

DOCKETED	
Docket Number:	21-ESR-01
Project Title:	Energy System Reliability
TN #:	248648
Document Title:	PG&E Comments on SB 846 Reliability Assessment and CERIP
Description:	N/A
Filer:	System
Organization:	PG&E
Submitter Role:	Public
Submission Date:	2/2/2023 3:10:01 PM
Docketed Date:	2/2/2023

*Comment Received From: PG&E
Submitted On: 2/2/2023
Docket Number: 21-ESR-01*

PG&E Comments on SB 846 Reliability Assessment and CERIP

Additional submitted attachment is included below.



Licha Lopez
CEC Liaison
State Agency Relations

1415 L Street, Suite 280
Sacramento, CA 95814
(202) 903 4533
Elizabeth.LopezGonzalez@pge.com

February 2, 2023

California Energy Commission
Vice Chair Siva Gunda
Deputy Director David Erne
Energy Assessment Division, Energy System Reliability
Docket Number 21-ESR-01
517 P Street
Sacramento, CA 95814

Re: Pacific Gas and Electric Company's Comments on the Lead Commissioner's Workshop on Senate Bill 846 Reliability Assessment and Clean Energy Reliability Investment Plan (Docket Number 21-ESR-01)

Dear Vice Chair Gunda and Deputy Director Erne,

Pacific Gas and Electric Company (PG&E) continues to appreciate the important work undertaken by the California Energy Commission (CEC), the California Public Utilities Commission (CPUC), the California Independent System Operator (CAISO), and other key stakeholders to determine how best to ensure that California's electric grid is able to meet its climate, reliability, and affordability goals. Central to this effort is the evaluation of the continuing role of existing generation resources, including Diablo Canyon Power Plant (DCPP). This discussion is in conjunction with a myriad of statewide efforts to shape investments in a manner that facilitates climate goals and emphasizes reliability and affordability.

PG&E supports the CEC's efforts to conduct a mid-term (2026-2030) reliability analysis in accordance with the requirements in Senate Bill 846 and appreciates the CEC providing an overview of the proposed funding priorities for year one of the Clean Energy Reliability Investment Plan (CERIP).

While PG&E does not have specific comments at this time on the CEC's hourly capacity stacking methodology of the joint agency reliability analysis, it appears to be consistent with previous findings on grid reliability conditions and the CPUC's recently issued proposed decision to bring online additional 4,000 megawatts of procurement before 2030. Crucially, PG&E notes the far-reaching consequences of the assessment in question. The extension of DCPP— and the efforts

to replace its capacity and energy— are and will continue to be challenging undertakings. Concluding that the extension of DCPD operations is prudent highlights two primary aspects: California’s grid continues to face significant reliability risks as the State transitions to a decarbonized grid, and DCPD’s status as a firm, non-seasonal, and clean energy resource provides immense benefit to California.

Lastly, PG&E looks forward to further discussions of how best to allocate CERIP funding and is eager to learn more about the proposed CERIP budget. In particular, PG&E emphasizes the role of transmission planning and assessment to support the significant growth of new clean energy generating resources coming online and looks forward to collaborating with key stakeholders to ensure that CERIP appropriately supports transmission planning work.

PG&E appreciates the opportunity to comment on the CEC’s workshop on Senate Bill 846 reliability assessment and CERIP, and looks forward to working with the CEC, other state agencies, and stakeholders on ongoing and upcoming efforts to extend DCPD and support California’s electrical grid. Please reach out to me with any questions.

Sincerely,

Licha Lopez