



Southern California Public Power Authority
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Rajinder Sahota, Deputy Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: SCPPA Comments on Final 2022 Scoping Plan Update

The Southern California Public Power Authority¹ (SCPPA) appreciates the opportunity to provide comments on the California Air Resources Board's (CARB) final Scoping Plan Update (SPU).

SCPPA recognizes the tremendous amount of work that has gone into finalizing the SPU, including designing, modeling, and evaluating the carbon neutrality scenarios. The final SPU represents a foundational step in charting the state's path to carbon neutrality and we recognize that it will lay the groundwork for implementation for years to come in rulemakings, programs, and policies at CARB and its sister agencies. For that reason, SCPPA participated through verbal and written comments throughout the process of finalizing the SPU². SCPPA also provided input as a participant in multiple calls between CARB and the Joint Utilities Group (JUG) and as a signatory to the JUG comment letter.

The electricity sector has a unique and pivotal responsibility to increase capacity to support almost every other sector included in the SPU. While utilities are already taking steps necessary for system upgrades to provide for the expected load growth, it will take significant time and expense to complete the necessary infrastructure buildout. For that reason, SCPPA's priority continues to be that the pathway to carbon neutrality must not compromise safe, reliable, and affordable electricity.

We appreciate the following adaptations of SCPPA (and JUG) comments being included in the "Strategies for Success" of the electric sector in the final SPU³:

¹ SCPPA is a joint powers authority whose members include the cities of Anaheim, Azusa, Banning, Burbank, Cerritos, Colton, Glendale, Los Angeles, Pasadena, Riverside, and Vernon, and the Imperial Irrigation District. Each Member owns and operates a publicly-owned electric utility (POU) governed by a board of local officials. Our Members collectively serve nearly five million people throughout Southern California. Together they deliver electricity to over two million customers throughout Southern California, spanning an area of 7,000 square miles.

² See June 24, 2022 SCPPA [comment letter](#); April 4, 2022 SCPPA [comment letter](#); November 19, 2021 SCPPA [comment letter](#); October 22, 2021 joint POU [comment letter](#); September 3, 2021 joint POU [comment letter](#); and July 9, 2021 joint POU [comment letter](#).

³ Final 2022 Scoping Plan Update (November 16, 2022), page 205.

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- Complete systemwide and local reliability assessments across CAISO and other balancing authority areas, using realistic assumptions for land use, build rates, transmission and distribution system level constraints, and energy needs. Such assessments should be completed before state agencies update their electricity sector GHG targets.
- Prioritize actions to mitigate impacts to electricity reliability and affordability and provide sufficient flexibility in the state’s decarbonization roadmap for adjustments as may be needed.

Ensuring sufficient supply to meet demand in all hours of the year, during all conditions, is needed to support reliable electric service. Reliability concerns exist today, even before factoring in the increased load in a high electrification scenario. Moreover, utilities will need to make significant upgrades to their distribution systems to support the increased levels of electrification envisioned by the SPU. In light of recent economic impacts, including inflation, supply chain delays, and the recent California budget outlook⁴, utilities continue to have concerns with receiving funds through state programs and maintaining affordability. Ensuring recognition in the value of early action from the utilities and customer side investments should be prioritized. Additionally, mitigating adverse impacts of electrification, like cumulative cost increases that could dampen customer adoption of electrification should be a priority, considering that many utility customers have already experienced rate increases associated with hardening the existing grid, transmission costs, and wildfire mitigation measures.

Thank you for the opportunity to provide feedback throughout this process of finalizing the SPU. SCPPA looks forward to closely working with CARB and its sister agencies as California moves forward with implementing the Scoping Plan to achieve carbon neutrality.

⁴ 2023-2024 [Budget](#), California’s Fiscal Outlook

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