

<b>DOCKETED</b>	
<b>Docket Number:</b>	23-SB-100
<b>Project Title:</b>	SB 100 Joint Agency Report
<b>TN #:</b>	253124
<b>Document Title:</b>	Golden State Clean Energy, LLC Comments - ON 2025 SB 100 REPORT ANALYTICAL FRAMEWORK WORKSHOP
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Golden State Clean Energy, LLC
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	11/14/2023 4:54:09 PM
<b>Docketed Date:</b>	11/14/2023

*Comment Received From: Golden State Clean Energy, LLC  
Submitted On: 11/14/2023  
Docket Number: 23-SB-100*

**COMMENT OF GOLDEN STATE CLEAN ENERGY, LLC, ON 2025 SB  
100 REPORT ANALYTICAL FRAMEWORK WORKSHOP**

*Additional submitted attachment is included below.*

**BEFORE THE ENERGY COMMISSION  
OF THE STATE OF CALIFORNIA**

*SB 100 Joint Agency Report: Charting  
a Path to a 100% Clean Energy Future*

23-SB-100  
(April 1, 2023)

**COMMENT OF GOLDEN STATE CLEAN ENERGY, LLC, ON  
2025 SB 100 REPORT ANALYTICAL FRAMEWORK WORKSHOP**

Golden State Clean Energy (“GSCE”) appreciates the opportunity to submit this comment on the October 31, 2023, workshop held to discuss the 2025 Senate Bill 100 Joint Agency Report. GSCE provides this comment to recommend running one additional scenario to better diversify the studies and to address some of the questions raised during the workshop.

During the Q&A portion of the workshop, Vice Chair Gunda and Commissioner McAllister asked a series of important questions that should be addressed through an additional scenario. Vice Chair Gunda’s questions focused on import assumptions and whether the changing regional landscape will render import assumptions outdated as they relate to reliability benefits and cost. Commissioner McAllister’s questions focused on the possibility of addition study scenarios, particularly to examine the uncertainty associated with future costs for certain nascent technologies. These questions highlight the risk created by resource portfolios that are dependent on a resource mix consisting of out-of-state resources and technologies that have not yet proved commercial viability at scale.

The questions asked by Vice Chair Gunda and Commissioner McAllister emphasize key questions for California’s clean energy future—to what extent will historical levels of import energy and capacity or new, development-stage technologies be available in the future to aid with reliability, and at what cost? GSCE believes the proposed study scenarios largely reflect more optimistic answers to these questions by assuming greater energy exchanges between California and the rest of the WECC, increased resource diversification, and higher levels of distributed resources and demand flexibility. Although there are important state policies backing these interests, none of the scenarios assesses the opposite scenario, in which nascent technologies or demand flexibility do not reach their full deployment potential, or where demand from external load-serving entities reduces access to out-of-state resources and increases costs. The proposed scenarios risk skewing the perceived range of possible resource builds such that the Reference or Current Resource Plans scenarios appear as the higher end of possible in-state solar, wind, and storage needs.

In light of the proposed scenarios and issues highlighted by Vice Chair Gunda and Commissioner McAllister, GSCE recommends running one additional scenario based on in-state

mature technologies focused on solar, wind, and storage. This can be done by using conservative import assumptions and higher end cost forecasts for nascent technologies.

GSCE appreciates that there are time and resource limitations that prevent unlimited scenarios from being tested. However, we believe an in-state mature technology scenario is needed to better diversify the scenarios being studied and to understand the implications of such a potential future. Nonetheless, to conserve time and resources, GSCE suggests limiting reliability analysis on the scenarios that primarily explore cost savings. Additional reliability analysis is not necessary for the DER Focus, Resource Diversification, and Geographic Diversification because increases in long-duration storage, hydrogen fuel cells, carbon capture and sequestration, and interstate transmission all come with known reliability benefits. In contrast, it is important to test the reliability of an in-state mature technology scenario to ensure this portfolio heavy in wind, solar, and storage is stress-tested and includes sufficient capacity.

### Conclusion

GSCE supports considering all technologies as part of the state's energy future, as the path toward decarbonization will require an all-the-above resource procurement approach to ensure reliability. However, transmission development is currently the most limiting factor in California's ability to bring new resources online. Focusing many of the proposed study pathways on resources that can provide important reliability benefits or obviate the need for new transmission but that have significant uncertainty may be counterproductive. An in-state mature technology scenario would better balance the planning for possible future outcomes.

GSCE appreciates the Joint Agencies' consideration of this comment and looks forward to continuing to be a part of California's decarbonization efforts.

Dated: November 14, 2023

Respectfully submitted,

/s/ Ian Kearney

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