



SOUTHERN CALIFORNIA PUBLIC POWER AUTHORITY
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Thuy Hua, AICP
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County of Los Angeles
320 West Temple Street
Los Angeles, CA 90012

Re: Comments on the Proposed “Los Angeles County Renewable Energy Ordinance”

Thank you for the opportunity to provide comments on Los Angeles County’s proposed Renewable Energy Ordinance to “establish regulations, which include definitions and development standards, for the development of small-scale renewable energy systems, utility-scale renewable energy facilities, and temporary meteorological towers” across 2,600 square miles of unincorporated portions of the County. While we greatly appreciate the County’s goal to “help facilitate the development of renewable energy within the County and assist the County to meet the goals of AB 32 [the Global Warming Solutions Act of 2006],” we believe that the proposal outlined in the April 30, 2014 *Notice of Preparation of a Draft Environmental Impact Report and Notice of Public Scoping Meeting* document may in fact **deter** renewables development in the County.

The Southern California Public Power Authority (SCPPA) is a joint powers authority consisting of eleven municipal utilities and one irrigation district. SCPPA Members deliver electricity to approximately two million customers over a 7,000 square mile area, with a total population of 4.8 million people. Seven SCPPA Member cities are located in Los Angeles County.

Publicly-owned utilities are heavily regulated at the local, regional, state, and federal levels towards procuring renewable energy resources and/or complying with aggressive emissions reduction goals. For example, the California Energy Commission oversees implementation of the State’s ambitious 33% by the end of 2020 Renewables Portfolio Standard (RPS) goal. The law directed the Energy Commission to adopt new regulations specifying RPS enforcement procedures for publicly-owned utilities, and to certify and verify eligible renewable resources and to monitor compliance. SCPPA Members are working diligently to implement a wide range of mandatory programs towards reducing greenhouse gases to meet California’s RPS and AB 32 goals, and are on target to meet or exceed the requirements.

However, SCPPA is concerned that the proposed ordinance as outlined may actually *deter* renewable project investments in Los Angeles County. An ordinance that would add unduly burdensome requirements – such as undergrounding transmission lines and placing excessive special conditions on projects – would likely make many future renewables projects so expensive that very few, if any, prospective buyers would be willing to purchase the power. Dramatically increasing the cost of renewables, especially for SCPPA Members interested in local renewables projects, would have a detrimental impact on ratepayers, small- and medium-sized renewables developers, and do little to further air quality improvements. SCPPA urges the County to give careful consideration to the long-term consequences of such an ordinance.

SCPPA appreciates the opportunity to provide these comments. Thank you for your time and consideration.

Respectfully submitted,

Tanya DeRivi
Director of Regulatory Affairs