



BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA

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Order Instituting Rulemaking to Continue  
Electric Integrated Resource Planning and  
Related Procurement Processes.

Rulemaking 20-05-003  
(Filed May 7, 2020)

**REPLY COMMENTS OF  
CENTER FOR ENERGY EFFICIENCY AND RENEWABLE TECHNOLOGIES ON  
PROPOSED DECISION ADOPTING 2021 PREFERRED SYSTEM PLAN**

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For: CENTER FOR ENERGY EFFICIENCY AND RENEWABLE TECHNOLOGIES

January 19, 2022

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Center for Energy Efficiency and Renewable Technologies (CEERT) respectfully submits these Reply Comments on the Proposed Decision Adopting 2021 Preferred System Plan (Proposed Decision), mailed in this proceeding on December 22, 2021. These Reply Comments are timely filed and served pursuant to Rule 14.3 of the Commission's Rules of Practice and Procedure and the instructions accompanying the Proposed Decision which specifically provide that Opening Comments are due on January 14, 2022, and Reply Comments are due on January 19, 2022.

**I.  
A 30 MMT GREENHOUSE GAS TARGET SHOULD BE ADOPTED AS SOON AS  
POSSIBLE**

In its Opening Comments, CEERT stated that while it supported the 38 MMT greenhouse gas (GHG) target adopted by the Proposed Decision, it still recommends adoption of the 30 MMT GHG target for the Preferred System Plan (PSP).<sup>1</sup> Numerous parties, including but not limited to Advanced Energy Economy (AEE), California Energy Storage Alliance (CESA), California Environmental Justice Alliance and Sierra Club (CEJA and SC), the Long Duration Energy Storage Association of California (the LDESAC), Natural Resources Defense Council

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<sup>1</sup> Opening Comments of CEERT, at p. 2.

(NRDC), Southern California Edison (SCE), and Union of Concerned Scientists (UCS) similarly support the adoption of the 38 MMT GHG target.<sup>2</sup>

However, CEERT also agrees with those parties, such as Protect Our Communities Foundation (PCF) who recommend that the Commission adopt a 30 MMT GHG target for the PSP for 2021.<sup>3</sup> As such, CEERT agrees with CEJA and SC who recommend that the Proposed Decision be modified to “include a firm commitment to ensuring consistency with State requirements and moving to a 30 MMT and lower targets[.]”<sup>4</sup> CEERT also supports the LDESAC’s request to add analysis of a 15 MMT target.<sup>5</sup> These lower targets are necessary for California to meet its climate goals.

At this time, there is not a significant difference from a cost perspective in adopting the 30 MMT GHG target in this Proposed Decision. PCF correctly states that the “30 MMT core portfolio provides ratepayers more clean energy and more reliability at the same cost as the 38 MMT core portfolio.”<sup>6</sup> This is echoed by CEJA and SC who argue that there is “no projected difference in the levelized average rate between the 38 MMT high electrification and the 30 MMT high electrification scenarios ...” and “that the non-energy benefits associated with a 30 MMT target provide additional reason to commit to a lower GHG target.”<sup>7</sup>

At a minimum, CEERT agrees with CEJA and SC that the Proposed Decision “should be revised with a clear commitment that the Commission will aim for a 30 MMT target as soon as

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<sup>2</sup> See, e.g., Opening Comments of AEE, at p. 1; Opening Comments of CEJA and SC, at p. 1; Opening Comments of CESA, at pp. 2-5; Opening Comments of the LDESAC, at pp. 3-4; Opening Comments of NRDC, at p. 1; Opening Comments of SCE, at pp. 1-2; and Opening Comments of UCS, at p. 1.

<sup>3</sup> See, e.g., Opening Comments of PCF, at p. 1.

<sup>4</sup> Opening Comments of CEJA and SC, at p. 1.

<sup>5</sup> Opening comments of the LDESAC, at p. 3.

<sup>6</sup> Opening Comments of PCF, at p. 1.

<sup>7</sup> Opening Comments of CEJA and SC, at p. 5.

possible.”<sup>8</sup> CEERT agrees with CESA that “planning for a more aggressive resource buildout offers reasonable hedges against transmission planning and reliability risks.”<sup>9</sup> UCS correctly states that “the electricity sector will need to reach the 30 MMT target for California to achieve its economy-wide decarbonization goals.”<sup>10</sup> Furthermore, CEERT concurs with SCE who supports “the expeditious development of a 30 MMT GHG limit policy-driven sensitivity portfolio[.]”<sup>11</sup>

Lastly, CEERT supports the City and County of San Francisco’s (San Francisco’s) recommendation that the Commission not restrict load-serving entities (LSEs) “that plan to emit less GHGs than the 30 MMT GHG target.”<sup>12</sup> Any LSE who is “planning to emit less than the lowest GHG benchmark set in the next cycle[.]” must be encouraged to do so.<sup>13</sup> CEERT agrees with San Francisco that “LSEs should be allowed to submit a preferred portfolio that emits less than its assigned 30 MMT benchmark.”<sup>14</sup>

## **II. CEERT AGREES WITH MULTIPLE PARTIES WHO RECOMMEND RETIREMENT OF FOSSIL FUEL RESOURCES**

CEERT agrees with PCF who appreciates that the Proposed Decision affirms Decision (D.) 21-06-035’s ban on fossil fuel procurement but recommends that the Proposed Decision go further and affirm that fossil fuel will not be considered in the future.<sup>15</sup> CEERT supports PCF’s recommendation that the “Commission should accelerate its adoption of new GHG-free

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<sup>8</sup> Opening Comments of CEJA and SC, at p. 5.

<sup>9</sup> Opening Comments of CESA, at p. 2.

<sup>10</sup> Opening Comments of UCS, at p. 1.

<sup>11</sup> Opening Comments of SCE, at p. 2.

<sup>12</sup> Opening Comments of San Francisco, at p. 9.

<sup>13</sup> *Id.*

<sup>14</sup> *Id.*, at pp. 9-10.

<sup>15</sup> Opening Comments of PCF, at pp. 3-4.

resources if the Commission has concerns about thermal plant retirement as discussed in the PD.”<sup>16</sup>

Environmental Defense Fund (EDF) also stresses the importance of modeling the retirement of fossil fuel resources, particularly to reduce reliance of fossil fuel in disadvantaged communities (DACs).<sup>17</sup> CEERT agrees with EDF that “[t]his modeling is the most important step the Commission can take to reduce the heavy pollution burden in DACs and facilitate the transition to a 100% clean electric grid.”<sup>18</sup>

Lastly, CEERT reiterates its request that Aliso Canyon be closed as soon as possible. In its Opening Comments, CEERT discussed how there had been little movement towards closing Aliso Canyon.<sup>19</sup> CEJA and SC share this concern and recommend that the Proposed Decision be modified to include “a firm commitment and timeline to ensure that an analysis actually does occur. The PD should be revised to include a clear timeline to start more effectively targeting local areas, including the LA Basin.”<sup>20</sup> CEERT agrees with this recommendation and again urges the Commission to act quickly to close Aliso Canyon.

### **III. CONCLUSION**

CEERT appreciates the opportunity to submit Reply Comments on this Proposed Decision. The Commission must act quickly to ensure that the proper targets are in place in order for California to meet its climate goals. As such, CEERT recommends that the Proposed Decision be modified to incorporate CEERT’s recommendations addressed in Opening and Reply Comments and included in CEERT’s Proposed Modifications to the Proposed Decision’s

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<sup>16</sup> Opening Comments of PCF, at p. 3.

<sup>17</sup> Opening Comments of EDF, at p. 3.

<sup>18</sup> *Id.*

<sup>19</sup> Opening Comments of CEERT, at p. 5.

<sup>20</sup> Opening Comments of CEJA and SC, at p. 6.

Findings of Fact, Conclusions of Law, and Ordering Paragraphs, which were attached to CEERT's Opening Comments.

Respectfully submitted,

January 19, 2022

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