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ACP-California Comments on SB 100 Resource Mapping

Attached please find comments on behalf of American Clean Power - California regarding SB 100 resource mapping.

Additional submitted attachment is included below.



August 20, 2021

California Energy Commission
715 P Street
Sacramento, CA 95814

Submitted online

Subject: American Clean Power (ACP) - California Comments on the August 12, 2021 Joint Agency Workshop on Next Steps to Plan for Senate Bill 100 Resource Build: Resource Mapping

ACP-California is pleased to provide these comments on the Joint Agency Workshop on Next Steps to Plan for Senate Bill 100 Resource Build: Resource Mapping.¹ California's SB 100 goals will require the development of unprecedented amounts of new carbon-free capacity.² ACP-California appreciates the Joint Agencies' effort to prepare for the unprecedented renewable resource development that will be needed in the coming years to meet SB 100's goals. As such, the Joint Agencies³ should ensure that any planning efforts streamline future development of renewable resources do not exacerbate current development challenges. ACP-California offers the following comments to further this purpose:

1. In mapping renewable resource areas, the Joint Agencies must holistically consider the many siting factors that drive commercial development.
2. Considering a wider geographic footprint will help understand constraints and opportunities for different build-out scenarios.
3. The climate crisis' potential impact on specific species and ecosystems should be considered in resource mapping.

¹ The American Clean Power Association (ACP) is the voice of developers from across the clean power sector that are providing utility scale clean capacity and transmission while creating jobs, spurring massive investment in the American economy, and driving high tech innovation across the United States. ACP's mission is to transform the U.S. power grid to a low-cost, reliable, and renewable power system. ACP-California is the state project of the national organization and shares this mission with an eye toward California's market and policy venues.

² See 2021 SB 100 Joint Agency Report, Charting a Path to a 100% Clean Energy Future, Figure 35, at p. 84 (March 2021) available at: <https://www.energy.ca.gov/sb100>.

³ California Public Utilities Commission, California Energy Commission, and California Air Resources Board.

1. In mapping renewable resource areas, the Joint Agencies must wholistically consider the many siting factors that drive commercial development.

ACP-California appreciates the initial review of wind and solar resource areas and the broader discussion around responsible renewable siting and land use implications of the 100% clean energy build-out. However, we request an opportunity to provide additional information to the Joint Agencies on renewable energy project siting factors beyond those considered in the initial resource mapping presented at the workshop. Renewable developers consider multiple factors, not the least of which is the quality of the resource, system value, location of existing energy resources (e.g., repower potential or available transmission capacity), local considerations, and potential environmental impacts. ACP-California would appreciate the opportunity to discuss various siting factors in future workshops and ensure renewable resource mapping reflects the realities of development constraints.

While ACP-California supports resource mapping's broader goals of protecting sensitive ecosystems and informing developers, we are concerned that the information presented could preempt or bias individual project reviews. Many projects already face multiple challenges associated with a complex regulatory and permitting environment; the goal of this effort should be to hasten the transition to clean energy while upholding critical environmental protections

In addition, a comment was made that the Joint Agencies would need to provide a more granular assessment for wind resources, and in particular, analysis of the impacts of wind build-out on birds. ACP-California notes that the interaction between wind energy generation and bird populations and other species is thoroughly addressed in both federal law and federal, state, and local permits, as well as industry guidelines. ACP-California does not believe it is necessary to revisit these interactions in this forum.

If the Joint Agencies are to embark on this process with the goal of advancing toward 100 percent clean energy deployment, more collaboration and partnership between the Joint Agencies and the renewable industry on how this information is captured and conveyed will be critical.

2. **Considering a wider geographic footprint will help understand constraints and opportunities for different build-out scenarios.**

During the workshop, agency staff indicated that the Joint Agencies have not yet considered how best to capture the benefits of resource diversity in the resource map. While out-of-state resources will be considered going forward, the Joint Agencies should examine the impact of enhanced resource and geographic diversity on various build-out scenarios. Additionally, ACP-California recommends additional consideration of Southwest solar and solar+storage.

In mapping regional resources, ACP-California also recommends analysis of more enhanced regional coordination and resource sharing as part of this analysis. Such an effort was initiated in the RETI 2.0 initiative and highlighted as a recommendation of the SB 100 Report earlier this year.⁴ It will be important to consider various degrees of regional coordination as energy markets and policy evolves between 2021 and 2045.

Furthermore, we appreciate the Joint Agencies' inclusion of offshore wind datasets in the next iteration of the mapping effort. ACP-California encourages the Joint Agencies to consider the potential opportunities that better geographic and resource diversity can have both on system reliability as well as land and ocean use.

3. The climate crisis' potential impact on specific species and ecosystems should be considered in resource mapping. Clean energy can have a positive impact on local ecosystems.

Finally, ACP-California encourages the Joint Agencies to focus on why we're working toward 100 percent clean energy in the first place, and that is to stave off the worst effects of climate change. Climate change already poses a significant risk to some of California's most cherished landscapes. Renewable energy provides one of the most affordable and straightforward opportunities to reduce greenhouse gas (GHG) emissions. ACP-California encourages the Joint Agencies to emphasize coordination with renewable resource developers throughout the resource mapping process to ensure that environmental resources are protected without creating barriers for the development necessary to reduce GHG emissions and mitigate climate change.

Respectfully submitted,

/s/

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⁴ See 2021 SB 100 Joint Agency Report, Charting a Path to a 100% Clean Energy Future, p. 20 (March 2021) available at: <https://www.energy.ca.gov/sb100>.

("Closer collaboration with other state agencies, tribal governments, local and regional jurisdictions, and stakeholders, to plan for development will be important to balance clean electric grid infrastructure needs with efforts to restore, conserve, and strengthen natural and working lands.")