

**DOCKETED**

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**Comments of Imperial Irrigation District**

*Additional submitted attachment is included below.*



# IID

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August 9, 2021

## **VIA E-COMMENT PORTAL**

California Energy Commission  
Docket Office, MS-4  
Re: Docket No. 21-SIT-01  
1516 Ninth Street  
Sacramento, CA 95814-5512  
[docket@energy.ca.gov](mailto:docket@energy.ca.gov)

**Subject: Imperial Irrigation District (IID) Comments on SB 100 Implementation Workshop: Planning for SB 100 Resource Build California Energy Commission Docket No. 21-SIT-01, In the Matter of SB 100 Implementation: Planning for SB 100 Resource Build**

Dear Commissioners:

The Imperial Irrigation District (“IID”) thanks the California Energy Commission (“CEC”), the California Public Utilities Commission (“CPUC”), and the California Independent System Operator Corporation (“CAISO”) for the opportunity to comment on the matters discussed on July 22, 2021 regarding implementation of Senate Bill (“SB”) 100. The July 22, 2021 workshop focused on an issue of critical importance to meeting the state’s SB 100 goals, the development and deployment of transmission to reach renewable and carbon-free resources and deliver those resources to load.

IID operates the third largest balancing authority area (“BAA”) in the State of California and provides electric power to more than 150,000 customers in the Imperial Valley and parts of Riverside and San Diego counties. As the sixth-largest utility in California, IID controls more than 1,100 megawatts of energy derived from a diverse resource portfolio that includes its own generation, and long- and short-term power purchases. IID plans its system to meet significant summer electric load, as the average summer high temperatures in IID’s service territory regularly exceed 100 degrees.

At the outset, IID notes that several California publicly owned utility (“POU”) BAAs are submitting written comments in response to the July 22, 2021 workshop. IID is joining those comments and underscores its support of those Joint BAA comments here. In the comments here, IID provides further perspective on how transmission can help meet SB 100 goals.

First, IID wishes to emphasize that it is open to discussion with entities leading to transmission solutions. IID is willing to discuss with and has demonstrated openness to out-of-the-box solutions to develop transmission. Presently, IID is working with Citizens Energy Corporation and Citizens S-Line Transmission LLC to upgrade transmission that will help relieve transmission bottlenecks for California customers, as well as provide energy assistance for low-income families in the Imperial Valley. IID is interested in proactive solutions from transmission developers, load-serving entities, and other entities that can expand transmission capacity to and from IID's service territory.

Secondly, the plentiful renewable resources within IID's service territory, including geothermal and solar, can help California meet SB 100 goals. Transmission solutions will be essential to unlocking such resources for use by California load. As IID described at the July 22 workshop, IID hosts a geothermal region located on the eastern part of the Salton Sea, where projected capacity of 2,000 MW in geothermal resources is available for development. A CPUC order<sup>1</sup> issued this year directing 1,000 MW of procurement by 2026 of resources able to deliver firm power (with a capacity factor of at least 80 percent), which consist in substantial part of geothermal energy, underscores the need to access geothermal resources in such regions in the Imperial Valley. Over 600 MW of geothermal currently is interconnected to the IID electric grid. In addition, 550 MW of additional geothermal resources is in IID's interconnection queue, with another 15 MW of geothermal waiting for their commercial operation dates. This geothermal expansion requires the development of new transmission in order for such resources to be available for consumption by California load.

The production of lithium from geothermal sites has added a new dimension to meeting carbon-free goals, where lithium provides a product used in the manufacture of electric vehicle batteries. General Motors recently announced a multi-million dollar partnership with Controlled Thermal Resources<sup>2</sup> to facilitate lithium mining at CTR's geothermal site in the Imperial Valley, with details to emerge soon. Such innovations highlight how the economic development of carbon-free resources can lead to multiple benefits in meeting state energy goals.

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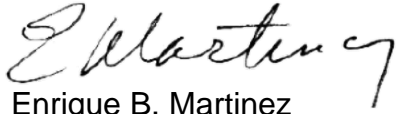
<sup>1</sup> See CPUC Decision 21-06-035, *Order Instituting Rulemaking to Continue Electric Integrated Resource Planning and Related Procurement Processes*, Proceeding No. R.20-05-003 at 36, 84, 91, 95 (issued June 30, 2021).

<sup>2</sup> See July 2, 2021 PRNewswire news release reposted on General Motors' investors page: <https://investor.gm.com/news-releases/news-release-details/gm-source-us-based-lithium-next-generation-ev-batteries-through>

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IID appreciates the opportunity to describe its potential to assist the state meet its SB 100 goals and willingness to discuss proactive, creative solutions in developing the transmission needed to reach those goals.

Sincerely,

A handwritten signature in black ink, appearing to read "E. Martinez". The signature is fluid and cursive, with a long, sweeping tail on the final letter.

Enrique B. Martinez  
General Manager