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LB ACE Comments on 2023 SB 100 Workshop

Additional submitted attachment is included below.

LONG BEACH ALLIANCE
FOR CLEAN ENERGY

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 held 8/22/2023

Long Beach Alliance for Clean Energy Comments on Senate Bill 100 Kickoff Workshop

Long Beach Alliance for Clean Energy (LB ACE) appreciates the opportunity to participate in and respectfully submit the following comment on the Senate Bill (SB) 100 Kickoff Workshop held on 8/22/2023 for the 2025 Senate Bill Joint Agency Report.

Long Beach Alliance for Clean Energy was founded by a group of BIPOC (Black, Indigenous, People of Color) scientists, educators, and advocates after Lead (Pb) was found in the drinking water by students at California State University Long Beach in 2017.

In 2018 we supported the passage of SB 100 with ongoing concern for how public infrastructure and resources are to be managed to ensure the long term viability of Long Beach as a commercial and industrial hub in Southern California, as well as a livable city for its diverse population.

The mission of LB ACE is to educate, advocate, and transform our fair town along science-based, and equity-focused, climate stabilization pathways. Our vision is the immediate and just transition away from all dirty energy resources in a geographical area with historically significant and attributable climate impacts from over 100 years of intensive fossil fuels production and consequent dependency on the trap of cheap and easy economic and technological development from dirty energy resources. We are painfully aware of the difficulties our City, and the Greater Long Beach Area, have in accomplishing such a transition in the handful of years still yet open for that task, and we do appreciate the Joint Agencies' efforts to provide a 2025 update to achieving SB 100 statutory targets, which are 100% clean energy as soon as practicable, no later than 2045.

LB ACE thanks the California Energy Commission (CEC), California Public Utilities Commission (CPUC), and California Air Resources Board (CARB) – collectively, the "Joint Agencies" – for their leadership on developing the SB 100 Joint Agency Report, and for the presentation of current progress on it at the Kickoff Workshop. To reiterate and clarify our request in the Kickoff Workshop for a model scenario of the "fastest possible transition" to only

renewable sources, first there needs to be clarity on which sources. Electricity generation types that create or rely on carbon pollutants, such as Waste-to-Energy (W-E) or Carbon Capture Utilization and Sequestration (CCUS) or various Hydrogen combustion schemes should not be included in the requested model scenario, nor should more familiar polluting or fossil fuel based generation types: Coal, Oil, Gas, or Nuclear. Similarly excluded should be incineration of municipal waste, like the City of Long Beach and the County of Los Angeles have extant at SERRF presently. LB ACE requests that the Joint Agencies create and include in the 2025 SB 100 Report a model scenario where only wind, solar, intertidal, geothermal electricity generation types – i.e. renewable and non-polluting types – are considered, along with Distributed Energy Resources such as battery storage, community micro-grids, salt domes, etc., in the *fastest possible transition timeline.*

What can we achieve? For the requested model scenario, could that be a year? A month? How about six days so Californians can rest on the seventh?

Two years ago, prior to the CPUC's NEM3 rule changes for instance, the answers to these questions might well have included the immediate public financing of solar panel and battery storage installation on the roof of every building in California that could physically support it, and such a scenario element might well have been shown through the modeling to be more cost-effective, reliable, and equitable over the 20+ year period of climate instability Californians can already expect than other alternatives. Would undergrounding every electricity transmission wire in California over the next 6 months be a scenario element if money is not a variable and skilled work-hours are assumed to be met, whatever the number or composition? What can we achieve?

Could minimizing environmental impacts be a condition of the requested scenario, even if that means excluding most utility-scale renewable generation projects in rural areas that service urban areas instead of their own? What about assuming public and state ownership to replace the (currently) Investor Owned Utilities, or some other scenario element so that no one actor's profit-making is a limiting factor on the quickest possible transition timeline for the state of California as a whole? Can the requested modeled scenario pathway include the maximal capacity utilization of battery storage and bi-directional charging of electrical vehicles and large machinery possible across the state of California? Do the Joint Agencies have an accurate site inventory for this scenario element? Doesn't every Californian deserve to know what their options are to participate in the energy transition across proposed SB 100 pathways? Again, LB ACE requests a model scenario to answer the question: What can we achieve – if we want California to achieve it as fast as possible ?

Across modeled scenarios, if for instance we know that Once-Through Cooling (OTC) coastal gas plants – such as AES Alamitos, AES Huntington, and Ormond Beach –are not going to be part of any post-2045 SB 100 Compliant scenario, can each and every modeled scenario in the 2025 Joint Agencies Report assume that these facilities will be retired in 2026 with no possibility of further extension? LB ACE strongly believes the total costs and risks of continued operation of these

facilities have not been adequately evaluated over the past year by State Agencies, and we strongly concur with the Union of Concerned Scientists (docketed, this proceeding) recommendation that the Joint Agencies hold another workshop, specific to evaluating the social costs and tradeoffs between proposed SB100 pathways. We believe such a workshop would better inform and focus the Joint Agencies' efforts later this year in an Inputs and Assumptions workshop, and is logically prior and distinct from that to-be-scheduled I&A workshop. In specific, the we believe the Joint Agencies have a responsibility to develop SB100 pathway scenarios other than those dependent on utility-scale generation and transmission of renewables – including pathway scenarios entirely independent of bulk system resources and load management generally, such as those based on population-wide adoption of locally-deployed Distributed Energy Resources and distributed renewables not found in the "Pathway Analysis" flowchart presented at the August 22nd Kickoff Workshop.[1] Californians deserve to know what the total costs and trade-offs are across and between SB 100 pathway scenarios, and a workshop specific to the differences would greatly help in this regard.

In conclusion, LB ACE looks forward to continued engagement and participation in the implementation of SB 100, and thanks the CEC, CPUC, and CARB for the efforts on achieving SB 100 goals, and for their consideration of these comments.

Sincerely yours,
Dave Shukla
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[1] 2025 SB 100 Report Vision, slide 16.