



**WATER AND  
POWER**



June 21, 2022

**VIA ELECTRONIC MAIL**

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

**SUBJECT: COMMENTS ON THE MAY 10, 2022 DRAFT 2022 SCOPING PLAN UPDATE**

Dear Chair Randolph:

On behalf of Burbank Water and Power (BWP), I appreciate the opportunity to comment on the May 10, 2022 Draft Scoping Plan Update (SPU). 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. We believe the scoping plan process will be an opportunity to provide input for a workable framework and we look forward to working with California Air Resources Board (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 April 4, 2022 comments, the City of Burbank supports sustainability goals and our City Council recently enacted an updated 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 has begun the process of updating the power 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.

BWP supports CARB's recommendation for alternative 3 as it proposes a 2045 time frame. A 2045 time frame 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.

As mentioned in our earlier comments, it is imperative that the SPU consider alternatives or scenarios that maintain reliability and limit reliance on untested and/or expensive technologies such as hydrogen and carbon capture and storage. Regarding hydrogen, it is unclear in the SPU whether the estimated transition costs refer to retrofitting existing natural gas plants, equipment

and infrastructure or to brand new plants, equipment and infrastructure. Clarification on this matter will assist with interpreting the data.

BWP appreciates the work the CARB did with the SPU and the stakeholder process. The CARB's recommendation is in line with state regulations and provides the necessary time to maintain reliability.

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,

A handwritten signature in black ink, reading "Dawn Roth Lindell". The signature is fluid and cursive, with the first letters of each name being capitalized and prominent.

Dawn Roth Lindell  
General Manager  
Burbank Water and Power