DOCKETED	
Docket Number:	21-SIT-01
Project Title:	21-SIT-01, SB100 Implementation Planning for SB100 Resource Build
TN #:	249519
Document Title:	American Clean Power – California Comments on the March 13, 2023 Commissioner Workshop on Land Use Screens
Description:	N/A
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Organization:	Ellison Schneider Harris & Donlan LLP
Submitter Role:	Public
Submission Date:	3/30/2023 4:51:07 PM
Docketed Date:	3/30/2023

March 30, 2023

California Energy Commission
Docket Unit, MS-4
Docket No. 21-SIT-01
715 P Street
Sacramento, California 95814

Submitted Electronically

Re: American Clean Power – California: Comments on the March 13, 2023 Commissioner Workshop on Land Use Screens (21-SIT-01)

American Clean Power – California ("ACP-California") appreciates this opportunity to provide the following comments and responses to staff's questions from the California Energy Commission ("CEC") on the March 13, 2023 Commissioner Workshop on Land Use Screens ("the Workshop").

Background on ACP-California

The American Clean Power Association ("ACP") is the voice of companies from across the clean power sector that are providing cost-effective solutions to the climate crisis 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 a state project of ACP, representing companies who develop, own, and operate utility-scale solar, storage, land-based wind, offshore wind, and transmission assets to power a clean and renewable economy for California and the West. Our wind developers are focused on high-capacity factor regions like New Mexico and offshore. ACP-California is unanimous in its commitment to the need for – and widespread economic benefits derived from – a diverse and balanced portfolio in California to reliably and affordably meet State energy demands and environmental goals. Members of ACP-California strive to direct the economic and environmental benefits of utility-scale renewable energy to California, while remaining sensitive to land use concerns. These comments express our appreciation for the public review and vetting led by the CEC. We

encourage the agencies to formalize an ongoing public review and information sharing process for the state's geo-spatial tools. We recommend the agencies focus on how the land use screens can be used as a tool to plan and approve long-term transmission, particularly through inputs and assumptions for the 2024-25 Transmission Planning Process ("TPP"). We commend the State for developing a robust and publicly available model that has the capability of applying successive, overlaying screens. We also recommend caution in applying successive screens, particularly those that are speculative in nature, such as the climate change screen. It is important to acknowledge that developers make considerable investments in site evaluation and permitting preparation. Instead of using the land use screens to limit development (e.g., queue prioritization), the State should use these important screens as a tool to identify and prioritize longer-term network transmission investments.

As was made painfully clear at the last transmission development forum, long-planned transmission developments continue to suffer delays and reprioritization. This situation is evidence of the long-term nature of transmission planning. It has also been made clear the State is not on track to develop at the pace and scale the State has identified in the last Senate Bill ("SB") 100 report. The land use screens should be used in the 2024-25 TPP to help address the need for long-term transmission investments.

Comments on Regulatory Actions Related to Land Use Screens

The land use screens should be used to ensure there is orderly development each year between now and 2045 so that the resource buildout is efficient, cost-effective, timely and meets the dual need of both energy and capacity (including deliverability) for the grid. The land use screens should enable the California Public Utilities Commission ("CPUC"), CEC, and California Independent System Operator ("CAISO") to conduct SB 100 Reporting, Integrated Resource Planning ("IRP") planning and the TPP in a way that enables the State to execute on a diverse resource buildout. In order to achieve the SB 100 targets, the State must plan now and approve new largescale transmission solutions in the near-term. SB 100 is a core State policy and has the potential to serve as a tool for conveying longer-term State public policy needs to the CAISO to study in the TPP. The projected delays in CAISO interconnection Cluster 15 and the ongoing "reprioritization" of key network upgrades by transmission owners has made it clearer

than ever that the State will only reach its goals if it plans and approves transmission needed 15-20 years from now.

The land use screens play a key role in the IRP and SB 100 processes, and in transmission siting which impacts project siting. There is also a proposal at CAISO that the busbar mapping could play into the ability for a project to enter the interconnection queue, which would give the land use screens and busbar mapping even more commercial impact.[1] At a high level, they should be viewed as a tool to enable timely and well-informed planning. The land use screens should be used and applied by the CPUC and CEC with the recognition that environmental impacts of individual generation projects will be evaluated when those projects go through permitting. Put differently, the land use screens should be used to justify and prioritize longer lead-time transmission planning, not to hamper or prejudge permitting and interconnection processes for renewable energy development.

The land use screens play an especially important role in the IRP process, particularly now that the State will need to start planning for a 15-year planning horizon starting with the 2024-24 TPP.[2] In addition to proactively planning for new bulk transmission through the Integrated Energy Policy Report and IRP, we also recommend the CEC and other agencies design the SB 100 reporting process to request additional inputs and assumptions for study in the 2024-25 TPP (and later TPP cycles) that may be on a longer-term horizon than the IRP or have a broader coverage than the IRP (e.g., planning in CAISO to account for all load-serving entities, not just those that are CPUC-jurisdictional). In both the IRP and SB 100, we encourage the agencies to avoid developing and using the busbar mapping results to avoid near-term transmission upgrades. As the CEC and CPUC evaluate various capacity expansion model runs in the IRP and SB 100, the land use screens should serve as an opportunity to identify where new transmission can help avoid land-use impacts.

We are also encouraged by the expansion of the screens to encompass out-of-state and other balancing authority areas ("BAAs") besides the CAISO. While we have some specific comments below regarding the development of out-of-state land use screens, particularly for

[1] See CAISO's 2023 Interconnection Process Enhancements Issue Paper and Straw Proposal, available at: http://www.caiso.com/InitiativeDocuments/Issue=Paper-and-Straw-Proposal-Interconnecton-Process-Enhancements-2023-Mar132023.pdf.

[2] See Pub. Util Code § 454.57(e), SB 887 (Becker, Stats of 2022), available at: https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220SB887.

wind resources, we nevertheless support a more holistic view of diverse resource development throughout the Western Interconnection. In particular, we support the State using busbar mapping to more clearly identify actions the State and CAISO can take to address longer-term Maximum Import Capability needs. ACP-California strongly supports collaboration on clean energy development with neighboring BAAs and we believe the land use screens could be a key input in understanding the overall land use benefits of a more regionalized grid.

Above all, the land use screens should help identify the actions needed now to achieve the longer-term resource buildout of SB 100. There are a handful of bulk transmission solutions needed to deliver offshore wind that should be planned and approved now. There are also bulk transmission facilities that should be developed now to ensure that the CAISO can deliver the full scale of solar and storage resources identified in the IRP. To ensure these bulk transmission facilities are actually developed when they are needed, the State must take a proactive role in the application of these land use screens in the IRP and SB 100 process and use them to inform longer-term transmission build-out through the TPP.

We appreciate the CEC's efforts to take into account more public participation on land use screens, especially given their increasing use and importance in several proceedings across state agencies. While strides have been made on transparency, there are additional steps that should be taken, as further described below.

Responses to Questions Posed by the CEC During the Workshop

1. **What geospatial data could be used in the determination of available land area for substation-level capacity additions for transmission planning?**

   No comment.

2. **Should the geospatial areas identified in the Core Land-Use Screen be used in busbar mapping to quantify available land area around a substation? Should additional datasets be considered given that busbar mapping occurs at a finer-scale resolution than the statewide land-use screens for resource potential? If so, what datasets?**

Renewable energy developers often go to great lengths to evaluate potential development locations and frequently conduct their own surveys and gather geospatial data on specific locations. This data could provide additional connectivity between the higher-level geospatial areas in the Core Land-Use Screen and at the more granular busbar mapping. While there is not a practical way to access this information on a systematic basis, the State could develop a

process that enables developers to share more granular geospatial data on a case-by-case basis. We recommend providing a publication schedule for the land use screens well-ahead of the development of busbar mapping for the IRP and TPP. This could be similar to the process the CEC has conducted over the last year where it has published various iterations of the mapping tool and invited public comment. The publication schedule would help provide predictable periods of time where developers know they will be able to confidentially share private data ahead of the publication and conclusion of the busbar mapping process.

3. How might the CEC update the environmental and land-use evaluation to be able to evaluate decisions across multiple land-use objectives?

As discussed above, we believe the IRP and the SB 100 processes should take a more holistic view of resource development and enable planning that supports clean capacity development throughout the Western Interconnection. Developing land-use data outside of the CAISO is challenging because data availability can vary by BAA, especially on the issue of projected resource development. In the CAISO, the commercial interest in particular interconnection points is made relatively clear through the interconnection process, but this is not always true in other BAAs. This issue was apparent at the Workshop when staff discussed its process for refining how close a wind resource area needed to be to a substation in order to merit inclusion in the busbar mapping. We are concerned that simply asking how close a wind resource area is to an existing substation misses the potential for new switchyards proximate to existing transmission corridors where there may not be a substation within ten to thirty miles. This is not uncommon in other parts of the West where there can be long distances between loads and generation sources and there may be many miles before there is a stepdown in the transmission system. Even for in-state mapping, distance to substation should be enlarged. The land available and most amenable to renewable energy development may require longer gen-ties and should not automatically be excluded.

Thus, as the CEC refines the out-of-state mapping data, it should account for longer potential distances from resources and substations, the potential for new switchyard development along transmission corridors, and new development by merchant transmission developers. As discussed above, the CEC should provide pre-defined points in time where it will seek input from the development community with these types of development insights before the busbar mapping is published and finalized.

4. What environmental and land-use metrics could the CEC report back to the CPUC?

The environmental and land-use metrics should provide the CPUC with a basis to identify the locations on the transmission system where bulk-transmission development is clearly needed in the longer term. We offer the following thoughts:

- **Remove overly restrictive and arbitrarily modeled screens.** We recommend avoiding overly limiting development areas based on uncertain or modeled screens. For example, the new climate change screen that attempts to predict how habitat and migration patterns will affect development should not create a barrier to new transmission development or project siting and the CEC should consider removing that screen. This is an evolving area of science as well, as California's climate patterns continue to change.
- **Remove and/or clarify exclusions applied.** Some other exclusions are less clear, such as whether there is a large buffer planned around infrastructure like roads. A 10 mile to substation assumption may also be overly restrictive as development areas get more constrained with additional renewable energy buildouts. In addition, these exclusions are arbitrary—why not 15-20 miles to a substation? An otherwise appropriate development site should not be excluded due to the application of arbitrary and overly restrictive criteria.
- **Lean on existing regulatory and permitting processes.** It also makes project development increasingly difficult and arbitrary when a myriad of land use screens, that are not attached to an existing permitting or regulatory process, are applied. Commercial interest already takes into account many factors, such as trying to avoid an area replete with endangered species which makes development more complicated and costly. Ultimately, new generation projects will still need to undergo stringent environmental review and some of the project-specific implications of renewable energy development should be deferred to the generation project's application process rather than a high-level screening exercise.

As discussed above, the land use screens should serve as a tool to help prioritize longer-term transmission plans and approvals that are needed now to reach the SB 100 targets.

Conclusion

ACP-California appreciates the opportunity to provide these comments on the Workshop. ACP-California encourages the CEC, CPUC and CAISO to continue and expand their efforts to address the transmission planning and approval needs that will be necessary for California to achieve the diverse, reliable, clean energy portfolio the State requires in the longer term.

Sincerely,

/s/

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