

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.

**REPLY 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 23, 2022

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The Center for Energy Efficiency and Renewable Technologies (CEERT) respectfully submit these Reply 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 Reply 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.
LOWER GREENHOUSE GAS TARGETS MUST BE ADOPTED AS SOON AS
POSSIBLE AND THE COMMISSION SHOULD ADOPT A ZERO EMISSIONS
TARGET IN 2045**

CEERT, in its Opening Comments, once again advocated that the Commission adopt a lower greenhouse gas (GHG) target for the electric sector as soon as possible and recommended that the Commission add a 15 MMT target in 2035.¹ Other parties, including but not limited to, California Energy Storage Alliance (CESA) and Protect Our Communities Foundation (PCF) agree that a lower target should be adopted sooner than what was proposed in the ALJ Ruling.²

¹ Opening Comments of CEERT, at p. 2.

² Opening Comments of CESA, at p. 6; Opening Comments of PCF, at p. 1;

In this regard, CEERT agrees with CESA who recommends that the Commission adopt “a 25 MMT target by 2035 to recognize the feasibility of accelerated decarbonization during the first years of transition, and the reliability hedge that aggressive deployment of preferred resources provides.”³ Similarly, CEERT agrees with PCF who advocates that the Commission “use a 30 MMT starting point” and that, from a cost-effectiveness perspective, there is “no reason for the Commission [to] adhere to a 38 MMT portfolio in 2030.”⁴ The Commission must commit to lower GHG emissions targets sooner rather than later or California will not meet its clean energy goals.

Further, CEERT agrees with California Environmental Justice Alliance (CEJA) and Sierra Club, Environmental Defense Fund (EDF), PCF, and Solar Energy Industries Association (SEIA) that the Commission must adopt a zero MMT GHG emissions target in 2045.⁵ As EDF states: “Omitting new clean firm power resources from capacity expansion capacity expansion modeling and using a 15 MMT of GHG target risks derailing California’s goals of fully decarbonizing its economy by 2045 and reducing pollution impacts in Disadvantaged Communities.”⁶ Furthermore, CEJA and Sierra Club correctly state that a zero MMT target in 2045 is the best way to meet the requirements of Senate Bill (SB) 100.⁷

There are numerous benefits to adopting a GHG target of zero emissions by 2045.

CEERT agrees with EDF that:

“The Commission should adopt a GHG target of zero emissions by 2045 for three distinct, but complimentary, reasons: (1) A GHG target of zero emissions for 2045 will enable the State to meet its emissions reduction requirements; (2) Studies show that California can achieve a GHG target of zero emissions by 2045

³ Opening Comments of CESA, at p. 7 and Opening Comments of PCF, at p. 3.

⁴ Opening Comments of PCF, at p. 2.

⁵ Opening Comments of CEJA and Sierra Club, at p. 3; Opening Comments of EDF, at p. 1; Opening Comments of PCF, at p. 3; and Opening Comments of SEIA, at p. 10.

⁶ Opening Comments of EDF, at p. 2.

⁷ Opening Comments of CEJA and Sierra Club, at p. 3.

in a cost-effective and reliable manner, (3) Transitioning to a GHG-free electric grid by 2045 will produce significant environmental benefits for California, particularly for Disadvantaged Communities.”⁸

In addition, CEERT concurs with PCF that “[r]educing California’s exposure to natural gas prices by reducing electricity generation at gas-fired generators will save Californians money and reduce emissions in disadvantaged communities.”⁹ CEERT supports SEIA’s recommendation that “the Commission should find that zero GHG emissions from the electric sector by 2045 is most consistent with the intent of SB 100.”¹⁰ The Commission must act now to take the steps necessary to meet zero MMT gas emissions in 2045 or it will have failed to comply with SB 100 and other clean energy goals.

II. CEERT SUPPORTS THE COMMUNITY CHOICE AGGREGATORS WHO RECOMMEND THAT LOAD-SERVING ENTITIES BE ALLOWED TO PLAN FOR LOWER EMISSIONS

Several community choice aggregators (CCAs), including but not limited to, Peninsula Clean Energy (PCE) and San Jose Clean Energy (SJCE), argue that load-serving entities (LSEs) should be able to procure emissions equal to or less than their GHG benchmark.¹¹ CEERT appreciates these CCAs’ commitment to 100% renewable energy. In fact, all LSEs should be encouraged to plan for and procure lower emissions than their assigned benchmarks.

⁸ Opening Comments of EDF, at p. 3.

⁹ Opening Comments of PCF, at p. 13.

¹⁰ Opening Comments of SEIA, at p. 10.

¹¹ Opening Comments of PCE, at p. 2 and Opening Comments of SJCE, at p. 2.

**III.
CONCLUSION**

CEERT appreciates the opportunity to submit these Reply Comments. CEERT urges the Commission to adopt a 15 MMT target for the electric sector in 2035 and a zero emissions target for 2045.

Respectfully submitted,

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