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**Defenders of Wildlife Comments on SB 100 2025 Demand
Scenarios Webinar 23-SB-100**

Additional submitted attachment is included below.



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

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

RE: SB 100 Demand Scenarios Project Webinar

Defenders of Wildlife (Defenders) respectfully submits these comments on the August 7, 2024 Demand Scenarios Project Webinar for the 2025 SB 100 Joint Agency Report. Defenders is dedicated to protecting all wild animals and plants in their natural communities and has 2.1 million members and supporters in the United States, 316,000 of whom reside in California. We employ science, public education and participation, media, legislative advocacy, litigation, and proactive on-the-ground solutions to prevent the extinction of species, associated loss of biological diversity, and habitat alteration and destruction.

We strongly support the development of renewable energy production. A low-carbon energy future is critical for California's economy, communities, and environment. Achieving this future—and *how* we achieve it—is critical for protecting California's internationally treasured wildlife, landscapes, and diverse habitats. We believe transitioning to a renewable energy future need not exacerbate the ongoing extinction crisis by thoughtfully planning projects while protecting habitat critical to species.

Comments

The Joint Agencies Should Include Front of the Meter Distributed Generation and Storage in Formulating Capacity Expansion Resource Portfolios.

We appreciate the staff's consideration of some behind the meter resources and the inclusion of a "High-Demand-Flex" policy scenario. We remain concerned, however, that the 2025 SB 100 Report will not give adequate consideration to the potential for front of the meter (FTM) distributed generation and storage (DGS) to be deployed close to load centers that can be served via the local distribution grid.

Small to medium utility-scale solar FTM DGS developed on and within the built environment (e.g., warehouses, schools, distribution centers, large commercial, and industrial buildings) that is located close to load and utilizes the local distribution grid to serve the local community should be included as a distinct resource type in the capacity expansion modeling used to formulate resource portfolios for the 2025 and subsequent SB 100 Reports. Much like any other utility-scale solar project, a FTM DGS solar project would likely have a lease or ownership arrangement for the use of the land/building as well as a power-purchase agreement with a load-serving entity or other off-taker for earning revenues from power generation and grid services. Each FTM DGS solar project would have its own FTM utility interconnection and meter and function independently of onsite uses.

FTM DGS provides both community benefits and offers the opportunity to reduce the need for costly new bulk grid transmission and the vast acreage needed to develop utility-scale renewable energy generation far from load centers. By incorporating FTM DGS as a distinct resource type in the capacity expansion analysis, the attributes that distinguish it from transmission-connected solar or solar+storage — including reduced land-use impacts, improved community energy and economic resilience, and reduced need for transmission capacity — would be considered in the algorithms that formulate the capacity expansion resource portfolios so that FTM DGS could be rigorously evaluated against transmission-connected renewable resources.¹ We direct the Joint Agencies' attention to the November 14, 2023 comments submitted by the Joint Non-Profit Parties for an approach to integrating a maximum FTM DGS ("Max DG") scenario into the analytic framework.²

FTM solar DGS developed on the built environment, located close to load — particularly in areas with high electric load growth — is more sustainable and aligned with state policies to meet our clean energy future and protect our environment.³ A study by the National Renewable Energy Laboratory (NREL) in 2016 found that solar photovoltaic generation deployed on buildings of all sizes in California could supply 74 percent of annual electricity sales by California's utilities.⁴ The jaw-dropping magnitude of this estimate, which is based only on building rooftops and does not include other potential deployment sites, combined with the important benefits noted above of locating supply resources close to load centers, should be sufficient evidence for the Joint Agencies to take this potential seriously and modify the SB 100 analysis accordingly. The Joint Agencies should use the 2025 SB 100 Report to fully integrate FTM DGS as part of California's energy future. Failure to do so will only result in business-as-usual excessive reliance on the bulk grid and remote generation, which are expensive and environmentally fraught.

¹ The upcoming Energy Commission proceeding on non-energy benefits and social costs (24-OIIP-03) is expected to more fully describe and estimate the complete range of resource attributes to be considered in planning and procurement decisions.

² <https://efiling.energy.ca.gov/GetDocument.aspx?tn=253118&DocumentContentId=88320>

³ [Executive Order N-82-20](#)

⁴ NREL, "Rooftop Solar Photovoltaic Technical Potential in the United States: A Detailed Assessment": <https://www.nrel.gov/docs/fy16osti/65298.pdf>

We thank the Webinar presenters for the informative presentation. We look forward to actively participating in developing the 2025 SB 100 Joint Agency Report. Please contact Pamela Flick at (916) 442-5746 or pflick@defenders.org or Kate Kelly at (530) 902-1615 or kate@kgconsulting.net with any questions.

Sincerely,

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