

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.

**OPENING COMMENTS OF CENTER FOR ENERGY EFFICIENCY AND
RENEWABLE TECHNOLOGIES ON ADMINISTRATIVE LAW JUDGE'S RULING
ESTABLISHING PROCESS FOR FINALIZING LOAD FORECASTS AND
GREENHOUSE GAS EMISSIONS BENCHMARKS FOR 2022 INTEGRATED
RESOURCE PLAN FILINGS**

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For: CENTER FOR ENERGY EFFICIENCY AND RENEWABLE TECHNOLOGIES

May 16, 2022

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The Center for Energy Efficiency and Renewable Technologies (CEERT) respectfully submit these Opening Comments on Administrative Law Judge’s Ruling Establishing Process for Finalizing Load Forecasts and Greenhouse Gas Emissions Benchmarks for 2022 Integrated Resource Plan Filings, issued in (R.) 20-05-003 (Integrated Resource Plan (IRP)), on April 20, 2022 (ALJ Ruling). These Opening Comments are timely filed and served pursuant to the Commission’s Rules of Practice and Procedure and the instructions contained in the ALJ Ruling.

**I.
INTRODUCTION**

CEERT is a nonprofit public-benefit organization founded in 1990 and based in Sacramento, California. CEERT is a partnership of major private-sector clean energy companies, environmental organizations, public health groups and environmental justice organizations. CEERT designs and fights for policies that promote global warming solutions and increased reliance on clean, renewable energy sources for California and the West. CEERT is working toward building a new energy economy, including cutting contributions to global warming, and reducing dependence on fossil fuels. CEERT has long advocated before the Commission for increased use of preferred resources and for California to move towards a clean energy future.

CEERT again advocates for adoption of a lower greenhouse gas (GHG) target for the electric sector as soon as possible. The Ruling sets forth a GHG target for the electric sector of 30 MMT in 2035 corresponding to the Preferred System Plan (PSP) adopted in Decision (D.) 22-02-004 and 25 MMT GHG target in 2035 for the more stringent planning target.¹ CEERT supports the more stringent planning target so that California can meet its clean energy goals but recommends that the Commission add a 15 MMT target in 2035.

II. CEERT SUPPORTS THE ADDITION OF A 15 MMT GHG TARGET IN 2035

Throughout this proceeding, CEERT has recommended that the Commission adopt a lower MMT GHG target as soon as possible.² As such, CEERT appreciates that the Ruling sets forth a 25 MMT GHG target in 2035 for load-serving entity (LSE) IRP planning purposes.³ However, CEERT remains concerned that even this target may be too high to meet the requirements set forth by Senate Bill (SB) 100. While CEERT understands that D.22-02-004 adopted a GHG planning target for 2030 of 38 MMT, CEERT continues to advocate that this 2030 target should be reevaluated and lowered.

Any capacity need must and can be filled cost-effectively by clean energy resources. Furthermore, a diverse set of clean resources must be relied upon to meet the State's aggressive GHG targets. The Commission must take the step now or as soon as possible to require that 100% zero-emitting resources be used to meet electric system needs going forward, instead of relying on any natural-gas-fueled generation. CEERT again cites to the California Energy Commission (CEC) Midterm Reliability Analysis which found that "[a] portfolio of preferred

¹ ALJ Ruling, at p. 9.

² See, e.g., Opening Comments of Center for Energy Efficiency and Renewable Technologies on Proposed Decision Adopting 2021 Preferred System Plan, submitted in this proceeding on January 14, 2022, at pp. 2-3.

³ ALJ Ruling, at p. 10.

resources can provide equivalent system reliability to gas resources.”⁴ There is no need for the Commission to continue to rely on natural-gas-fueled generation and all GHG targets going forward should be as low as possible. One important step would be for the Commission to quickly close Aliso Canyon, or at a minimum, commit to its closure and provide a firm timeline for doing so.

As such, CEERT supports the more stringent target of 25 MMT GHG, but urges the Commission to add analysis of a 15 MMT target in 2035. The addition of this 15 MMT target will enable the state to meet the clean energy goals by 2045.

III. CONCLUSION

CEERT appreciates the opportunity to submit these Opening Comments.

Respectfully submitted,

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⁴ CEC Lead Commissioner Workshop – Midterm Reliability Analysis & Incremental Efficiency Improvements to Natural Gas Power Plants, presented on August 30, 2021 (CEC MTR Analysis) which can be found here: <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=21-ESR-01>.