

DOCKETED

Docket Number:	21-SIT-01
Project Title:	21-SIT-01, SB100 Implementation Planning for SB100 Resource Build
TN #:	249520
Document Title:	Golden State Clean Energy Comments - COMMENT OF GOLDEN STATE CLEAN ENERGY, LLC, ON WORKSHOP ON LAND USE SCREENS
Description:	N/A
Filer:	System
Organization:	Golden State Clean Energy
Submitter Role:	Public
Submission Date:	3/30/2023 4:50:08 PM
Docketed Date:	3/30/2023

*Comment Received From: Golden State Clean Energy
Submitted On: 3/30/2023
Docket Number: 21-SIT-01*

**COMMENT OF GOLDEN STATE CLEAN ENERGY, LLC, ON
WORKSHOP ON LAND USE SCREENS**

Additional submitted attachment is included below.

**BEFORE THE ENERGY COMMISSION
OF THE STATE OF CALIFORNIA**

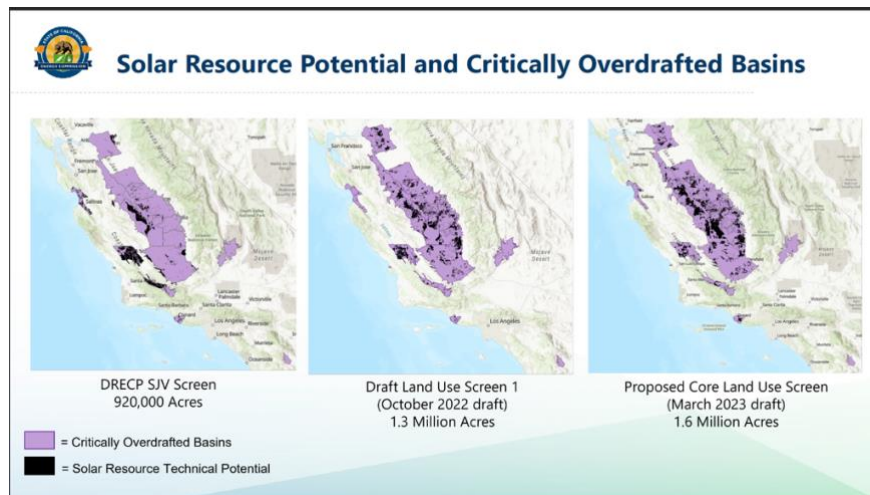
*SB 100 Implementation: Planning for
SB 100 Resource Build.*

21-SIT-01
(May 21, 2021)

**COMMENT OF GOLDEN STATE CLEAN ENERGY, LLC, ON
WORKSHOP ON LAND USE SCREENS**

Golden State Clean Energy (“GSCE”) appreciates the opportunity to submit this comment on the workshop held on March 13, 2023, to provide an update on revisions to the land use screens used for statewide electric system planning. We want to take the opportunity to acknowledge the effort of staff at the Energy Commission, as well as those at the Public Utilities Commission who collaborated with the Energy Commission on this workshop. Given the impact of these land use screens on multiple planning efforts across different policy venues, a collaborative effort is crucial to this tool laying a foundation for further resource planning.

GSCE agrees with the final results for solar presented at the workshop. The results show that the amount of land in Southern PG&E that meets the screening criteria has the capacity potential to meet the state’s solar needs singlehandedly. GSCE believes the results reflect the current state of commercial development and the opportunity for future development. We have advocated for years for the need to unlock solar development in the Central and San Joaquin Valley given their great potential and numerous energy and non-energy benefits, as well as their ability to create state policy synergy. We appreciate the Energy Commission highlighting that much more solar potential is appearing on critically overdrafted basins in the most recent round of screens compared to previous screens.¹



¹ Proposed Updates to Land-Use Screens for Statewide Renewable Resource Potential, slide 16 (CEC presentation at PDF pg. 23), March 13, 2023.

The updated land use screens are a crucial first step to unlocking the immense potential for solar development in this region and taking advantage of the many benefits the region has to offer. The next step to unlocking solar development in the San Joaquin Valley will be to ensure that the many policies expressed in the land use screens are carried through the busbar mapping process and into final resource portfolios. The CPUC presented a reasonable approach to help ensure this, where it not only considers land use screens on the front end (in RESOLVE) but also on the back end (in busbar mapping) to affirm the more granular allocation still respects land use considerations. This back-end consideration should be a binding constraint to ensure that land use policies being expressed in the land use screens are driving siting decisions for state planning purposes and not being undone by either manual changes or through RESOLVE modeling.

Ensuring the land use policies expressed via land use screens are carried through the busbar mapping process and reflected in final resource portfolios is also critical for properly planning new transmission assets that will ultimately guide future generator interconnection. Of course, RESOLVE selects candidate resources by transmission area, and the model solves for a number of requirements such as minimizing cost. But as we shift toward a stage of state planning where we see needed development out-pacing existing or planned infrastructure, what it means to minimize cost needs to be reexamined. CAISO's 20-Year Transmission Outlook provides a view of many major transmission assets that will likely be required in the near future to meet state policy goals, so while investments in more modest or existing upgrades may have a reduced cost year-to-year, in the end this approach does not move us towards the grid needed to attain state policy goals. RESOLVE must support CAISO in proactively planning for major new transmission assets and drive the interconnection of clean energy resources into areas that align with the land use screens.

Ultimately, land use screens need to have a stronger impact on the final resource portfolios. The land use screens targeting development in least regrets resource zones helps California proactively avoid environmental and land use obstacles to development, and concentrated areas of land that meet these screens indicate least regrets areas to direct future resources because of the increased optionality for development opportunities and cost savings to ratepayers. Not only does Southern PG&E have a lot of total acres that meet the screens, but it also appears to have the most concentrated resource potential of any resource area. This provides a least regrets opportunity to plan for new resources in this area and drive transmission expansion because the increased likelihood that enough projects can be successfully and quickly developed in this area. Concentration of land that meets the screening criteria should be an influential metric in future resource mapping.

Core Land Use Screen – layers

During the workshop, it was stated that a specific study was used to inform the previous technical potential for solar in the San Joaquin Valley. Energy Commission staff said that the March 2023 proposal is to remove that study constraint and not consider the study in its update. This update leads to a lot more land being available in the San Joaquin Valley, although there is

significant overlap with the land that was previously included and what is being proposed to be included.

GSCE supports Energy Commission's proposal to not constrain available land in the San Joaquin Valley to the cited study, but it is not clear to us why the study is not continuing to be used to add to the available land in the San Joaquin Valley. To the extent there are not specific issues with parcels that were previously deemed available for solar development under this study and in land use screens, this available land should continue to be included in land use screens in addition to new lands that are being shown to have technical potential in the San Joaquin Valley.

Core Land Use Screen – application

GSCE supports the goal to finalize the land use screens in the coming months so that the updated information can feed into the next IRP cycle and be part of the inputs and assumptions update that will kick off this IRP cycle. With the portfolio capacity increases now being observed, it is crucial that the next IRP have more up-to-date land use assumptions informing future transmission needs. We appreciate that the timeline laid out by Energy Commission will make this possible.

Furthermore, completing the update to the land use screens soon could also help guide CAISO in its plan to implement queue reform in the 2023 Interconnection Process Enhancements initiative. CAISO's proposal to apply zonal limits on future interconnection requests could benefit from recently updated land use screens.

Similar to the importance of updating land use screens for the IRP, with another SB 100 report process about to begin, that resource planning effort will also need to have updated land use assumptions. We support the Energy Commission's planned pivot toward preparing these land use screens for use in the SB 100 report process.

However, there is another long-term planning effort that will take place ahead of the SB 100 report, which is CAISO's update to the 20-Year Transmission Outlook. While we do not yet have many details on its plan for this update, CAISO has said it will conduct the update in parallel with the 2023-24 Transmission Planning Process. Given the 20-Year Outlook update process has yet to begin, it seems like preparing the land use screens for the IRP generally aligns with also having these updated assumptions ready to possibly inform the 20-Year Outlook. We urge the Energy Commission to work with CAISO in advance of its 20-Year Outlook to see how the updated land use screens may be able to inform the 20-Year Outlook. If this opportunity is missed, it is unclear when CAISO will next conduct a 20-Year Outlook, but it is plausible that it would not occur until around the time the next SB 100 report is complete, which would represent a long period where the state's most forward-looking planning efforts have outdated assumptions.

SB 100 Climate Study Screen

GSCE supports creating additional land use screens to conduct sensitivity studies to test land use scenarios. The proposed SB 100 Climate Study Screen is a reasonable secondary screen, especially for use in the SB 100 report process. Moving forward, we hope the Energy Commission and CPUC can work together to consider how to adopt a land use screen such as the SB 100 Climate Study Screen as a sensitivity portfolio the CPUC transmits to CAISO in the TPP. This type of sensitivity analysis will further expose least regrets transmission and better prepare the grid and its long development lead-time for a range of climate and policy uncertainties.

Conclusion

GSCE applauds the efforts of the Energy Commission and CPUC to refine the land use screens and busbar mapping efforts and to collaborate on this process to ensure they are working together to respect state land use policy. Capturing land use policy upfront in studies will help avoid development challenges that pose a risk to timely reaching state policy goals. We look forward to the final results of the land use screens and further updates in the context of the IRP.

Dated: March 30, 2023

Respectfully submitted,

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