

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
PROPOSED DECISION ORDERING SUPPLEMENTAL MID-TERM RELIABILITY
PROCUREMENT (2026-2027) AND TRANSMITTING ELECTRIC RESOURCE
PORTFOLIOS TO CALIFORNIA INDEPENDENT SYSTEM OPERATOR FOR 2023-2024
TRANSMISSION PLANNING PROCESS**

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February 7, 2023

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PORTFOLIOS TO CALIFORNIA INDEPENDENT SYSTEM OPERATOR FOR 2023-2024
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Center for Energy Efficiency and Renewable Technologies (CEERT) respectfully submits these Reply Comments on the Proposed Decision Ordering Supplemental Mid-Term Reliability Procurement (2026-2027) and Transmitting Electric Resource Portfolios to California Independent System Operator for 2023-2024 Transmission Planning Process (Proposed Decision), mailed in this proceeding on January 13, 2023. 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. Attachment A to this Proposed Decision is the Methodology for Resource-to-Busbar Mapping & Assumptions for the Annual Transmission Planning Process (Attachment A).

**I.
CEERT AGREES WITH SEVERAL PARTIES WHO OPPOSE 10 YEAR BRIDGE
CONTRACTS FOR UNSPECIFIED IMPORT POWER**

California Environmental Justice Alliance (CEJA) and Sierra Club, Natural Resources Defense Council (NRDC) and the Union of Concerned Scientists (UCS), and The Utility Reform Network (TURN) oppose the Proposed Decision’s determination that “firm import contracts from any resource and with any counterparty should be allowed to be used as bridge resources

until such time as new resources can come online, for a period of not more than ten years.”¹ CEERT agrees with CEJA and Sierra Club, NRDC and UCS, and TURN that the Proposed Decision should be modified to limit authorization for any system power imports as bridge resources to only one year, as proposed by Southern California Edison (SCE).²

CEERT agrees with CEJA and Sierra Club that “there is no evidence to support the PD’s assumption that contracts up to ten years will not result in additional fossil-fueled resources.”³ Similarly, NRDC and UCS note that “[a]llowing such bridge resources for up to ten years could lead to an increase in GHG emissions compared to the alternative where system power imports can only be used as bridge resources for one year.”⁴ Lastly, CEERT concurs with TURN who “questions the wisdom of encouraging [load-serving entities (LSEs)] to contract for firm imports from fossil generation in lieu of developing new clean generating capacity to meet in-state reliability needs.”⁵ As such, CEERT agrees with these parties that the Proposed Decision should not expand the ability of LSEs to procure bridge capacity from firm imports for a term of up to 10 years.

II. CEERT AGREES WITH CALIFORNIA ENERGY STORAGE ALLIANCE THAT LSE’S SHOULD BE PERMITTED TO PROCURE THEIR LONG LEAD-TIME RESOURCE REQUIREMENTS UP TO 2030

The Proposed Decision orders that the long lead-time (LLT) resources required by D.21-06-035 may be procured at any time during 2026 through 2028.⁶ CEERT agrees with the California Energy Storage Alliance (CESA) who supports an extension in time because it allows

¹ Proposed Decision, at p. 67; *see also*, Opening Comments of CEJA and Sierra Club, at pp. 8-9; Opening Comments of NRDC and UCS, at pp. 5-7; and Opening Comments of TURN, at pp. 1-2.

² Opening Comments of CEJA and Sierra Club, at p. 9; Opening Comments of NRDC and UCS, at p. 6; and Opening Comments of TURN, at p. 2.

³ Opening Comments of CEJA and Sierra Club, at p. 8.

⁴ Opening Comments of NRDC and UCS, at p. 6.

⁵ Opening Comments of TURN, at p. 2.

⁶ Proposed Decision, at p. 70 (Ordering Paragraph 2).

for capturing the benefits of the Inflation Reduction Act (IRA) more fully, and it will provide developers with additional time and some more opportunity to replace the capacity caused the retirement of Diablo Canyon.⁷ CEERT concurs with CESA that “if the good faith efforts can be demonstrated, LLT resources should then be allowed to meet procurement requirements through 2030.”⁸ CEERT agrees with CESA that this is reasonable because the need for resources under the LLT umbrella extends and increases after 2028.⁹ The additional 4000 megawatts in this order will substantially exceed the amount directed in D.21-06-035 and this extension provides the opportunity for LLT resources to be developed without jeopardizing reliability.

**III.
THE COMMISSION SHOULD PROVIDE SPECIFIC PROCUREMENT AMOUNTS
FOR EACH LSES IN ITS FINAL DECISION**

Pacific Gas and Electric Company (PG&E) and San Diego Gas & Electric Company (SDG&E) recommend that the Commission explicitly state the actual quantity of procurement allocation for each of its jurisdictional LSEs.¹⁰ CEERT agrees with their proposal to revise the Proposed Decision to expressly identify the incremental procurement obligations allocated to each LSE for 2026 and 2027 because it will avoid confusion and possible errors in calculation and assumptions.¹¹

**IV.
THERE MUST BE MORE TRANSPARENCY ON BUSBAR MAPPING**

CEERT agrees with EDF Renewables (EDFR) and the Large-scale Solar Association (LSA) that there should be greater transparency as to busbar mapping.¹² CEERT concurs with EDFR that “[g]reater transparency will allow parties to better understand the details of the busbar

⁷ Opening Comments of CESA, at p. 5.

⁸ *Id.*

⁹ *Id.*, at pp. 5-6.

¹⁰ Opening Comments of PG&E, at p. 6 and Opening Comments of SDG&E, at pp. 4-5.

¹¹ *Id.*

¹² Opening Comments of EDFR, at p. 2 and Opening Comments of LSA, at pp. 5-7.

mapping process and in some cases to correct errors in the mapping.”¹³ Both EDFR and LSA argue that there should be more stakeholder input on the busbar mapping.¹⁴ CEERT agrees with this approach and concurs with LSA that “[t]his type of pooled knowledge will significantly improve busbar mapping results and help to facilitate timely development.”¹⁵

V. CONCLUSION

CEERT appreciates the opportunity to provide Reply Comments on the Proposed Decision.

Respectfully submitted,

February 7, 2023

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¹³ Opening Comments of EDFR, at p. 1.

¹⁴ Opening Comments of EDFR, at p. 2 and Opening Comments of LSA, at p. 7.

¹⁵ Opening Comments of LSA, at p. 8.