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Comments on SB 100 Modeling Inputs and Assumptions Workshop

Additional submitted attachment is included below.



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March 1, 2024

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

SUBJECT: SDG&E Comments on SB 100 Joint Agency Report Update Kickoff Workshop (Docket # 23-SB-100)

San Diego Gas & Electric Company (SDG&E) appreciates the opportunity to provide comments in response to the February 14, 2024, Senate Bill (SB) 100 Joint Agency Report Workshop on Modeling Inputs and Assumptions. The initial *2021 SB 100 Joint Agency Report*¹ (“SB 100 Report”) laid an important framework for informing the electricity sector’s transition to providing energy sourced from 100% renewable and zero-carbon resources by 2045. The 2021 report identified a number of future improvements for consideration, including the value of incorporating reliability and land use analysis.

SDG&E was encouraged by much of the discussion in the February workshop and pleased to hear California Energy Commission (CEC) staff’s interest in incorporating several significant improvements in the forthcoming 2025 SB 100 Joint Agency Report Update—including the forthcoming work to ensure that selected scenarios are assessed on their ability to support electric reliability standards. As Californians increase their reliance on electricity with the adoption of electric vehicles and appliances, the imperative of reliable and affordable power becomes even more significant.

In past comments tied to the SB 100 Report, SDG&E highlighted its support for including robust reliability modeling via a 1-in-10 loss of load expectation analysis; establishing clear definitions for technologies intended to support the zero-carbon electricity goal; and evaluating a wide array of resource portfolio scenarios inclusive of clean fuels. SDG&E also provided commentary identifying the need for close coordination amongst state agency and California Independent System Operator (CAISO) proceedings to ensure that evaluation of SB 100 resource portfolios occurs with consideration of anticipated investments in infrastructure that can support the transmission and distribution of clean

¹ *2021 Joint Agency SB 100 Report*, available at <https://www.energy.ca.gov/publications/2021/2021-sb-100-joint-agency-report-achieving-100-percent-clean-electricity>.

resources. These topics remain high priorities for SDG&E in the context of SB 100 planning.

Directly related to the material presented during the February workshop, SDG&E notes its appreciation for the CEC's inclusion of a diverse set of proposed expansion candidate resources, including a variety of hydrogen and carbon capture and sequestration technologies. These technologies can provide valuable support for the electricity sector and support the decarbonization of existing electric generation facilities.

The 2025 SB 100 Report will be an important input into electric utility planning efforts to support the achievement of clean energy goals. The February joint agency workshop on initial modeling inputs provided helpful, but preliminary insights. SDG&E looks forward to engaging more deeply as additional information is provided in the noted demand scenario workshop expected this Spring and with the release of draft modeling results. The additional specificity that will be provided at these later points in the process will better support stakeholders in their assessments on the feasibility, affordability, and reliability of the selected scenarios.

Thank you for your consideration of SDG&E's input. If you have any questions or would like to discuss these comments in greater detail, please contact me at (916) 708-7409 or staheri@sdge.com.

Sincerely,



Sarah M. Taheri
Regulatory Affairs Manager