

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA



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Order Instituting Rulemaking to Develop an  
Electricity Integrated Resource Planning  
Framework and to Coordinate and Refine  
Long-Term Procurement Planning  
Requirements.

Rulemaking 16-02-007  
(Filed February 11, 2016)

**REPLY COMMENTS OF THE  
CENTER FOR ENERGY EFFICIENCY AND RENEWABLE TECHNOLOGIES  
ON ADMINISTRATIVE LAW JUDGE'S RULING SEEKING COMMENT ON  
PROPOSED REFERENCE SYSTEM PORTFOLIO AND RELATED POLICY ACTIONS**

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For: CENTER FOR ENERGY EFFICIENCY AND RENEWABLE TECHNOLOGIES

Dated: January 6, 2020

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The Center for Energy Efficiency and Renewable Technologies (CEERT) respectfully submits these Reply Comments on the Administrative Law Judge’s Ruling Seeking Comment on Proposed Reference System Portfolio (RSP) and Related Policy Actions, issued November 6, 2019 (ALJ Ruling) in the Integrated Resource Planning (IRP) proceeding, Rulemaking (R.) 16-02-007. These Opening Comments are timely filed and served pursuant to the Commission’s Rules of Practice and Procedure and ALJ Rulings on November 6 and November 19, 2019.

**I.  
REPLY COMMENTS.**

CEERT strongly agrees with Southern California Edison (SCE) that “[f]uture IRP cycles should consider scenarios that have both a lower GHG target and a plan for cross-sector decarbonization through higher electrification and other measures.”<sup>1</sup> Again, CEERT believes that due to the failures in the IRP process at the Commission, the IRP process should be suspended or paused to enable load-serving entities and stakeholders to help inform the Commission IRP process through the Senate Bill (SB) 100 planning process at the California Energy Commission (CEC).<sup>2</sup> Given the urgency of the global climate crisis and California’s

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<sup>1</sup> Opening Comments of SCE, at p. 43.

<sup>2</sup> Opening Comments of CEERT, at pp. 4-5.

prominent place as a leader in the necessary collective response, continuing to waste precious time and energy studying narrow scenarios that are inconsistent with current long term state goals for the electric sector alone is simply inappropriate.

CEERT is also among several parties, including but not limited to California Energy Storage Alliance (CESA), California Environmental Justice Alliance and Sierra Club (CEJA and SC), Environmental Defense Fund (EDF), Protect Our Communities (POC), and Union of Concerned Scientists (UCS) who recommend that the Commission adopt the 30 million metric tonne (MMT) scenario as the basis for the 2030 greenhouse gas (GHG) goal.<sup>3</sup> CEERT agrees with POC that “[l]ower GHG emissions result in lower health costs, lower climate change-related costs, and a more productive society. The Commission should target greater emissions reductions at least down to the 30 MMT level – the lowest MMT level modeled.”<sup>4</sup> Furthermore, as UCS states, “the 46 MMT goal does not put the state on track to achieve its 2045 clean electricity goals.”<sup>5</sup>

CEERT and parties, such as CEJA/SC and UCS, pointed out the failures of the Staff-proposed RSP in their Opening Comments.<sup>6</sup> CEJA and SC correctly note that “the proposed RSP fails to set the State on a trajectory towards meeting its 2030 and future GHG-reduction requirements[,]” by assuming that once-through cooling (OTC) “gas plant extensions are locked in even though they are only a back-up plan if other resources are not online when scheduled” and by repeating “the same major error from the last IRP cycle by assuming that fossil generation in local areas should remain online even though preferred resources can be deployed

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<sup>3</sup> Opening Comments of CEJA and SC, at p. 2; Opening Comments of CESA, at pp. 10-11; Opening Comments of EDF, at p. 1; Opening Comments of POC, at p. 21; and Opening Comments of UCS, at p. 10.

<sup>4</sup> Opening Comments of POC, at p. 21.

<sup>5</sup> Opening Comments of UCS, at p. 10.

<sup>6</sup> Opening Comments of CEERT, at p. 3; Opening Comments of CEJA/SC, at p. 2 and Opening Comments of UCS, at p. 10.

to phase them out.”<sup>7</sup> UCS also points out that the “Ruling seems to ignore the bulk of the lessons learned from the 2045 framing studies.”<sup>8</sup>

CEERT supports CESA’s recommendation that the Commission recognize “that quickly decarbonizing the electrical grid is a least-regrets decision as it would guarantee GHG reductions regardless of load growth or cross-sectoral interactions (*i.e.*, massive electrification of transportation).”<sup>9</sup> Likewise, CEERT agrees with UCS that “the Commission should genuinely incorporate the lessons learned from the 2045 framing studies by reducing the GHG emissions goal to 30 MMT.”<sup>10</sup>

## **II. CONCLUSION**

In conclusion, CEERT again recommends that the Commission suspend further action on the IRP and instead works collaboratively with other state agencies to ensure better coordination and implementation of the planning and procurement needed. However, if the Commission does move forward with the IRP, it should adopt the 30 MMT requirement as the basis for the 2030 GHG target.

January 6, 2020

Respectfully submitted,

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<sup>7</sup> Opening Comments of CEJA/SC, at p. 2.

<sup>8</sup> Opening Comments of UCS, at p. 10.

<sup>9</sup> Opening Comments of CESA, at p. 11.

<sup>10</sup> Opening Comments of UCS, at p. 11.

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