



PASADENA WATER AND POWER

February 18, 2020

Clerk of the Board
California Air Resources Board
1001 I. Street
Sacramento, CA 95814

RE: Low Carbon Fuel Standard ("LCFS") Rulemaking

Submission Type: e-File

**RE: Comments from The City of Pasadena, Water and Power ("PWP")
Department on the Proposed Amendments to the LCFS Regulation dated
February 3, 2020.**

In response to the Amendments to the LCFS Regulation dated February 3, 2020, PWP respectfully submits the following comments for review and consideration.

These comments are in addition to previously submitted comments to the California Air Resources Board ("CARB") on November 18, 2019. This comment letter focuses on PWP's understanding of the proposed regulation with respect to disadvantaged ("DAC") and low-income ("LI") communities.

PWP appreciates the additional flexibility in the proposed regulations with regard to the *Restriction on Use of Holdback Credits*, section 95483(c)(1)(A)(6)(a). PWP understands that the City of Pasadena's governing board has the authority to establish the definition of both its own DAC and LI communities. PWP recommends adding language that states, "DAC as defined by the local governing board," as an acceptable definition for DAC, so that utilities can be more inclusive with the DAC definition to help a larger population in section 95483(c)(1)(A)(6)(a).

Currently, PWP offers a variety of programs specifically for populations living in a DAC. The Water & Energy Direct Install Program ("WeDIP") provides free water and energy installation services to small businesses that often operate on narrow profit margins and are unable to invest the time and financial resources to participate in PWP's commercial efficiency rebate programs. In 2018, PWP expanded the program to include additional services, eligibility for medium-sized businesses, and active recruitment of small businesses in the DAC census tract area. PWP obtained a \$1.2 million grant from the California Department of Water Resources to expand the WeDIP program, and the

grant requires that 85% of grant funding be spent on services in the DAC area. Since PWP expanded the WeDIP program, more than 100 onsite audits and 53 installations have been completed, with over half of these in the DAC. Participants included churches, nursing care facilities, residential care facilities, grocery stores, retail stores, drug stores, restaurants and laundry services.

PWP's Under One Roof program provides all available City programs and services to residents living in the DAC (and elsewhere in the City) who meet certain income requirements. Additionally, income qualified residents can potentially qualify for free installation of energy and water efficiency measures, refrigerator exchange program, no-cost exterior home painting, turf replacement to drought tolerant landscaping, greywater systems, and home energy rebates.

In 2019, PWP enhanced its electric vehicle rebate program to provide larger incentives for customers located in a DAC. Other projects under consideration include fleet vehicle electrification, if regularly based and charged in a DAC/LI community, as well as investments in last-mile mobility options, including, but not limited to electric scooters, bikes and bike sharing equity projects. PWP understands that these projects comply with the Holdback Credit ("HBC") restrictions outlined in the proposed regulations. Additionally, PWP would like to invest in electrification infrastructure, with lower rates for charging for DAC/LI residents.

PWP also supports CARB's decision to allow utilities to use HBC funds for administrative costs associated with the development of Holdback Credit Equity Projects. PWP requests that CARB consider adding language in the regulation to allow a POU's governing body to define a DAC. PWP appreciates the opportunity to comment on the Proposed Amendments to the LCFS Regulation dated February 3, 2020.

Should you have any questions, please contact me.

Respectfully Submitted,

A handwritten signature in black ink, reading "Badia Harrell". The signature is fluid and cursive, with the first name "Badia" being more prominent than the last name "Harrell".

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