

**DOCKETED**

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**CEERT Written Comments on SB 100 Buildout Joint Agency  
Workshop**

*Additional submitted attachment is included below.*



June 22, 2021

California Energy Commission

Docket No. 21-SIT-01

**Written Comments of The Center for Energy Efficiency and Renewable Technologies (CEERT) Regarding the Joint Agency Workshop on Next Steps to Plan for Senate Bill (SB) 100 Resource Build**

CEERT commends the California Energy Commission (CEC) for initiating and facilitating the Joint Agency Workshop on Next Steps to Plan for SB 100 Resource Build (Joint Agency Workshop), held on June 2, 2021. The high level of engagement between the state's energy agencies, the publicly-owned utilities (POUs), investor-owned utilities (IOUs), community choice aggregators (CCAs), industry representatives, and environmental stakeholders represent the immense amount of ongoing collaboration needed to meet the goals of SB 100.

CEERT strongly agrees with the Governor's Office of Planning and Research Director Kate Gordon's opening comments during the Joint Agency Workshop that achieving our goals in California is no longer just a climate imperative, but also an economic and equity imperative. These overlapping but complementary goals require robust analysis and decisive actions to yield comprehensive solutions. Thus, given the historical amount of buildout and state-wide coordination needed to implement SB 100, interagency planning will be a vital part of successfully decarbonizing California's electric grid and economy. CEERT encourages the joint agencies to sustain the momentum and spirit of collaboration initiated by this inaugural workshop to ensure success in meeting our SB 100 goals.

As supported by the CEC's SB 100 buildout analysis, many factors may impact resource build, including electrification of other sectors, changes to the gas fleet, portfolio diversity, and land-use constraints.<sup>1</sup> These various factors warrant a holistic analysis which may result in more expensive investment in resources up front for the best fit solutions. Furthermore, CEERT strongly agrees with Marin Clean Energy's Dawn Weisz that to implement SB 100, we have to find solutions to reliability that unhook from fossil fuels. The state cannot continue to dump money into fossil fuels and simultaneously and affordably meet its decarbonization goals. Along that line, CEERT wishes to highlight the CEC's SB 100 modeling key takeaway that investing in a diverse resource portfolio will lower overall costs in the long run. Additionally, a diverse, synergistic resource portfolio will lower overall buildout requirements as the best fit resources will work in harmony to meet grid needs. As resource diversity is a key piece of the path to a decarbonized, reliable grid, the joint energy agencies must ensure that all resource modeling assumptions facilitate the development of a diverse resource portfolio to the greatest extent possible.

Resources such as the 2,000 MW of geothermal available in the Salton Sea,<sup>2</sup> offshore wind, solar + storage, and long-duration storage can help reduce California's dependence on fossil fuels and facilitate an orderly, reliable, and equitable transition away from the natural gas system. As such, CEERT

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<sup>1</sup> Joint Agency Workshop Presentation, SB 100 Report Resource Builds presented by Dr. Liz Gill on June 2, 2021, at slide 20.

<sup>2</sup> Henry Martinez of Imperial Irrigation District, Joint Agency Workshop, June 2, 2021.

maintains that the SB 100 analysis and report should be released more frequently than every 4 years to keep pace with important technological innovation and economic scaling. However, absent legislative action to amend the mandated timeframe, CEERT appreciates the CEC’s commitment to hold annual SB 100 workshops to support alignment among the joint agencies and continuity between SB 100 reports.<sup>3</sup> CEERT recommends that these workshops also provide updated analysis on the progress and implementation of SB 100 as new modeling assumptions evolve over time. Additionally, CEERT strongly supports the idea of creating a “dashboard”, akin to that of the Los Angeles Department of Water and Power (LADWP) in its individual Integrated Resource Plan (IRP),<sup>4</sup> to track the state’s progress on resource buildout and necessary transmission upgrades.

As the Joint Agency Workshop demonstrated, transmission updates and buildout to integrate new renewable generation will be critical to the success of implementing SB 100. While clean energy resource development and procurement is certainly crucial to meeting the state’s climate and clean energy goals, deliverability of the energy generated by those resources to the customer is elemental to a truly decarbonized, functional, and reliable energy grid.

During the Joint Agency Workshop, the California Public Utilities Commission (CPUC) observed that the SB 100 “Core Scenario” results align closely with the 38 million metric ton (MMT) greenhouse gas emission target scenario in the IRP Reference System Plan (RSP) decision throughout the next decade.<sup>5</sup> However, the 38 MMT portfolio is not the Base Case portfolio that the CPUC transmitted to the California Independent System Operator (CAISO) to study in this current TPP cycle. Rather, the CPUC recommended the 46 MMT portfolio as the Base Case in this TPP cycle, with the 38 MMT portfolio transmitted as a sensitivity portfolio.<sup>6</sup> As a result, this TPP cycle will not yield transmission upgrade recommendations that are aligned with the 38 MMT portfolio and therefore, the needs of the grid under SB 100.

However, with the closure of Diablo Canyon, and the prospect of 11,000 MW of new clean energy procurement in the IRP, we must turn our attention to the urgent need to expand transmission, particularly in the Central Valley to enable both East/West and North/South exports of solar + storage projects. In addition, the anticipated loss of hundreds of acres of agricultural land going out of production, and consequent economic and job losses because of severe groundwater over pumping, and the potential permitting challenges of building thousands more megawatts of solar in areas with habitat and land use constraints, argues for more intensive efforts to site more solar in the Central Valley.

Unfortunately, under the limiting generation assumptions imposed by the CPUC on the CAISO TPP as mentioned above, the current TPP won’t include studying the need and value of expanding transmission in the Central Valley, or the need to reduce North/South congestion on Path 26. CEERT believes it is imperative to study between 10 and 30 GW of solar + storage, and include the Western Area Power Authority (WAPA), the Sacramento Municipal Utility District (SMUD), and the Transmission Agency of Northern California (TANC). Our initial review suggests this scenario would mean 1) extend the 500 KV backbone to the east, probably using the WAPA line and 2) Path 26 upgrade, and possibly the TANC Path 15 upgrade. These upgrades could be publicly financed, to reduce costs to ratepayers, but it is urgent that this study be included in the current TPP and completed during the current cycle.

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<sup>3</sup> Joint Agency Workshop Presentation, SB 100 Report Resource Builds presented by Dr. Liz Gill on June 2, 2021, at slide 22.

<sup>4</sup> James Barner of LADWP, Joint Agency Workshop, June 2, 2021.


<sup>5</sup> Joint Agency Workshop Presentation, CPUC IRP presented by James McGarry on June 2, 2021, at slide 32.

<sup>6</sup> CPUC Decision (D.) 21-02-008, issued on February 17, 2021, at pp. 2-3.

Finally, CEERT concurs with the overwhelming stakeholder support for local community outreach regarding renewable energy development. During Session 2 of the Joint Agency Workshop, stakeholders identified increased local opposition to renewable energy projects as a major barrier to the historical buildout required under SB 100. As such, CEERT strongly supports increased local educational outreach. As California's clean energy evolution involves strong attention to a just and equitable transition, local outreach is key to ensuring communities are heard and collaboration prospers.

CEERT is grateful for the opportunity to participate in and comment on the Joint Agency Workshop. This initial workshop clearly revealed the immense amount of coordination needed to achieve our climate and clean energy goals. Maintaining this momentum will ensure this effort evolves into decisive actions and ultimately lead California to success.

Sincerely,

A handwritten signature in black ink, appearing to read "V. John White". The signature is fluid and cursive, with the first name "V." and last name "White" clearly distinguishable.

V. John White  
Executive Director