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on Land Use Screens

Additional submitted attachment is included below.

March 30th, 2023

California Energy Commission
Docket Unit, MS-4
Docket No. 21-SIT-01

Delivered via email to: docket@energy.ca.gov

RE: Docket No. 21-SIT-01 — SB100 Implementation Planning for SB 100 Resource Build Comments on CEC Workshop on Land Use Screens

On behalf of the Nature Conservancy of California, thank you for the opportunity to comment on the proposed Land-Use Screens for Electric System Planning modifications represented in the Draft Staff Report. TNC supports the California Energy Commission's (CEC) efforts, along with the California Independent Service Operator (ISO) and the California Public Utilities Commission (CPUC) to "enhance coordination of resource planning and transmission planning to achieve state reliability and policy needs," as outlined in the December 2022 Memorandum of Understanding. Through assessment of technical renewable resource potential that accounts for the needs of California's communities, biodiversity, and climate resilience, the CEC Land Use Screens for Electric System Planning and its influence into Integrated Resource Planning and SB 100 modeling, supports this enhanced coordination and acceleration to meeting SB 100 in an affordable and timely way. TNC commends the CEC Commissioners and staff for this effort, including for managing an engaging, informative, and focused process.

What geospatial data could be used in the determination of available land area for substation-level capacity additions for transmission planning?

TNC response: TNC acknowledges the complex challenge of accounting for many perspectives and needs in a multi-stakeholder process, and encourages the CEC to continue with plans to include geospatial information reflecting critical habitat and future climate resilience. As Californians have learned with recent fires impacting transmission grids, our energy infrastructure and reliability are very much dependent on climate resilient decision-making. TNC also appreciates the CEC's exploration of geospatial data on distributed energy resources

presented during the last Commissioner Workshop. TNC encourages continued study and inclusion of data on energy capacity on disturbed sites to ensure that policymakers and stakeholders identify and do not exceed the appropriate amount of industrial-scale development needed. TNC acknowledges that this may require broadening the scope of land use screening to consider all scales of renewable energy development. Overall, TNC supports the modifications proposed by the CEC to the draft Land Use Screens.

Should the geospatial areas identified in the Core Land Use Screen be used in busbar mapping? Should additional datasets be considered given that busbar mapping occurs at a finer scale resolution than the statewide Land Use Screens for resource potential?

TNC response: TNC concurs with other stakeholders and the CEC's current direction on this topic that busbar mapping should be directly informed by land use planning, and that it is critical to consider the level of impact for available land near a substation. Additionally:

- Reflecting TNC's comment above, spatial data currently being used for statewide natural climate solutions and 30x30 target-setting may prove a helpful input.[1] Busbar mapping should avoid development on these lands.
- Reflecting TNC's comments above, spatially explicit information on distributed energy resources should also be included.
- Farmland more likely to be fallowed due to the Sustainable Groundwater Management Act (SGMA) should be explored further with stakeholders as part of busbar mapping. Recent work by the Public Policy Institute of California (PPIC) with stakeholders may provide a helpful starting place.[2]

TNC also supports the inclusion of the following resources suggested by other stakeholders: ACE Terrestrial Climate Resilience, Audubon Important Bird Areas, California Native Plant Society Important Plant Areas, and CPUC High Fire Threat maps.

Additional comments on considerations for busbar mapping

TNC appreciates the basin-level analysis that CEC staff presented on resource potential in the San Joaquin Valley during the most recent Commissioner Workshop. TNC concurs with the

[1] https://resources.ca.gov/-/media/CNRA-Website/Files/Initiatives/Expanding-Nature-Based-Solutions/CNRA-Report-2022---Final_Accessible.pdf, https://resources.ca.gov/-/media/CNRA-Website/Files/Initiatives/30-by-30/Final_Pathwaysto30x30_042022_508.pdf, https://experience.arcgis.com/experience/23d722cab25c482593645019057fa0e0/, and https://www.gov.ca.gov/2020/10/07/governor-newsom-launches-innovative-strategies-to-use-california-land-to-fight-climate-change-conserve-biodiversity-and-boost-climate-resilience/

[2] https://www.ppic.org/water/san-joaquin-valley/

CEC's assessment of potential to develop solar power and provide economic value on agricultural lands in the San Joaquin Valley, where production levels are at risk of decline due to groundwater constraints. TNC performed a similar analysis to the approach utilized in busbar mapping–a spatial analysis to identify the intersection of low-impact solar resource potential (Wu et al 2021) with potential retirable farmland (Bryant et al 2021) in the San Joaquin Valley study area. The focus of TNC's analysis was on the substations identified in the CAISO transmission capability whitepaper,[3] which provides an overview of available transmission capacity on the existing system and additional capacity that could be accommodated with upgrades. The observations presented here are based on preliminary findings that TNC will continue to refine and validate with key stakeholders.

The preliminary findings of TNC's analysis indicate that there is potential to develop solar on agricultural land at risk, while avoiding impacts to areas of conservation and habitat importance. TNC found that for the majority of substations identified in the whitepaper, commercial interest exceeds the solar potential on retirable farmland, but does not exceed current and planned transmission capacity. This is good news; it appears that industry trends already favor the policy-preferred outcome: the opportunity for increased clean energy deployment on previously disturbed land, where economic benefits of solar development may help mitigate the risk of declining agricultural production due to groundwater constraints, all while avoiding impacts to high-conservation value areas. TNC recommends that the CEC closely evaluate the transmission constraints and potential transmission upgrade information for the Southern PG&E area to support continued planning focused in this area.

Thank you for your consideration of TNC's comments. We look forward to continuing to support the CEC's work on Land Use Screens and busbar mapping and the integration of the CEC, CPUC, and CAISO's shared efforts and responsibilities to meet California's decarbonization and reliability goals.

Sincerely,
Marybeth Benton
Energy Project Director

About the Nature Conservancy: *The Nature Conservancy (TNC) is a science-based organization working throughout the world and in California to advance a clean energy future, support thriving economies, protect communities against climate impacts, and preserve critical biodiversity. TNC actively supports California's efforts through SB 100 to achieve 100% renewable and zero-carbon energy by 2045 and develops research and spatial planning resources to equip communities and policymakers with key information to identify least conflict areas for development of clean energy resources.*

[3] https://www.caiso.com/Documents/RevisedWhitePaper-2021TransmissionCapabilityEstimates-CPUCResourcePlanningProcess.pdf