

DOCKETED

Docket Number:	19-SB-100
Project Title:	SB 100 Joint Agency Report: Charting a path to a 100% Clean Energy Future
TN #:	236053
Document Title:	Vistra Corp Comments on SB 100 Joint Agency Report
Description:	N/A
Filer:	System
Organization:	Vistra Corporation
Submitter Role:	Public
Submission Date:	12/18/2020 4:15:07 PM
Docketed Date:	12/18/2020

Comment Received From: Vistra Corporation
Submitted On: 12/18/2020
Docket Number: 19-SB-100

Vistra Corp Comments on SB 100 Joint Agency Report

Additional submitted attachment is included below.



Cathleen Colbert
Director, CAISO Market Policy
Regulatory Affairs
412-720-7016
cathleen.colbert@vistracorp.com

12/18/2020

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

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

Vistra Corporation (“Vistra”) appreciates the opportunity to comment on the SB 100 Joint Agency Report: Charting a Path to a 100% Clean Energy Future discussed at the workshop held on December 4, 2020. We appreciate the California Energy Commission (“CEC”), California Public Utility Commission (“CPUC”), and California Air Resources Board (“CARB”) leadership in guiding California to a plan for achieving Senate Bill 100 requirement for 100% clean energy sector by 2045. The 100% clean energy requirement transitions the state to a zero-carbon energy fleet, in addition to its Renewable Portfolio Standard requiring 60% of retail sales and state sales to come from eligible renewable energy resources by 2030 supported by the 1,325 MW storage target established by AB 2514.

Vistra provides 1,185 MW thermal generation capacity to the state via facilities under CEC’s jurisdiction located in Moss Landing and Oakland. We also provide retail natural gas products to California consumers within the state. In addition, Vistra is expanding our fleet to include battery energy storage systems at our Moss Landing and Oakland sites. Once these projects reach commercial operation, this will bring our total battery energy storage capacity to 436.25 MW/1,745 MWh under contract in California. We continue to explore further battery energy storage expansion opportunities. Our development of viable storage projects contributes to the state’s progress towards its environmental and clean energy goals.

One of the existing challenges with implementing SB 100 is that the bill did not explicitly define what qualifies as “zero-carbon resources”. It is important that more certainty is provided on the types of eligible resources to assist developers in pursuing opportunities that comply with the 100% clean energy standard. In our view, “zero-carbon resources” should be explicitly defined and codified by the State Legislature.

Today, Vistra would like to provide feedback on the draft joint agency report to suggest that in the final report, the joint agencies make clear to the State Legislature that the set of resources it excluded from modeling should not be interpreted to constitute a recommendation for these resources to be ineligible as “zero-carbon”. The joint agencies excluded certain resources from modeling, for example natural gas with carbon capture and sequestration, based on a lack of sufficient data rather than that they are not zero-carbon.

We respectfully ask the joint agencies ensure the final report clarifies whether a resource was excluded because the group recommends the resource not qualify as zero-carbon or because there was insufficient data. We also believe it would be valuable to communicate to the State Legislature that some of these resources may be included in future reports as data becomes available. Our understanding is that coal-fired generation with carbon capture and sequestration is the sole resource type that the joint agencies recommend should be ineligible as a zero-carbon resource. The requested revisions should help confirm our understanding.

Vistra appreciates the opportunity to provide these comments to the CEC on the joint agency draft SB 100 report. We look forward to continuing to engage with the joint agencies and contributing to the transition to 100% clean energy through storage development opportunities.

Sincerely,

Cathleen Colbert

Director, CAISO Market Policy