

**DOCKETED**

<b>Docket Number:</b>	23-SB-100
<b>Project Title:</b>	SB 100 Joint Agency Report
<b>TN #:</b>	252128
<b>Document Title:</b>	Golden State Clean Energy, LLC Comments - ON 2025 SB 100 REPORT KICKOFF WORKSHOP
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Golden State Clean Energy, LLC
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	9/5/2023 1:16:31 PM
<b>Docketed Date:</b>	9/5/2023

*Comment Received From: Golden State Clean Energy, LLC  
Submitted On: 9/5/2023  
Docket Number: 23-SB-100*

**COMMENT OF GOLDEN STATE CLEAN ENERGY ON 2025 SB 100  
REPORT KICKOFF WORKSHOP**

*Additional submitted attachment is included below.*

**BEFORE THE ENERGY COMMISSION  
OF THE STATE OF CALIFORNIA**

*SB 100 Joint Agency Report: Charting  
a Path to a 100% Clean Energy Future*

23-SB-100  
(April 1, 2023)

**COMMENT OF GOLDEN STATE CLEAN ENERGY, LLC, ON  
2025 SB 100 REPORT KICKOFF WORKSHOP**

Golden State Clean Energy (“GSCE”) appreciates the opportunity to submit this comment on the August 22, 2023, kickoff workshop held to discuss the 2025 Senate Bill 100 Joint Agency Report.

GSCE strongly supports the introductory remarks from the dais focusing on (1) the importance of bringing land use to the forefront in the study process, (2) the need to move as quickly as possible and accelerate resource and transmission build out, (3) addressing interconnection and permitting challenges, and (4) the desire to elevate non-energy benefits in the resource portfolio development process. These topics should be at the forefront of the 2025 SB 100 Report process, as they have historically not received sufficient focus in other resource portfolio development processes.

Many of these elements are difficult to quantify and thus have been secondary considerations to least-cost modeling in other planning forums. However, the pressing need to move from high-level planning to large-scale infrastructure build out requires a more directed effort. To effectively meet policy goals, the state must identify areas with both the resource potential and favorable land use planning circumstances and incorporate them into actionable decisions in a timely manner.

In particular, focusing on the land use and environmental ramifications of portfolio resource locations, particularly for solar, can support numerous policy issues if given a more impactful role. The state must aggressively direct development to areas where the land use screens show an aggregation of suitable land for future development overlaid with commercial interest and community support. These areas will require new transmission development, but the only way to study and identify sufficient transmission need is to actively target scalable future development on low implication lands. In contrast, evenly spreading planned resources across the state fails to account for serious land use constraints and underestimates the transmission needs for resource development in more ideal areas. The SB 100 Report process should take aggressive action in directing the location of resource portfolios. Failure to do this in a timely manner will delay requisite transmission development for meeting California’s clean energy requirements.

## Statewide Planning

Given the significance of this planning document, GSCE urges the Joint Agencies to bring the California balancing authority areas (“BAA”) together and use the 2025 SB 100 Report to conduct inter-BAA resource and transmission planning. The SB 100 Report provides a unique forum to consider cost-sharing opportunities and opportunities to scale expected resource areas to maximize development efficiency for the state. Currently no formal forum exists for this type of coordinated planning. The Joint Agencies should strive to provide stakeholders, the integrated resource planning process, and the SB 100 Report process with an understanding of what opportunities exist and how cost-effective certain transmission projects could be with joint or multiple BAA cost-sharing arrangements.

## Pathway Studies

GSCE urges the Joint Agencies to conduct a land use focused pathway study with the base case portfolio mapped using the new SB 100 Terrestrial Climate Resilience Study Screen from the new land use screens. This land use screen appears to have been developed with the SB 100 Report process in mind, and the implications of this land use screen will be best understood by isolating the land use screen as the only variable.

Pathway studies should also be used to better understand and manage reliability risks such as interconnection and development delays, development timelines for evolving resource technologies, and other drivers that create more need for in-state resources and long lead-time transmission. GSCE believes the pathway studies should include scenarios that illuminate the siting and transmission implications associated with an increasing reliance on in-state solar and storage. This can be done through studies of less resource diversification and an accelerated resource build with more in-state development, focusing on regions and projects that can and will actually be built. The opportunities to further scale up the development of proven in-state resources and the associated transmission implications needs to be understood.

GSCE supports considering all technologies as part of the state’s energy future. Recent experience has demonstrated that the path toward decarbonization will require an all-the-above resource procurement approach to ensure reliability as the state’s thermal resource fleet retires. However, transmission development is currently the most limiting factor in California’s ability to bring new generation and storage online. Focusing many of the proposed study pathways on resources that can provide important reliability benefits, but that have significant development or timeline risk may be counterproductive. More pathway studies should be conducted to better balance the different planning scenarios and provide least regrets solutions that avoid future reliability issues.

Conclusion

GSCE appreciates the Joint Agencies' consideration of this comment and looks forward to continuing to be a part of California's decarbonization efforts.

Dated: September 5, 2023

Respectfully submitted,

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