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April 10, 2017

Ms. Rajinder Sahota
California Air Resources Board
1001 "I" Street
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Subject: Los Angeles Department of Water and Power's Comments on
California Air Resources Board's Proposed 2017 Climate Change Scoping
Plan of January 20, 2017

The Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to provide comments to the California Air Resources Board (ARB) on its 2017 Climate Change Scoping Plan Update (Scoping Plan) released on January 20, 2017.¹ In submitting these comments, the LADWP reaffirms its strong support of achieving the substantial greenhouse gas (GHG) emissions reductions goals of AB 32 and SB 32 in a cost-effective manner that protects the LADWP's ratepayers and minimizes impacts to low-income communities.

Serving approximately 1.4 million residential and business customers, the LADWP is the largest municipal electric utility in the nation, and the third largest utility in California. The LADWP strives to promote the goals of maintaining high reliability and exercising environmental stewardship. The LADWP intends to make unprecedented major capital investments over the next ten years to significantly reduce greenhouse gas (GHG) emissions on a the LADWP system-wide basis. The LADWP's plan to reduce GHG emissions and associated estimated costs of the LADWP's programs include the following:

¹ California Air Resources Board, The 2017 Climate Change Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target (January 20, 2017) [hereinafter "Scoping Plan"].

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- Replacing all existing coal resources with non- or low-emitting replacement generation, \$49 million (net revenue requirement between operating a coal plant and operating gas-fired generators);
- Expanding reliance on renewable energy, \$6.1 billion;
- Modernizing power plants in the South Coast Air Basin, \$1.4 billion;
- Implementing major projects and measures for improving end-use energy efficiency, \$1.2 billion;
- Investing in electric transportation infrastructure to assist in reducing mobile source emissions, \$250 million; and
- Developing increased capacity for energy storage, \$279 million.

As ARB moves forward in the development of the Scoping Plan, the LADWP urges ARB to fully analyze and consider input from all stakeholders in order to develop a complete understanding of the potential impacts on industries and communities of the modeled scenarios. The LADWP applauds ARB's decision to extend the comment deadline for the Scoping Plan, as it will allow for a more thorough review of the ARB proposal and enhance stakeholders' ability to provide thoughtful input to ARB. In addition, the LADWP appreciates ARB's effort to address issues brought up in previous ARB Board meetings with refinements to the Scoping Plan. The LADWP is commenting on currently available information, and its comments may change when additional Scoping Plan-related information becomes available for review.

The LADWP Supports the Scoping Plan Proposed Scenario

The LADWP supports ARB's Proposed Scenario as the best option for cost-effectively reducing GHG emissions consistent with the goals of AB 32, SB 32, and AB 197. In particular, based on past positive experiences with flexible, market-based cap-and-trade programs for achieving cost-effective emission reductions, the LADWP supports those scenarios that primarily rely on continuation of the Cap-and-Trade Regulation to guarantee emission reductions (including the Proposed Scenario and Alternative 3). ARB's own analysis shows that the per-ton cost of emission reduction under the Cap-and-Trade Regulation is an order of magnitude less than the costs of most other emission reduction measures analyzed.²

² Scoping Plan at 65.

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The LADWP agrees that continuation of the Cap-and-Trade Regulation post-2020 is critical for ensuring “the most secure, reliable, and feasible clean energy future for California—one that will continue to provide crucial investments to improve the quality of life and the environment in disadvantaged communities.”³ The Proposed Scenario incorporates a well understood, cost-effective approach to reducing GHG emissions that simultaneously can be designed to address environmental justice concerns as required by AB 197.

As ARB recognizes, the Cap-and-Trade Regulation has the capability of raising revenues that can be spent to ensure that disadvantaged communities are not disproportionately impacted by the effects of climate change and that disadvantaged and low-income communities can benefit from the economic opportunities of a clean energy economy in California.⁴

The LADWP urges ARB to consider the environmental justice impacts that each scenario will have on the electricity rates paid by low-income ratepayers. The LADWP applauds ARB for highlighting that “the Cap-and-Trade Program is designed to protect electricity and natural gas residential ratepayers from higher energy prices.”⁵ The efficiencies achievable through market-based regulatory mechanisms, such as the Cap-and-Trade Regulation, can help entities like the LADWP minimize rate increases on its ratepayers (including those in disadvantaged and low-income communities), while the commitments that Los Angeles has made to divesting as quickly as possible from its existing coal generation fleet and increasing renewable energy generation produce direct substantial environmental benefits for all Los Angeles citizens.

The LADWP also supports ARB’s consideration of “which measures might lend themselves, through careful design and collaboration with other interested jurisdictions, toward linked GHG reduction programs,”⁶ and the conclusion that by extending the existing Cap-and-Trade Regulation, “the State would preserve its current linkages and supports future linkages.”⁷ Interstate and international linkages can simultaneously

³ Scoping Plan at 39.

⁴ Scoping Plan at 39-40.

⁵ Scoping Plan at 40.

⁶ Scoping Plan at 28.

⁷ Scoping Plan at 52.

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reduce the costs of GHG reductions and encourage GHG reduction efforts beyond California and even the United States. For that reason, the California legislature has made linkage a policy priority under AB 32 and should be an important factor in selecting among the scenarios.

Notably, Alternative Scenarios 1, 2, and 4 do not meet these objectives. In particular, the LADWP is concerned with newly proposed Alternative Scenario 4, an overly prescriptive approach that would impose both (1) a per-unit emissions limit with no mechanism for averaging, trading or banking, and 2) a tax on emissions. This approach does not carry any of the important flexibility mechanisms that make the Cap-and-Trade Regulation an effective way for reducing GHG emissions at reasonable cost to ratepayers. Without emission trading, many baseload and load following electric generating units needed to supplement variable renewable generation will not be able to continue operating above their assigned unit-specific limits, posing significant reliability concerns and operational constraints that would likely increase compliance costs with no corresponding environmental benefits. And by imposing a tax on top of the inflexible emission limit, Alternative 4 would further increase costs for compliance entities, and ultimately ratepayers and California consumers, without any additional climate change mitigation benefits as compared to the Proposed Alternative or Alternative 3. Because of this, Alternative 4 also risks substantial emissions leakage, with no clear means of mitigating that leakage concern.⁸

For these reasons, the LADWP strongly urges ARB to adopt an approach that continues the Cap-and-Trade Regulation and to reject approaches such as Alternative 4 that replace the currently working policy with uncertain, inflexible, and ultimately unworkable alternatives.

ARB's analysis takes an economy-wide approach to accounting for costs. However, while Cap-and-Trade imposes a uniform allowance price, it will have significantly disparate impacts on different industries within California. The LADWP suggests that ARB conduct additional supplementary analysis that can shed light on the diverse costs that different industries will face under each of the Scenarios that ARB considers.

⁸ Scoping Plan at 53.

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The LADWP Recommends That ARB Take Into Account the Implications of the Uncertainty Scenario in Finalizing Any Changes to the Scoping Plan and Cap-and-Trade Regulation

The LADWP supports the continuation of a well-designed, market-based mechanism to achieve affordable greenhouse gas reductions, and believes that the Cap-and-Trade Regulation fulfills these objectives. However, as it considers changes to existing law pursuant to the Scoping Plan, ARB should take into account the possibility that a significant regulatory and cost burden would be imposed on parties with compliance obligations under the Cap-and-Trade Regulation if the other regulatory components of the Proposed Scenario fail to produce projected GHG reduction levels. This will result because the Cap-and-Trade Regulation is the fallback regulatory mechanism that will force compliance entities make up for any shortfall in GHG reductions.

In fact, ARB has modeled the impact of the failure of prescriptive requirements to achieve projected GHG reductions as an "Uncertainty Scenario." Under the Uncertainty Scenario, if the other prescriptive requirements fail to achieve their expected level of emission reductions, it appears that the demand for allowances under the Cap-and-Trade Regulation will significantly increase while the allowance supply stays the same. Notably, Figure II-2 of the Scoping Plan clearly illustrates this dynamic by identifying expected emission reductions from various components of the Scoping Plan Scenario under expected conditions and under an Uncertainty Scenario in which the prescriptive, non-Cap-and-Trade measures do not achieve their projected emissions reduction levels.⁹ That graphic shows that under the Uncertainty Scenario, the Cap-and-Trade Regulation would have to achieve an additional 151 MMT reduction, or a 79% increase in the GHG emission reductions expected to be achieved by the Cap-and-Trade Regulation beyond what is expected to occur under the Scoping Plan Scenario. This would result in a substantial increase in demand for allowances without any change in their supply, most likely increasing allowance prices, and imposing a significant burden on parties with compliance obligations under the Cap-and-Trade Regulation. Moreover, this significant increase in compliance costs would result without achieving any corresponding environmental gain.

⁹ Scoping Plan at 41.

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Given that these unexpected developments could have major economic impacts, the LADWP urges ARB to take the implications of this Uncertainty Scenario into account when designing the Scoping Plan and in finalizing any changes to the post-2020 Cap-and-Trade Regulation. Sectors that have already achieved significant GHG reductions to date and have substantial known commitments should not bear the brunt of further GHG emission reduction requirements imposed through changes to the Cap-and-Trade Regulation or additional prescriptive measures in order to address the Uncertainty Scenario.

In addition, ARB has indicated that it is considering changes to the Cap-and-Trade Regulation to reduce environmental impacts on disadvantaged communities, including “redesigning the allocation strategy to reduce free allocation at a rate to support increased technology and energy investment at covered entities to reduce GHG emissions.” Any strategy that reduces free allocation will create an additional economic burden that the LADWP will have to overcome in order to protect our customers from higher energy prices and will remove funds that the LADWP would spend on discretionary programs such as electric transportation. The Uncertainty Scenario clearly demonstrates this problem will become even more acute to the extent that prescriptive non-Cap-and-Trade measures fail to achieve the level of reductions that are intended.

The LADWP Supports ARB’s Efforts to Revise its Economic Analysis to Account for Regional Differences and Disadvantaged Communities

The LADWP appreciates and supports ARB’s effort to revise the economic analysis to account for regional differences under the Proposed Scoping Plan Scenario, along with the four alternative scenarios. We believe that not all regions will experience growth of one half of one percent less than the Reference Scenario as described in the Proposed Scoping Plan. The LADWP is interested in the results of this assessment, and in particular, the impact that the metrics of economic growth, employment, wages, and sector value add will have for each county in the State. In addition, the LADWP applauds ARB’s proposal to estimate the economic impact to disadvantaged communities. As a publically owned utility with over 20% of its customers participating in its low income discount program, the LADWP is committed to working with ARB and other interested in completing a full assessment of all significant economic impacts, including those disadvantaged communities.

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Relationship/Conflict Between SB 350 RPS Goals and Natural and Working Lands Goals

The LADWP is concerned that the Scoping Plan will establish conflicting goals with regard to renewable energy deployment and natural and working lands (NWL) conservation. The goal of California's RPS mandate as established by SB 350 is to significantly increase the utilization of in-state renewable power such as wind and solar. On the other hand, SB 1386 calls for policies and actions that reduce GHG emissions attributable to natural and working lands. In particular, the goals set for the natural and working lands sector are to protect land from conversion, enhance the resilience of those lands for carbon sequestration, and to innovate ways to utilize biomass. The Scoping Plan presents these goals as in conflict with one another.¹⁰ In order to mitigate this potential conflict, ARB appears to preference infill-oriented regional development—primarily deployment of solar photovoltaic (PV) technology in infill areas—to conserve land usage. The LADWP supports solar PV. For example, the LADWP currently offers a number of programs to support deployment of distributed solar generation, including the Community Solar Program, Utility Built Solar, and Feed-in Tariff Program. However, the LADWP urges ARB to realistically evaluate the extent and pace by which infill solar PV can be cost-effectively deployed to meet California's energy needs. Moreover, in developing the Integrated Natural and Working Lands Climate Change Action Plan, ARB should be sure to take into account the impact that all energy sources have on the natural working lands sector.

¹⁰ Scoping Plan at 17 ("land disturbance due to increased renewables through utility scale wind and solar and transmission can release GHGs from soil and disturb grasslands and rangelands that have the potential to sequester carbon"); *id.* at 89 ("Siting of power plants (including solar and wind facilities) and transmission and distribution lines has impacts on land use in California—be it conversion of agricultural or natural and working lands, impacts to sensitive species and habitats, or implications to disadvantaged, vulnerable, and environmental justice communities").

Transportation GHG Reduction Strategies

The Scoping Plan is intended to establish a “framework of action for California to meet” the GHG emissions reduction goals of SB 32.¹¹ The Scoping Plan references the Mobile Source Strategy, Sustainable Freight Action Plan, and the Transportation Plan 2040 as efforts to achieve the State’s climate goals, and states ARB’s plans to work with regions to update SB 375 Sustainable Communities Strategies (SCS) targets. ARB states that “each of these efforts is important in its own right, but considered together they provide insights into the synergies and conflicts between policies and demonstrate how the State will move toward a sustainable and resilient future.”¹² However, the plan fails to specifically or transparently establish an actionable framework for the transportation sector. ARB does not describe in the Scoping Plan specific measures of each strategy that can be implemented to reach its transportation goal, such as the Mobile Source Strategy goal of 15% reduction in total light-duty VMT by 2050.¹³

For example, the proposed Scoping Plan scenario states that ARB’s Mobile Source Strategy has a goal of 4.2 million zero emission (ZEV) and plug-in hybrid electric vehicles (PHEV) by 2030 as a result of the Cleaner Technologies and Fuels Scenario (CTF). With the CTF Scenario, in conjunction with SB 375 SCS, measures of the scenario “would achieve a 45 percent reduction in on-road GHG emissions by 2030, and reduce on-road petroleum demand by approximately 50 percent.”¹⁴ According to the Mobile Source Strategy, existing policies without adoption of the additional policies detailed in the CTF Scenario are anticipated to reduce on-road mobile source GHG emissions between 2020 and 2030 by 20 percent, and will increase beyond 2035.¹⁵ In other words, successful implementation of the CTF Scenario will account for an additional 25 percent reduction of on-road GHG emissions by 2030. These GHG reductions and control measures of the CTF Scenario were described in the Mobile Source Strategy, but were not discussed in the Scoping Plan. In the event that measures of the CTF Scenario fail to realize complete fruition, it is unclear how the 25 percent additional GHG emission reduction would be achieved from the Mobile Source

¹¹ Scoping Plan at ES1.

¹² Scoping Plan at 17.

¹³ Scoping Plan at 105.

¹⁴ 2016 Mobile Source Strategy at 38.

¹⁵ 2016 Mobile Source Strategy at 34.

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sector. Further discussion and analysis is needed to show the “synergies and conflicts” between the Mobile Source Strategy and the Scoping Plan.

The LADWP supports electrification of the medium- and heavy-duty vehicle sectors; unfortunately, beyond mentioning the Sustainable Freight Action Plan, the Scoping Plan does not discuss California’s strategy with respect to achieving higher penetration of medium- and heavy-duty electric vehicles. Moreover, the Scoping Plan does not demonstrate the “synergies and conflicts” of these strategies effectively by providing any data or other supporting information indicating that these plans will work well together. As the Scoping Plan is the blueprint for California to achieve its GHG reduction goals, it is important for the Scoping Plan, which encompasses every State strategy, to make evident that these strategies show continuity with each other, and to address any discrepancies.

Electrification

The LADWP supports ARB’s view that electrification of transportation (as well as residential, commercial, and industrial sources) is critical to reducing emissions consistent with California’s long term GHG reduction objectives. Vehicle electrification results in substantial *net* GHG reductions by shifting from the use of transportation fuels to cleaner, lower-carbon electricity. However, the additional generation to charge the growing number of electric vehicles may result in an overall emissions increase at the individual electric utility level. This could lead to potential issues with obtaining sufficient compliance instruments to comply with various existing programs like the California Cap-and-Trade Regulation. The LADWP supports electrification of sources and thus emphasizes that a balance in existing regulations is needed to ensure that electric utilities can invest in electric transportation infrastructure and electrification incentives as well as provide low carbon, reliable electricity to support increased generation needed to support electrification. Electric utilities should receive consideration such as allocation of additional allowances to cover the increased GHG emissions resulting from the increased electricity demand due to electrification efforts in all sectors of the economy, including vehicle electrification.

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The Scoping Plan assumes that one half of light-duty electric vehicles will have access to workplace charging.¹⁶ This is a laudable goal but may be overly optimistic without additional policy support. The National Renewable Energy Laboratory (NREL) estimates that by 2020, California will need the infrastructure in place to charge at least 1 million electric vehicles in public or at the workplace.¹⁷ This presents an opportunity for electric utilities such as the LADWP to help drive the electric vehicle market. To support this goal, the LADWP again emphasizes the need for both the development of regulations to ensure that electric utilities can invest in electric transportation infrastructure and provision of incentives to maximize such infrastructure investments.

Since electric vehicles and hybrids cost more to purchase than comparable conventional internal combustion vehicles, the operating cost of electric vehicles must be significantly lower than that of conventional vehicles in order for electric vehicles to make economic sense for most consumers. Only if electricity remains a low cost alternative fuel for transportation will it be cost effective for consumers to purchase and use electric vehicles. If ARB's programs require an increase in the price of electricity for ratepayers, the higher cost will have a chilling effect on electrification of the transportation sector, and achievement of the 2030 GHG emission reduction target will be at risk.

The LADWP reiterates its strong support for the Low Carbon Fuel Standard Regulation (LCFS). The generation of LCFS credits is an incentive for electric utilities to fund electric vehicle infrastructure. Policies such as LCFS credit generation for electricity used to fuel transportation vehicles and direct allowance allocation of GHG allowances can help reduce the cost of electricity supplied to consumers and further encourage electric vehicle penetration and deployment of critical charging infrastructure. The LADWP also supports the use of the Greenhouse Gas Reduction Fund to support such initiatives.

¹⁶ Scoping Plan Appendix D at 13.

¹⁷ California Statewide Plug-In Electric Vehicle Infrastructure Assessment, NREL, May 2014

Energy Efficiency Assumptions

Development and implementation of energy efficiency (EE) programs continues to be a key LADWP strategy for reducing its GHG emissions. As mentioned previously, the LADWP will be investing \$1.2 billion over the next ten years to implement major projects and measures for improving end-use EE. LADWP's Board of Water and Power Commissioners adopted a goal for the LADWP to achieve 15 percent EE by 2020, exceeding the AB 2021 required cumulative energy savings goal by 37 percent. This goal is incorporated into the LADWP's 2016 Integrated Resource Plan (IRP) which was vetted through a public outreach process and IRP Advisory Committee represented by Neighborhood Councils, Business Customer Representatives, Environmental Representatives, the Los Angeles City Council and Mayor's office, and an academic representative. The LADWP supports ARB's efforts to include EE as a key strategy to reduce GHG emissions; however, LADWP is concerned about the uncertain achievability of ARB's EE assumptions given (1) the limited documentation in the Scoping Plan and appendices and (2) that there is no precedent for the penetration of EE that ARB has assumed will occur. The lack of documentation reduces the ability of utilities to understand how the scenarios will impact EE programs and whether the required endpoint (2.5 times Additional Achievable Energy Efficiency, or AAEE) is a realistic market achievable value.

Specific comments on the assumptions used in the modeling are as follows:

- There is no definition for "high efficiency" appliances or equipment. The Proposed and Alternate 1 Scenarios provide an assumed saturation of high efficiency appliances by certain timelines. For example, is SEER 18, SEER 20 or something higher assumed in the forecast for heating, ventilation, and air conditioning equipment?
- The forecasts seem to be agnostic to code/standards versus program interventions as the driver for savings. However, the embedded calculations for the impacts of these two strategies to reducing energy use (GHG emissions) are modeled differently (linear vs. S curve, respectively). As a result, it is unknown how much of the responsibility of achieving the Scoping Plan reductions will fall on the utilities (who oversee rebate programs) versus the California Energy Commission (CEC) and Department of Energy (e.g. state and federal codes and standards).

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- ARB uses a separate accounting framework for the industrial and agricultural sectors. It is not clear if the EE improvements in these sectors are part of the 2.5 times the AAEE forecast or in addition to it.
- ARB results are stated as statewide values and not allocated by utility. Additional details by sector specific to the LADWP would allow richer analysis and facility understanding how ARB's plans may impact the LADWP's future planning.

ARB lists assumptions regarding the required penetration rates of high efficiency technologies and replacement of gas appliance with electric appliances (i.e. "electrification") to meet the 2X AAEE and 2.5X AAEE in the Proposed and Alternate 1 Scenario respectively. These are as identified in Appendix D (pages 8-11) of the Scoping Plan. Specific comments related to future penetration assumptions are as follows:

- ARB assumes that many technologies start with a low market share (less than 5 percent) and achieve a very high market share (75 to 100 percent) over a period of 9 to 15 years. Such an increase in market share over a short period of time is indicative of aggressive market transformation and may not be consistent with current electric utility program plans.
- ARB assumes that many technologies have an ending market penetration of 100 percent. Achieving 100 percent market penetration of any technology implies the use of codes and standards requiring higher levels of EE.

The LADWP urges ARB to work with the electric utilities and energy agencies to determine whether, by 2030, implementing energy saving measures consistent with 2.5 times the level of savings anticipated by AAEE is cost-effective or even feasible. The inputs to the PATHWAYS model ARB is using are in aggregate and many inputs are not regionally adjusted; thus, region-specific or utility-specific impacts cannot be extracted.

The current AAEE forecast is based on the data provided by LADWP (and other publicly-owned utilities and investor-owned utilities) in 2015. Since that time, updates to both the investor-owned utilities' and publicly-owned utilities' energy efficiency potential studies have started but have not been finalized. The Integrated Energy Policy Report AAEE and LADWP models consider the various paths to achieving cost-effective energy efficiency in buildings through various market and policy actions, including codes and standards and program activities. These modeling frameworks take into account

technical, economic, and program achievable potential to define the savings that could be achieved under various market interventions. In contrast, the PATHWAYS model is forecasting a “means to an end” and not “achievable potential” with respect to energy efficiency.

The California Public Utilities Commission stated in its *Proposed Decision Energy Efficiency Goals for 2016 and Beyond and Energy Efficiency Rolling Portfolio Mechanics*, “The CEC and [ARB], among other agencies, oversee significant programs relating to reducing energy use (and carbon emissions more generally)... Misplaced reliance on overoptimistic forecasts can lead to misallocated resources and reduced activity by other actors, to ratepayers’ and to the environment’s detriment. It can compound the internal and external pressure to claim success regardless of real-world program impact.”¹⁸ The LADWP believes that ARB should analyze the AEE assumptions in the model to avoid these potential adverse impacts.

Local Action

The Scoping Plan acknowledges that “Local governments are essential partners in achieving California’s goals to reduce GHG emissions. They can implement climate strategies to address local conditions and issues, and they can often more effectively engage citizens than the State can.”¹⁹ The LADWP supports ARB’s efforts to encourage local actions. The City of Los Angeles is committed to supporting the State’s climate goals by implementing local actions in its Sustainability pLAN. The pLAN focuses on both short-term results and long term goals, provides a framework to build out policies and promote collaboration, set metrics for progress, and pathways to engage the community.²⁰ The local actions in the Sustainability pLAN align with the examples given in the Scoping Plan, with measures in categories such as, but not limited to: water, local solar, green buildings, waste management, and transportation. The LADWP commends ARB for reiterating the importance of local action in the Scoping Plan.

¹⁸ CPUC Proposed Decision, *Energy Efficiency Goals for 2016 and Beyond and Energy Efficiency Rolling Portfolio Mechanics*.

¹⁹ Scoping Plan at 131.

²⁰ Los Angeles Sustainable City pLAN. <https://www.lamayor.org/plan>

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Conclusion

The LADWP strongly supports ARB's efforts to develop a new Scoping Plan for achieving the next phase of GHG reductions for California by 2030, as called for under SB 32. For that reason, the LADWP appreciates the opportunity to provide these comments on the Scoping Plan to ensure the development of a balanced and well-coordinated package of GHG reduction strategies that meet California's goals in a cost-effective manner that protects the LADWP's ratepayers and minimizes impacts to low-income communities.

If you have any questions, please contact me at (213) 367-0403 or Jodean Giese at (213) 367-0409.

Sincerely,



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Director of Environmental Affairs

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