

April 4, 2022

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RE: Technical Workshop on Initial Modeling Results for the 2022 Scoping Plan Update

The Joint Utilities Group (JUG) appreciates the opportunity to offer comments on the California Air Resources Board’s (CARB) March 15, 2022, Public Workshop on the 2022 Scoping Plan Update (SPU) – Initial Modeling Results Workshop. The JUG consists of the electricity sector’s investor-owned, publicly-owned, and electric cooperative utilities in California.¹²³⁴⁵

The JUG would like to thank CARB, E3, and the University of California at Santa Barbara for their presentations at the workshop. The JUG recognizes the important role of the Scoping Plan in setting the path to achieve the state’s economy-wide decarbonization goals. The JUG also understands that the Initial Modeling Results workshop was an important step to engage stakeholders in review of the modeling results for the four carbon neutrality scenarios and that further analysis is being conducted, some of which will be presented at the upcoming April 2022 workshop.

The goal of the JUG is to provide feedback to CARB regarding the SPU modeling and to help inform the selection of the path to achieve a decarbonized future, while ensuring that the electric grid remains reliable and affordable in the face of increased electrification. Our comments are also intended to help ensure that assumptions about emerging technologies are reasonable, and that the alternatives being modeled can be feasibly achieved within their respective timeframes.

¹ This JUG letter represents the collective comments of the following utilities: Pacific Gas & Electric Company, San Diego Gas & Electric Company, Southern California Edison, California Municipal Utilities Association, Sacramento Municipal Utility District, Northern California Power Agency, Los Angeles Water and Power Department, the Golden State Power Cooperative, Turlock Irrigation District and the Southern California Public Power Authority.

² The Northern California Power Agency (NCPA) is a nonprofit California joint powers agency established in 1968 to construct and operate renewable and low-emitting generating facilities and assist in meeting the wholesale energy needs of its 16 members: the Cities of Alameda, Biggs, Gridley, Healdsburg, Lodi, Lompoc, Palo Alto, Redding, Roseville, Santa Clara, Shasta Lake, and Ukiah, Plumas-Sierra Rural Electric Cooperative, Port of Oakland, San Francisco Bay Area Rapid Transit (BART), and Truckee Donner Public Utility District—collectively serving nearly 700,000 electric consumers in Central and Northern California.

³ The Southern California Public Power Authority (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. SCPPA 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.

⁴ The California Municipal Utilities Association is a statewide organization of local public agencies in California that provide electricity and water service to California consumers. CMUA membership includes publicly-owned electric utilities that operate electric distribution and transmission systems. In total, CMUA members provide approximately 25 percent of the electric load in California.

⁵Golden State Power Cooperative is the statewide association representing electric cooperatives and rural public utility districts.

One takeaway from the Initial Modeling Results presentation was the key role of the electricity sector in all four scenarios. As the electricity sector has already made significant emissions reductions to date, clean electricity has emerged as a key strategy to decarbonize other sectors, with the Initial Modeling Results projecting a 30%-80% increase in load by 2035 and 60-90% increase by 2045, depending on the scenario. However, the success of this strategy relies on ensuring reliable and affordable electricity, especially considering the wide array of different types of energy service providers with varying challenges.

While the E3 presentation was insightful in understanding the general technology pathways that the Scoping Plan's four alternatives would entail, there are still many undisclosed details that the JUG will need in order to provide meaningful feedback. These include impacts to ratepayers, impacts to electric system reliability, and more explanation on the assumptions and why technologies were or were not selected under each scenario. This also includes providing standard results for the reference scenario, which were not provided at the March 15 workshop.

Since the modeling and assumptions are critical to the total analysis, the JUG needs timely access to the data model, inputs and assumptions in order to provide meaningful feedback prior to the publication of the draft SPU.

The JUG respectfully requests the data inputs and assumptions, detailed results, and cost analysis underlying the initial modeling results. This information will allow JUG members to thoroughly review the analysis and provide thoughtful feedback on the alternatives to develop a practical and well-vetted SPU.

Additionally, we strongly urge CARB to consider the context of modeling results. Most importantly, it is imperative to consider supply and construction constraints, the timeline for new technologies to be developed, affordability of each alternative, and impacts to electric system reliability and the varying conditions faced by different types of energy service providers and utilities under each alternative. Particularly, maintaining affordability and reliability is crucial to our consumers and to reaching California's decarbonization goals when further reliance on the electric sector is required.

The JUG provides these comments on the SPU development in the interest of helping to frame the context of the initial modeling results and highlight the additional assessments necessary to fully inform the final array of measures needed to reach the state's climate goals. Thank you in advance for your consideration of our comments and questions on the Initial Modeling Results Workshop of the 2022 Scoping Plan Update.