

<b>DOCKETED</b>	
<b>Docket Number:</b>	23-SB-100
<b>Project Title:</b>	SB 100 Joint Agency Report
<b>TN #:</b>	253101
<b>Document Title:</b>	Coalition for the Optimization of Renewable Development's Comments on SB100 Analytical Framework Workshop
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Coalition for the Optimization of Renewable Development (CORD)
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	11/14/2023 11:41:59 AM
<b>Docketed Date:</b>	11/14/2023

*Comment Received From: Coalition for the Optimization of Renewable Development (CORD)*

*Submitted On: 11/14/2023*

*Docket Number: 23-SB-100*

## **CORD Comments on SB100 Analytical Framework Workshop**

*Additional submitted attachment is included below.*

November 14, 2023

California Energy Commission  
715 P Street  
Sacramento, CA 95814

RE: Docket #: 23-SB-100: SB 100 Joint Agency Report

Commission Staff:

The Coalition for the Optimization of Renewable Development (C.O.R.D.) is a nonpartisan coalition of renewable energy developers, energy and transmission companies dedicated to advancing renewable energy development in the West with particular focus on solar, wind and geothermal development in the Southern Nevada region of the California Independent System Operator's (CAISO) grid.

The Southern Nevada region of CAISO is an area of high commercial interest for renewable development that is well-suited to provide timely, low-cost, reliable, renewable energy and capacity to California in order to help meet its green house gas (GHG) reduction and renewable portfolio standard (RPS) goals.

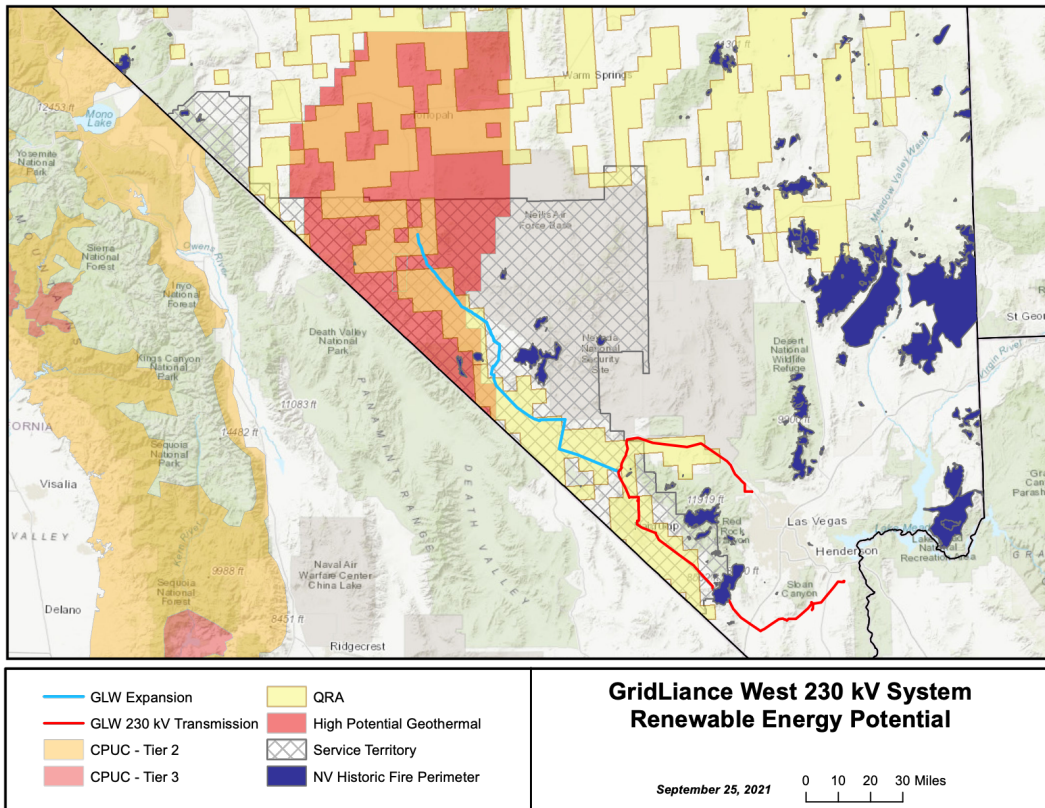
This letter comes in support of the comments filed by GridLiance West (GLW) requesting the California Energy Commission (CEC) align the assumptions used for the southern Nevada region of the CAISO in the next SB 100 analysis with assumptions developed through the California Public Utilities Commission's (CPUC's) IRP Process and the California Independent System Operator's (CAISO's) Transmission Planning Process. C.O.R.D. understands that the Southern Nevada region of the CAISO is outside of the typical geographical area of study when it comes to analysis completed by the State of California and its political subdivisions, but by implementing GLW's proposals, C.O.R.D believes the region will be more accurately represented in terms of resource potential and transmission costs.

Additionally, C.O.R.D. believes that the CEC should consider creating land use screens that consider the impact of wildfire on resource potential and deliverability uniformly across the geographic bounds of California and the Southern Nevada region of CAISO using historical fire data from both California and Nevada. C.O.R.D. believes that justification for this request is reasonable when one considers that the Southern Nevada region of the CAISO's grid is subject to much less potential fire-risk comparatively than a vast majority of CAISO's grid as demonstrated in the CPUC's Fire-Threat map<sup>1</sup>, Nevada Division of Forestry's Wildfire Threat map<sup>2</sup>, and illustrated in Figure 2.

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<sup>1</sup> <https://capuc.maps.arcgis.com/apps/webappviewer/index.html?id=5bdb921d747a46929d9f00dbdb6d0fa2>

<sup>2</sup> <https://nevadaresourcesandwildfireinfo.com/Map/Public/#whats-your-risk>



**Figure 2: Map of GLW's Renewable Energy Potential, Fire-threat risk, and historic fire perimeter**

C.O.R.D. believes this lower fire risk makes the Southern Nevada region of the CAISO's future resource and infrastructure development even more cost-effective and makes it an important hedge against the devastating impacts of future climate change-related wildfires to California's grid. With that in mind, C.O.R.D. recommends that the CEC incorporate land-use screens detailing potential impacts of fire risk into SB 100 Analysis in order to prioritize the potential risk trade-off in resource siting uniformly amongst all resources considered in the land-use screening processes.

C.O.R.D. appreciates the opportunity to weigh in on this important matter and thanks the agencies involved with the Joint Agency Report for all of their hard work and effort.

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