

**DOCKETED**

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**Sierra Club California Comments on SB 100 Draft Modeling Results**

*Additional submitted attachment is included below.*



September 23, 2020

California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

Docket 19-SB-100  
*Submitted via electronic comment system*

**RE: Sierra Club California Comments on SB 100 Draft Modeling Results**

Dear Commissioners and Members:

Sierra Club California appreciates the opportunity to provide comments on the Senate Bill 100 Draft Modeling Results to the California Energy Commission (CEC), the California Public Utilities Commission (CPUC), and the California Air Resources Board (CARB) (the “Joint Agencies”).

In developing this clean energy framework, Sierra Club California urges the Joint Agencies to not lose sight of the purpose behind the SB 100 goals. SB 100 was enacted as part of California’s response to a warming climate and to lead the world in the transition to a zero-carbon future. The evidence of rapid climate change is abundantly clear and it is devastating. If SB 100 is going to have the impact on the climate crisis that we need, the report must provide a faster transition off of polluting energy resources.

Thus, Sierra Club California offers the following comments:

**I. Joint Agencies must accelerate the SB 100 timeline to 2030**

SB 100 is a key component of California’s climate and clean, zero-carbon renewable energy policy framework. The bill mandates that 100 percent of total retail sales of electricity in California come from renewable energy resources and zero-carbon resources by 2045.

However, SB 100 does not assume that achieving zero-carbon electricity should wait until that date. We are in a climate crisis. It is imperative that California cuts greenhouse gas (GHG) emissions at a rapid pace and transforms our energy system to clean, zero-carbon renewable energy by 2030.

California has been devastated by wildfires and air pollution for the past several weeks. While touring the after effect of the recent wildfires, Governor Newsom blamed the fires on climate change and then stated “Our goals are inadequate to the reality we are experiencing.” To reflect the urgency of this climate emergency, the Joint Agencies must develop a timeline that reaches the SB 100 goals by 2030.

## **II. Biomass Must be Excluded from the SB 100 Analysis**

The language of SB 100 provides that eligible renewable energy resources and “zero-carbon resources” as the generation resources to achieve our clean electricity goals. However, the bill fails to define “zero-carbon resources.” So, the Joint Agencies have provided their own interpretation of “zero-carbon resources” to mean generation resources that meet the requirements for RPS-eligibility set forth in the most recent RPS Eligibility Guidebook and/or that have zero onsite GHG emissions.

Unfortunately, this definition fails to consider that biomass generation is highly polluting and degrades our forest ecosystems, air quality and climate. Biomass emits more GHGs than fossil fuel generation.<sup>1</sup> In fact, biomass generation is three to four times more carbon-intensive than methane gas-fired generation and even more intensive than coal-fired generation. In addition, biomass generation can result in significant emissions of air pollutants that harm public health, including nitrogen oxides, carbon monoxide, particulate matter, and black carbon.<sup>2</sup> It also could incentive forest management practices that both emit GHGs and reduce carbon sinks. Lastly, biomass is not a proven renewable resource and classifying it as such is fictional policy. The state simply cannot guarantee that the exact amount of GHGs emitted by biomass generation plants would be equal to the amount sequestered by the growth of similarly sized trees, especially when wildfires are taken into consideration.

Biomass generation is not a zero-carbon resource. Biomass is a dirty fuel and its inclusion in the SB 100 definition for “zero carbon resources” is inappropriate. Inclusion of biomass in this definition would be counter to the state’s other climate and energy goals in reducing air pollution, protecting carbon sinks, and promoting clean, zero-carbon renewable energy resources. Therefore, biomass should be explicitly excluded from the Joint Agencies’ definition “zero-carbon resources” and excluded from the SB 100 analysis entirely.

## **III. Gas Combustion Must Continue to be Excluded from the SB 100 Report**

Sierra Club California would also like to reiterate that gas combustion must be excluded in the Joint Agency SB 100 report.<sup>3</sup> For example, biomethane is costly, unsustainable and an unhealthy fuel option. Biomethane combustion has damaging impacts on air and water quality, especially in vulnerable communities throughout the state. We were happy to see that biomethane was excluded from the draft modeling reports, but are concerned that it may be permitted in future SB 100 reports.

Biomethane or any type of gas combustion contributes to GHG emissions and climate change impacts. To reflect the urgency of the climate crisis, gas combustion must be entirely excluded from any scenario in the report. For the State’s climate and energy policies to be successful, the report must support the decline of fossil fuel generation.

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<sup>1</sup> Mary S. Booth, Not carbon neutral: Assessing the net emissions impact of residues burned for bioenergy, Vol. 13 *Env’t. Research Letters* at p. 5 (Feb. 21, 2018), <https://doi.org/10.1088/1748-9326/aaac88>.

<sup>2</sup> Mary S. Booth, Trees, Trash and Toxics: How biomass energy has become the new coal. Partnership for Policy Integrity (Apr. 2, 2014), available at <https://www.pfpi.net/wpcontent/uploads/2014/04/PFPI-Biomass-is-the-New-Coal-April-2-2014.pdf>.

<sup>3</sup> See Letter submitted by UC Berkeley Law (on behalf of EJ orgs), docket 19-SB-100 (June 12, 2020) [hereinafter “Joint EJ Letter”].

#### **IV. Inclusion of Social Costs and Non-energy Benefits (NEBs)**

Sierra Club California would like to thank the Joint Agencies for including a scenario that excluded all new and existing combustion resources. However, we noticed that the Draft Modeling Report did not include an evaluation of NEBs and social costs in the analysis. The inclusion of social costs and NEBs is necessary for the Joint Agencies to accurately determine the costs and benefits of energy resources. It is also necessary for ensuring that the transition to 100% clean, zero-carbon energy is done in an equitable manner.<sup>4</sup> We look forward to continuing to work with the agencies to ensure that the SB 100 Report accounts for the social costs and NEBs of zero-carbon, renewable energy resources.

#### **V. Conclusion**

Sierra Club California understands the important role SB 100 must play in developing a pathway to a completely clean energy future. Yet, SB 100 must be aggressive if we are going to have a chance at combating climate change. To act with the urgency required, the SB 100 report must have an accelerated timeline of 2030. And we must stop adding pollutants to our atmosphere. Therefore, it is also essential that the SB 100 report strictly exclude all polluting generation resources, such as biomass and biomethane, that contribute to GHG emissions.

In addition, the Joint Agencies must ensure that planning protects the most vulnerable populations in California. For years, many communities in California have felt the brunt of the fossil fuel industry as well as climate change impacts. It is essential that planning for the clean energy future does not overburden these communities that are already suffering. Thus, the Joint Agencies must ensure its policy recommendations prioritize equity and environmental justice concerns.

Sierra Club California appreciates the Joint Agencies' consideration of these written comments and we look forward to continuing to work with the Joint Agencies on the development of the SB 100 Report.

It is essential that the pathway set forth in SB 100 supports truly zero-carbon renewable energy resources.

Sincerely,



Lauren Cullum  
Policy Advocate

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<sup>4</sup> See Joint EJ Letter for more details.