



Southern California Public Power Authority  
1160 Nicole Court  
Glendora, CA 91740  
(626) 793-9364

November 19, 2021 | Submitted Electronically

Ms. Rajinder Sahota  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

## **RE: Comments on the November 2<sup>nd</sup> Technical Workshop on Electricity Sector Considerations**

The Southern California Public Power Authority (SCPPA)<sup>1</sup> appreciates the opportunity to provide comments on the California Air Resources Board's (CARB) November 2<sup>nd</sup> technical workshop on the electricity sector, conducted in support of the 2022 Scoping Plan Update (Scoping Plan) process. SCPPA thanks CARB and its joint agency partners for facilitating this discussion of the challenges and opportunities for the electricity sector in decarbonizing other sectors, and thanks the panelists for their thoughtful and detailed presentations.

Reliable, affordable electricity is key to the success of the state's emissions reduction goals and achieving carbon neutrality. To best position the state to achieve these goals, detailed attention to electricity sector considerations and continuing the pragmatic focus from the November 2<sup>nd</sup> workshop are necessary and appropriate as CARB finalizes draft modeling scenarios and moves toward evaluation in the Scoping Plan process.

### **Clean, Affordable, Reliable Electricity Provides an Important Opportunity to Decarbonize Other Sectors, But Barriers Must Be Considered**

SCPPA incorporates by reference the prior comments of the Joint POU's<sup>2</sup> and the Joint Utilities Group<sup>3</sup> describing the importance of maintaining affordable, reliable electricity as the state transitions to 100% clean energy and plans to decarbonize other sectors through electrification. The comments also explained some of the practical and operational challenges that must be addressed to implement and realize those goals.

---

<sup>1</sup> SCPPA is a Joint Powers Authority (a public agency), created in 1980, for the purpose of providing joint planning, financing, construction, and operation of transmission and generation projects. SCPPA's Members include the cities of Anaheim, Azusa, Banning, Burbank, Cerritos, Colton, Glendale, Los Angeles, Pasadena, Riverside, and Vernon, and the Imperial Irrigation District. Each Member owns and operates a publicly owned electric utility (POU) governed by a board of local officials. Our Members collectively serve nearly five million people throughout Southern California. Together they deliver electricity to over two million customers throughout Southern California, spanning an area of 7,000 square miles. On behalf of SCPPA Members, SCPPA is part of (through ownership and contracts) 35 operational generation facilities and 946 miles of transmission.

<sup>2</sup> Joint POU [comments](#) on the September 30<sup>th</sup> Scenario Inputs Technical Workshop and Joint POU [comments](#) on the August 17<sup>th</sup> Scenario Concepts Technical Workshop.

<sup>3</sup> Joint Utilities Group [comments](#) on the September 30<sup>th</sup> Scenario Inputs Technical Workshop.

---

*The Members of Southern California Public Power Authority work together to power sustainable communities.*





Southern California Public Power Authority  
1160 Nicole Court  
Glendora, CA 91740  
(626) 793-9364

SCPPA welcomes the ambitious but pragmatic discussion at the November 2<sup>nd</sup> workshop, which highlighted the electricity sector’s significant GHG reductions to date and opportunity to facilitate economy-wide decarbonization, while also recognizing barriers associated with achieving 100% clean electricity. SCPPA appreciates the recognition that to maintain adequate supply and support reliability each hour of the year, across all seasons and during the shifting peak and net peak, firm zero-carbon resources and some level of combustion will be needed. Green hydrogen and other long lead-time zero-carbon resources may serve an important role, but the state must also recognize the need for existing traditional resources to maintain reliability during the transition.

SCPPA similarly appreciates the open discussion about permitting and land-use challenges that must be addressed to develop new zero-carbon generation resources and transmission at the scale needed to meet the state’s clean energy goals, and how addressing those challenges may become more complex as more projects are deployed in a region. SCPPA also supports the focus on addressing costs, affordability, and ratepayer impacts. Electricity is an essential public service, and the achievement of the state’s clean energy goals must be equitable and ensure reasonable electricity access for all Californians.

CARB’s attention to these important challenges is an essential first step in developing a realistic and implementable path to carbon neutrality. Only after identifying the potential barriers can the state and other stakeholders develop workable solutions to address them. Similarly, a recognition of operational needs will help inform the feasible steps toward achieving carbon neutrality. The urgency of the climate crisis requires the state to act, but it is not enough to merely set out a desired pathway if that pathway is unable to realize the final objective.

### **Electricity Sector Considerations Should Be Reflected in Modeling Scenarios and CARB’s Framework for Evaluating the Scenarios**

As CARB finalizes the draft modeling scenarios this month, SCPPA urges CARB to keep at the forefront the importance of reliable, affordable electricity and the complex issues that must be addressed to support a successful transition to 100% clean electricity as well as the achievement of carbon neutrality. As such, we reiterate our recommendation that CARB focus on scenarios that inform viable, implementable paths to carbon neutrality. We also urge CARB to incorporate electric system reliability and electricity affordability analyses into the Scoping Plan process, following the release of the preliminary modeling results, along with an assessment of the risks associated with realizing each scenario.

---

*The Members of Southern California Public Power Authority work together to power sustainable communities.*





Southern California Public Power Authority  
1160 Nicole Court  
Glendora, CA 91740  
(626) 793-9364

**Conclusion**

SCPPA looks forward to working with CARB and other stakeholders to help preview the modeling results and evaluate feasible scenarios that advance the state’s important climate, environment, and health goals without compromising electricity affordability or electric system reliability.

---

*The Members of Southern California Public Power Authority work together to power sustainable communities.*

