

DOCKETED	
Docket Number:	23-SB-100
Project Title:	SB 100 Joint Agency Report
TN #:	252183
Document Title:	Defenders of Wildlife Comments on SB 100 2025 Kick Off Workshop
Description:	N/A
Filer:	System
Organization:	Defenders of Wildlife
Submitter Role:	Public
Submission Date:	9/7/2023 8:19:01 PM
Docketed Date:	9/7/2023

*Comment Received From: Defenders of Wildlife
Submitted On: 9/7/2023
Docket Number: 23-SB-100*

**Defenders of Wildlife Comments on SB 100 2025 Kick Off
Workshop 23-SB-100**

Additional submitted attachment is included below.



California Program Office
P.O. Box 401, Folsom, California 95763 | 916-313-5800
www.defenders.org

September 8, 2023

California Energy Commission
Docket Unit, MS-4
Docket No. 23-SB-100
715 P Street
Sacramento, California 95814-5512

Delivered via email to: docket@energy.ca.gov

RE: SB 100 Kickoff Workshop

Defenders of Wildlife (Defenders) respectfully submits these comments on the August 22, 2023 Kickoff Workshop for the 2025 SB 100 Joint Agency Report (Report). Defenders is dedicated to protecting all wild animals and plants in their natural communities and has 2.1 million members and supporters in the United States, 316,000 of whom reside in California. We employ science, public education and participation, media, legislative advocacy, litigation, and proactive on-the-ground solutions to prevent the extinction of species, associated loss of biological diversity and habitat alteration and destruction.

We strongly support the development of renewable energy production. A low-carbon energy future is critical for California's economy, communities, and environment. Achieving this future—and *how* we achieve it—is critical for protecting California's internationally treasured wildlife, landscapes and diverse habitats. We believe transitioning to a renewable energy future need not exacerbate the ongoing extinction crisis by thoughtfully planning projects while protecting habitat critical to species.

The California Energy Commission (CEC), California Public Utility Commission (CPUC), California Air Resources Board, and the California Independent System Operation (CAISO) – collectively the energy agencies – have made great strides forward since the 2021 SB 100 Joint Agency Report. The 2022 Joint Agency Memorandum of Understanding for energy planning¹ and the CEC's advancements in land use screening methodology and tools are already benefiting energy planning to meet SB 100 goals. We look forward to seeing the CEC's land use screening tools inform and advance the 2025 SB 100 Joint Agency Report.

¹ <http://www.aiso.com/Documents/ISO-CEC-and-CPUC-Memorandum-of-Understanding-Dec-2022.pdf>

Comments

Proposed Pathways

We support the selected Pathways for the Report and recommend:

DER Focus – This Pathway offers the opportunity to reduce the vast acreage needed for utility scale renewable energy located far from load centers. We request that any techno-economic screen specifically include low implication areas such as urbanized industrial areas (e.g., warehouses in Ontario) to capture large industrial areas such as warehouse distribution centers close to load. The SB 100 process should elevate the value of community level and small system generation versus continued reliance on the bulk grid system. Further, we recommend consideration of the carbon sink values of California’s native habitats under this Pathway as discussed in the Center for Biological Diversity’s recent report.²

Resource Diversification – While resource diversification is important for reliability and allowing California to be nimble in meeting our clean energy needs, this Pathway is uncertain. To date, the deployment of floating offshore wind at the magnitude and offshore depth planned for under SB 525 is untested and deliverability and transmission timelines remain aspirational. While there is strong interest in hydrogen energy, the concerns about its cost, efficiency, and environmental consequences cannot be ignored.³ We encourage the Commission to take a measured approach to considering these resources so their inclusion does not trip up meeting the SB 100 goals and objectives.

Geographic Diversification – Similar to resource diversification, geographic diversification can benefit meeting SB 100. We recommend the Commission consider the availability and reliability of out of state resources in light of increasing demand west-wide for renewable resources and the now common extreme weather cycles that impact generation (e.g., drought and hydroelectricity) and transmission (e.g., wildfire and weather events). We appreciate the inclusion of the WECC environmental screens to supplement the CEC’s land use screens but caution that the level of detail in out of state environmental datasets is uneven compared to California’s.

Combustion Resource Retirement – Achieving this Pathway has taken far too long in California. Recent decisions by the Commission and CPUC to extend the life of gas-fired power plants and natural gas storage only exacerbate the problem. California can and must do better. We encourage the Commission to aggressively accelerate combustion resource retirement in SB 100 planning. Studies have shown we can meet our clean energy goals while meeting natural resource protection goals and

² [Hidden In Plain Sight: California's Native Habitats Are Valuable Carbon Sinks](#). Yap, T., Prabhala, A., Anderson, I. Center for Biological Diversity. July 2023.

³ <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M496/K396/496396697.PDF>

that this approach increases project viability while being cost effective.⁴ Rodger Lin commented during the workshop that affordability vs. clean energy is a false choice. The same holds true for resource protection and clean energy.

To better understand the implications of each Pathway, we request a metric-based analysis that identifies the acres needed for generation and transmission and how much of that area would overlay biological planning priorities, terrestrial intactness, CEC cropland model, and ACE climate resilience as mapped in the CEC's Land Use Screens for Electric System Planning.⁵ We also request this information be provided at the CAISO transmission planning zone level to support the consideration of regional equity for communities and natural resources.

Finally, we direct the energy agencies' attention to the Roosevelt Institute's recently released report on equitable approaches to planning and permitting renewable energy and transmission.⁶ The report makes an important distinction between performative permitting reform and the actual planning needed to achieve a timely clean energy transition. We request the energy agencies convene a stakeholder workshop on the Report for development of the 2025 SB 100 report.

We thank the Workshop presenters and panelists for the informative and thoughtful discussions. We look forward to actively participating in developing the 2025 SB 100 Joint Agency Report. Please contact Pamela Flick at (916) 442-5746 or pflick@defenders.org or Kate Kelly at (530) 902-1615 or kate@kgconsulting.net with any questions.

Sincerely,



Pamela Flick
California Program Director



Kate Kelly
Consultant

⁴ Wu, G. C., Jones, R. M., Leslie, E., Williams, J. H., Pascale, A., Brand, E., Parker, S. S., Cohen, B. S., Fargione, J., Souder, J., Batres, M., Gleason, M., Schindel, M., & Stanley, C. K. (2023). Minimizing habitat conflicts in meeting net-zero energy targets in the western United States. *Proceedings of the National Academy of Sciences of the United States of America*, 120(4). <https://doi.org/10.1073/pnas.2204098120>

⁵ <https://experience.arcgis.com/experience/de6ab11146bf47068ff294d87780ce00>

⁶ [A Progressive Take on Permitting Reform: Principles and Policies to Unleash a Faster, More Equitable Green Transition](#). Bozuwa, Johanna, Mulvaney. Roosevelt Institute. August 2023.