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**COMMENTS ON THE JUNE 23, 2023 REMOTE-ACCESS  
WORKSHOP TO DISCUSS RESOURCE PORTFOLIO ASSUMPTIONS  
FOR USE BY THE CALIFORNIA INDEPEN**

*Additional submitted attachment is included below.*

**STATE OF CALIFORNIA  
CALIFORNIA ENERGY COMMISSION**

*IN THE MATTER OF:*

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

Docket No. 21-SIT-01

RE: Resource Portfolio for the next CAISO  
20-Year Transmission Outlook

**CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S COMMENTS ON THE JUNE  
23, 2023 REMOTE-ACCESS WORKSHOP TO DISCUSS RESOURCE PORTFOLIO  
ASSUMPTIONS FOR USE BY THE CALIFORNIA INDEPENDENT SYSTEM  
OPERATOR IN THE NEXT 20-YEAR TRANSMISSION OUTLOOK**

Evelyn Kahl,  
General Counsel and Director of Policy  
Eric Little,  
Director of Regulatory Affairs  
Lauren Carr  
Senior Market Policy Analyst

CALIFORNIA COMMUNITY CHOICE  
ASSOCIATION  
One Concord Center  
2300 Clayton Road, Suite 1150  
Concord, CA 94520  
(510) 980-9459  
[regulatory@cal-cca.org](mailto:regulatory@cal-cca.org)

July 7, 2023

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ASSUMPTIONS FOR USE BY THE CALIFORNIA INDEPENDENT SYSTEM  
OPERATOR IN THE NEXT 20-YEAR TRANSMISSION OUTLOOK**

The California Community Choice Association<sup>1</sup> (CalCCA) submits these Comments pursuant to the *Notice of Extension of Public Comment Period*, dated June 27, 2023, extending the comment period on the Joint Agency Staff Workshop on Resource Portfolio Assumptions for the Next CAISO 20-Year Transmission Outlook, held on June 23, 2023, from June 30, 2023, to July 7, 2023.

**I. INTRODUCTION**

CalCCA applauds the California Energy Commission (CEC), California Independent System Operator (CAISO), and California Public Utilities Commission’s (CPUC) presentations on the development of the next 20-year transmission outlook. Identifying and developing new

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<sup>1</sup> California Community Choice Association represents the interests of 24 community choice electricity providers in California: Apple Valley Choice Energy, Central Coast Community Energy, Clean Energy Alliance, Clean Power Alliance, CleanPowerSF, Desert Community Energy, East Bay Community Energy, Energy For Palmdale’s Independent Choice, Lancaster Energy, Marin Clean Energy, Orange County Power Authority, Peninsula Clean Energy, Pico Rivera Innovative Municipal Energy, Pioneer Community Energy, Pomona Choice Energy, Rancho Mirage Energy Authority, Redwood Coast Energy Authority, San Diego Community Power, San Jacinto Power, San José Clean Energy, Santa Barbara Clean Energy, Silicon Valley Clean Energy, Sonoma Clean Power, and Valley Clean Energy.

transmission will be critical in ensuring the state is prepared to meet Senate Bill (SB) 100<sup>2</sup> goals that require renewable energy and zero-carbon resources to supply 100 percent of electric retail sales to end-use customers by 2045. CalCCA supports the joint agencies' efforts in updating the 20-year transmission outlook as part of the 2023-2024 Transmission Planning Process (TPP) cycle, and offers the following comments to the Workshop:

- CalCCA supports prioritizing the study of gas retirements that may require transmission development to reduce local area constraints;
- The CPUC should clarify its stand-alone and co-located storage assumptions given local area needs; and
- The CEC should clarify how it defines land use mapping categories.

## **II. CALCCA SUPPORTS PRIORITIZING THE STUDY OF GAS RETIREMENTS THAT MAY REQUIRE TRANSMISSION DEVELOPMENT TO REDUCE LOCAL AREA CONSTRAINTS**

The CAISO and CPUC's presentations indicate that the agencies will evaluate the transmission needed to support local area gas retirements in the 20-year transmission outlook process.<sup>3</sup> CalCCA strongly supports this effort. Local reliability needs are responsible for the retention of some of the most polluting generation in the state. Much of the gas fleet is located in transmission-constrained local areas - the 20-year transmission outlook resource portfolios will assume roughly 72 percent of the retiring gas will come from local areas<sup>4</sup> - and many of the local areas require *all* the resources in the local area in order to maintain reliability. Addressing local reliability needs to enable retirement of these resources is a complex problem requiring coordination between the agencies to ensure the most cost-effective and efficient solution.

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<sup>2</sup> Senate Bill 100 Budget Acts of 2021 and 2022:  
[https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill\\_id=202320240SB100](https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202320240SB100).

<sup>3</sup> CAISO Presentation at 15; and CPUC Presentation at 41 and 43.

<sup>4</sup> CPUC Presentation at 41.

The ability to retire fossil fuel resources in local areas will depend on some combination of (1) eliminating transmission constraints that limit the number of resources capable of serving load in the local area, and (2) bringing online enough effective carbon-free resources inside of the local area to replace the existing fossil fuel resources. When evaluating what combination of these options to pursue for each local area, the agencies should study the cost alternatives of transmission to eliminate local constraints and resources to meet local Resource Adequacy requirements with resources within the local area. The agencies should also determine which solutions are feasible given existing land use. This coordination is key to determine the cost-effectiveness and feasibility of transmission or resource alternatives. Without robust upfront planning focused specifically on how to reliably phase out local carbon-emitting resources, California risks jeopardizing the fast-approaching SB 100 target of zero-carbon resources supplying 100 percent of electric retail sales to end-use customers by 2045.

### **III. THE CPUC SHOULD CLARIFY ITS STAND-ALONE AND CO-LOCATED STORAGE ASSUMPTIONS GIVEN LOCAL AREA NEEDS**

The CPUC indicates that it will assume 9,100 megawatts (MW) of stand-alone storage and 39,701 MW of co-located storage in the final portfolio for 2045.<sup>5</sup> The CPUC should clarify how it develops these assumptions and how they interact with local area needs. As described in Section II, maintaining local area reliability with significant gas retirements will require evaluating each local area for the combination of new transmission into local areas and new resources within local areas that is most cost-effective and feasible given existing land use. Given local areas are developed around load centers, it is unlikely utility-scale storage that is co-located with solar will be able to locate in local areas. Therefore, storage within local areas will likely need to be stand-alone and will require transmission to charge from renewables outside of

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<sup>5</sup> *Id.* at 43-44.

the local area. The CPUC should clarify if the 9,100 MW of stand-alone storage is anticipated to be in a local area. If the stand-alone storage is in local areas, the CPUC should clarify if the stand-alone storage would require transmission upgrades to charge or if it could be charged using the existing transmission system.

#### **IV. THE CEC SHOULD CLARIFY HOW IT DEFINES LAND USE MAPPING CATEGORIES**

CalCCA supports the 20-year transmission outlook's consideration of key environmental and land use impacts provided by the CEC. By incorporating these considerations into transmission planning, the CAISO, CPUC, and CEC can help steer transmission development projects to less-sensitive areas and avoid potentially serious delays or cancellations of transmission projects needed to integrate future resource procurement. As the CEC updates the land use screens for the next 20-year transmission outlook, the CEC should clarify how it defines each category of the screen (including Base Exclusions, Biological Priorities, High Cropland, High Intactness, and Core Resource Potential)<sup>6</sup> and the extent to which there is any overlap among the Core Resource Potential areas and any of the other areas.

#### **V. CONCLUSION**

CalCCA looks forward to further collaboration on this topic.

Respectfully submitted,



Evelyn Kahl  
General Counsel and Director of Policy  
CALIFORNIA COMMUNITY CHOICE  
ASSOCIATION

July 7, 2023

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<sup>6</sup> *Id.* at 38-39.