

DOCKETED

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**Defenders of Wildlife Comments on SB 100 Transmission
Workshop**

Additional submitted attachment is included below.



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California Energy Commission
Dockets Office, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

Submitted via electronic comment system

RE: Docket 21-SIT-01 - Comments on July 22, 2021 Joint Agency Workshop on Next Steps to Plan for Senate Bill 100 Resource Build: Transmission

Introduction

On behalf of Defenders of Wildlife (Defenders), we respectfully submit these comments in response to the July 22, 2021 Joint Agency Workshop on Next Steps to Plan for Senate Bill 100: Transmission (Workshop). Defenders is committed to achieving a low carbon energy future, a future that centers on the health of California communities, our economy, and the environment. We appreciate the thoughtful discussion during the Workshop. We are pleased to see the California Independent System Operator (CAISO) undertake a 20 Year Transmission Outlook as part of their work to meet the demands of planning for SB 100. Transmission must be integrated into planning for SB 100 to match resource build with the grid build. Consideration of land use and environmental opportunity and constraints is foundational to enable effective transmission planning that reduces risks of unintended impact, conflict, and disputes and ensures timely build-out.

As noted in the 2021 Joint Agency Report¹

As California considers the more ambitious renewable energy goals of SB 100, proactive landscape-scale planning can help identify opportunities for renewable energy facility and transmission development while reducing adverse effects. Landscape-scale planning considers a wide range of potential constraints and conflicts, including environmental sensitivity, conservation and other land uses, tribal cultural resources, and more when considering future renewable energy development. The benefits of using landscape-level approaches for renewable energy and transmission planning include early identification and resolution of large issues or barriers to development, coordinated agency permitting processes, increased transparency in decision making, increased collaboration, avoidance of

¹ <https://efiling.energy.ca.gov/EFiling/GetFile.aspx?tn=237167&DocumentContentId=70349>

impacts, and more rapid development of environmentally responsible renewable energy projects. (pg. 122)

The state has an opportunity to plan for and coordinate this effort and it must happen now. Accordingly, we offer the following observations and recommendations:

Recommendations

I. Collaborative geospatial analysis for transmission planning to accelerate permitting timelines and lower overall project costs.

Recommendation 3 (pg. 134) in the 2021 Joint Agency Report² rightly identifies that understanding how land use impacts vary across scenarios and assessing the relative environmental impacts in different areas is foundational to identifying strategies to avoid, minimize or mitigate environmental impacts and maximize environmental impact co-benefits. Project failure is a significant concern in meeting SB 100 goals, and one only needs to look at projects that have failed due to siting conflicts with natural resources or litigation, or both. Siting a transmission project that conflicts with high-value natural resources such as endangered species and their habitats will likely result in increased permitting uncertainty, increased mitigation costs, project development delays, litigation, and/or project failure. Avoiding and minimizing conflicts with high-value natural, agricultural, and cultural resources is the simplest and most cost-effective way to reduce project failure. CAISO should collaborate with Agency staff to integrate the California Energy Commission's geospatial planning tools into transmission planning as part of the "Starting Point" resource mapping for their 20 Year Transmission Outlook.

II. Establish a Transmission Technical Working Group to ensure transmission planning is consistent with goals set forth in SB 100.

The lack of transmission capacity to support responsibly sited renewable energy development and deployment of distributed generation needs a dedicated approach by the Joint Agencies and CAISO to prioritize transmission development to serve those areas. Effective implementation of Recommendations 3, 4, and 12 of the 2021 Joint Agency Report³ can only occur if transmission planning is fully integrated. California cannot balance clean electric grid infrastructure needs with efforts to restore, conserve, and strengthen natural and working lands unless transmission is planned to support and prioritize energy development in locations that avoid or minimize impacts to natural and working lands.

We strongly urge the Joint Agencies to establish a transmission technical working group promptly. This is similar to the recommendation from the Preliminary Root Cause Report⁴ for the mid-August heat storm outages that states:

² <https://efiling.energy.ca.gov/EFiling/GetFile.aspx?tn=237167&DocumentContentId=70349>

³ <https://efiling.energy.ca.gov/EFiling/GetFile.aspx?tn=237167&DocumentContentId=70349>

⁴ <http://www.caiso.com/Documents/Preliminary-Root-Cause-Analysis-Rotating-Outages-August-2020.pdf> at pg. 68

“Building on the Senate Bill (SB) 100 (De Leon, 2018) scenarios, consider where diverse resources can be built and the transmission and land use considerations that must be taken into account. Establish a transmission technical working group (CAISO, Bas, CEC, CPUC) to evaluate the transmission options and constraints from the SB 100 scenarios.”

Conclusion

Thank you for the opportunity to provide comments on the Workshop and the next steps to plan transmission to serve the SB 100 resource build. We appreciate the Joint Agencies and CAISO and their staffs’ time at the workshops and their hard work on moving forward with implementing the requirements of SB 100. We look forward to actively participating in the implementation of SB 100. Please contact Kate Kelly at kate@kgconsulting.net with any questions.

Sincerely,



Pamela Flick
Defenders of Wildlife
California Program Director