



WATER AND POWER



November 19, 2021

VIA ELECTRONIC MAIL

Ms. Rajinder Sahota
California Air Resources Board
1001 I Street
Sacramento, CA 95814

**SUBJECT: Comments on the 2022 Scoping Plan November 2nd workshop on Electricity
Sector Considerations**

Dear Ms. Sahota:

On behalf of Burbank Water and Power (BWP), I appreciate the opportunity to comment on the November 2nd electricity sector workshop to support the 2022 Scoping Plan process. BWP is a publicly owned utility serving the residents and businesses of Burbank with electricity and water. BWP thanks California Air Resources Board (CARB) for putting together the discussion about the challenges and opportunities for the electricity sector with the aim to achieve the greenhouse gas (GHG) reduction goals, as required by Assembly Bill (AB) 32, Senate Bill (SB) 32, Assembly Bill (AB) 398, and the potential to achieve carbon neutrality earlier than 2045.

BWP supports the comments made at the the electricity sector workshop, which highlights the importance of reliable and affordable electricity as a foundation for the framework and modeling that CARB must consider in the scenarios for the Scoping Plan process. Furthermore, BWP supports the comments submitted by the Southern California Public Power Authority and the Joint Utilities Group.

For the electricity sector, it is imperative that CARB model scenarios are feasible for agencies like BWP and consider alternatives that maintain reliability and provide a cost-effective approach to reducing GHG emissions. BWP would urge CARB to model scenarios that do not impact reliability and prefer modeling alternatives with appropriate timelines and achievable goals with the technologies that exist today to limit the potential for negative impacts to reliability of the grid.

BWP appreciates the discussion at the electricity sector workshop about the permitting and land-use challenges. We agree that we need to develop new zero-emission technologies and move toward the construction of new transmission needed at the scale to meet our goals. As previously stated in BWP's October 21st comment letter, modeling scenarios that propose an accelerated timeline do not provide ample time for the permitting and construction of new zero-carbon resources and new transmission lines. Additionally, this acceleration raises supply and demand concerns with the availability of zero-carbon resources and may come at a high cost to our ratepayers, given the potential for stranded assets. One example we would mention is the

Magnolia Power Plant (MPP), located in the City of Burbank, which adds important reliability benefits for BWP and the grid, and is an efficient source of power to our customers. MPP frees up BWP's regional transmission rights to bring in renewable resources, which are important for BWP to meet its sustainability goals as well as the state's renewable mandates. An accelerated timeline can impact reliability and leave MPP as a stranded asset lacking the recognition of operational needs.

Additionally, as discussed in our September 2nd and October 12th, 2021 comments, BWP is the operator and manager of MPP, and BWP reports the GHG emissions from this facility under the mandatory reporting rule (MRR) and retires allowances for this facility under the cap-and-trade program. Any scenario planning or GHG target setting analysis should include exemptions or a solution for jointly owned resources which are used for grid reliability. These exemptions include potentially exceeding GHG targets in order to maintain reliability for the grid and to mitigate ratepayer impacts. A similar provision was part of the Regional Clean Air Incentives Market (RECLAIM) program several years ago when there were similar constraints on nitrogen oxide limitations. Language was added to the RECLAIM program to ensure that the utilities were able to meet such requirements in a cost-effective manner. As such, it would be appropriate to include similar language as part of the scoping plan analysis.

As noted in BWP's September 2nd and October 12th, 2021 comments, discussions on the impact to utilities that manage, maintain, and operate resources that are used to ensure reliability of the grid should be an integral part of the scenario selection and evaluation process. As a matter of equity, the implications to such utilities will need to be addressed through the MRR. All participants of jointly owned projects should be liable for the GHG implications in proportion to the power used by the joint owner.

BWP supports discussions about the long lead time that is necessary to develop additional baseload renewable resources while meeting the SB 100 mandates. BWP recommends that CARB consider utilizing existing and emerging technologies, in line with recent agency reports (AB 74 carbon neutrality in transportation and SB 100 zero-carbon electricity grid) to achieve state goals.

In a changing climate resulting in extreme heat events, wildfires and drought, the importance of electric system reliability cannot be overstated. If homes, businesses and industry cannot rely on dependable electric service, customers will not adopt electrification as a viable long-term strategy. Transmission constraints need to be part of the modeling and assumptions as not all utilities have transmission access to bring in plentiful zero-carbon resources. In order to provide additional, flexible and baseload resources to the grid, transmission needs to be built and financed.

Burbank has been, and will continue to be a leader in our region in sustainability. Furthermore, we are committed to participating in the scoping plan and providing guidance on the scenarios and modeling efforts to ensure we are able to provide affordable electricity and reliability of power for our community.

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 DRothLindell@burbankca.gov.

Sincerely,

A handwritten signature in black ink that reads "Dawn Roth Lindell". The signature is written in a cursive, flowing style.

Dawn Roth Lindell
General Manager