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Comment on Fountain Wind Project Opt-in Application for Certification

Additional submitted attachment is included below.



California Wind Energy Association

December 4, 2023

California Energy Commission
Docket No. 23-OPT-01
1516 Ninth Street
Sacramento CA 95814

Submitted via e-commenting portal

Re: Comments Following Joint Environmental Scoping and Informational Meeting on Fountain Wind Project Opt-in Application for Certification

CalWEA appreciated the opportunity to comment in person at the November 28, 2023, workshop in Shasta County. These comments elaborate on those remarks, responding to portions of Questions 3, 4 and 6 in the November 17, 2023, Meeting Notice:

- What factors are most important and should be considered by CEC staff in developing a recommendation for or against approval of the project despite the inconsistency with the local ordinance?
- What value to state goals, such as meeting renewable energy and greenhouse gas emission reduction targets, does the project and its 205 MW of renewable energy generation bring, if any?
- Are there alternative renewable energy generation technologies or project sites the state should consider instead of the Fountain Wind's potential energy generation of 205 MWs?

We address these in turn.

What factors are most important and should be considered by CEC staff in developing a recommendation for or against approval of the project despite the inconsistency with the local ordinance?

The Meeting Notice explained that, in 2022, California adopted legislation that enabled a statewide perspective when siting renewable energy projects. This was not precedent setting: in 1974, the Legislature recognized that electricity generation was essential to California's growth and energy security, and that entrusting local governments with siting decisions was untenable since necessary oil, gas, and nuclear power plants were not being approved due to local opposition. Thus, the state passed the Warren-Alquist Act, creating the California Energy Commission and vesting it with exclusive jurisdiction over the certification of large thermal power plants. As a result, facilities

critical to the state's energy demand were scrutinized and reviewed at the state level. Similarly, the CPUC approves new power lines.

Dozens of fossil fuel power plants were built as a result, successfully meeting the state's need for reliable electricity and enabling its economic growth. However, Californians are now suffering the climate change impacts of those power plants: wildfires, floods, droughts, and the dramatic loss of biodiversity known as the "sixth mass extinction" that is unfolding before our eyes.¹ And so, California has adopted policies that require a dramatic scale-back of our reliance on fossil fuels – as well as our gasoline-powered cars and the natural gas we use in our buildings. And that can only be done by building renewable energy facilities where renewable resources exist, including the limited commercially viable wind resources in Shasta County.

Further, California's fossil fuel power plants (and the oil refineries that support most of California's transportation needs) were often sited in populated, urban, and scenic areas. Disproportionately, these facilities exist in low-income and minority communities, where environmental burdens are high.^{2,3}

The Commission must consider the local impacts of Fountain Wind in this larger context. Fountain Wind will help the state achieve its renewable energy and climate goals while also reducing dependence on fossil fuels in power plants,⁴ thus reducing associated historic impacts in overburdened communities. Similarly, as the transportation sector is increasingly electrified, air pollution impacts on populations near roadways will be reduced.⁵

The Energy Commission must take this statewide view into account as it evaluates the Fountain Wind Project.

¹ See, e.g., World Wildlife Fund, "What is the sixth mass extinction and what can we do about it?" <https://www.worldwildlife.org/stories/what-is-the-sixth-mass-extinction-and-what-can-we-do-about-it#:~:text=Unlike%20previous%20extinction%20events%20caused,been%20converted%20for%20of%20food%20production>). Accessed November 29, 2023.

² PSE Health Energy, "California Peaker Power Plants" (May 2020). Available at: <https://www.psehealthyenergy.org/wp-content/uploads/2020/05/California.pdf>.

³ See, e.g., Chris Chavez, "Tackling Refinery Pollution in Southern California," Coalition for Clean Air (October 12, 2021). <https://www.ccair.org/refinery-pollution-rule-so-cal/#:~:text=More%20than%20half%20of%20California's,earners%20and%20people%20of%20color>. Accessed November 29, 2023.

⁴ The California Public Utilities Commission (CPUC) expects a reduction in natural gas plant use within the CAISO area of approximately 90 percent by 2039. See Administrative Law Judge Ruling Seeking Comment on Proposed 2023 Preferred System Plan and Transmission Planning Process Portfolios, CPUC, pp. 36-37 (October 5, 2023).

⁵ "CARB approves first-in-nation ZEV regulation that will clean the air, slash climate pollution, and save consumers money," California Air Resources Board (August 25, 2022). Available at: <https://ww2.arb.ca.gov/news/california-moves-accelerate-100-new-zero-emission-vehicle-sales-2035>

What value to state goals, such as meeting renewable energy and greenhouse gas emission reduction targets, does the project and its 205 MW of renewable energy generation bring, if any?

The latest draft CPUC plan to meet our climate goals will require an additional 12,000 megawatts of wind energy in or near California by 2045 – in addition to nearly 100,000 megawatts of other clean energy resources, including out-of-state wind and offshore wind, solar energy, and energy-storage projects.⁶ These planning figures also take into account the Energy Commission’s projections of rooftop solar and load reductions from energy efficiency measures.

It is important to understand that including a lot of wind energy in the portfolio to balance daytime solar energy production dramatically reduces the total resources that we need. A good wind-solar balance reduces overall capacity needs by about 30 percent. Remarkably, the CPUC’s current proposed resource plan would, in 2035, require nearly 30 percent less capacity overall – *over 25 gigawatts less capacity* – than did its previous, substantially less-resource-diverse, resource plan that informed the CAISO’s 2023-24 transmission planning base case for 2035.⁷

As CalWEA explained in its recent comments to the CPUC, the fact that resource diversity reduced total capacity needs is consistent with many other studies of high-diversity portfolios.⁸ Substantial resource diversity will bring numerous important benefits that will increase the odds of California meeting its greenhouse gas (“GHG”) goals on time. Specifically, high resource diversity will:

- **Mitigate the supply chain, price, and operational risks** that will be present with a grid that is heavily reliant on solar and batteries.
- **Use significantly less land**, which will reduce risks related to limitations on, and conflicts over, land availability in solar-heavy portfolios. Offshore wind is obviously not on land, onshore wind has a very small land footprint, and geothermal is very energy-dense in its footprint.
- **Reduce environmental and public conflicts.** Using less land, and spreading impacts across land and sea, will lessen impacts concentrated in any one area, reduce challenges with public acceptance, and reduce cumulative species impacts.
- **Reduce the need for raw materials.** By reducing overall capacity requirements, a more diverse portfolio would substantially reduce the raw materials – copper, lithium, steel, cement, etc. – needed to achieve our goals, which will be sourced largely from around the world. This is a global equity issue that California should be mindful of.
- **Reduce transmission needs.** Eliminating the need for 25 GW of projects would also likely reduce transmission needs since fewer resources would require interconnection.

⁶ *Supra* note 4 at Table 2.

⁷ CalWEA Comments on October 5, 2023, CPUC ALJ Ruling on Proposed 2023 Preferred System Plan and Transmission Planning Process Portfolios (Nov. 13, 2023) at pp. 5-6. Available at <https://www.calwea.org/public-filing/comments-ruling-re-proposed-preferred-system-plan>.

⁸ *Ibid.*

But 12,000 MW of CAISO-interconnected wind will require 60 new wind projects the size of Fountain Wind. That means it will be near-impossible to achieve our goals if well-studied projects on active timberland, like Fountain Wind, are turned down. While there is no energy source of any kind that does not create impacts, the Energy Commission must keep in perspective that non-polluting wind projects will reduce air pollution and climate warming gases elsewhere in the state, allowing all Californians to turn on our lights, heating and – importantly -- air conditioning as the earth warms.

Fountain Wind is, to CalWEA's knowledge, the only wind project currently moving forward in a permitting process in the state, in large part because it is so difficult to go through local permitting processes where statewide concerns are not the focal point. The CEC's Opt-In siting process really must work if the state is to meet its greenhouse-gas-reduction goals, because approving Fountain Wind's application will demonstrate the continued ability to develop wind in the California so that developers will put invest the capital needed to find those other 59 wind projects. A denial would all but declare California off limits to wind energy, driving wind development out of the state, undermining the ability to fulfill a diverse resource portfolio.

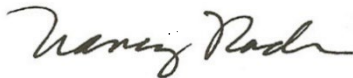
Are there alternative renewable energy generation technologies or project sites the state should consider instead of the Fountain Wind's potential energy generation of 205 MWs?

As discussed above, Fountain Wind is but one of approximately 60 CAISO-interconnected wind projects that would be needed to achieve the draft plan now pending before the CPUC and is the only project currently under land-use review in California. Many more projects must be identified and approved to fulfill the CPUC's plan and, thus, there are no alternatives to Fountain Wind.

Moreover, as also noted above, 100,000 MW of other clean energy resources -- including out-of-state wind and offshore wind, solar energy, and energy-storage projects -- will also be needed to meet the state's goals. This is a daunting task, one that demands that renewable energy projects be rejected only for very serious impacts. Fountain Wind, which has already been substantially modified to minimize impacts, is not such a project and is deserving of the Energy Commission's full support.

CalWEA appreciates this comment opportunity.

Sincerely,



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