

DOCKETED

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100% by 2030

Please see our comments on the Draft 2021 SB100 study. Thank you.

Additional submitted attachment is included below.

Friday December 18th, 2020

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

**Long Beach Alliance for Clean Energy Comment on
Draft 2021 SB100 Joint Agency Report: Charting a path to a 100% Clean Energy Future
Docket No. 19-SB-100**

The mission of the Long Beach Alliance for Clean Energy is to educate, advocate, and transform our fair town along science-based, and equity-focused, climate stabilization pathways.

We are a group of Black, Indigenous, People of Color scientists and educators committed to the long term viability of Long Beach as a commercial and industrial hub in the Los Angeles region, as well as a livable city for its diverse population.

With passage of SB100, state policy is that “eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers by December 31, 2045 and 100 percent of electricity procured to serve all state agencies by December 31, 2045.”

The current Draft of the 2021 SB100 Joint Agency Report (‘Draft Report’) includes modelling across several scenarios, only two of which - no combustion and accelerated timelines - align in some way with meeting the Paris Agreement targets of 1.5°C global temperature rise.

Over 4 million acres burned in California this year, with eerily orange skies and toxic ash affecting every single Californian, including us here in Long Beach where our homes and streets have been covered with ash by increasingly predictable wildfires not disconnected from our energy system¹. As endorsees of the Climate Safe California campaign², we strongly recommend this Draft Report prioritize achieving 80% reductions in emissions from 1990 levels and net-negative emissions by 2030 *as a reference timeline for each and every scenario modelled*.

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<https://www.latimes.com/california/story/2020-10-27/edison-power-lines-may-have-sparked-silverado-fire-in-irvine>

² <https://theclimatecenter.org/climatesafeca/>

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We request that the SB100 Joint Agency report include 2030 as an accelerated timeline for every scenario modelled. We also request modelling new scenarios that include more aggressive mitigation efforts: those without extant natural gas generation from once-through cooled coastal facilities state-wide; those with a greater share of generation from existing cost-effective and deployable technologies such as off-shore wind; those which prioritize localized energy resiliency through existing solar and battery storage and distributed resources, such as microgrid development per SB1339; and, crucially, those scenarios with conversion to low-carbon manufacturing across the extensive supply and value chains California residents, workers, and visitors currently enjoy.

A fundamental barrier to the State's climate goals is how heavily dependent municipal governments are on existing oil and gas sales, and how much of that dependency is masked by inter-agency convolution between regulators and regulated entities, informational gaps, and ratepayer subsidization of Load Serving Entity institutional priorities. Another generation type of great interest to us from a local informational perspective, but decidedly not for the study as an RPS+ or eligible resource, is our City's current reliance on the Southeast Regional Recovery Facility (SERRF), a trash incinerator, for electricity needs where sited. We strongly concur with comments already docketed, and recommend the exclusion of generation from biogas, biomethane, municipal solid waste, or biomass eligible electricity resources for SB100 or future PATHWAYS modelling.

We recommend this Draft Report be updated in light of the tremendous challenges 2020 has revealed for effective climate action, and appreciate the Joint Agencies efforts to identify barriers to operating a truly zero-carbon electric grid in the State of California, with welcome emphasis on a just and equitable transition to a clean-energy economy for all Californians.

Being from Long Beach, very much at the heart of climate and environmental problems with quick and easy dirty energy development over the past 100 years, we look forward to further participation in the SB100 process.

Thanking You,
Dave Shuka and Derald Tucker
on behalf of LB ACE