



California Wind Energy Association

August 13, 2019

The Honorable Lorena Gonzalez
Chair, Committee on Appropriations
California State Assembly
State Capitol Room 2114
Sacramento, CA 95814

RE: SB 155 (Bradford) As Amended 8-12-19 – SUPPORT

Dear Chair Gonzalez:

The California Wind Energy Association (CalWEA) is a 19-year-old trade association representing wind energy and related companies focused on the California market, primarily consisting of owners and operators of wind energy projects located in California.

I write on behalf of CalWEA to support Senate Bill 155 (Bradford), which addresses two substantial shortcomings in the state's requirements related to planning the overall electricity resource portfolio that serves most of the state and ensuring timely achievement of the state's Renewables Portfolio Standard (RPS) program and associated greenhouse-gas-reduction requirements:

- 1. Lack of clarity regarding CPUC authority over LSE adherence to the resource plan adopted pursuant to the CPUC's Integrated Resources Planning (IRP) process.**
While current law addressing that process clearly allows the CPUC to require load-serving entities (LSEs) to procure a share of integration resources (such as pumped storage) that are deemed to be needed, or pay their share of the cost for such resources, there is debate regarding whether the law allows the CPUC to direct LSEs to procure a mix of resources with certain characteristics or attributes that would avoid the need to procure integration resources in the first place, thereby lowering overall costs to utility consumers.
- 2. Lack of CPUC oversight regarding timely compliance with the RPS.** The CPUC has no mechanism, beyond after-the-fact compliance reviews, to track non-utility LSEs' compliance with RPS requirements and to remedy any problems. RPS compliance reviews occur several years after the compliance year. For example, CPUC RPS compliance reviews are just now – in 2019 – getting underway for the 2014-2016 compliance period. Waiting this long to take action to ensure that all LSEs are on track with compliance is not a recipe for success. SB 155 requires the CPUC to review the annual RPS compliance report of each LSE, notify the LSE if it is at risk of not satisfying RPS requirements, and make recommendations for remedying the situation.

Absent the new tools that SB 155 would put into place, timely achievement of the state's greenhouse gas, renewable energy and reliability goals at least cost will be at risk. Moreover, providing the CPUC with greater control over individual LSE resource plans will produce a more optimal and lower-cost overall portfolio. These tools can be implemented at negligible cost since they are completely in line with the CPUC's ongoing RPS and IRP implementation activities.

CalWEA therefore urges your "aye" vote.

Sincerely,



Nancy Rader
Executive Director

cc: Members and Staff, Assembly Committee on Appropriations
Senator Steven Bradford
