



**WATER AND  
POWER**



April 4, 2022

**VIA ELECTRONIC MAIL**

Liane Randolph, Chair  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**SUBJECT: COMMENTS ON THE MARCH 15, 2022 PUBLIC WORKSHOP ON THE 2022  
SCOPING PLAN UPDATE (SPU) – INITIAL MODELING RESULTS WORKSHOP**

Dear Chair Randolph:

On behalf of Burbank Water and Power (BWP), I appreciate the opportunity to comment on the March 15, 2022 Public Workshop on the 2022 Scoping Plan Update (SPU) – Initial Modeling Results Workshop. BWP is a publicly owned utility serving the residents and businesses of Burbank with electricity and water. BWP remains committed to working with the state to achieve the greenhouse gas (GHG) reduction goals, as required by Assembly Bill (AB) 32, Senate Bill (SB) 32 and AB 398. In addition, we look forward to the request of Governor Gavin Newsom that California Air Resources Board (CARB) evaluate the potential to achieve carbon neutrality earlier than 2045. We believe the scoping plan process will be an opportunity to provide input for a workable framework and we look forward to working with CARB on this process. Furthermore, BWP supports the jointly submitted comments by the Joint Utilities Group, Southern California Public Power Authority, Northern California Power Agency and California Municipal Utilities Association.

As stated in our September 2, 2021 and October 22, 2021 comments, the City of Burbank supports sustainability goals and is updating its own GHG reduction plan that will reduce our GHG emissions through a holistic and citywide approach. BWP will seek to achieve the city's goals through energy efficiency, building electrification as well as facilitating the adoption of transportation electrification and access to charging infrastructure for Burbank's community. In addition, BWP will begin an update to our integrated resources plan, which will include considerations for fuel diversity within our energy portfolio such as solar plus storage, wind, biofuel, options for carbon sequestration as well as exploring the potential for hydrogen at our Magnolia Power Plant.

As mentioned in our earlier comments, it is imperative that the SPU consider alternatives or scenarios that maintain reliability, limit reliance on unproven/untested technologies, consider timeline restrictions and ratepayer impacts, while increasing sustainability. In order to balance these items, the 2045 time frame is the only plausible time frame that must be considered. This is consistent with SB 100 and provides the time necessary to test unproven technologies while

continuing to meet reliability. This also provides existing baseload power plants (namely natural gas) the time to convert to sustainable fuels.

The scoping plan sets a goal for GHG reductions, but when reliability and affordability are at risk, there should be exemptions for the GHG reduction goals for operators of baseload resources that assist with reliability. Alternatives with a short time frame that do not meet reliability requirements with technologies in existence today should be removed from consideration.

The limited data provided to the public at this workshop, coupled with the lack of information on costs, makes it difficult to provide any meaningful input on the workshop at this time. BWP respectfully requests that the CARB provide access to the inputs, assumptions and modeling tools in order for the public to provide additional input. We also request that additional time be devoted to the electric sector and achieving GHG reduction in a cost effective and pragmatic manner.

Burbank has been, and will continue to be, a leader in our region for sustainability. Furthermore, we are committed to participating in the SPU and providing guidance on the scenarios and modeling efforts. BWP supports CARB's recommendation to hold additional electricity sector workshops and appreciates the transparency in the SPU.

Thank you for the opportunity to play an active role in this process. If you have any questions or require additional information regarding our comments, please contact Dawn Roth Lindell, Burbank Water and Power General Manager at (818) 238-3554 or via email at [DRothLindell@burbankca.gov](mailto:DRothLindell@burbankca.gov).

Warm regards,



Dawn Roth Lindell  
General Manager  
Burbank Water and Power