

DOCKETED

Docket Number:	21-SIT-01
Project Title:	21-SIT-01, SB100 Implementation Planning for SB100 Resource Build
TN #:	242251
Document Title:	American Clean Power - California Comments - on the Joint Agency Workshop to Plan for SB 100 Resource Build – Analysis of Land Use Implications
Description:	N/A
Filer:	System
Organization:	American Clean Power - California
Submitter Role:	Public
Submission Date:	3/10/2022 4:36:10 PM
Docketed Date:	3/10/2022

Comment Received From: American Clean Power - California
Submitted On: 3/10/2022
Docket Number: 21-SIT-01

**ACP â€™ California Comments on the Joint Agency Workshop to
Plan for SB 100 Resource Build â€™ Analysis of Land Use
Implications**

Additional submitted attachment is included below.



March 10, 2022

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

Submitted Electronically

Re: American Clean Power – California: Comments on the Joint Agency Workshop to Plan for Senate Bill 100 Resource Build – Analysis of Land Use Implications (21-SIT-01)

American Clean Power – California (“ACP-California”) provides the following comments for consideration by the California Energy Commission (“CEC”) on the Joint Agency Workshop to Plan for Senate Bill (“SB”) 100 Resource Build – Analysis of Land Use Implications (Doc. No. 21-SIT-01).

The American Clean Power Association (“ACP”) is the voice of companies from across the clean power sector that are providing cost-effective solutions to the climate crisis while creating jobs, spurring massive investment in the American economy, and driving high tech innovation across the United States. ACP’s mission is to transform the U.S. power grid to a low-cost, reliable, and renewable power system. ACP-California is a state project of ACP, representing companies who develop, own, and operate utility-scale solar, storage, land-based wind, offshore wind, and transmission assets to power a clean and renewable economy for California and the West. Our wind developers are focused on high-capacity factor regions like New Mexico and offshore. ACP-California is unanimous in its commitment to the need for – and widespread economic benefits derived from – a diverse and balanced portfolio in California to reliably and affordably meet State energy demands and environmental goals. Members of ACP-California strive to direct the economic and environmental benefits of utility-scale renewable energy to California, while remaining sensitive to land use concerns.

**Transmission is Critical for a Sustainable, Cost-Effective
Transition to 100% Clean Energy.**

In order to achieve the diverse portfolio of resources the State needs, both in terms of technologies and in terms of geography, California needs effective transmission infrastructure to reach and enable this diverse portfolio. This will also alleviate some of the land and ocean use impacts of our energy sector. Transmission can also provide access to the most cost-effective supply resources since transmission can provide access to a broader market of generation resources both within and outside of California.

Amongst the State’s energy agencies, and the California Independent System Operator (“CAISO”), there has been a growing acknowledgment of the need for immediate progress on transmission development over the last year. While much focus has been directed towards the 20-year outlook, and the State’s goals for 2045, addressing near-term bottlenecks will be a key factor in reaching those long-term objectives. Toward this end, ACP-California offers the following recommendations:

1. Continue to build out a robust public transmission planning process, incorporating input from a diverse array of stakeholders.

Over the past year, ACP-CA has worked with the CAISO and stakeholders to identify approximately 5 GW of clean energy and energy storage projects in the late stages of development which require interconnections and transmission upgrades in order to fill near-term and midterm capacity shortfalls. The Transmission Development Forum held in January 2022 was a positive first step in moving towards transparency around those projects, as well as creating a structure for accountability to ensure that transmission owners are moving forward in executing those projects, and others, to bring new capacity online. To maintain this momentum, transmission forums should be held quarterly over the next several years with a focus on creating additional oversight of key transmission projects that have been approved and which are precursors to delivering new clean capacity.

2. Commit resources and attention to creating greater oversight and accountability in the transmission sector.

California lacks a clear accountability or oversight structure for processing and completing needed transmission upgrades. Additional resources that could be explored include

State budget allocations, general funds, and greater commitments from transmission owners in recognition of the importance of those projects from a reliability perspective. When there are unforeseen and unavoidable delays in transmission projects, these delays should be communicated as early as possible to affected developers. The state should take a more involved role in ensuring that potential delays are identified, remedied and monitored throughout the development process (i.e., immediately after approval of a project by the CAISO).

3. Proactive, coordinated transmission planning for longer lead time resources.

In order to proceed with these planning efforts effectively, the inputs to the busbar mapping system, as well as the general assumptions around transmission, must be refreshed at the beginning of the next Integrated Resource Planning (“IRP”) cycle. Getting locked into limiting assumptions could lead the State to a far less diverse portfolio than is needed in the long term. Focusing on creatively rethinking through these planning assumptions now will help connect the State’s near-term objectives with the longer term, “no-regrets” transmission and generation projects.

As the energy agencies refine the data sets informing the busbar mapping, it is critical that the state not overly-rely on existing interconnection queue data to the exclusion of new or developing resource zones outside of the CAISO. For example, the CAISO interconnection queue will not represent commercial interest in regional wind resources imported into California from the inner-mountain west. The same is true for offshore wind resources. Offshore wind interconnection requests filed to date do not represent the full potential of offshore wind resource areas in the north and central coast regions. It is critical that the SB 100 mapping process fairly represents all resource zones.

Finally, ACP-California appreciates and supports the portfolio or “zonal” approach to the 20-year outlook, which considers upgrades within the CAISO footprint, as well as expansions to out-of-state renewable resource areas and offshore wind transmission to harness California’s powerful offshore wind resource potential. However, consideration for the longer-term outlook as part of the IRP process is also crucial. There must be a strong and regular connection between the IRP process and individual Load Serving Entities’ IRP plan development and the longer-term objectives of SB 100. Otherwise, the State runs the risk of falling short of greenhouse gas and

reliability targets in the longer term. New procurement and development will need to occur at scale, and to facilitate this development, proactive long-range transmission planning must occur now.

Conclusion

ACP-California appreciates this opportunity to provide these comments on the Joint Agency Workshop to Plan for Senate Bill 100 Resource Build – Analysis of Land Use Implications. ACP-California encourages the CEC to continue and expand its efforts to address the transmission needs necessary for California to achieve the diverse, reliable, clean energy portfolio the State is moving towards.

Sincerely,

/s/

Brian S. Biering
Ellison Schneider Harris & Donlan, LLP
2600 Capitol Avenue, Suite 400
Sacramento, CA 95816
(916) 447 - 2166
bsb@eslawfirm.com

Attorneys for American Clean Power – California