BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Continue Electric Integrated Resource Planning and Related Procurement Processes.	Rulemaking 20-05-003

CALIFORNIA WIND ENERGY ASSOCIATION REPLY COMMENTS ON PROPOSED PREFERRED SYSTEM PLAN

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On behalf of the California Wind Energy Association

October 11, 2021

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I. INTRODUCTION AND SUMMARY

Pursuant to Administrative Law Judge Ruling Seeking Comments on Proposed Preferred System Plan issued on August 17, 2021 (Ruling), the California Wind Energy Association (CalWEA) submits these reply comments in response to parties' September 27, 2021, opening comments on the Ruling.[1]

In summary, CalWEA supports parties' recommendations to:

- conduct one or more sensitivities that evaluate the tax policies now under consideration in Congress, which are widely expected to be adopted, and sensitivities to evaluate various levels of behind-the-meter solar;
- require load-serving entities (LSEs) to supply additional information to guard against resource shuffling within the western grid;
- adopt the 38 MMT Core Portfolio as the Proposed System Plan (PSP) and as the basis for transmission planning in the CAISO's 2022-23 cycle. However, evidence provided by Pacific Gas & Electric (PG&E) and Southern California Edison (SCE) supports the need for additional analysis to ensure that the adopted PSP achieves reasonable, rather than excessive, levels of reliability, which could also reflect scenarios with higher levels of electric vehicles. Other aspects of the utility proposals should be subject to further vetting in the next IRP cycle.

[1] All references are to parties' opening comments unless otherwise stated.

Many parties appropriately recognize that the Commission should take a more programmatic approach to clean, reliable energy procurement and that allocation requirements should be causation-based. Reliability resources should be construed broadly, as the Commission has previously recognized, to include diverse resources as these resources will significantly reduce the need for integration resources. CalWEA agrees with other parties that the Commission should initiate a stakeholder process to develop a comprehensive planning and compliance framework to achieve these goals, however, such a process should be used to fine-tune LSE-specific obligations that are at least generally established with the adoption of the present PSP. While a strong attribute-based approach, such as mandating the procurement of generation that delivers in the evening hours, might be sufficient to promote established technologies, it will not be enough to support the nascent offshore wind industry that will require massive capital investments. California must *begin now* to tackle those challenges because they will not disappear with delay.

Finally, while seeking a limited waiver from the Federal Energy Regulatory Commission to allow CAISO to reserve transmission capacity around the Diablo Canyon Nuclear Power Plant in upcoming deliverability allocations should be considered, that is an uncertain path; thus, such an approach should be one of several that the Commission encourages CAISO to pursue to ensure grid access for offshore wind at the Central Coast.

II. REPLIES TO PARTIES' RESPONSES TO QUESTIONS IN THE RULING

Question 3. Comment on the appropriateness of the scenarios and sensitivities developed in RESOLVE to be considered as the preferred portfolio. Suggest any alternative sensitivities or changes to the analysis.

Tax policy sensitivities. CalWEA supports the requests by Offshore Wind California (at pp. 3-5) and Vote Solar, the Solar Energy Industries Association, and the Large-scale Solar Association (Joint Solar Parties) (at p. 4) to conduct one or more sensitivities that evaluate tax policies now under consideration by Congress. It is widely expected that Congress will expand existing tax credits for renewable energy through the budget reconciliation process, known as the Build Back Better Act,[2] although the duration of the credits could fluctuate before final passage.

[2] The current tax proposal includes a 10-year, $25/MWh Production Tax Credit for wind, geothermal, landfill gas, and a new option for solar, and an extension of the Investment Tax Credit at its original

The Commission should also monitor the final bill for its inclusion of energy storage tax credits and a 10-year ITC for transmission projects built before 2031 that have capacity greater than 500MW and 275kV.

CalWEA also supports Offshore Wind California's recommendation (at p. 9) that the Commission engage with the Offshore Wind Task Force to foster timely progress in the siting process to increase the likelihood that California will be able to benefit from the tax credits available to offshore wind projects.

BTM Solar. As did CalWEA, several other parties call for sensitivity studies that evaluate the cost of the high level of behind-the-meter (BTM) solar that was forced into the IRP model as an input. More specifically, CalWEA agrees with the Natural Resources Defense Council (NRDC), The Utility Reform Network (TURN), and the California Coalition of Utility Employees (CUE) that the Commission should model sensitivities relating to BTM solar to assess the mix of replacement resources required and the impact on total portfolio costs and, specifically, that the Commission should evaluate 0.5x and 2.0x the default values along with an optimized case where no minimum level of customer solar adoption is assumed but the resource may be selected by the model if cost-effective.[3]

Resource shuffling. CalWEA support's NRDC's recommendation that Staff require more specific information in LSE filings regarding new resources to ensure that the achievement of California's emissions reduction goals do not lead to resource shuffling or an increase in carbon emissions elsewhere in the western grid, including adding specific questions to be answered by LSEs in their IRP filings.[4]

Question 4. Comment on the SERVM analysis and results of the 38 MMT Core Portfolio.
-and-
Question 5. Comment on the appropriateness of the 38 MMT Core Portfolio as the PSP.

A broad range of parties joined CalWEA in supporting the 38 MMT Core Portfolio as the Proposed System Plan, and these parties generally support the Proposed PSP as the basis for

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full 30% (currently 26%) through the end of 2031, phasing down to 26% in 2032 and 22% in 2033. It also modifies the ITC to include standalone storage, as well as technologies such as biogas. A 100% direct pay option is also included for all tax credits.

[3] NRDC at p. 3; TURN at p. 5-8; CUE at pp. 1-2.

[4] NRDC at p. 12.

transmission planning in the CAISO's 2022-23 cycle.[5] Many of these parties specifically supported the resource diversity reflected in that portfolio.[6]

PG&E and SCE support a 38 MMT target, but independently propose alternate PSPs based on various revisions to the modeling.[7] Interestingly, although the utilities' proposed revisions differ significantly, both efforts conclude that the PSP contains an excess of approximately 3,500 MW of energy storage resources than are necessary to maintain reliability, while other elements of the proposed portfolios varied in different ways.[8] These results appear to stem largely from aiming to achieve reasonable, rather than excessive, reliability levels measured based on Loss-Of-Load-Expectation (LOLE) calculations. PG&E and ratepayer advocates are concerned that the 38 MMT Core Portfolio results in an unnecessarily high level of reliability that unnecessarily raises costs.[9] As PG&E points out, the proposed PSP rests on the enforcement of a 22.5 planning reserve margin (PRM) and results in an LOLE of 0.064 and

[5] For example, see CEJA and Sierra Club at p. 9 ("We support the reliance on the 38 MMT Portfolio as the PSP with two caveats….)"; NRDC at pp. 2-3 ("preparing for the 38 MMT Core scenario should position the state well to integrate electric vehicles while achieving 2030 emissions reduction targets"); SDG&E at pp. 2-3 ("SDG&E supports the 38 MMT Core Portfolio as the PSP …The 38 MMT Core Portfolio will help to achieve the 2045 goal without imposing an unreasonable financial burden. … SDG&E supports planning to more aggressive GHG targets given the long lead times associated with transmission development"); TURN at p. 2 ("TURN supports the PSP's inclusion of renewable resource additions from the Mid-Term Reliability Decision (MTR) and the use of RESOLVE modeling to address 2032 resource needs which allows a ten-year look ahead for the 2022-2023 Transmission Planning Process (TPP)"); CAISO at p. 2 ("The CAISO studied the 38 MMT Core Portfolio using both stochastic and deterministic production cost modeling. Based on this analysis, the 38 MMT Core Portfolio meets the 0.1 loss-of-load expectation (LOLE) standard." However, the CAISO did not specifically comment on use of this portfolio in its next TPP cycle); and ACP-California at pp. 3-4 (supporting the use of the 38MMT scenario as the core portfolio, while taking issue with the timing of out-of-state wind in that portfolio for transmission planning purposes).

[6] See, e.g., NRDC at p. 6; ACP-California at p. 9; TURN at p. 2; Offshore Wind California at pp. 5-6; Golden State Clean Energy at p. 8. CEJA and Sierra Club, at p. 12, remind the Commission that it "has extensive authority to require procurement to meet GHG requirements [and] under Section 454.51(a) of the Code, … must "identify a diverse and balanced portfolio of resources needed to ***ensure*** a reliable electricity supply that provides optimal integration of renewable energy in a cost-effective manner." (Emphasis in original, footnote omitted.) Pattern and Southwestern Power Group, at p. 13, note the risks of a portfolio overly dependent on solar and batteries.

[7] PG&E response to Question 3 and p. A-3; SCE at p. 16 and response to question 4.

[8] PG&E at table, p. A-3; SCE at Table 1.

[9] PG&E at p. 3. Also see SCE at p. 12-13; Cal Advocates at p. 3; and TURN at p. 2.

0.054 in 2026 and 2030, respectively -- both much lower than the established industry standard of a 0.1 LOLE.

Given these modeling results, CalWEA would support additional analysis by the Commission including at least one RESOLVE/SERVM iteration that adjusts to appropriate levels of LOLE. This can be done by conducting a SERVM model run after the initial RESOLVE study to produce a PRM that comports with an acceptable LOLE level. The resulting PRM would then be fed back into the RESOLVE model for a second run to optimally, rather than arbitrarily, adjust the resource portfolio. [10] The Commission should also consider building-in the high-EV scenario from the 2020 IEPR in view of the fact that PG&E's analysis included that scenario, and NRDC, among others, note that the 38-MMT adopted scenario should position the state to integrate electric vehicles while achieving emissions reduction targets.[11]

Increasing LOLE values, which appears likely to reduce storage resources, will also provide more time to consider whether further diversification of the resource mix is warranted. As noted in response to Question 3, above, many parties have called for sensitivity analyses looking at the unjustifiably high levels of BTM solar that are "hard-wired" in the IRP. As CalWEA discovered in its analysis of those excessively high levels of BTM solar, halving that level of rooftop solar not only substantially reduces costs, but also results in significantly higher levels of diverse (i.e., non-solar/storage) resources (while not significantly increasing total utility-scale renewable resource requirements) and substantially reduces storage requirements.[12]

Other aspects of the utility proposals should be subject to further vetting in the next IRP cycle. For example, while we agree with SCE that *annual* effective load carrying capability (ELCC) values are no longer appropriate for determining the contribution of variable resources during the early evening net-peak demand period, we do not agree that picking a *single hour* is appropriate.[13] Consistent with the Commission's adoption of the "slice of day" framework for

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[10] The assumptions (e.g., inclusion of MTR-mandated resources and a high-EV load scenario), as well as policy-based/individual-IRP-based RPS resources (i.e., 2026-2030 offshore wind), should be consistently enforced in all these Commission-conducted studies.

[11] NRDC at pp. 2-3. Also see SDG&E at p. 4. While SCE states, at p. 16, that "it is vital that California plan for a higher electrification future," SCE supports revisiting the CEC's high-EV load forecast assumptions.

[12] CalWEA at p. 5 and Appendix 1. CalWEA's modeling showed that higher levels of wind and geothermal resources, and lower levels of utility-scale and BTM solar, reduce storage requirements by over 7 GW in 2045.

[13] SCE at Table 2, footnote 1 and p. 9.

Resource Adequacy reform, ELCC values should be selected for a number of hourly blocks during several seasons of the year.

Question 12. Comment on whether the Commission should require the procurement of resources contained in the individual IRP filings and have LSEs face penalties and/or backstop procurement requirements with cost allocation arrangements …
-and-
Question 13. Comment on whether you would prefer an approach where the Commission determines procurement need for GHG-free resources or the GHG-free attributes of resources at the system level and then uses a need allocation methodology to assign procurement to individual LSEs…

Many parties agree that the Commission should not require LSEs to procure the resources contained in their individual IRP filings.[14] Many parties appropriately recognize, however, that the Commission should take a more programmatic approach to clean and reliable energy procurement. For example, SCE states that a framework is needed to "set the foundation for LSE planning so there are clear requirements on what is necessary to meet LSEs' share of system reliability and GHG reduction goals as they develop their IRPs."[15] As CalWEA discussed in opening comments, "system reliability" resources should be construed broadly, as the Commission has previously recognized, to include diverse resources as they will reduce the need for "integration resources" such as batteries and, thus, themselves constitute integration resources.[16]

CalCCA advocates an approach "that accounts for the prior action or inaction taken by LSEs in adopting new requirements,"[17] which is consistent with the causation-based allocation requirements that are required by law,[18] and CalCCA's call for flexibility in meeting procurement targets implicitly recognizes the need to set such targets.

While CalWEA agrees with SCE that the Commission should "initiate a stakeholder process to develop a comprehensive planning and compliance framework with enforcement mechanisms to meet reliability and GHG goals," such a process should be used to fine-tune LSE-

[14] See, e.g., CalWEA at pp. 7-8; CalCCA at pp. 14-15; PG&E at p. 18; SDG&E at 6-7; SCE at p. 21.

[15] SCE at p. 20-21.

[16] CalWEA at p. 16. Also see note 14, *supra.* The modeling analysis in Appendix 1 to CalWEA's opening comments shows that increasing portfolio diversity with wind and geothermal resources reduced required storage resources by over 7,000 MW in 2045.

[17] CalCCA at p. 14.

[18] CalWEA at pp. 16-17.

specific obligations that are at least generally established with the adoption of the present PSP. Many parties joined CalWEA's call for the need for taking such action now:

- The CAISO (at p. 8) "strongly urges the Commission to direct procurement for both existing and new resources to ensure the baseline and incremental needs, respectively, are met to ensure reliability."
- NRDC (at p. 6) agrees that "LSEs should procure the optimal mix of clean energy resources through the RPS and the IRP Procurement track to meet their clean energy and reliability obligations."
- TURN (at 8-9) states:

  > in the development of an optimal resource mix, the Commission may reasonably decide that a particular resource at a specific location should be constructed to provide broad system benefits that are not exclusively captured by the LSE contracting for project output. In such situations, LSEs will not be motivated to pay for benefits that they cannot fully monetize and provide to their customers. Resources of this type that are priced above market, relative to alternatives that provide the LSE with similar value, may languish and fail to find a buyer. *In such a situation, the Commission should consider requiring procurement of the project.*

- TURN suggests (at p. 2) that the diverse resources included in the proposed PSP should be addressed under the same approach taken in D.19-11-016, where LSEs were required to procure a share of each category of needed resource. CalWEA agrees with TURN that each LSE should have the option of initially requesting that their share of required resources be procured by a central buyer while receiving a share of the relevant costs and benefits, which will reduce lag time in these procurements.
- Pattern and Southwestern Power Group (SWPG) (at p. 13) illustrated the need for the Commission to promote resource diversity, noting the risk of supply chain disruptions associated with solar and batteries and the rolling outages of August 2020 that were due in part to the wildfires that created smoke and cloud cover that prevented solar projects from generating and charging storage for several days. The Joint Solar Parties similarly underscored (at p. 4-5) that the forecast of battery storage costs has significant uncertainties and that the Lazard forecast used for the IRP is toward the low end of the range and noted that the high demand for

batteries in other applications, such as electric vehicles, may create supply-chain constraints and issues with the availability of raw materials.

Regarding offshore wind, Offshore Wind California correctly observes that early offshore wind procurement will "unlock system-wide benefits" and that "[e]ven if offshore wind is an important component of the optimal system in the long run, "LSEs will not be eager to subsidize others" by purchasing power from these early projects, and thus the Commission must "eliminat[e] the penalty" for early procurers. This can only be done by requiring all LSEs to share in the early procurements, as CalWEA explained at length (at pp. 14-15). Thus, NRDC's suggestion (at p. 6) that the Commission should wait and see whether LSE procurements fulfill the Commission's optimal portfolio is inappropriate.[19] Brookfield emphasizes (at p. 4) that, "[a]bsent a clear procurement mandate, developers may be both reluctant or unable to commit the substantial monies necessary to secure the leases and to begin what is anticipated to be the lengthy and costly permitting process. Procurement certainty will enable developers to bid on lease parcels with some confidence on the basic structure of off-take arrangements and pricing."

These realities counterweight SCE's assertion (at p. 22) that "[t]he Commission should not establish resource-specific technology carve-outs," and instead rely on an attribute-based approach.[20] This statement, firstly, ignores the fact that IRP analyses have identified offshore wind as a cost-effective part of a reliable portfolio. Secondly, however, if the Commission accepts SCE's argument, it should not expect the offshore wind in its PSP or the SB 100 Joint Agency Report to materialize, much less the development of a U.S. or California-based jobs-producing offshore wind industry. While a strong attribute-based approach, such as mandating the procurement of generation that delivers in the evening hours, might be sufficient to promote established technologies, it will not be enough to support a nascent industry that will require massive capital investments. Similarly, Cal Advocates has it backwards when it argues (at p. 15) that the "huge barriers" related to permits, site control, and engineering design to build offshore

[19] The argument that NRDC makes (at p. 8) in support of making "targeted investments" in green electrolytic hydrogen apply equally to offshore wind.

[20] Cal Advocates (at pp. 17-18), CalCCA (at p. 15) and PG&E (at p. 24) similarly promote an attribute-based approach to address specific capacity needs, although PG&E appropriately recognizes that "the CPUC should also set standards and guidelines for resources like renewable hydrogen." Cal Advocates states that an attribute-based approach is necessary to create a larger pool to mitigate the market power problems associated with mandates but, as CalWEA advocated (at p. 18), flexibility and the possibility of open-book procurement where competition is limited offer other approaches. TURN has additional suggestions at pp. 9-10.

wind are a reason for the Commission *not* to include offshore wind in earlier years. The reality is just the opposite: California must *begin now* to tackle those challenges because they will not disappear with delay.

SDG&E (at p.8) at least recognizes that LSE portfolios may be imbalanced and require correction, and PG&E recognizes further (at p. 27) that "[o]ffshore wind and out-of-state renewable resources may present an attractive value for California energy consumers. PG&E supports policy action to advance transmission development for access to high-capacity factor diverse resources (e.g., out of state and offshore wind)." Advancing transmission development for offshore wind would make no sense without also fostering the resources that will make use of that transmission. CalWEA agrees with PG&E also when it states that "the IRP proceeding is a tool to plan for *and order* procurement, while the RA filings function as the enforcement mechanism for near-term."

CalWEA supports PG&E's suggestion (at pp. 28-29) that the procurement needs identified and established in the IRP will require all LSEs – investor-owned as well as publicly owned – to share in these goals, which will require coordination among the legislature, CPUC and CEC.

Question 21. Comment on whether and how the Commission should act to preserve transmission deliverability rights in the central coast area that could be utilized for offshore wind or other resources.

In response to this question, some parties advocated that the Commission request that CAISO seek a limited waiver from the Federal Energy Regulatory Commission (FERC) allowing CAISO to reserve transmission capacity (more specifically TPD capacity), in the area of the Diablo Canyon Nuclear Power Plant in upcoming deliverability allocations.[21] While obtaining a FERC waiver is one avenue that the CAISO could consider to ensure that access is available for at least 3 GW of offshore wind capacity at the Central Coast by 2032, it is a controversial and uncertain one because it creates winners and losers. Therefore, such an approach should be one of several that the Commission pursues to ensure grid access for offshore wind at the Central Coast.

[21] American Clean Power – California at p. 6; Offshore Wind California at p. 7.

As CAISO and other parties pointed out,[22] CAISO's interconnection process is governed by its FERC-approved tariff that currently provides potential access to any active generation interconnection project that seeks an allocation of deliverability rights. As the Joint Solar Parties indicate (at p. 10), "reserving deliverability, or other preferential treatment for a single technology would be a major policy change, and it's not clear whether such modifications of the open-access framework would be acceptable to FERC as just and reasonable, much less fair to other projects entering the queue in the future." Given the uncertainty of this means of ensuring transmission deliverability rights for offshore wind by 2032, the Commission should request that CAISO consider other options outlined by CalWEA and other parties in opening comments.

Namely, CalWEA proposed (at pp. 20-23) that the most efficient and timely option would be for the CAISO to reform its deliverability assessment methodology in conjunction with the Commission's planned structural reforms to its Resource Adequacy program. By making more efficient use of existing transmission assets, such reforms would deliver substantial ratepayer benefits and immediately create additional transmission deliverability capacity for use by all generators.

Another option would be for the Commission to request that the CAISO seek to purchase the necessary deliverability rights for at least 1.7 GW of offshore wind from PG&E and its retiring nuclear plant. As PG&E noted (at p. 26), it retains those rights for up to three years following the retirement of the plant and PG&E has not yet made its decision on which of its options it will pursue. PG&E stated that it "welcomes Commission input on this matter."

It is alarming, however, to learn from TURN (at pp. 15-16) that PG&E is proposing to remove the 230kV switchyard and dismantle the associated infrastructure shortly after the shutdown of Diablo Canyon Unit 2 in 2025. CalWEA is encouraged that a recently-adopted settlement in PG&E's Nuclear Decommissioning case directs PG&E to consider options for repurposing existing site infrastructure in the next triennial proceeding, and we agree with TURN that the Commission should direct PG&E to address, into the next update of its decommissioning plan, "strategies for the maximum utilization of existing transmission infrastructure at the site to support future offshore wind deployment. facility that is scheduled to retire by 2025."

A longer-term option that CalWEA and other parties advocated, which should be pursued in any case, is a least-regrets upgrade between the Los Angeles Basin and Central California that

[22] CAISO at p. 8; Joint Solar Parties at p. 10.

would deliver multiple benefits.[23] We note that relieving local transmission constraints will facilitate the siting of more storage resources in load centers (by providing charging capacity) as well as in areas outside of load centers with lower development costs.

Question 22. Comment on the amount of offshore wind, if any, that should be included in the 2022-2023 TPP base case. Comment on how the results of the 2021-2022 TPP offshore wind sensitivity case should influence this issue.

In response to Question 22, many parties supported the inclusion of at least 1.7 GW of offshore wind in the 2022-2023 TPP base case.[24] Some parties, including CalWEA, call for studying at least 3 GW at the Central Coast (whether in the base case or sensitivity) as well as additional offshore wind capacity at the North Coast, potentially pending the outcome of the sensitivity studies being conducted in the present TPP cycle.

CalCCA (at p. 19) does not support including the offshore wind in the 2022-2023 TPP base case "until a CAISO sensitivity study is complete and included in the PSP for analysis." CalCCA's position is disappointing, given the expressed interest of several of its member-CCAs in pursuing offshore wind resources.[25] SCE similarly argues that no offshore wind should be included in the 2022-2023 TPP base cases, "particularly in the base portfolio for which transmission projects could be approved," because "it is uncertain how much offshore wind should be selected." Such positions ignore the fact that the IRP process itself – as well as the SB 100 Joint Agency Report – have demonstrated that at least 10 GW of offshore wind *will be needed because its attributes are part of the least-cost, reliable portfolio.* As Golden State Clean Energy aptly noted (at p. 8), "even if offshore wind does not reach commercial operation in 2032, it will sometime soon after and it is a large undertaking that should begin now." Moreover, as discussed above, there are several options available to the CAISO to provide transmission deliverability capacity to offshore wind that do not require transmission upgrades.

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[23] BRTM at p. 9; California Western Grid Development, LLC at pp. 7-8; and CalWEA at p. 24.

[24] BRTM at p. 9; ACP – California at p. 10; CalWEA at p. 23; Golden State Clean Energy at p. 8; Offshore Wind California at p. 8; TURN at p. 2. PG&E stated, at p. 27, that it "supports policy action to advance transmission development for access to high-capacity factor diverse resources (e.g., out of state and offshore wind). In the past, California successfully developed renewable energy zones (i.e., CREZs) through systematic planning. Similarly, the Commission should adopt a similar zone approach to plan for and develop transmission for offshore and out-of-state wind resources."

[25] Redwood Coast Energy Authority, Clean Power Alliance of Southern California, and Central Coast Community Energy each included offshore wind in their individual IRPs by or before 2030.

Finally, as CalWEA discussed in opening comments (at pp. 11-13), if California is to capture the critical reliability, economic, and workforce benefits that offshore wind offers, it must address the challenges associated with building an offshore wind industry. Offshore Wind California similarly notes (at p. 7) that the loss of interconnection opportunities on the Central Coast would "set back efforts to position California for build out at least 10 GW of offshore wind capacity as envisioned in the SB 100 Report."

Respectfully submitted,

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On behalf of the California Wind Energy Association

October 11, 2021

VERIFICATION

I, Nancy Rader, am the Executive Director of the California Wind Energy Association. I am authorized to make this Verification on its behalf. I declare under penalty of perjury that the statements in the foregoing copy of "California Wind Energy Association Reply Comments on Proposed Preferred System Plan" are true of my own knowledge, except as to the matters which are therein stated on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 11, 2021, at Berkeley, California.

/s/ *Nancy Rader*
Nancy Rader
Executive Director
California Wind Energy Association