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California Energy Commission
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Sacramento, CA 95814-5512

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RE: Docket No. 19-SB-100

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

Defenders of Wildlife (Defenders) respectfully submits these comments on the September 5, 2019 workshop on the Senate Bill (SB) 100 Joint Agency Report: Charting a Path to a 100% Clean Energy Future.

Defenders, on behalf of our 279,000 members and supporters in California, works towards protection of wildlife, ecosystems, and landscapes while supporting the timely development of renewable energy resources in California. Achieving a low carbon energy future is critical for California – for our economy, our communities, and the environment. Achieving this future—and *how* we achieve it—is critical for protecting California’s internationally treasured wildlife, landscapes, productive farmlands, and diverse habitats.

It is gratifying to see the California Energy Commission (CEC), California Public Utility Commission (CPUC), and California Air Resources Board (CARB) – the Joint Agencies – come together to begin developing the joint-agency report required by SB 100, the “100 Percent Clean Energy Act of 2018” (de León, Chapter 312, Statutes of 2018).

SB 100 brings a bold clean energy future to California that will require a holistic, collaborative integrative approach by all parties to achieve its milestones. As noted by Secretary Crowfoot in opening comments at the Workshop - the implementation of SB 100 must integrate land use, conservation, biodiversity, and resilience.

SB 100 specifically requires consideration of environmental costs and environmental protection. The bill directed the Joint Agencies and all other state agencies shall take ... “into full consideration the economic and environmental costs and benefits of renewable energy and zero-carbon resources.”¹ The legislation further directed the Joint Agencies to consult with all California balancing authorities to produce a joint report to the Legislature that includes a review of the 100% renewables and zero carbon by 2045 policy ... “focused on technologies, forecasts, then-existing transmission, and maintaining safety, environmental and public safety protection, affordability, and system and local reliability.”²

Achieving SB 100 goals is not just a matter of identifying how much and what kind of generation needs to be developed and procured. Rather, reaching goals under SB 100 will come with potentially significant land use ramifications. Indeed, according to The Nature Conservancy’s Power of Place study, achieving 100% renewables could require up to 1.2 million acres of renewable energy development in California. Such a massive amount of development would be a sweeping change to the landscape and natural resources in California or the West. Identifying what can be built where and how with the least conflict is both required and essential for California’s future.

Thus, energy planning is land use planning.

This focus on taking land use implications from the development of lands for the purposes of renewable energy generation and transmission is also consistent with the state policy and directive from Senate Bill 1386 that stated “[i]t is the policy of the state that the protection and management of natural and working lands is an important strategy in meeting the state’s greenhouse gas emissions reduction goals.” (emphasis added)

SB 1386 directed “[a]ll state agencies, including, but not limited to, the Natural Resources Agency, the Department of Food and Agriculture, and the California Environmental Protection Agency, and their respective departments, boards, and commissions, [to] consider the policy set forth in this section when revising, adopting, or establishing policies, regulations, expenditures, or grant criteria relating to the protection and management of natural and working lands. State agencies shall implement this requirement in conjunction with the state’s other strategies to meet its greenhouse gas emissions reduction goals and with the intent to, among other things, promote the cooperation of owners of natural and working lands.”³ (emphasis added)

Charting the Path for California’s Renewable Energy Future

Identifying the what, how, and where for utility scale renewable energy development in California has been an area of intense focus for the past decade by federal, state, and local government as well as a diverse group of stakeholders that has resulted in planning efforts to identify “least-conflict”

¹ CA Public Utility Code Section 454.53(b)(2)

² CA Public Utility Code Section 454.53(d)(2)(A)

³ CA Public Resources Code Section 9001.5

areas for utility scale renewable energy development and transmission including the Desert Renewable Energy Conservation Plan (DRECP)⁴ and the San Joaquin Least Conflict Study.⁵

To further facilitate siting and development of renewable energy including utility scale projects the CEC has invested significant effort in developing the tools and resources found in the California Energy Gateway.⁶ In particular, the California Energy Infrastructure Planning Analyst⁷ was created by the Conservation Biology Institute for the California Energy Commission to assist with planning energy development throughout the state to improve planning efficiency and to avoid environmental risks based on the best available spatial datasets.

We recommend continued focus and investment in least-conflict planning and development and implementation of policies that direct energy development and transmission to least-conflict areas and emphasize distributed generation near load to further reduce unwarranted impacts.

Because energy planning is land use planning, we recommend that the Governor's Office of Planning and Research (OPR) be included in the team developing the SB 100 Report and developing implementation strategies. OPR will bring beneficial and necessary land use planning input to bringing SB 100 to life in a sustainable and environmentally responsible manner.

Conclusion

Thank you for the opportunity to provide initial comments on the SB 100 Joint Agency Report: Charting a Path to a 100% Clean Energy Future. We look forward to actively participating in the development of the SB 100 Report. Please contact Kim Delfino at (916) 313-5800 or kdelfino@defenders.org or Kate Kelly at (530) 902-1615 or kate@kgconsulting.net with any questions.

Sincerely,



Kim Delfino
California Program Director



Kate Kelly
Consultant

⁴ <https://www.drecp.org/>

⁵ <https://www.law.berkeley.edu/research/clcc/research/climate/solar-pv-in-the-siv/>

⁶ <https://caenergy.databasin.org/>

⁷ <http://ceipa.databasin.org/>