

DOCKETED	
Docket Number:	23-SB-100
Project Title:	SB 100 Joint Agency Report
TN #:	258626
Document Title:	Angie Hacker Comments - CCEC Comments - SB 100 Demand Scenarios
Description:	N/A
Filer:	System
Organization:	Angie Hacker
Submitter Role:	Public
Submission Date:	8/21/2024 7:38:44 PM
Docketed Date:	8/22/2024

Comment Received From: Angie Hacker
Submitted On: 8/21/2024
Docket Number: 23-SB-100

CCEC Comments - SB 100 Demand Scenarios

Attached please find comments on the demand scenarios and assumptions used in the Senate Bill (SB) 100 analysis presented on August 7th for the 2025 SB 100 Joint Agency Report, respectfully submitted on behalf of the California Climate and Energy Collaborative (CCEC). Thank you for the opportunity to provide input. We look forward to ongoing collaboration on unprecedented and entwined decarbonization, affordability, reliability, and equity challenges facing California communities.

Additional submitted attachment is included below.

August 21, 2024

California Energy Commission
Docket #: 23-SB-100
Project Title: SB 100 Joint Agency Report



RE: California Climate and Energy Collaborative (CCEC) Comments on SB 100 Demand Scenarios

Dear CEC, CPUC, and CARB Leadership and Staff,

The [California Climate and Energy Collaborative \(CCEC\)](#) welcomes the opportunity to provide comments in response to the demand scenarios and assumptions used in the Senate Bill (SB) 100 analysis presented on [August 7th for the 2025 SB 100 Joint Agency Report](#). CCEC is a program of CivicWell that supports California local governments and their partners in their efforts to save energy, reduce greenhouse gas emissions, and accelerate climate action by building knowledge and networks amongst practitioners. Our network of local governments and their partners across the state are working to rapidly implement community energy efficiency, clean energy, electric vehicle and other climate actions, in alignment with State goals.

In recent years, no California energy and climate practitioner can ignore growing statewide concerns related to energy reliability and affordability, made worse by the fire and other extreme climate events we are working to avoid, and made better when we manage demand and load more effectively. Local governments are doing their best to prepare and protect their constituents in real time, but with limited individual ability to improve reliability and add load capacity through clean energy resources to cover growing electricity needs due to various hurdles, including load constraints and interconnection barriers. Current decarbonization, affordability, reliability, and equity challenges facing the State are unprecedented and critically entwined, and collaboration among State and local agencies is essential.

CCEC is increasingly developing ways to foster better two-way communication between State and local agencies to more effectively reach mutual energy and climate goals, and we welcome greater collaboration with the State on this matter. In the past year we have operated the [State and Local Energy and Climate Coordination](#) (SLECC) meetings with participation across roughly two hundred local governments and 6 State agencies. We greatly appreciate that CEC representatives engage with our network regularly, including recently to provide an update on SB 100 related processes and discuss relevant opportunities for productive local government input.

We recognize that the 2025 SB 100 Joint Agency Report is a critical analysis to inform how the State will meet its 100% clean energy laws while meeting California's service capacity needs, and that this analysis must be based on accurate assumptions about demand as well as the role that buildings, community assets, and land use all play in meeting power system long term planning. Local governments have a unique perspective on this issue, as they regularly confront challenges and barriers when tying assets to the grid. In many venues, including our SLECC meetings and in a working group of the [Local Government Sustainable Energy Coalition](#) (another program of CivicWell), California local government energy officials and practitioners are sharing growing frustration about

the long delays associated with service capacity. CCEC hosted three listening sessions last year with CARB on the topic of barriers to local climate action ([Listening Session #1 Recording: Barriers to Local Climate Action](#), [Listening Session #2 Notes: Local Climate Action Needs and Solutions](#), in which a top barrier identified by local governments was load constraints. Participants of these meetings indicate that transitioning vehicles and buildings to electric fuels is challenging due to electrical capacity constraints overseen by the utilities. Information on load capacity available for projects is difficult to obtain, often taking months to years, and the process lacks transparency. We hosted a specific [SLECC discussion](#) on this topic with the CEC on December 14th, 2023, where local governments shared experiences like losing EV charging funding due to long delays in load capacity studies, thwarting progress towards their emission reduction goals. Participants asked for State agency and policymaker leadership in addressing these issues, and the SB 100 process was highlighted as a potential pathway to doing so.

The CCEC network is aware that these experiences are increasingly common in communities across the State, but that there is no database that can be used to integrate these incidents (the work not getting done) into SB 100 models or assumptions, which may result in a blind spot in your analysis. However, this information could be useful real world context when the State makes future decisions about capacity and distribution planning. We recommend that the State prioritize the concerns shared by communities across the State and find a way to meaningfully integrate these barriers into your future demand forecasts and assumptions.

Thank you for the opportunity to relay comments from our statewide network and place these important matters on the record in relation to SB 100. We greatly appreciate your time in considering our comments and encourage CEC, CPUC, and CARB to join us in further discussion to more thoroughly assess and address load constraints and other intersecting decarbonization, climate, equity, and reliability challenges. We aim to ensure the State understands the barriers associated with achieving the assumed progress towards 100% clean electricity, and better yet can help us address them. We would be happy to help you more formally gather and share local experiences for future analyses. CCEC remains committed to coordinating with State and our extensive network of local governments and their partners, and look forward to ongoing collaboration. Please do not hesitate to reach out to Angie Hacker at ahacker@civicwell.org if you have any questions. We hope your agencies will continue to participate in our SLECC meetings or reach out if CCEC can be helpful in distributing information or coordinating listening sessions with our network.

Respectfully submitted by Angie Hacker, CCEC's Statewide Best Practices Coordinator, on behalf of the California Climate and Energy Collaborative (CCEC).