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**Defenders of Wildlife Comments on SB 100 20-Year Outlook  
Workshop 21-SIT-01**

*Additional submitted attachment is included below.*



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June 27, 2023

California Energy Commission  
Docket Unit, MS-4  
Docket No. 21-SIT-01  
715 P Street  
Sacramento, California 95814-5512

Delivered via email to: [docket@energy.ca.gov](mailto:docket@energy.ca.gov)

RE: Docket No. 21-SIT-01 — Staff Workshop on Resource Portfolio Assumptions for the Next CAISO 20-Year Transmission Outlook

Thank you for holding the June 23<sup>rd</sup> staff workshop on the Resource Portfolio Assumptions for the Next CAISO 20-Year Transmission Outlook. These comments are submitted by Defenders of Wildlife (Defenders) on behalf of its 2.1 million members in the U.S., including over 316,000 in California. Defenders has a long history of advocating for generating and transmitting electricity from renewable energy sources with the least environmental impact. A low carbon energy future is critical for California – for our economy, our communities, and the environment. Achieving this future—and *how* we achieve it—is critical for protecting California's internationally treasured wildlife, landscapes, productive farmlands, and diverse habitats.

### **Comments and Recommendations**

We are pleased to see many of our 2021 recommendations on the 2040 SB 100 Starting Point Scenario incorporated into this update. The update to the 20-Year Transmission Outlook and the 2045 SB 100 Starting Point Scenario correctly recognizes that energy planning cannot be separated from land use planning. We appreciate and support the California Independent System Operator and California Public Utility Commission's (CPUC) integration of the California Energy Commission's (CEC) Land Use Screens<sup>1</sup> into their

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<sup>1</sup> [California Energy Commission Workshop on Land Use Screens](#). Docket 21-SIT-01.

planning processes. The CEC's Core Land Use Screen is a significant step forward for energy planning in California.

### More Distributed Energy Resources Needed

We appreciate the inclusion of 125 MW of distributed energy resources (DER) in the 2045 SB 100 portfolio. Increased DER can reduce utility scale solar development pressure on imperiled desert lands in California and Nevada. DER may be under-represented in the portfolio due to the CPUC's techno-economic screen. The CPUC's techno-economic screen appears to exclude low implication areas such as urbanized industrial areas (e.g., warehouses in Ontario).<sup>2</sup> This skews the land use screen results to rural and desert lands and precludes consideration of low implication opportunities in industrialized areas with significant rooftop potential for solar generation. We request the techno-economic criteria be modified to allow the portfolios to capture solar generation potential of large industrial areas such as warehouse distribution centers close to load.

### **Conclusion**

Thank you for the informative webinar and the prompt posting of the webinar recording. We appreciate the energy agencies' collaboration and look forward to continuing to engage in these planning processes. Please contact Pamela Flick at [pflick@defenders.org](mailto:pflick@defenders.org) or Kate Kelly at [kate@kgconsulting.net](mailto:kate@kgconsulting.net) with any questions.

Sincerely,

Pamela Flick  
California Program Director  
Defenders of Wildlife

Kate Kelly  
Consultant  
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<sup>2</sup> [California Public Utilities Commission June 7, 2023 Workshop Presentation on Draft 2023 Inputs and Assumptions](#), Slide 62.