



Appendix A: Parties that Recommend a Lower Emissions Scenario as the Reference System Plan (RSP) and Their Rationale for Doing So

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Table 1. List of 16 Parties Who Recommend a Lower Emissions Scenario as the RSP, the Parties' Rationale, and the Relevant Page Number of their Respective Comments.

Party	Preferred Scenario	Rationale	@ p.
Defenders of Wildlife	30 MMT	<p>“46 MMT will not position California to meet greenhouse gas (GHG) goals.”</p> <p>“30MMT is the appropriate GHG target.”</p> <p>“The 30 MMT target is most aligned with the procurement required to attain SB 100’s 2045 goals per Commission analysis.”</p> <p>“Accurately setting the target, challenging as it is, will spur additional investments and innovations to meet that goal.”</p>	3
Hydrostor	30 MMT	<p>“Such a target (30 MMT) better sets California on the path to achieve its Senate Bill (“SB”) 100 objectives.”</p> <p>“Electrification could substantially increase electricity demand sooner than what is anticipated.”</p> <p>“A 30 MMT GHG target by 2030 would also allow for the greatest participation of potential resources resulting in the most cost-effective procurement outcome compared to potentially rushed procurements in the period after 2030 in order to meet SB100 objectives by 2045.”</p>	4, 5
Vote Solar	30 MMT	<p>“The 46 MMT planning target is insufficient to meet the decarbonization goal required by SB 100.”</p> <p>“30 MMT GHG planning target will drive the selection of more long duration storage earlier, as an alternative to the retention of out-of-market natural gas capacity, and better prepare the electric sector to serve the increasing load from transportation and building electrification after 2030.”</p>	2, 4

Party	Preferred Scenario	Rationale	@ p.
Environmental Defense Fund (EDF)	30 MMT	<p>“California’s electric sector decarbonization goal requires deeper reductions to be established now.”</p> <p>“The Commission should revise the Proposed Decision to adopt a 30 MMT GHG emissions target for 2030.”</p> <p>“The downsides of establishing the lower target are minimal, and the consequences of having the target be set too high at 46 MMT include lost time for new procurement, higher costs to customers, and a diluted procurement signal for new generation to come online.”</p> <p>“EDF is concerned that the Commission may be setting a higher target of 46 MMT in part because it is worried about recent market shifts from investor owned utilities to Community Choice Aggregators (CCAs).”</p>	1, 2, 5
Eagle Crest Energy	30 MMT	<p>“30 MMT scenario, which is more realistic in light of SB 100 clean energy goals given the slow pace in achieving the GHG reductions in other state economic sectors to date, including in particular transportation.”</p>	2
California Energy Storage Alliance (CESA)	30 MMT	<p>“Due to the continued preference for imports within SERVM, the Commission should evaluate using a more stringent greenhouse gas (“GHG”) emissions target to minimize the risk of not meeting the state’s Senate Bill (“SB”) 350 and SB 100 goals. CESA continues to support the use of a 30 million metric ton (“MMT”) case for the RSP.”</p> <p>“The Commission recognizes that these electrification initiatives pose risks; however, the PD finds a 46 MMT target is more suitable at this time even in the face of expected increase in load. CESA believes this logic is flawed, as it would create a mismatch between the expected load and the zero-carbon resources available in the state.”</p>	2, 4
California Environmental Justice Alliance (“CEJA”) and the Sierra Club	30 MMT	<p>“This portfolio must be rejected (46 MMT) because it: (1) most likely does not fall within the requirements of the Scoping Plan set by CARB; (2) fails to minimize criteria pollutant emissions; (3) does not set California on a trajectory to meet SB 100’s clean energy targets; and (4) fails to meet statutory requirements to not increase emissions when Diablo retires.”</p>	2

Party	Preferred Scenario	Rationale	@ p.
California Efficiency + Demand Management Council	30 MMT	<p>“The proposed target of 46 MMT falls within the ranges outlined by the California Air Resources Board (“CARB”), we base our concerns on the evidence which suggests that the Commission’s own modeling tools tend to under-predict greenhouse gas (“GHG”) emissions compared to real-world emissions data which tend to be substantially higher.”</p> <p>“The 30 MMT target facilitates building and procuring resources on the most efficacious timeline to reach both the 2030 and 2045 goals.”</p> <p>“The 46 MMT target allows substantially more carbon-emitting electric generating resources versus a cleaner portfolio of resources that state policy and laws prioritize.”</p> <p>“By allowing the 46 MMT target, the Commission is systematically ignoring the role that efficiency and demand management resources can play in California’s clean carbon future.”</p>	2
Peninsula Clean Energy Authority, Marin Clean Energy, San José Clean Energy	30 MMT	<p>“The Commission should find that the proposed investment supporting the 30 MMT is appropriate and commit to working to deliver policies and regulatory stability to minimize the cost of achieving this target.”</p> <p>“The Commission should not adopt either the 46 MMT Default or the 46 MMT Alternate case because it will likely result in stable or increased emissions between 2022 and 2030. In particular, the Commission estimate of GHG emissions may be too optimistic if modeling systematically underestimates actual emissions. For example, comparison of the CAISO reported emissions and RESOLVE emissions in the 2018 cycle suggests that the RESOLVE modeling estimates may be many MMTs lower than actual emissions.”</p>	3, 6

Party	Preferred Scenario	Rationale	@ p.
The Protect Our Communities Foundation (POC)	30 MMT	<p>“POC cannot endorse the 46 MMT GHG target proposed in the PD, as the 46 MMT GHG target fails to lower GHG emissions as quickly as possible. Pursuant to Executive Order B-55-18 (“EO”), the Commission should adopt a 30 MMT GHG target in this cycle.”</p> <p>“The PD however uses the highest possible GHG target of 46 MMT rather than the lowest considered target of 30 MMT without sufficient analysis or support. The decision ignores the still applicable Executive Order to achieve carbon neutrality as soon as possible.”</p>	2, 9
Natural Resources Defense Council (NRDC)	30 MMT	<p>“The Commission should adopt the low emissions, 30 MMT scenario, to comply with CARB’s recommendation and put California’s load serving entities (LSE) on the best path towards SB100 compliance.”</p> <p>“Supporting the 30 MMT scenario in this cycle will also give the LSEs, especially newer Community Choice Aggregators, adequate time to transition to a zero-carbon grid by 2045 in a smooth and cost-efficient manner.”</p>	4, 5
Union of Concerned Scientists (UCS)	30 MMT	<p>“The Commission should choose a lower electric sector GHG emissions target to ensure California achieves its 2030 GHG emissions reduction goals.”</p> <p>“The 46 MMT target will not put the state on track to achieve its 2030 climate goals.”</p> <p>“Due to inaccuracies in GHG accounting with the Commission’s modeling tools, the 46 MMT portfolio will likely produce emissions outside of the CARB range. The Commission should adopt a 30 MMT electric sector emissions target because of these inaccuracies.”</p>	1, 2-4

Party	Preferred Scenario	Rationale	@ p.
Southern California Edison (SCE)	38 MMT	<p>“The proposed 46 MMT planning target will not put the electric sector on an appropriate path to meeting California’s Senate Bill (“SB”) 32 goals for GHG reduction by 2030 and SB 100 goals for carbon neutrality by 2045.”</p> <p>“Planning to a 46 MMT target for 2030 puts California at risk of not setting a feasible and least-cost path to meeting the necessary GHG reduction targets through 2045.”</p> <p>“Setting a GHG target approximately 10 MMT too high in the electric sector means that not only will other sectors (e.g., transportation, buildings) need to make up the difference with more expensive abatement alternatives.”</p> <p>“SCE urges the Commission to adopt a 38 MMT GHG planning target for 2030 for all LSEs in the 2019-20 IRP.”</p>	2, 5
Center for Energy Efficiency and Renewable Technologies (CEERT)	46 MMT GHG target is too high	<p>“The Proposed Decision claims that the resulting 46 MMT/year 2030 GHG emission goal keeps LSEs on track to meet the state’s Senate Bill (SB) 100 goals. However, the 46 MMT/year goal is too high to ensure a smooth transition to meet those policy goals.”</p> <p>“Using the high 46 MMT/year GHG emission reduction baseline, and relying on gas generation to get us there, locks California onto a path that will prevent the state from reaching its SB 100 goals on time and in the most cost-effective manner.”</p>	4, 8
American Wind Energy Association (AWEA)	Revisit the selection of a 46 MMT Emissions Target	<p>“The selection of the 46 MMT target will not fulfill the statutory requirement for a 2030 GHG emission reduction target nor the recent amendments to Section 454.52 of the Public Utilities Code to integrate the statutory requirements of SB 100.”</p> <p>“The CPUC should revisit its selection of a 46 MMT target and ask whether the stool will stand when the Commission is faced with the selection of a PSP that is compiled from plans that do not collectively achieve Section 454.52(a)(1)(A) of the Public Utilities Code.”</p>	2, 4

Party	Preferred Scenario	Rationale	@ p.
California Wind Energy Association (CalWEA)	46 MMT GHG target is relatively high	“By adopting a relatively high 46 MMT GHG target and by using the 2017-18 RSP for transmission planning, the proposed RSP refrains from taking any concrete steps toward the limited and preliminary diversity resources identified.”	6