



California Wind Energy Association

March 28, 2024

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

RE: AB 2661 (Soria) Central Valley Solar – Oppose Unless Amend

Dear Chair Petrie-Norris,

The California Wind Energy Association (CalWEA) respectfully conveys its opposition to AB 2661 unless amended. CalWEA is a 24-year-old trade association. Our members are focused on operating and developing wind energy resources within and directly interconnected to California and off the coast of California, as well as capturing related economic and workforce development benefits for California.

Section I of AB 2661 would require the Public Utilities Commission (PUC) to evaluate the potential for 10 to 30 GW of solar electrical generation in the Central Valley beyond the amount of utility-scale solar in the most recently adopted preferred system plan as of January 1, 2025. If the PUC determines that solar electrical generation to be cost effective, the bill would require the PUC to provide, no later than the March 31 immediately following that determination, transmission-focused guidance to the ISO that includes the solar electrical generation in the resource portfolios of expected future renewable energy resources and zero-carbon resources.

CalWEA would not object if the Legislature wishes to direct utility-scale solar development to particular areas in the Central Valley. However, the bill does not specify that the solar that could be added in the Central Valley would replace solar elsewhere in the PUC's plan. That is, it could crowd out the wind in the PUC's portfolio. A resource portfolio that balances the daytime production of solar resources with the steadier round-the-clock production profile of wind energy resources requires *tens of gigawatts less capacity* compared to a portfolio that relies heavily on solar and storage. That is a remarkably large amount of saved capacity that represents a considerable reduction in land use and use of raw materials in the U.S. and globally. Moreover, it is a more reliable portfolio that also diversifies supply chain risks.

Further, if an extra 10 to 30 GW of Central Valley solar were cost-effective, that ought to be revealed as a matter of course in the PUC's planning process. If there is a flaw in the process, that should be corrected. Alternatively, CalWEA recommends that the Legislature simply mandate its preference for locating cost-effective solar in the Central Valley. (We encourage the Legislature also to explicitly endorse a resource-diverse resource portfolio.)

Therefore, CalWEA must regrettably assume an oppose-unless-amend position on the bill as introduced. However, we would be pleased to work with the author to correct the provisions that concern us.

Sincerely,

A handwritten signature in cursive script that reads "Nancy Rader".

Nancy Rader
Executive Director
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cc: Members and Staff of the Assembly Utilities and Energy Committee
