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Comments on SB 100 Analytical Framework Workshop

Long Beach Alliance for Clean Energy appreciates the opportunity to attend and comment on the October 31st SB 100 Analytical Framework Workshop. These comments will be brief.

With respect to the Resource Diversification Scenario, it is our view that modelling diverse resources -- particularly those with similar attributes, such as coastal once-through-cooled natural gas peakers along with newer combined cycle gas generation plants -- should not be combined, but each separate diverse resource type should be modeled individually. Not only with respect to costs and benefits in an economic or energy sense, but in terms of the social costs of each resource type. Generally, it is our view that gas generation, hydrogen combustion, and nuclear power are not "clean energy", and so the public health costs, environmental costs, and opportunity costs of displaced investment in clean and green renewables, must be included in the modelling of these resource types.

Moreover, the uses to which certain resource types are devoted -- again, for instance, coastal gas plants whose primary productive function is to supply the energy required for offshore oil drilling installations -- should be considered in the model. We are at a stage in human history where all carbon-polluting energy resource types need to be eliminated, worldwide since 2022, according to the IPCC 6th Assessment Report. The social costs of and trade-offs with continued operation of water and energy resources devoted to offshore oil drilling that the State of California and various municipalities draw revenues from today must be accounted for in their impacts tomorrow, and through the 2030, 2040, and 2045 goals of the SB 100 Joint Agency Report.

We commend the CEC and its Staff for committing to modeling the retirement of natural gas combustion for electricity in the State of California, and we likewise urge the CEC to also model scenarios that do not rely on trash incineration or other waste-to-energy schemes that currently are a small portion of the electricity mix in California. We also wish to point out that there are several social and economic benefits, such as reduced wildfire risk, that need to be incorporated into the modeling of Scenarios that rely solely on Solar, Wind, and Geothermal -- i.e. true clean and green "renewables". It is our view that the CEC has an obligation, given the language of SB 100 as well as the spirit in which the legislature passed the bill in 2018, to model several iterations of Scenarios that rely exclusively on Solar, Wind, Geothermal, non-polluting Hydroelectric -- i.e. true clean and green "renewable" sources. Note that these Scenarios should also include mandates from related legislation -- SB350, SB337, SB1000, etc.

Finally, we commend the CEC and its Staff for their transparency and inclusivity in the process thus far, and look forward to further working with you throughout the SB 100

process on the implementation of this and related clean energy legislation.

Thanking you,
Dave Shukla, on behalf of the
Long Beach Alliance for Clean Energy