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100 REPORT LAND USE 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 LAND USE WORKSHOP**

Golden State Clean Energy, LLC (“GSCE”) submits this comment on the February 1, 2024, workshop held to discuss the land use evaluation in the 2025 Senate Bill 100 Joint Agency Report. GSCE provides this comment to respond to the questions posed on slide 20 of the California Energy Commission’s (“Commission”) presentation.

GSCE appreciates the Joint Agencies hosting a workshop focused on land use considerations, and in particular we support the many statements calling attention to the value of planning for solar development on water challenged acreage in the San Joaquin Valley. GSCE highlights the following comments that warrant additional consideration:

- Commissioner Douglas’s important question about aligning clean energy resource planning with groundwater management.
- The Department of Conservation’s response that aligning clean energy resource planning with groundwater management should consider the implementation timelines and mandates related to groundwater sustainability plans and the ability for alignment to reduce the long-term cost of achieving compliance.

These comments highlight the need to coordinate the state’s energy resource development with its other policy goals, particularly groundwater management required by the Sustainable Groundwater Management Act of 2014 (“SGMA”). Groundwater sustainability compliance timelines align well with possible solar development timelines given that solar is both a known technology and the clean resource most likely to be considered on water-challenged lands. The SB 100 Report should recognize the need for large-scale solar development and corresponding new transmission to meet resource needs in the early to mid 2030s. Solar resources are uniquely positioned to meet these mid-term reliability needs because they have known development timelines and synergies with SGMA compliance timelines (which largely require subbasins in the San Joaquin Valley to achieve groundwater sustainability by the early 2040s), in contrast to other resources that are less certain in that timeframe. Such SGMA mandates and related water

constraints are projected to result in 500,000-900,000 *new* fallowed acres in the San Joaquin Valley.<sup>1</sup>

Water challenged acreage in the San Joaquin Valley could support tens of gigawatts of solar and storage resources, but transmission access and transfer capability need to expand. The westside of the valley includes significant acreage of contiguous land that both aligns with the Commission’s land use screens and is in proximity with 500 kV backbone transmission. However, new substations that tie directly into the 500 kV system are needed to integrate solar resources in the area at gigawatt scale. CAISO’s original 20-Year Transmission Outlook (2022) called for a new “Westland 500/230 kV Substation” and high voltage lines in the region, and these transmission facilities represent the type of investments the region needs. The SB 100 Report should support the need for this degree of future transmission investment in the westside of the San Joaquin Valley so solar can develop at gigawatt scale on low conflict lands that align with the Commission’s land use screens and bring cross-sector policy alignment.

### **1. What are the land-use-related challenges to SB 100 implementation?**

One of the difficulties generally with SB 100 implementation is that the important inter-agency work done for this report and broad stakeholder feedback provided only culminates in an informational or directional report that does not concretely guide the planning and procurement venues in which resources are authorized. The primary regulatory venue where the SB 100 resource need is being implemented is the California Public Utilities Commission’s (“CPUC”) integrated resource planning (“IRP”) proceeding.<sup>2</sup> The California Independent System Operator (“CAISO”) and the Commission also play important roles in the CPUC’s IRP proceeding, namely through CAISO’s transmission planning process (“TPP”), which identifies transmission projects to facilitate the IRP portfolios, and the Commission’s demand forecast and land use screens, which are inputs into the IRP. These processes are critical to SB 100 implementation, but the future generation and transmission resources that succeed in being authorized for development (and thus implement SB 100) are ultimately driven by the amount and location of future resources identified in the IRP portfolios.

Because the CPUC’s IRP portfolios generally dictate what new transmission is developed and thus where future resources interconnect, the SB 100 Report should play a more significant role in guiding the CPUC IRP portfolio development process, particularly in planning the location of future resources to prioritize land use considerations. One of the major challenges in developing IRP portfolios is recognizing land use and siting considerations to accurately inform resource

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<sup>1</sup> Public Policy Institute of California, *Managing Water and Farmland Transitions in the San Joaquin Valley*, pg. 9, Sept. 2023, available at: <https://www.ppic.org/?show-pdf=true&docraptor=true&url=https%3A%2F%2Fwww.ppic.org%2Fpublication%2Fmanaging-water-and-farmland-transitions-in-the-san-joaquin-valley%2F>. (“In the worst-case scenario—with no new supplies and no trading—nearly 900,000 acres of farmland would be fallowed, almost 50,000 jobs would be lost, and regional economic activity would decline by 2.3 percent (Figure 2). . . . But even in the most optimistic scenario—with one million acre-feet of new supplies—almost 500,000 acres would need to be fallowed annually. *This underscores the importance of finding productive alternative uses for these lands.*” (emphasis added)).

<sup>2</sup> Non-jurisdictional load serving entities also play a critical role in California meeting SB 100, but the CPUC oversees resource planning for the large majority of load in California.

selection and location beyond the CPUC's resource modeling processes. The resulting portfolios do not aggressively direct future generation and transmission to low conflict lands. Land use and environmental issues are considered in the busbar mapping process, and this process has improved with the new land use screens, but there is room for significant improvement to elevate the role that land use has in determining the resource portfolio provided to CAISO's TPP.

From a land use perspective, the SB 100 Report can guide the CPUC IRP by showing the long-term vision of where the resources needed by 2045 should be sited. A land use-focused view of the state's long-term resource needs should reduce the planning value of resources currently in the interconnection queue, which is currently considered alongside land use factors during the IRP busbar mapping process and thus detracts from land use's role. Instead, resource planning for 2045 should identify foundational transmission investments that need to be developed in key areas to guide future generator development. Further, the long-term vision of where the resources needed by 2045 should be sited should not strictly adhere to past busbar mapping results, as low conflict lands where future development should be directed may not currently have sufficient transmission infrastructure, but if new transmission is expected by 2045 than the IRP's assumptions about cost-effective available transmission capacity could completely change. In other words, what is deemed a low-cost portfolio decision in the IRP's study horizon may change simply by looking further out into the future, and a land use focused mapping process with a longer-term study horizon could lead to significantly different mapping results.

The SB 100 Report should clearly document the broad stakeholder support for San Joaquin Valley solar and the non-energy benefits this solar provides so that the CPUC IRP can use this joint agency multi-year planning effort to aggressively pursue needed San Joaquin Valley solar and related new transmission.

**2. Do you agree with staff's proposed goals (slides 10 and 19)? If not, what would you recommend?**

GSCE generally agrees with staff's proposed goals. To the extent feasible and applicable, the report should frame its assessment of these goals in terms of the Commission's land use screens so that the findings and conclusions can lead to more actionable improvements to resource planning and SB 100 implementation.

When addressing staff's first stated goal on slide 19 of the Commission's presentation (i.e., reviewing progress on the SB 100 resource build), the Commission should report how much new capacity has come online since the 2021 report and where those resources are located (at least by CAISO transmission zone, if not more granular, such as at the substation level). This will allow stakeholders to have a more informed discussion about where the SB 100 resource build is occurring and the broader land use ramifications of this development. Further analysis should identify the extent development was aligned or misaligned with current land use screens.

Regarding staff's second stated goal on slide 19 of the Commission's presentation (i.e., reducing environmental and land use impacts), the Commission should take a step back from the busbar mapping process that has occurred in the CPUC's IRP and take a land use focused view of where

future resources would be most ideal. The Commission should review where development at gigawatt scale is possible on low conflict land such that new transmission investments in the area can occur with a high confidence the investment will not be stranded. This does not have to occur for all resources, but the land intense resources like solar and wind should be considered. The Commission can also frame future transmission projects in terms of acreage protected by looking at how much development on working environments can be avoided by investing in a new substation that unlocks low conflict lands for development, which helps quantify some of the land use benefits of transmission investments.

A land use and environmental focused view of where future resources would be most ideal should largely build off the existing land use screens, as the screens capture the types of environmental and land use considerations that should be guiding resource planning. However, this effort to locate planned resources should differ from IRP busbar mapping in that it should give less consideration to existing transmission capacity and no weight to the existing queue (i.e., commercial interest)—these types of consideration can justify planning that does not align with land use and environmental priorities. A land use and environmental focused view of where future resources would be most ideal should still consider real-world development issues like access to large amounts of contiguous land such that investing in new transmission in the area is de-risked because of a large amount of available land where a generator could be developed and interconnect to the new transmission.

Regarding staff's third stated goal on slide 19 of the Commission's presentation (i.e., implementation challenges), the Commission can analyze any difference in where development has been occurring and where development would be more ideal from a land use perspective. This can highlight how IRP may need to steer the location of future resources more aggressively or other potential planning needs.

### **3. Do you agree with staff's resources under consideration (slides 12 and 16)? If not, what would you recommend?**

One missing element here is consideration of actual projects. Among all the modeling and planning that occurs to inform the SB 100 Report and other state planning efforts, regulatory bodies must not lose sight of the fact that it is actual project development that needs to occur for SB 100 to be implemented.

From a land use perspective, the Commission should consider as a factor whether developers have site control over the land necessary for development. Such land should be reasonable to consider from a long-term planning perspective by being sufficiently large so that a meaningful amount of new resources can be planned for, and the land should generally align with land use and environmental priorities. To the extent there are large areas of land that developers control, and those lands align with land use screens, the Commission should elevate this land in its planning efforts.

**4. Do you agree with staff’s proposed approach to resource mapping for the scenario analysis (slide 18)? If not, what would you recommend?**

GSCE agrees that additional study areas should be identified when mapping resources beyond the amounts in the recent CPUC busbar mapping. For instance, the original 20-Year Transmission Outlook identified a new substation in the Westlands area of Southern PG&E (“Westland 500/230 kV Substation”). The Commission should incorporate this facility as a future substation needed to unlock resources on low conflict land. GSCE supports additional substations in the area like this that tie into the 500 kV system while aligning with land use screens so that the area’s solar potential on low conflict land can be further taken advantage of.

**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: February 15, 2024

Respectfully submitted,

/s/ Ian Kearney

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