



## California Wind Energy Association

---

May 1, 2020

Honorable Susan Talamantes Eggman  
California State Assembly  
State Capitol Room 4117  
Sacramento, CA 95814

RE: AB 2255 – 3/3/20 Substantive Amendments (Eggman) – OPPOSE

Dear Assembly Member Eggman:

The California Wind Energy Association (CalWEA) is a 20-year-old trade association representing wind energy companies focused on the California market, primarily consisting of owners and operators of projects located in California. AB 2255, with the amendments dated 03/03/20, would establish a process that could lead to the California Independent System Operator (CAISO) studying the need for, and ultimately soliciting the development of and funding for, an unspecified amount of long-duration energy storage for 2030.

CalWEA respectfully opposes this legislation for three primary reasons.

First, the legislation is at odds with the CPUC's Integrated Resource Planning (IRP) process, which was established by the legislature in SB 350 in 2015. The CPUC is currently evaluating two resource planning portfolios for 2030 – one with a greenhouse-gas (GHG) target of 46 million metric tons (MMT) and a second with a GHG target of 38 MMT. Each of these include a significant amount of long-duration storage (973 MW and 1,605 MW, respectively). AB 2255, as amended, would require the CAISO to plan for long-duration storage assuming a much more aggressive 2030 GHG target of 30 MMT. Planning for storage in the context of a very aggressive GHG target when the CPUC is otherwise planning for a less aggressive target would result in a gross over-estimate of the storage resources actually needed in 2030.

Second, the CPUC has not completed its analysis for how to best achieve a GHG target of 30 MMT, whether in 2030 or in later years. Studies completed for the California Energy Commission (CEC) indicate that far less storage would be needed in a more diverse resource portfolio. Specifically, the CEC's June 2018 "Deep Decarbonization in a High Renewables Future" shows that achieving the state's ultimate GHG goals with a balanced wind-solar portfolio would dramatically reduce the need for storage resources, compared with a solar-dominated portfolio. Further, such a portfolio would dramatically reduce total costs. California's tremendous offshore wind resources could play a large role in such a

balanced portfolio. Therefore, it is too soon to say how much storage – long-duration or otherwise – will be needed to most efficiently achieve California’s long-term GHG goals.

Third, it is not clear that it is necessary for the CAISO to play a role in the procurement of storage resources in order to realize these resources. The CPUC has recognized that the procurement of large, long-lead-time resources will require coordination among the state’s many load-serving entities. The CPUC’s April 6, 2020, IRP decision indicates that this will be a topic of discussion later this year.

Given this activity in the CPUC’s IRP process, CalWEA believes that it would be counter-productive for the legislature to inject the CAISO into the planning process at this time, in a way that is inconsistent with the CPUC’s activities. This is especially true in the context of the legislature’s far more pressing priorities in addressing the Covid-19 crisis and the coming wildfire season.

We respectfully request that no further action be taken on AB 2255.

Sincerely,

A handwritten signature in black ink, appearing to read "Nancy Rader". The signature is fluid and cursive, with the first name "Nancy" being more prominent than the last name "Rader".

Nancy Rader  
Executive Director

cc: Members, Assembly Committee on Utilities and Energy  
Chair Chris Holden