

Iraheta, Alba

From: John Odell <john.odell@pasadenacalifornia.gov>
Sent: Monday, January 31, 2022 11:55 AM
To: PublicComment-AutoResponse
Subject: Today's item on Power IRP

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31 January 2022

Dear Mayor Gordo and Council Members,

I am John Odell, Pasadena resident and member of the Power IRP Stakeholder Advisory Committee for the 2018 revision. I am grateful to you and Water and Power for the 2021 draft update to that plan. I think this draft improves on the 2018 plan in significant ways. It complies with new state minimum requirements. For the first time we set a date for retiring our Magnolia fossil-fueled plant, though that date is not until 2036. We dip our toe, at least, in planning to incorporate storage, and we acknowledge in a small way that demand conservation can cost less than purchasing more energy. The resulting rate increase is low.

This draft is disappointing, however, in failing even to ask what it would cost to reach zero carbon emissions by 2030. Several other cities have adopted this plan, to align with the urgent calls the world's scientists have been making for years to save us from the climate emergency that already engulfs us because we have moved too slowly.

This is also the time to give Water and Power guidance for the coming full IRP revision. Judging from 2018, PWP will probably hire consultants and give them their requirements, closing off some options, before they invite stakeholders to give advice. So our elected leaders, representing those stakeholders, should insist now that the next full revision include a scenario that will reach net zero carbon emissions by 2030, plus another scenario that will reach actual zero carbon emissions without any offsets by 2030. Why should you not even **ask** how much it would cost to move faster?

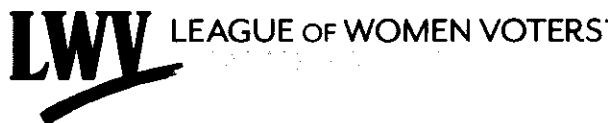
All scenarios should also be fair and apply a reasonable social cost of carbon to all fossil energy for which Pasadena is responsible as a consumer or producer, not just to the fraction of electricity we export to the state grid. The 2021 update is biased in favor of fossil energy in this respect.

Thank you for your kind attention and your generous service to our community.

Sincerely,

John Odell

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January 31, 2022

Pasadena City Council
City Hall
100 N. Garfield Avenue
Pasadena, California 91109

Dear Council Members,

INTEGRATED RESOURCE PLAN POWER 2021 UPDATE

The League of Women Voters Pasadena Area believes the source of our energy supply is fundamental to Pasadena's response to the climate crisis. We can have EV incentives and electrify buildings, but if the energy source is still gas or coal, we are not reducing dangerous greenhouse gas emissions.

Reviewing the Pasadena Water and Power (PWP) Integrated Resource Plan (IRP) Power 2021 Update (the Update), we saw certain positive elements, including a recognition that the costs of renewable resources continue to fall, an interest in bulk storage and geothermal to address energy reliability and an intention to add "new zero carbon resources sooner than previously anticipated." (p. 3 Update).

However, we also note several worrisome elements

*The plan is only to comply with the California state law requirement that 60% of energy sourced is renewable by 2030, and even that seems a *tentative goal*: PWP says it will "Continue efforts toward achieving 60% RPS by 2030 and net-zero carbon by 2045." (p. 7) Further, PWP includes Renewable Energy Credits in the 60%.

*The PWP plan falls short of the 2045 mandate of 100%, at 90%.

**There is no mention* of any more ambitious plan to achieve 100%, 90, 70% renewable energy supply by 2030 and the cost and benefits of such a plan.

*The need for "firm energy," that is, energy that is less subject to intermittency, appears to be driving a retreat from the 2018 commitment to *not* enter into new fossil fuel contracts. (See the contrast chart on p. 10 which mentions "Build *least-cost* mix of new resources to meet all requirements (RPS, GHG, *reliability*)")" and the disturbing statement that PWP should seek "all resource types" to meet anticipated energy shortfall (p. 63). The alternative ways of meeting firm energy requirements include geothermal, solar plus storage, hybrid, renewable energy that is discounted, demand response, and paying or otherwise avoiding CAISO penalties. These are briefly mentioned but not adequately explored.

*The Update relies heavily on "spot" purchases after 2027 (26%) when the IPP coal and gas commitment terminates, which are not identifiable as renewable or fossil fuel.

*Distributed energy solutions such as microgrids and community solar for low-income housing, schools, hospitals, fire department etc. are omitted from planning.

*The true "social cost of carbon" is not taken into account in the model that PWP plans to use and is less than the 2018 plan. Further, using a "discount rate" makes it sound like greenhouse gas emissions are a

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tolerable cost of doing business. More accurate would be a frank recognition that fossil fuels are suffocating the earth and endangering our lives and those of our children and grandchildren.

Therefore, we urge the City Council to charge PWP with:

- identifying options for achieving higher percentages of actual use of renewable energy by 2030 than the 60% mandated by law (not including Renewable Energy Credits), together with transparent information about costs, benefits and how these options can be achieved;
- evaluating early termination of the coal-gas IPP contract can be negotiated (a buy-out or other negotiated resolution) and make the pros and cons available to the City Council and the public, recognizing that the situation has changed since the 2018 decision on the matter, as we become increasingly aware of climate risk;
- seeking "firm energy" by means of non-fossil fuel sources only; and
- integrating plans for distributed energy into energy planning, including rooftop solar, community solar, microgrids, energy supply to municipal buildings.

The Update mentions "preparing for Climate Change (e.g., longer and more intense heat storms, fires)" as among "Relatively Certain Factors with Long Implementation Periods." (p.66). But there is nothing long term about actions that we must implement to avoid climate disaster.

We are certain PWP has additional contributions that can be added to the list of proposed solutions that are needed to arrest the destruction of our environment. As you know current scientific consensus is that we have less than 10 years to address climate change before more catastrophic consequences are suffered.

We are experiencing almost unbearable hot summer days, fires in the foothills, destructive winds, and water shortages. We are counting on you to represent us. We respect your willingness to take this heavy responsibility on your shoulders. There has never been a more momentous time for your leadership.

Respectfully submitted,



Martha Zavala
President
League of Women Voters Pasadena Area

From: carl selkin <carl@pasadenajewishtemple.org>
Sent: Monday, January 31, 2022 4:41 PM
To: PublicComment-AutoResponse
Subject: Revised 2021 IRP

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To: Mayor Gordo and Members of the Pasadena City Council
From: The Social Justice Committee, Pasadena Jewish Temple and Center
Subject: PWP Revised 2021 IRP
Date: January 31, 2022

We are writing on behalf of the Social Justice Committee of Pasadena Jewish Temple and Center in response to the interim report of Pasadena Water and Power. We recognize and appreciate the work of staff in preparing this plan and the expressed intent to reduce the carbon footprint of our municipal power generation and distribution. However, while the revised IRP seeks to adapt to California state mandates, such limited planning is a necessary but unfortunately insufficient response to the cascading effects of climate change. We believe that a comprehensive, integrated rapid response approach is needed. Affordable housing, employment, environmental issues, and the quality of life in our area cannot be addressed in separate silos of planning and action.

Stopping or reversing the exponential warming of our planet is beyond the capacity of local actions. However, the IRP outlines an incremental approach that fails even to address the things we can do. There is a bit of Talmudic wisdom that applies here: "It is not our work to complete the task, but it is our responsibility to continue it." We are morally and ethically responsible to do all that we can to preserve a livable, sustainable environment for our children and all future generations.

There are five areas where the IRP needs to stimulate rather than delay and defer action.

1. The projections in this revised IRP are based on a window for change that is inadequate given escalating environmental change. We cannot "kick the can down the road" to avoid addressing the exigences caused by climate change—for example, power interruption due to the inadequacies of the poorly maintained, outdated grid in the face of more frequent and severe storms and fires. Indeed, the inherent conflicts of interest for entities responsible for the grid while beholden to shareholders may be a root cause of inadequate investment in the backbone of power distribution, just as it is a likely reason for inadequate reparations for those directly affected by recent wildfires. We can protect ourselves by moving from reliance on the centralized distribution of electricity to local production and distribution. For example, Pasadena could mandate that new construction incorporate 100% electric infrastructure and rooftop solar and battery storage where feasible, actions that will help reduce the power drain on the existing system, as will accelerated retrofitting of existing structures. Local solar production, battery storage and distribution are, we believe, key.
2. The past is an inadequate basis from which to extrapolate future needs, let alone innovate solutions. Solar, wind, and battery storage are evolving dynamically and require us to adopt green technologies without waiting for perfected technologies. Creating more effective incentives to make rooftop solar available to low-income residents and to landlords of affordable apartments will not only reduce monthly housing costs by reducing utility bills for those in need of rent relief but will also facilitate this nimble response to heat waves and grid interruption.
3. Energy, jobs and housing are elements in an interconnected web. The installation of solar panels and virtual power stations can provide needed local employment and local workforce development, especially in the Pasadena communities most in need of such opportunities. In conjunction with reduced costs to families for electricity, green jobs will lift many out of the cycles of poverty that affect too many in our area. Apprenticeships, job training, and more affordable housing in a green Pasadena, are some direct and ancillary benefits that arise from addressing the challenges as interrelated rather than discrete.
4. Revisiting and revising the rate structure for electricity should include opportunities for those unable to "go solar" to opt for green energy. Many of us are unable to retrofit our homes or make the investment necessary to install solar,

even with incentive programs. However, other communities have found residents willing and able to commit to purchasing their energy from green sources through local utilities. A program such as the CPA (Clean Power Alliance) can provide this option and certify the sourcing.

5. Finally, mid-size to larger scale projects such as parking lot solar canopies, that both generate energy and reduce the heat sink properties of asphalt that covers much of the city, could be sited on city property like the parking lots at Brookside Park and the Rose Bowl. Public-private partnerships for commercial areas could generate less costly electricity while making parking at markets and malls more comfortable for customers. Larger projects in nearby locales-- the open areas in Irwindale and the Hansen dam for solar power generation, battery farms next to and underneath the 210 and 605 freeways—are regional projects that should be explored as ways to replace reliance on the megawatts contemplated as backup in the IRP.

We hope that these points resonate with the Council and that the current 2021 Draft of the Revised IRP will lead to Pasadena pursuing a comprehensive approach bridging bureaucratic silos to integrate planning in the areas of power, housing, employment, traffic and environment.

Respectfully submitted,

Carl Selkin, Howard Landau, and Anne-Marie Otey
Co-Chairs, Social Justice Committee, Pasadena Jewish Temple and Center

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