



March 28, 2024

The Honorable Cottie Petrie-Norris, Chair
Assembly Utilities & Energy Committee
1020 N Street, Room 408A
Sacramento, CA 95814

RE: AB 2292 (Petrie-Norris) – Transmission Streamlining – SUPPORT

Dear Chair Petrie-Norris and Members of the Committee:

The undersigned organizations are pleased to support AB 2292, which would eliminate a redundant statutory requirement for the CPUC to consider “non-wires” alternatives to transmission projects already approved by the CAISO. While we encourage the author and committee to build on this common-sense step going forward, AB 2292 adds to the groundswell of support from the legislature to expedite permitting of transmission lines that are critical to enable clean energy projects to come online and support reliability.

We represent the companies developing the solar, storage, land-based wind, offshore wind and enhanced geothermal projects necessary to decarbonize California’s electricity sector. To achieve this goal and meet growing demand California must rapidly increase the pace of transmission development.

AB 2292 would streamline transmission approvals by repealing Public Utilities Code § 1002.3, which requires the CPUC to consider demand-side alternatives such as energy efficiency and distributed generation before approving an application for a CPCN (i.e. permit) for a new transmission line or upgrade. While the state should continue to deploy demand-side strategies where cost-effective, CAISO undertakes a robust alternatives analysis before approving transmission projects as part of its annual planning process. Moreover, CAISO’s transmission plans are based squarely on the CPUC’s resource portfolios, which fully consider resources that do not require transmission. Requiring the CPUC to second-guess CAISO’s analysis therefore adds time (and cost) to a development timeline that already stretches more than a decade on average.

As this committee’s recent informational hearings have underscored, accelerating transmission development will require reforms to address delays at each step of the timeline, including reducing duplication in the approval process. We respectfully request an “AYE” vote on AB 2292.

Sincerely,

Alex Jackson, Director
American Clean Power-California

Rachel McMahon, Vice President, Policy
California Energy Storage Alliance

Nancy Rader, Executive Director
California Wind Energy Association

Jan Smutny-Jones, CEO & General Counsel
Independent Energy Producers Association

Shannon Eddy, Executive Director
Large-Scale Solar Association