Rajinder Sahota

Division Chief

Industrial Strategies Division

California Air Resources Board

**RE: Draft 2020 - Integrated Resource Planning (IRP) Electricity Sector Greenhouse Gas (GHG) Planning Targets**

Dear Ms. Sahota,

Southern California Edison (SCE) appreciates the opportunity to provide comments on: *Senate Bill 350 Integrated Resource Planning Electricity Sector Greenhouse Gas Planning Targets: Draft 2020 Update* (2020 Draft Update)*.*

Planning for the state’s decarbonization goals requires all stakeholders to plan in a coordinated fashion using similar GHG planning targets so that the electricity sector is not moving independently from the other sectors in the state to achieve future GHG emission reductions. In its 2020 Draft Update, the existing 2030 GHG planning target range of 30-53 MMT CO2e established in the California Air Resources Board’s (CARB) 2018 staff report remains unchanged. In its updated analysis, CARB recognizes that implementation of Senate Bill (SB) 100’s 60% Renewables Portfolio Standard (RPS) brings the top end of the 2017 Scoping Plan range from 53 MMT CO2e to 44 MMT CO2e, but states that, “the adopted IRP electricity sector target range is still valid under the new SB100 RPS 2030 target; however, LSEs and POUs may end up below the top range of their respective IRP targets as a result of meeting a stricter RPS target, and are encouraged to plan towards the bottom end of their range.”[[1]](#footnote-2) Although the adopted IRP electricity sector target remains within the existing range, SCE recommends CARB reflect the impacts of the 60% RPS target and lower the top end of the range to 44 MMT CO2e.

Revising this range is closer in line with California Public Utility Commission (CPUC) staff’s 2045 Framing Study, which shows a 2030 GHG target between 30-38 MMT CO2e for the California electric sector in each scenario in order to meet the longer term 2045 decarbonization goal.[[2]](#footnote-3) Additionally, adjusting the range to 44 MMT CO2e to 30 MMT CO2e for CARB’s 2020 Scoping plan is also closer aligned with the California Energy Commission’s (CEC) *Deep Decarbonization in a High Renewables Future study[[3]](#footnote-4)* and SCE’s *Pathway 2045* whitepaper[[4]](#footnote-5) which found that in order to achieve the longer-term decarbonization goal feasibly and affordably by 2045, a lower electricity sector GHG target ranging from 30-38 MMT CO2e is needed.

Moreover, maintaining a 2030 GHG target with an upper limit set too high would result in adding resources at a very rapid pace for the years after 2030 to meet the aggressive 2045 decarbonization goals. A 53 MMT CO2e upper limit for the GHG target range could result in resources being added by the electric sector too slowly because the broad range underestimates the appropriate level of resources needed by 2030 to achieve a smooth glidepath to reach 2045 goals. Even the 46 MMT CO2e target used in the updated base planning portfolio or the Reference System Portfolio (RSP) in the CPUC’s IRP proceeding is too high as shown in the graph below.[[5]](#footnote-6) Adding resources too slowly to meet a higher GHG reduction target creates a pathway that is overly aggressive in later years and may put the state’s 2045 GHG reduction goals at risk.

In conclusion, SCE recommends the 2020 Draft Update be revised with a narrower GHG planning target range of 44 MMT CO2e to 30 MMT CO2e.

Sincerely,

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1. 2020 Draft Update at 4. [↑](#footnote-ref-2)
2. *See* 2019-20 IRP: Proposed Reference System Plan, CPUC Energy Division, Nov. 6, 2019, at 165. [↑](#footnote-ref-3)
3. *See* CEC Energy Research and Development Division, Deep Decarbonization in a High Renewables

   Future, June 2018, available at: <https://efiling.energy.ca.gov/GetDocument.aspx?tn=223785>. [↑](#footnote-ref-4)
4. SCE’s Pathway 2045 whitepaper can be found at: [https://www.edison.com/home/ourperspective/pathway- 2045.html](https://www.edison.com/home/ourperspective/pathway-%202045.html). [↑](#footnote-ref-5)
5. The resource build-outs shown in the figure reflect the 46 MMT with 2019 Integrated Energy Policy Report portfolio recommended by CPUC staff for use in the 2021-2022 California Independent System Operator Transmission Planning Process, which uses post-2030 incremental building electrification load assumptions from the CEC High Biofuels PATHWAYS scenario. [↑](#footnote-ref-6)