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DER can advance non-energy benefits cost effectively

Additional submitted attachment is included below.

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California Energy Commission
Docket 23 SB100

350 Bay Area is a non-profit organization focused on ensuring a sustainable climate and associated environmental and economic justice for all, with a reach of over twenty-two thousand people, primarily concentrated in the nine Bay Area counties. We appreciate the importance and urgency of the SB100 process. We also recognize the complexity of weighing different pathways to reach the goal, and coordinating among the centrally involved agencies, CARB, CEC, and the CPUC, as demonstrated at the workshop on April 16, 2024.

Over the past 10 years, we have participated in multiple CPUC, CARB, and CEC proceedings in hopes of accelerating California's electricity sector decarbonization effort. We note relevant legislative mandates include SB100, as well as Assembly Bill 3995[1] which in 1990 required consideration of environmental costs and benefits, including air quality.

We focus in this comment on the specific role of DER, which can directly provide non-energy benefits, as well as support local resiliency and decrease land used for remote energy installations and transmission. In addition DER can accelerate meeting other SB100 objectives, while constraining the current growth in electricity rates.

The workshop explicitly raised the issue that consideration of non-energy benefits would increase rates (see example in footnote[2]). This is a premature conclusion. Both actual experience and models provide evidence that planning which incorporates DER upfront

[1] Assembly Bill 3995 (Sher, Ch.1475, Stat. 1990) Section 701.1 C states "In calculating… the Commission shall include, in addition to other ratepayer protection objectives, a *value for any costs and benefits to the environment, including air quality*." (emphasis added)

[2] CPUC Non-energy impacts: social costs and benefits April 16th 2024 slide four states utility scale solar and storage cheaper, without considering delivery cost; ignores potential for load shifting with electrification of buildings and transportation; relies on RESOLVE which could not select in front of meter DG solar or storage

can result in cost savings, as well as decreasing costs for California's electrification efforts.

Specific examples include

a) CAISO's 2017-18 Transmission Plan called for canceling or modifying projects to avoid $2.6 billion in future costs. "The changes were mainly due to changes in local area load forecasts, and strongly influenced by energy efficiency programs and increasing levels of residential, rooftop solar generation."
b) Vibrant Clean Energy model found that California could save $120 billion by 2050 in part through deployments of over 60,000 MW of distributed solar. Retail rates would fall dramatically from today's rates, [3]
c) Public Advocates office study of Distributed Generation showed "Approximately 70 percent of the costs identified in the Electrification Impact Study – $35 billion – vanish if EV charging is shifted away from hours of peak demand."[4]

We look forward to participating in the California Energy Commission's ("CEC") Order Instituting Informational Proceeding, 24-OIIP-03, to integrate non-energy benefits ("NEBs") and social costs into energy planning and investment decisions to further clarify how non-energy benefits will be quantified and included in California energy planning from the outset.

We recognize the time frame for producing the 2025 SB100 report may preclude full incorporation of non-energy benefits and DER during this cycle. At a minimum, we urge that the two scenarios which look at high DER and rapid retirement of combustion, especially in DAC should be prioritized in the current analyzes.

Claire Broome
Representing 350 Bay Area

[3] https://vibrantcleanenergy.com/media/reports/
[4] PAO DGEM pES5