<sup>5</sup> (“Draft Outlook”), an important informational tool that models transmission needs and costs to integrate resources from the 2040 SB 100 starting point scenario. The starting point scenario, developed in support of this initiative, is a snapshot of one path for achieving the state’s clean energy policy based on the core SB 100 portfolio and a high electrification load projection, with the resource build mapped to specific locations. It is important to keep in mind, however, that the state’s resource portfolio in 20 years may look different based on technology development and state and/or local resource preferences, among other factors.

The Draft Outlook estimates that it could cost \$30.5 billion to integrate the offshore wind and out-of-state wind, as well as make necessary upgrades to the current CAISO transmission system, to support the

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<sup>4</sup> CEC, *Report to the Governor on Priority SB 100 Actions to Accelerate the Transition to Carbon-Free Energy* (“SB 100 Priority Actions Report”), September 2021, <https://www.energy.ca.gov/sites/default/files/2021-09/CEC-200-2021-008.pdf>.

<sup>5</sup> CAISO, *20-Year Transmission Outlook* (draft), January 2022, <http://www.caiso.com/InitiativeDocuments/Draft20-YearTransmissionOutlook.pdf>.

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Southern California Public Power Authority  
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resource build in the 2040 SB 100 starting point scenario.<sup>6</sup> SCPPA agrees with Tony Braun's comments during the February 22<sup>nd</sup> panel discussion that the significant costs estimated in the Draft Outlook are worthy of careful attention. Several of SCPPA's Members are located within the CAISO footprint. Rising fixed costs, including related to transmission, are already a primary driver of high electricity rates in California. The potential for significant additional costs underscores the need to prioritize cost containment and ensure the cost of transmission to connect specific resources is allocated equitably and commensurate with benefits.

The Draft Outlook also estimates that lead times of 8-10 years are "reasonable or even optimistic" for the kinds of transmission upgrades identified, suggesting the state will need to start making longer-term decisions relatively soon. While SCPPA agrees the lead time to develop transmission may necessitate some near- to mid-term decisions, the potential cost impact noted above also underscores the need to focus on transmission investments that are least regrets and could support multiple future scenarios.

- **Support federal assistance for major transmission investments.** SCPPA agrees with panelist comments that federal support for transmission investments could help mitigate cost impacts. Federal funding could play a key role to support needed transmission development throughout the state. SCPPA's Members also include the Imperial Irrigation District (IID) and Los Angeles Department of Water and Power (LADWP), which own and operate transmission within their own BA areas, and Glendale and Burbank are located within LADWP's BA. While CAISO's Draft Outlook does not analyze the transmission needs of these other BAs, more localized assessments considering the needs of IID, LADWP, Burbank, and Glendale recognize they also require several new transmission developments in order to achieve 100 percent clean energy and serve the increased load anticipated from building and transportation electrification.

SCPPA also agrees with Tony Braun's observation during the first panel that federal assistance could help lower barriers for other states and regions to participate in interregional projects where that may be needed (for example, out-of-state wind identified in the Draft Outlook).

- **Continue discussion of land use implications and transmission needs in SB 100 implementation proceeding.** SCPPA encourages the joint agencies to continue discussing these important topics as part of SB 100 implementation efforts, in addition to individual agency proceedings. For example, while the CPUC's Integrated Resource Planning modeling informs both the starting point scenario and draft transmission outlook, as noted at the workshop, transmission planning to support SB 100 implementation will affect not just CPUC-jurisdictional load-serving entities, but also POU's and other states/regions.

<sup>6</sup> The Draft Outlook does not include an estimate of impacts to the transmission access charge (TAC), but the Bay Area Municipal Transmission Group estimated in [comments](#) that that the transmission development contemplated in the draft outlook could increase the TAC from \$16.60/MWh up to \$47/MWh in 2036, a 190% increase.

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Thank you for the opportunity to provide feedback on the February 22<sup>nd</sup> workshop. SCPPA looks forward to continuing to work with the joint agencies on SB 100 implementation planning to help ensure the state can achieve the SB 100 clean energy policy while mitigating affordability impacts.

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