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Comments of Imperial Irrigation District

Additional submitted attachment is included below.



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March 9, 2020

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

**Re: Docket 19-SB-100
Comments of Imperial Irrigation District – Joint Agency Report: Charting a
path to a 100% Clean Energy Future – Balancing Authority Area
Perspective**

Imperial Irrigation District appreciates the opportunity to have participated in the balancing authority area panel discussion on February 24, 2020. In addition, IID provides these comments to help illustrate the impact of SB100 on grid operations from the perspective of a balancing authority area. IID sees the initiative to be an important one.

- IID has been aligned with decisions that support SB 100 and similar legislation that supports renewables development and carbon reduction. It is worth noting that these decisions have cost impacts to IID customers, and future requirements should factor in all additional cost impacts. Those impacts can be especially burdensome for IID who serves customers in an area with very high unemployment rates and disadvantaged communities. A phased-in approach would allow for incremental cost increases that may be more easily borne by IID's customers.
- A rapid shift away from carbon must be balanced with grid realities including safety, reliability and affordability. New technologies may provide the necessary grid reliability but at very high costs. Given current technologies, existing resources, including thermal and large hydro, may be necessary to ensure grid reliability on a going forward basis. New technologies may become sufficiently developed to reduce reliance on thermal combustion units.
- Advancing carbon reductions through investments in the transportation and building sectors may yield the best results and be most affordable for end-users.
- Investments in carbon reductions must allow low income and disadvantaged communities to benefit from such investments.

- The long-term plan based on legislation needs to be allowed flexibility in case of changes in future laws. Decisions today can be permanent for IID, but legislation over the next 25 years can have a major impact on the cost impact of those decisions. The state should consider adding a mechanism to provide stakeholders the ability to adapt in step with changing laws and changing plans, in order to maximize the impact of such changing laws and changing plans.
- IID's significant load shift between winter and summer and further, between the peaking hours vs the non-peaking hours, has a significant impact on resources. The State should consider adopting exemptions when seasonal demand shifts are extreme, similar to those of IID. Generation that fills in the gaps will aid in ensuring grid reliability.
- Geographic anomalies should be considered. IID's transmission system experiences extreme high temperatures (>110 degrees) and that affects efficiencies in all resources necessary to generate electricity, from generating resources to transmission and distribution. The SB 100 assumptions should consider this type of impact and how it may affect resources.
- Investment in alternative fuels to drive combustion generation may provide some relief, but retrofitting to accommodate the alternative source may take time.
- IID's resource area offers a vast resource base for all renewables, including geothermal. The State should include scenarios where geothermal technologies allow greater flexibility. Furthermore, the state should look at IID's service territory and consider incentivizing other utilities to use IID's immense resource capability to help reduce unemployment, enhance the quality of life for disadvantaged communities and further the state's Salton Sea restoration efforts in the same region.
- Transmission planning will become more important in meeting the SB 100 goals. Though consolidation of regional transmission planning across the West (be it a Regional Transmission Organization (RTO) or by other means) is probably not realistic in the near-term, increased coordination and integration of regional planning should be feasible.
- Regarding the modeling scenarios and assumptions that are being proposed, as a BA, IID offers the following:
 - o IID recognizes the need for simplification of modeling at the statewide level and not at the individual BA level for this initial report analysis. However, future analyses should allow for BA input and concurrence on assumptions that best reflect their individual plans.
 - o A High Electrification case that allows for low levels (e.g. – 20% capacity factor) of combustion generation needs to be run as a reference for both existing technology capabilities and to help understand what a zero net carbon approach might look like.

- A case with high geothermal generation from the Imperial County should be included.

In addition to the comments provided herein, IID also supports and agrees with the comments submitted by the Balancing Authority Area of Northern California.

Sincerely,

A handwritten signature in blue ink, reading "Marilyn Del Bosque Gilbert". The signature is written in a cursive style with a large initial "M".

Marilyn Del Bosque Gilbert
Energy Manager