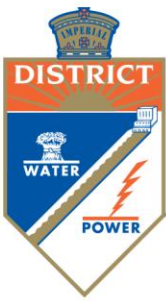


DOCKETED	
Docket Number:	19-SB-100
Project Title:	SB 100 Joint Agency Report: Charting a path to a 100% Clean Energy Future
TN #:	234722
Document Title:	Imperial Irrigation District Comments - Comments on SB 100 draft modeling results and Joint Agency Report
Description:	N/A
Filer:	System
Organization:	Imperial Irrigation District
Submitter Role:	Public Agency
Submission Date:	9/15/2020 12:10:56 PM
Docketed Date:	9/15/2020

*Comment Received From: Imperial Irrigation District
Submitted On: 9/15/2020
Docket Number: 19-SB-100*

Comments on SB 100 draft modeling results and Joint Agency Report

Additional submitted attachment is included below.



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September 15, 2020

California Energy Commission
Docket Unit, MS-4
Docket No. 19-SB-100
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Comments on the SB 100 draft modeling results and Joint Agency Report

Dear Commissioner Hochschild and Commission staff:

The Imperial Irrigation District (IID) respectfully submits the following comments to the California Energy Commission (Commission) on the SB 100 draft modeling results and updates to the Joint Agency Report. IID has previously participated in various stages of Docket No. 19-SB-100 and appreciates the opportunity to reiterate the following:

AFFORDABILITY IMPACTS

- IID supports SB 100 and other legislation like it necessary to meet the aggressive energy policy goals of the State; however, it is critical that a “one size fits all” approach not be utilized to meet these objectives. The transition from the current energy fleet to one made up mostly of renewable resources, must be weighed against any unintended cost impacts to utility customers. The Joint Agency Report must address cost concerns of all customers, including those located in areas like the Imperial and Coachella Valleys, that face high unemployment rates, low median incomes and face greater economic challenges than their counterparts in other parts of the State.

DRAFT MODELING

- The modeling results appear to reflect a broad approach to accomplish State goals; however, IID’s service territory is unique due to extreme temperatures, ample resource potential and its strategic location bridging the east and west interconnect. The State should consider IID’s needs and previous SB 100 accomplishment as it determines the recommend breakdown of resources for the State.
- The study does not fully cover reliability needed for the Joint Agency Report. IID would like to see this covered, especially for the Balancing Authorities to ensure grid stability and resiliency.

ENERGY LOAD AND PLANNING

- IID’s energy load profile has seen a significant shift due to customer program requirements and the district has become more nimble in operations and will look for

greater flexibility over the next 25 years. The cost impacts can be significant in this approach if IID is not allowed resource flexibility and resource diversity.

- IID's significant load shift between winter and summer and further, between peak hours and non-peak hours has a significant impact on resources. The State should adopt mechanisms to allow for exemptions when demand shifts are similar to IID's.
- IID's transmission system experiences extreme high temperatures (>110 degrees) and that affects all resource efficiency. The SB 100 assumptions should consider how this type of impact might affect resources.
- Load growth, under current State law, is extremely difficult to project. As a result, evaluating supply and demand resources can have a significant impact on costs. The State needs to incorporate a range-based approach for planning to meet SB 100 requirements.

RESOURCE TECHNOLOGIES

- IID's service area offers vast renewable resources, including geothermal. The State needs to include other scenarios that evaluate the characteristics of each technology type and not focus solely on procurement costs. Geothermal, mineral extraction and flexibility will lower the cost of geothermal, allowing competition with solar, storage and wind industries.
- The State should also look at IID's service area and consider incentivizing other utilities to tap into those resources while simultaneously creating positive economic impacts and promoting environmental goals.
- Over the next 25 years, IID anticipates a shift in resource technologies; however, the State needs to consider how this shift and the timing of the requirements can force utilities like IID to take on more debt when the technology being introduced is not fully proven and has not settled in costs and abilities, particularly with energy storage.
- Storage modeling is still under development and storage applications need to be studied further. Specifically, energy storage and its uses by the various Balancing Authorities needs to be further analyzed.

IID appreciates the opportunity to submit these comments and looks forward to continuing its work with the Commission to help inform the ongoing SB 100 proceedings.

Sincerely,



Enrique B. Martinez
General Manager