

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

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For: CENTER FOR ENERGY EFFICIENCY AND RENEWABLE TECHNOLOGIES

November 10, 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 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 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.
CEERT AGREES WITH THE NUMEROUS PARTIES WHO SUPPORT THE
COMMISSION STAFF’S RECOMMENDATION REGARDING THE 2023-2024
TRANSMISSION PLANNING PROCESS**

CEERT was one of numerous parties, including but not limited to, American Clean Power – California (ACP-California), California Energy Storage Alliance (CESA), California Environmental Justice Alliance and Sierra Club (CEJA and Sierra Club), EDF Renewables, Inc. (EDFR), Large-scale Solar Association (LSA), Natural Resources Defense Council (NRDC), Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) who supported the Commission’s recommendation that the California Independent System Operator (CAISO) 2023-2024

Transmission Planning Process (TPP) analyze an electric resource portfolio that meets a 30 MMT greenhouse gas (GHG) target in 2030.¹

As correctly stated by CEJA and Sierra Club, this 30 MMT base case with high electrification is necessary to meet climate and air quality requirements and is a critical step for preparing the grid to meet the increased penetration of critical, new clean resources.² CEERT agrees with EDFR that this aggressive, yet practical portfolio reflects the urgent need to slow climate change.³ CEERT shares NRDC's support for the Commission "taking proactive steps to determine and execute transmission development needs for future clean energy resources..."⁴ Lastly, CEERT concurs with CEJA and Sierra Club who "urge the Commission to include a sensitivity examining retiring all gas plants in disadvantaged communities to begin the planning needed to end our reliance on fossil fuels."⁵

However, CEERT agrees with concerns raised by Environmental Defense Fund (EDF) that the TPP may be insufficient to guarantee the procurement of transmission resources required to achieve California's decarbonization and electrification goals.⁶ EDF correctly states that "the effectiveness of the TPP to ensure the necessary build-out of transmission resources is limited, and must be complemented by a holistic, long-term outlook for planning and procurement."⁷ CEERT supports EDF's recommendation that the CPUC, CAISO, and California Energy

¹ Opening Comments of CEERT, at p. 2; Opening Comments of ACP-California 2; Opening Comments of CEJA and Sierra Club, at p. 2; Opening Comments of CESA, at p. 2; Opening Comments of EDFR, at p. 1; Opening Comments of LSA, at p. 2; Opening Comments of NRDC, at p. 1; Opening Comments of PG&E, at p. 1; Opening Comments of SCE, at pp. 1-2; and Opening Comments of SDG&E, at p. 1.

² Opening Comments of CEJA and Sierra Club, at p. 2.

³ Opening Comments of EDFR, at p. 1.

⁴ Opening Comments of NRDC, at p. 1.

⁵ Opening Comments of CEJA and Sierra Club, at p. 7.

⁶ Opening Comments of EDF, at p. 6.

⁷ *Id.*, at p. 7.

Commission (CEC) should develop a Clean Energy Deployment Plan with specific quantities, locations, and timing of new resource development and infrastructure expansion.⁸

II. THE COMMISSION SHOULD CONDUCT A LOSS OF LOAD EXPECTATION ANALYSIS

The Public Advocates Office (Cal Advocates) and SDG&E recommend that the Commission conduct a loss of load expectation (LOLE) planning analysis of the base case and the sensitivity portfolios.⁹ CEERT supports Cal Advocates' recommendation that "[g]oing forward, the Commission should continue to conduct LOLE analysis of the reliability and policy-driven base case portfolios and any sensitivity portfolios that the Commission submits to the CAISO's TPP."¹⁰ CEERT also agrees with Cal Advocates that this LOLE analysis would ensure that the proposed portfolios are robust.¹¹

III. CEERT SUPPORTS EDF AND EDFR'S RECOMMENDATION THAT THE COMMISSION SHOULD TAKE ADVANTAGE OF THE INCENTIVES FROM THE INFLATION REDUCTION ACT

EDF states that the recently enacted Inflation Reduction Act (IRA) "provides incentives for the development of a variety of generation and energy storage technologies."¹² EDF and EDFR encourage the Commission to take advantage of the federal tax incentives available from the IRA and to do so, the State must leverage this development cycle as much as possible.¹³ CEERT agrees with EDFR that "the IRA's incentives seem likely to increase the development of

⁸ Opening Comments of EDF, at pp. 8-9.

⁹ Opening Comments of Cal Advocates, at pp. 4-7 and Opening Comments, at p. SDG&E, at p. 2.

¹⁰ Opening Comments of Cal Advocates, at p. 4.

¹¹ *Id.*, at p. 6.

¹² Opening Comments of EDFR, at p. 3

¹³ Opening Comments of EDF, at p. 4 and Opening Comments of EDFR, at p. 3.

renewable generation projects and the corresponding need for additional transmission capacity beyond what is contemplated in the portfolios proposed in the Ruling.”¹⁴

**IV.
CONCLUSION**

CEERT appreciates the opportunity to submit these Reply Comments.

Respectfully submitted,

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¹⁴ Opening Comments of EDFR, at p. 3.