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Stanford University Comments on SB 100 Joint Agency Report Process

Additional submitted attachment is included below.



Stanford University

**Comments of Stanford University on the Senate Bill 100 Joint Agency
Report: Charting a Path to a 100% Clean Energy Future
(Docket 19-SB-100)**

Stanford University appreciates this opportunity to submit comments as the California Energy Commission (CEC), California Public Utilities Commission (CPUC) and California Air Resources Board (CARB) initiate the process of implementing Senate Bill 100. We look forward to working with agency leaders and other stakeholders to develop a framework for achieving the goals of Senate Bill 100. The SB 100 goal of 100 percent clean electricity by 2045 is ambitious, but we are confident that it can be achieved.

Our confidence in the state's ability to take on the challenge of SB 100 is based in part on our own experience creating and implementing Stanford's Energy and Climate Action Plan. The University's executive leadership has committed to making the campus 80 percent carbon-free by 2024 and achieving zero waste by 2030.

Our guiding principles for the Energy and Climate Plan are: (1) to recognize that emissions reduction may come from a number of areas in campus facilities design, construction, operations, and maintenance and will affect a diverse group of students, staff, and faculty across all academic and administrative departments, as well as the surrounding community; (2) to recognize that Stanford must operate within the broader context of energy infrastructure, emissions reduction, and regulation; and (3) to recognize that both short- and long-term improvements are needed and that the long-term impact must be considered before decisions are made regarding existing buildings and infrastructure.

We have committed to provide leadership in climate change solutions, using Stanford's intellectual and financial resources. On the main campus we are modeling a multifaceted energy demand and supply management plan, using innovative energy conservation tactics and greening the campus energy supply. Specifically, Stanford has replaced a fossil-fueled combined heat and power plant with clean grid-sourced electricity and a more efficient electric heat recovery system. This new system, along with Stanford's solar power procurement, has reduced campus emissions by 72% from peak levels. In its first year of operation it saved 18% of campus potable water. By the end of 2021, when the second Stanford Solar Generating station comes online, Stanford's greenhouse gas emissions reduction will reach 80%. We hope that these concrete accomplishments, and our ongoing vision and planning process, can offer a model for other campuses, cities, and private and public institutions.

We look forward to participating actively in discussing the Senate Bill 100 framework. At this point we do not offer specific policy recommendations, but strongly encourage the agencies leading this process to focus on identifying near term policy

obstacles that may be preventing large institutions from planning for and making long-term investments toward a zero carbon future. Creating an environment that leverages the leadership and resources of these large energy consumers is “low-hanging fruit” that can contribute substantially to the larger vision of a 100 percent clean energy future for California. The investor-owned and local publicly-owned utilities and community choice aggregators must be leaders in implementing state policy to achieve the goals of Senate Bill 100. But large commercial, industrial, and public utility customers can also play a significant role by securing and self-providing zero carbon energy through on- and off-site renewable investments.

In order to enhance private investment in clean technologies and zero carbon energy supplies, state policy incentives, renewables and direct access (DA) program implementation must be carefully examined and aligned with this objective. As a DA customer seeking to optimize its energy portfolio consistent with the vision described above, Stanford has encountered regulatory obstacles in the RPS program that prevent us from effective long-term planning for and procurement of clean energy. These unfortunate and unintentional regulatory obstacles, which preclude recognition of long-term renewables investments made by Stanford, result from program rules that do not adequately consider the vision and opportunities that can enable a large customer to create and implement an ambitious, multi-faceted green energy procurement plan.

Achieving the goals of Senate Bill 100 will require a concerted effort across the entire spectrum of utilities, communities, and institutional customers. Stanford is firmly committed to supporting this process in any way we can.