



November 1, 2019 | Submitted electronically

Mr. David Mehl
Short-Lived Climate Pollutant Enforcement Section, Manager
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95828

RE: SCPPA Support for the Draft Enforcement Policy Amendment for RPS Enforcement

The Southern California Public Power Authority (SCPPA) is pleased to offer its support for the draft amendment to CARB's Enforcement Policy to clarify CARB's role in enforcing the Renewables Portfolio Standard (RPS) for Publicly Owned Utilities (POUs) as released on October 8, 2019.

SCPPA is a joint powers agency whose members include the cities of Anaheim, Azusa, Banning, Burbank, Cerritos, Colton, Glendale, Los Angeles, Pasadena, Riverside, and Vernon, and the Imperial Irrigation District. Our Members collectively serve nearly five million people throughout Southern California. Each Member owns and operates a publicly owned electric utility governed by a board of local officials who are directly accountable to their constituents. Each SCPPA Member has a duty to provide reliable power to their customers – many of whom reside in disadvantaged communities – at affordable rates, while also complying with all local, regional, state, and federal environmental and energy regulations.

We appreciate the time and consideration CARB staff has afforded to SCPPA Members and other POU stakeholders over the course of the past year, to listen to and address our concerns with the proposed policy, and for having held multiple working group meetings and workshops throughout this process (including with California Energy Commission staff). SCPPA continues to be appreciative of discussions to recognize that Supplemental Environmental Projects could be located within a POU service territory, as doing so would also benefit the communities which are served by the POU. We look forward to further discussions to clarify and help bring this concept to fruition.

SCPPA would like to take this opportunity to sincerely thank you and the following CARB staff for their willingness to meet and work with our Members: Satapana Buthken, Steve Brisby, and Wesley Dyer. We believe that the draft Enforcement Policy amendment language reflects an earnest and cooperative policymaking effort that resolves our concerns.

Thank you again for your time and consideration of POU requests.

Respectfully submitted,

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