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Defenders of Wildlife Comments on SB-100 Workshop on Utilities Progress

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: 2025 Senate Bill 100 Interagency Report – Utilities Progress Toward Statutory Goals Workshop

Defenders of Wildlife (Defenders) respectfully submits these comments on the November 22, 2024 workshop on the utilities' progress toward statutory goals for the 2025 Senate Bill (SB) 100 Interagency 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

Thoughtful, well planned, and timely deployment of renewable energy generation, storage, and transmission is essential for California to meet its climate goals while protecting our natural resources, tribal and cultural resources, and communities. We share the concern for a timely build-out of our clean energy future.

We appreciate the California Public Utilities Commission (CPUC) presentation mentioning the California Public Advocates Office's Transmission Data Dashboard.¹ The Dashboard clearly shows that the CPUC's permitting time is only about 25% of the development timeline, while transmission owners are responsible for 65% of the average project development timeline. These statistics call into question the need for permit streamlining vs. improving pre-application project planning and design to prioritize least conflict siting and proactive community outreach.

As demonstrated by The Nature Conservancy's Green Light Study², project delays and increased costs are frequently the result of bad siting decisions, which result in significant environmental, cultural resources, and land use conflicts. These conflicts are avoidable or mitigatable with proactive geospatial analysis and community engagement. We were surprised and disappointed that least conflict (Smart from the Start) siting and development was not more fully discussed as a fundamental tool to achieve California's clean energy future. SB 1386 and the California Air Resources Board (CARB) Scoping Plan requires the protection of natural and working lands. The California Energy Commission, CPUC, and CARB, in conjunction with the California Independent System Operator, should be directing the siting and development of generation, storage, and transmission to locations that avoid natural and working lands and have low potential for conflict.

We recommend the Joint Agencies explore how the California Energy Commission's Land Use Screens for Electricity Planning³ can be used not just for busbar mapping but also for siting generation, storage, and transmission lines. These land use and environmental screens incorporate well vetted data and have been broadly accepted by stakeholders. Using best available land use and environmental screens in a transparent public process will help avoid stakeholders and communities from being blindsided by ill-conceived generation, storage, and transmission projects and the resulting controversy, delays, and potential litigation.

Conclusion

We thank the workshop presenters for the informative workshop. We look forward to continuing to actively participate in the development of the 2025 SB 100 Interagency

¹ <https://www.publicadvocates.cpuc.ca.gov/-/media/cal-advocates-website/files/press-room/reports-and-analyses/241023-public-advocates-office-transmission-data-dashboard.pdf>

² Dashiell, S.; Buckley, M.; Mulvaney, D. Green Light Study: Economic and Conservation Benefits of Low-Impact Solar Siting in California, 2019

³ <https://www.energy.ca.gov/data-reports/california-energy-planning-library/land-use-screens>

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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