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Comments of the Union of Concerned Scientists on the SB 100 Kickoff Workshop

Additional submitted attachment is included below.

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September 08, 2023

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Docket 23-SB-100
Submitted via electronic comment system

RE: Comments of the Union of Concerned Scientists on the SB 100 Kickoff Workshop

The Union of Concerned Scientists ("UCS") appreciates the opportunity to submit these comments on the SB 100 Kickoff Workshop, conducted on August 22, 2023.

UCS thanks the California Energy Commission ("CEC"), California Public Utilities Commission ("CPUC"), and California Air Resources Board ("CARB") for their leadership in crafting the SB 100 Joint Agency Report, and for all the hard work that has gone into the creation of the report vision presented at the August workshop.

In these comments, UCS offers four pieces of feedback, which are summarized below:

1. UCS supports the continued inclusion of a Combustion Retirement scenario. To the extent that gas plants can be retired in all pathways, UCS supports the prioritization of gas plant retirements in disadvantaged communities. Additionally, the models should assume that the three once-through-cooling plants that were recently extended at the State Water Resources Control Board meeting on August 15 will be retired by the 2026 deadline with no possibility of extension.
2. UCS supports the inclusion of non-energy benefits/impacts and social costs in the evaluation of the SB 100 pathways. As part of the process, UCS believes an additional workshop focused on these variables will be helpful. Further discussions with experts in these fields will be important for understanding how these issues should be evaluated in the SB 100 pathways.
3. UCS recommends a larger emphasis on equity and community engagement when considering land use impacts. As part of this, UCS supports the tribal report process recommendations, including ongoing consultation and regular in-person meetings.
4. UCS supports the inclusion of probabilistic reliability modeling in the SB 100 planning process.

First, UCS believes that all SB 100 pathways should prioritize the retirement of gas plants in disadvantaged communities to the extent that gas plants can be retired. With half of California's gas power plants located in the 25 percent of communities that are most

disadvantaged,[1] retiring these plants and reducing their air pollution emissions is an important part of achieving California's environmental justice and air pollution emissions reduction goals.

Importantly, all models should assume that the three once-through-cooling plants (Ormond Beach, AES Alamitos and AES Huntington Beach power plants) that were recently extended will be retired by 2026 with no possibility of extension. The continued extension of these plants has had major negative impacts on the surrounding communities with community members overwhelmingly calling for their retirement. Evaluating and articulating an explicit retirement plan by the 2026 deadline is an important step to address community concerns and meet statewide clean energy and environmental justice goals.

Second, UCS supports the inclusion of non-energy benefits/impacts and social costs in the assessment of the SB100 pathways and recommends holding an additional workshop focused on these issues. Given that these factors are a new variable in the evaluation of tradeoffs between pathways, UCS believes it is necessary to have a space that brings in subject matter experts, such as water quality and public health professionals, to better understand how these issues may be evaluated in the context of the SB 100 pathways.

A workshop would additionally help clarify the scope of these issues and potential ways to quantify them for comparison. For example, "economics" could imply many different issues related to labor, utility bills, or economic growth. Similarly, resiliency could use further discussion on best methods for measuring grid resilience.

Correctly analyzing non-energy benefits/impacts and social costs could additionally support intersecting issues in the state, such as crop land repurposing for smaller scale solar[2] and electric vehicles supporting the grid[3][4].

Third, UCS believes that there should be a larger emphasis on equity and community engagement when considering land use impacts. The SB 100 report should consider any implications to energy equity that might occur from resource portfolios and where these resources will be built. Community preferences for land use should help inform land use screens.

A good example of stronger community engagement are the tribal listening sessions that occurred during the SB 100 report scoping. UCS supports the tribal process recommendations for meaningful and ongoing consultation with tribes, as well as regional in-person meetings. The SB 100 process should establish an inclusive partnership with tribes so

[1] PSE Healthy Energy, *Natural gas power plants in California's disadvantaged communities* (April 2017), p. 1. Available at: https://www.psehealthyenergy.org/wp-content/uploads/2017/04/CA.EJ_.Gas_.Plants.pdf
[2] UCS, *Can California Cropland be Repurposed for Community Solar?* (August 08, 2023). Available at https://blog.ucsusa.org/vivian-yang/can-california-cropland-be-repurposed-for-community-solar/
[3] UCS, EVs Can Support Power Grid Reliability and Reduce Costs. Here's How. (August 16, 2023). Available at https://blog.ucsusa.org/mark-specht/evs-can-support-power-grid-reliability-and-reduce-costs-heres-how/
[4] UCS, *California Has a Chance to Ensure EVs get Even Better with Bidirectional Charging* (August 16, 2023). Available at https://blog.ucsusa.org/samantha-houston/california-has-a-chance-to-ensure-evs-get-even-better-with-bidirectional-charging/

that cultural resources and areas of cultural significance are properly modeled and evaluated in the pathways.

Fourth, in the previous cycle of SB 100 planning, UCS strongly supported the inclusion of probabilistic reliability modeling,[5] and UCS thanks the joint agencies for incorporating this type of modeling into this cycle of the SB 100 planning process. Probabilistic reliability modeling will help ensure that all pathway portfolios meet system reliability standards, and it will also help ensure that pathway portfolios do not retain existing gas plant capacity that is not strictly necessary to meet reliability standards.

UCS looks forward to further participation in SB 100 implementation, and we thank the CEC, CPUC, and CARB for their consideration of these comments.

Sincerely,

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[5] UCS, *Comments of the Union of Concerned Scientists on the SB 100 Draft Results Workshop* (September 15, 2020), p. 3. Available at: https://efiling.energy.ca.gov/GetDocument.aspx?tn=234777&DocumentContentId=67627