

**DOCKETED**

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*Comment Received From: POU BAs and California Municipal Utilities Association*  
*Submitted On: 9/4/2019*  
*Docket Number: 19-SB-100*

**Statutory Requirements for Balancing Authorities' Consultation with the Agencies in SB 100 Joint Agency Report**

Publicly Owned Utilities Balancing Authorities (POU BAs)

*Additional submitted attachment is included below.*



September 4, 2019

To: David Hochschild, Chair, California Energy Commission  
Marybel Batjer, President, California Public Utilities Commission  
Mary Nichols, Chair, California Air Resources Board

From: Publicly Owned Utilities Balancing Authorities:

- Balancing Authority of Northern California
- Imperial Irrigation District
- Los Angeles Department of Water and Power
- Turlock Irrigation District

California Municipal Utilities Association (representing POUs in the California ISO)

Subject: Statutory Requirement for Balancing Authorities' Consultation with the Agencies in the SB 100 Joint Agency Report

Successful implementation of SB 100 requires careful study and evaluation to ensure that the regulatory policies developed meet the underlying intent of the legislation. This was recognized by the authors. To that end, the bill requires in part that:

*In consultation with all California balancing authorities, as defined in subdivision (d) of Section 399.12, as part of a public process, issue a joint report to the Legislature by January 1, 2021, and at least every four years thereafter. The joint report shall include all of the following: (A) A review of the policy described in subdivision (a) focused on technologies, forecasts, then-existing transmission, and maintaining safety, environmental and public safety protection, affordability, and system and local reliability. (B) An evaluation identifying the potential benefits and impacts on system and local reliability associated with achieving the policy described in subdivision (a). (C) An evaluation identifying the nature of any anticipated financial costs and benefits to electric, gas, and water utilities, including customer rate impacts and benefits. (D) The barriers to, and benefits of, achieving the policy described in subdivision (a). (E) Alternative scenarios in which the policy described in subdivision (a) can be achieved and the estimated costs and benefits of each scenario.*

Establishing this study process was critical to POUs and a core reason we supported the legislation. California's POU Balancing Authorities serve approximately one-quarter of the electric load in California and submit Integrated Resource Plans to the Energy Commission. Furthermore, three of the four are either operating within the Energy Imbalance Market or have committed to join the EIM by 2021.

The POU BAs were actively involved in the Renewable Energy Transmission Initiative (RETI), which was commenced by the Energy Commission. As part of that process a multiple-committee/working group structure was established to marshal the resources of the state and stakeholders to examine a complex technical issue that required close collaboration and input from a variety of impacted sources. We ask the joint agencies to consider a similar structure to perform the complex and integrated analyses required in SB 100.

Whatever the structure or process you decide to follow, the POU Balancing Authorities look forward to working closely with the state energy agencies and the California ISO to scope, perform, assess, and prepare the report required by SB 100. Meeting the SB 100 goals will require a careful balance between reliability, affordability, and carbon neutrality. As agencies with the authority to achieve all three goals for the communities we serve, the POU Balancing Authorities are eager to meet this challenge with you.