

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 SEEKING COMMENTS ON
ELECTRICITY RESOURCE PORTFOLIOS FOR 2023-2024 TRANSMISSION
PLANNING PROCESS**

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For: CENTER FOR ENERGY EFFICIENCY AND RENEWABLE TECHNOLOGIES

October 31, 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 Seeking Comments on Electricity Resource Portfolios for 2023-2024 Transmission Planning Process, issued in (R.) 20-05-003 (Integrated Resource Plan (IRP)), on October 7, 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.

II. CEERT SUPPORTS THE ADOPTION OF A 30 MILLION METRIC TONNE GREENHOUSE GAS TARGET

Throughout this proceeding, CEERT has recommended that the Commission adopt a lower MMT GHG target as soon as possible.¹ As such, CEERT supports the Commission Staff recommendation that the California Independent System Operator (CAISO) 2023-2024 Transmission Planning Portfolio (TPP) analyze an electric resource portfolio that meets a 30 million metric tonne (MMT) greenhouse gas (GHG) target in 2030.² CEERT agrees with the ALJ Ruling that studying the transmission impacts associated with the 30 MMT portfolio, also known as the High Electrification (HE) portfolio, “will help the State move toward planning for a higher electrification future and identify any incremental infrastructure needs, given existing and new policy drivers regarding high electrification.”³ CEERT also supports the recommended 2023-2024 sensitivity portfolios for high offshore wind and limited wind.⁴

Similarly, CEERT is pleased to see that the Commission demonstrates a new understanding of the need to prioritize transmission expansion and recognizes the need to plan for transmission over a longer time horizon.⁵ CEERT agrees that “planning for transmission needs to be ahead of planning for electricity resources, in order to be available when the generation or storage is developed.”⁶ CEERT also appreciates that the Commission is expanding

¹ 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 and 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 for 2022 Integrated Resource Plan Filings, submitted in this proceeding on May 16, 2022, at p. 2.

² ALJ Ruling, at p. 3.

³ *Id.*, at p. 4.

⁴ *Id.*, at pp. 9-11.

⁵ *Id.*, at pp. 4-5.

⁶ *Id.*, at p. 4.

the base case to 2035 and its recognition that future portfolios will need to include a resource portfolio that extends at least 15 years.⁷

CEERT also supports the recommendations in the July 1, 2022 Letter from the Commission and the CEC to the CAISO in which they recommended changes for the 2022-2023 TPP cycle.⁸ These recommendations include directing the CAISO to use the 2021 Integrated Energy Policy Report (IEPR) Additional Transportation Electrification (TE) as its load assumptions for 2022-2023 TPP base and sensitivity case studies and to “study the 30 MMT High Electrification policy-driven sensitivity portfolio as the 2022-2023 TPP High Electrification Sensitivity Scenario.”⁹ CEERT agrees with the ALJ Ruling that making these changes will allow CAISO Staff to “get a ‘head start’ on advancing identified transmission needs by considering the results of the 30 MMT High Electrification sensitivity in making transmission investment recommendations to its board in the 2022-2023 TPP cycle.”¹⁰

CEERT reiterates its arguments that a diverse set of clean resources must be relied upon to meet State goals. Adoption of the HE portfolio for the CAISO 2023-2024 TPP is a step towards requiring that 100% zero-emitting resources be used to meet electric system needs going forward, instead of relying on any natural-gas-fueled generation. Continuing to lower GHG targets as soon as possible will help California meet the requirements set forth by Senate Bill (SB) 100.

⁷ ALJ Ruling, at p. 4.

⁸ *Id.*, at p. 8.

⁹ *Id.*

¹⁰ *Id.*, at pp. 8-9.

**IV.
CONCLUSION**

CEERT appreciates the opportunity to submit these Opening Comments.

Respectfully submitted,

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