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Comment Received From: Fariya Ali
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PG&E Comments on DCPP Cost Comparison Report

Additional submitted attachment is included below.



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October 9, 2023

California Energy Commission
Energy System Reliability
Docket No. 21-ESR-01
715 P Street
Sacramento, CA 95814

RE: Pacific Gas and Electric Company's Comments on Draft Senate Bill 846 Diablo Canyon Power Plant Extension Cost Comparison (Docket No. 21-ESR-01)

Pacific Gas and Electric Company (PG&E) thanks the California Energy Commission (CEC) for its draft staff report on the Diablo Canyon Power Plant Extension Cost Comparison (Staff Report) and appreciates the opportunity to submit these comments on the Staff Report. PG&E recognizes the ongoing efforts of the CEC to fulfill its requirements under Senate Bill 846 to facilitate a final decision by the California Public Utilities Commission establishing new retirement dates for the Diablo Canyon Power Plant (DCPP) by December 31, 2023, that best serve the needs of California's rapidly evolving energy landscape and meet its system reliability and decarbonization goals.

In its assessment, the CEC developed and presented three alternative portfolios of feasible resources, which seek to ascertain whether any demand-side or supply-side resources, subject to certain CEC criteria, can be brought online prior to 2024 and 2025 to meet either an equivalent energy or capacity output as that of DCPP. Based on the CEC's assessment, the Staff Report concludes that no suitable supply-side resources can be brought online as alternatives to DCPP's energy and capacity output prior to its planned retirement dates in 2024 (Unit 1) and 2025 (Unit 2).¹ The Staff Report also concludes that approximately 500 megawatts of "realized" capacity from demand response could be online by 2025, "which is insufficient to replace the reliability contributions of DCPP,"² which is 2.2 gigawatts of capacity during the net peak load window.

PG&E finds the CEC's conclusions to be reasonable. That is, California does not have sufficient resources adequate to substitute for DCPP and will not be able to maintain the same level of reliability or progress towards its decarbonization goals without extended operations at DCPP. PG&E appreciates the opportunity to comment on the Staff Report.

Sincerely,

Jennifer Privett
State Agency Relations

¹ Erne, David and Chie Hong Yee Yang. September 2023. *Draft SB 846 Diablo Canyon Power Plant Extension Cost Comparison*. California Energy Commission. Publication Number: CEC-200-2023-013-SD, p. 2.

² *Ibid.*, p. 23.