

May 3, 2022

Rajinder Sahota  
Deputy Executive Officer, Climate Change and Research  
California Air Resources Board  
1001 I Street  
Sacramento, California 95814

Dear Ms. Sahota:

Subject: Comments on the 2022 Scoping Plan Update - Initial Air Quality & Health Impacts and Economic Analyses Results Workshop

The Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to comment on the 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop held on April 20, 2022 and would like to offer the following comments.

### **The Path to Statewide Carbon Neutrality**

Achieving carbon neutrality for the entire state will require major changes across different sectors. Bringing this to fruition will depend on the maturity of commercially available clean energy technology and the build out of the electric system to support additional load resulting from electrification. LADWP agrees with CARB that the state's decarbonization goals are more attainable by 2045 as opposed to 2035. This longer glide path, while still ambitious, will result in lower costs and fewer job losses as shown in the modeling. It will also result in pronounced health benefits, specifically in disadvantaged communities in the South Coast Air Basin that are impacted by pre-existing air quality challenges, the presence of emission sources, and a large, dense population. LADWP is supportive of the staff recommendation to achieve statewide carbon neutrality by 2045 but also urges staff to assess the 2045 scenarios and make sure that the final scenario for the Scoping Plan optimizes the air quality and health benefits, minimizes the economic impacts, and guarantees continued access to reliable and affordable electricity.

### **Reliability, Resiliency, and Affordability of the Electricity Generation and Delivery System**

Last year, LADWP, in partnership with the National Renewable Energy Laboratory completed the LA100 Study, which looks at the feasibility of transitioning to a 100% carbon-free energy supply for LADWP customers. That study found that substantial local generating capacity is needed in order to reliably serve customers in Los Angeles throughout the year and during times of system stress, such as wildfires that affect long-distance transmission lines that bring renewable energy into the City. The LA100 Study also found that air quality benefits are due mainly to changes in electrification of end-use categories and less to changes in power plant fuel use. The Scoping Plan must support an electric system that offers reliable power in a cost-

effective manner to incentivize customers to electrify transportation, industrial operations, and commercial and residential buildings, since those changes offer the highest potential to improve air quality. To facilitate these emission reductions, the electricity supply must be affordable, reliable, and dependable.

### **Transparency of Modeling Inputs and Assumptions**

Transparency of the modeling inputs and assumptions is needed in order to properly evaluate the results. LADWP again requests that CARB post the detailed inputs and assumptions that went into the modeling along with the draft Scoping Plan to allow stakeholders to review and evaluate the feasibility of the scenarios. Details needed include the timing and location for the projected increase in electricity demand, and the forecast adoption of electric and hydrogen-fueled vehicles within the light-duty vehicle and medium and heavy-duty vehicle classes. Details are also needed on the proposed locations and power source for carbon dioxide removal to evaluate the future costs associated with procuring and running the equipment. Further details on the economic analysis are also needed to determine the quality and location of job losses, rather than just the number of job losses, to fully understand the economic impacts of each scenario.

### **Conclusion**

In closing, LADWP thanks CARB for holding public workshops to discuss the modeling results of Scoping Plan scenarios and the opportunity to provide comments and suggestions. LADWP looks forward to continue to work with CARB on the Scoping Plan.

Thank you for your consideration of these comments. If you have any questions, please contact Ms. Andrea Villarin at (213) 367-0409 or Ms. Julie Van Wagner at (213) 367-5295.

Sincerely,

**Katherine Rubin**  
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Katherine Rubin  
Manager of Environmental Rulemaking and Compliance

JVW:

c: Mr. Matt Botill (CARB)  
Ms. Carey Bylin (CARB)  
Ms. Andrea Villarin  
Ms. Julie Van Wagner