

March 7, 2022

Rajinder Sahota  
Deputy Executive Officer  
Climate Change & Research  
California Air Resources Board

**RE: Public Workshop on Public Health of the 2022 Scoping Plan Update to Achieve Carbon Neutrality by 2045.**

Dear Ms. Sahota,

Southern California Edison (SCE) appreciates the opportunity to provide comments on the Public Health Workshop of the 2022 Scoping Plan Update (2022 SPU), held on February 15 by the California Air Resources Board (CARB).

[SCE recommends developing a policy recommendation and framework for joint energy and health partnership based on energy and health benefits](#)

SCE recommends that CARB include policy recommendations to promote and facilitate partnerships between energy and health agencies and organizations for combined policies and programs that realize customer health and energy benefits in order to maximize their impact. Through the important work of the 2022 SPU, CARB sits in the unique intersection of energy and health, as it straddles energy resource planning to reduce climate change impacts and evaluates significant health impacts as part of energy resource planning. CARB's 2022 SPU could assess a spectrum of policy activity, such as developing methodologies and tools for claiming energy and health benefits based on the robust public health research presented at the February 15<sup>th</sup> workshop, establishing processes for developing and co-funding programs, organizing coordination with health and energy agencies to facilitate the partnership, and more. The size of quantified health benefits from electrification shows the importance of establishing health and energy partnerships so that more customers can realize the significant health and energy benefits that result from increased electrification.

The robust and rigorous quantification of health benefits contained in the 2022 SPU demonstrates an opportunity to combine funding for energy programs and health programs based on the energy and health benefits created. For example, based on the energy benefits, an energy program could fund a program that electrifies 10,000 homes per year and a separate health program could electrify 5,000 homes per year, based on the value of the health benefits. Separately, they electrify 15,000 homes per year, however, if the programs were partnered, they could realize 20,000 homes per year through economies of scale (administrative efficiencies, marketing, implementation, greater purchasing power, etc.). Another illustrative example is a situation in which there is no separate health program because it wouldn't be cost-effective to administer a program that only can afford to electrify 5,000 homes per year. In that instance, the net impact of a partnership would increase from electrifying 10,000 homes per year to 20,000 homes per year.

One precedent for this type of energy/non-energy partnership is water and energy efficiency programs where costs and benefits are shared between energy and water utilities proportional to the energy and water benefits. This results in combined programs where homeowners receive energy

efficiency incentives and water efficiency incentives at the same time. This creates economies of scale for larger programs than energy or water utilities could have created independently (or sometimes, no program at all because there's not sufficient funding or benefits to warrant launching a program).

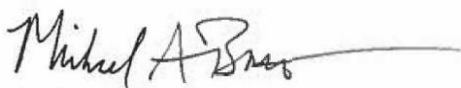
A larger precedent is the decades of electricity and gas utility partnership for energy efficiency programs, which is based on co-funding joint programs based on the share of electric and gas benefits. The policy framework, including the process for coordination, approved methodologies for calculating benefits, and shared implementation responsibilities, is already established and could be adapted for a health/energy program partnership.

Coordinating and integrating with other state agencies on the intersection of energy and health would benefit this partnership opportunity. For example, CARB could incorporate the recent work the CPUC completed that quantified the air quality health benefits of reducing a therm of methane (such as from building electrification) at \$1.20/therm<sup>1</sup>. A partnership's ability to align policies and organizations across the state for accounting and realizing health and energy benefits to maximize the impact in support of the state's ambitious goals for reducing climate change and improving air quality and public health.

## Conclusion

SCE thanks CARB for taking into consideration the above comments on the Public Health Workshop of the 2022 Scoping Plan Update. Please do not hesitate to contact me at (626) 302-8442 with any questions or concerns you may have. I am available to discuss these matters further at your convenience.

Sincerely,



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<sup>1</sup> "Quantifying the Air Quality Impacts of Decarbonization and Distributed Energy Programs in California, January 2022, available at <https://www.ethree.com/wp-content/uploads/2022/01/CPUC-Air-Quality-Report-FINAL.pdf>