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Comments on Non-Energy Benefits Workshop

Additional submitted attachment is included below.



Tuesday, April 30th, 2024

California Energy Commission
Docket: 23-SB-100

Delivered via email to: docket@energy.ca.gov

RE: Docket 23-SB-100 — Senate Bill 100 Report Non-Energy Benefits Workshop.

On behalf of The Nature Conservancy (TNC) of California, thank you to the Commissioners, staff, and panelists for the informative presentations and discussions during the April 16th Senate Bill (SB) 100 Report Non-Energy Benefits Workshop. TNC commends the Commissioners and staff for including non-energy benefits in the 2025 SB 100 Report as an important lens through which to analyze pathways to decarbonization.

The 2025 Report Vision identifies reliability, affordability, non-energy benefits, social costs, and land use impacts as the criteria through which the 2025 Report will evaluate the pathways, and notes that “land-use, public health and air quality, water supply and quality, economics, and resilience” are potential criteria for non-energy benefits. To answer the central question posed by the Report Vision: “what are the tradeoffs of different pathways?” a common set of criteria is necessary to draw conclusions about potential pathways.

TNC submits the following recommendations:

1. Adopt the draft criteria for non-energy benefits outlined in the 2025 Report Vision: land-use, public health and air quality, water supply and quality, economics, and resilience. Include energy equity, leveraging insights from the efforts discussed in the CEC presentation: “[CEC Progress Incorporating Non-Energy Benefits.](#)”
2. Prioritize analysis of climate change-related risks to the energy system across criteria.
3. For the land-use criteria, include preserving California’s habitat and biodiversity as a benefit to both people and nature.
4. For the economic criteria, prioritize analysis of the largest factors driving costs.

Recommendation details:

1. TNC commends the CEC for including a robust list of non-energy benefits criteria, and recommends including energy equity to support Tribal sovereignty and reliability and access for Tribes and disadvantaged and rural communities. During the [Land-Use Workshop](#), Tribal Leaders provided commentary on the value and importance of energy sovereignty. Last week, [the Biden Administration allocated \\$7B](#) towards solar for low-income and historically disadvantaged communities, underscoring this opportunity. Including equity can also inform how California achieves a given pathway. For example, analyzing data from [Google's Project Sunroof](#), TNC found that 13-53 GW of new distributed solar could be installed, starting with low-income census tracts, to achieve California's goal of 32 GW of distributed solar by 2035 (See [2023 IEPR BTM PV Forecast](#); [DGStats data](#)).
2. We recommend referencing the following resources: [NREL's Power System Wildfire Risks and Potential Solutions](#); [International Energy Agency's Power Systems in Transition](#); [U.S. Government Accountability Office \(GAO\) Electricity Grid Resilience](#); [Extreme Weather and Climate Vulnerabilities of the Electric Grid](#); and [Predicting Electricity Infrastructure Induced Wildfire Risk in California](#).
3. TNC supports the analytical approach outlined in the 2025 Report Vision to apply the CEC Land Use Screens as an initial step. We also recommend evaluating the degree of alignment between the Land Use Screens and each pathway in this step to identify which pathway(s) are most supportive of Tribal, natural, and cultural resources and best avoid unnecessary conflicts.
4. Analysis of the drivers of rate increases allows for identification of key levers for controlling costs. California is considering 2045 resource mix scenarios which include higher cost, zero-carbon resources, so increasing costs pose challenges across resource types. We also recommend considering the costs of conflict, with a [recent survey](#) by Lawrence Berkeley National Laboratory finding that opposition to utility-scale projects is more expensive and common than in the last five years.

Thank you for the CEC's leadership on attention to non-energy benefits and your consideration of our comments on the Non-Energy Benefits Workshop.

Sincerely,
Marybeth Benton
Energy Project Director

