

Letter
L3

From: Gabaldon, Joseph M
To: CAP
Subject: SDG&E response to County CAP
Date: Friday, September 22, 2017 4:37:56 PM
Attachments: Letter Maggie Soffel.pdf

Hello Maggie,

Attached are comments concerning the Draft County of SD CAP/EIR from the SDG&E Clean Energy. Should you have any questions, please let me know.

L3-1

Joe Gabaldon

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Response to Comment Letter L3

San Diego Gas & Electric Company (SDG&E)
Joe Gabaldon, Public Affairs Manager
September 22, 2017

L3-1

The comment indicates San Diego Gas and Electric's (SDG&E's) comments are enclosed. No further response is required.



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September 22, 2017

Ms. Maggie Soffel
 Land Use/Environmental Planner
 County of San Diego – P&DS
 5510 Overland Avenue, Ste 310
 San Diego, CA 92123

Re: County of San Diego Climate Action Plan

Dear Ms. Soffel:

San Diego Gas & Electric Company (SDG&E) shares the County of San Diego's (the County) ambitions for achieving reductions in greenhouse gas (GHG) emissions in your aggressive and forward-thinking Climate Action Plan (CAP). The purpose of this letter is to submit our comments in response to recently the distributed draft CAP and draft EIR.

Your CAP aligns well with our mission of building the cleanest, safest, and most reliable energy company in America. SDG&E is the Nation's clean energy leader. We are the only California utility to deliver more than 40 percent of our energy from renewable sources and we are forecasted to reach 49% by 2021. SDG&E continues to be well ahead of the State mandate to achieve 50% renewable energy by 2030. At SDG&E, we recognize and embrace the important role that we have and must play by providing energy resources that you can depend on every day and night, including from clean sources. While we are proud of our work to date to reduce our carbon footprint, we want you to know that we look forward to continuing our long partnership with the County, to help the County achieve its climate goals now and in the future.

As the County's CAP indicates, reaching the County's GHG goals will require a host of thoughtful and complementary efforts. SDG&E has a tailored suite of complementary tools that we have provided to the County via our Clean Energy Plan to support the County's agenda. We strongly believe that GHG-reducing actions, such as those in energy efficiency and electric vehicle promotion, should remain a central focus for the County. SDG&E plans to continue to support the County in a comprehensive manner to meet our mutual objective of improving the lives of those in our communities through a cleaner energy future. We have a long-standing commitment to our community and we have the skills, expertise, and track record required to foster achievement of the County's climate vision.

Our Clean Energy team has reviewed the proposed CAP and offers the following comments:

L3-2

The comment indicates that the County should focus on GHG-reducing measures such as those in energy efficiency and electric vehicle promotion. It also states that SDG&E plans to continue to support the County in a comprehensive manner to provide for a cleaner energy future. This comment does not raise an environmental issue related to the adequacy of the Draft SEIR. The comment will be included in the Final EIR and made available to the decision makers prior to a final decision on the project.

L3-2

<p>Preferred CEQA Alternative:</p> <p>SDG&E believes that the best outcome can be achieved in the County’s CAP by combining aspects of the Enhanced Direct Investment Alternative (S.5.2) and the 100% Renewable Energy Alternative ((S.5.3). Neither alternative alone will deliver on their full promise immediately, but clearly, Alternative S.5.2’s plainly stated reduction in emphasis on large-scale renewable energy facilities would slow down the incremental reduction in GHG reduction while also running counter to a key component of the County’s Comprehensive Renewable Energy Plan (CREP). The Board of Supervisors has supported CREP Component 5, <i>Increase the County’s Renewable Energy Generation, Transmission, Use and Storage</i>, which only works with larger scale renewables in the mix of power sources. While roof top solar is an increasingly large share of renewable energy production, it is only a part, and growing slowly at that.</p> <p>Combining Alternatives S.5.2 and S.5.3 provides the County with a way to fine tune the best parts of both while increasing the ability of the County to derive credit for reducing greenhouse gases through its land use authority.</p> <p>Transportation Partnership Opportunities:</p> <p>There are numerous areas for which SDG&E could be a critical advisor/partner in helping in the transition to transportation electrification. Specifically, SDG&E can assist in the development and execution of the following efforts through consultation and/or helping shape the marketing and outreach plans for: “T-3.2 Use Alternative Fuels in County Initiated Projects”, “T-3.3 Develop a Local Vehicle Retirement Program”, “T-3.4 Reduce the County’s Fleet Emissions,” and “T-4.1 Establish a Direct Investment Program.” Two of these proposals are discussed in further detail below.</p> <p>T-3.3 Develop a Local Vehicle Retirement Program, page 3-33</p> <p>Supporting effort - <i>Install Level 2 EV charging stations in the unincorporated County through a partnership with SDG&E.</i></p> <p>Comments: As a part of our SB 350 filing in January 2017, SDG&E is seeking to establish a program to install 90,000 residential charging stations throughout San Diego and Orange Counties. A decision on the residential charging program is expected in 2018. If approved as expected, the County could derive significant GHG reduction credit by participating in the implementation of the program. We look forward to partnering with the County on outreach and education to implement the finalized program.</p> <p>We suggest the County add an additional supporting effort: <i>Support SDG&E’s effort to Electrify Local Highways program</i></p> <p>Comments: Also, as a part of our SB 350, SDG&E is seeking to install grid-integrated public charging at four Park-and-Ride locations - 20 Level 2 charging stations and two DC fast chargers (DCFC) at each site. One will be located in the unincorporated County community (Pala) - at</p>	<p>L3-3</p> <p>The comment states that SDG&E believes that the County should combine the aspects of the Enhanced Direct Investment Alternative and the 100% Renewable Energy Alternative. The comment does not specifically state which aspects of the alternatives should be combined, if this “combined” alternative would reduce environmental impacts, or if it would meet project objectives. As the comment does not specifically recommend a detailed alternative, no further response can be provided.</p> <p>The comment also states that the Enhanced Direct Investment Alternative would slow down the incremental reduction in GHG reductions by not allowing large-scale renewable energy facilities. It also states that this alternative would run counter to a key component of the County’s Comprehensive Renewable Energy Program (CREP).</p> <p>As detailed in Section 4.3.2.1 of the Draft SEIR, the Enhanced Direct Investment Alternative would pursue a greater level of direct investment projects in exchange for eliminating the renewable energy program component of GHG Reduction Measure E-2.1. By eliminating the renewable energy program component, this alternative would eliminate the induced demand for potentially larger and a greater number of large-scale renewable energy systems. While large-scale renewable energy systems could still be developed and their associated impacts could occur, this alternative would eliminate the induced demand for these systems; thereby reducing the total number of systems that would occur within the County.</p> <p>The alternatives analysis compares the impacts of the Enhanced Direct Investment Alternative to the proposed project, including Greenhouse Gas Emissions (GHG). As stated within Page 4-17 of the Draft SEIR, both large-scale renewable energy projects and direct investment projects (see Section 2.7, Greenhouse Gas Emissions) would result in significant construction-related GHG impacts and, therefore, would have overall similar GHG impacts. However, both the project and this alternative would meet 2020 and 2030 reduction targets established in the CAP and because the same total amount of GHG emissions would be achieved, this</p>
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	<p>alternative would result in similar significant impact related to the 2050 GHG reduction goal in the CAP (i.e., goal would not be achieved). Therefore, the County does not agree that this alternative would “slow down” GHG reductions as this alternative would be able to meet 2020 and 2030 reduction targets.</p> <p>L3-4 The comment indicates that SDG&E can be an advisor/partner in helping the transition to transportation electrification. This comment does not raise an environmental issue related to the adequacy of the Draft SEIR. The comment will be included in the Final EIR and made available to the decision makers prior to a final decision on the project.</p> <p>L3-5 The comment indicates that SDG&E is seeking to establish a program to install 90,000 residential charging stations throughout San Diego and Orange counties. The comment suggests adding an additional supporting effort of “Support SDG&E’s effort to Electrify Local Highways program.” The CAP includes a supporting effort to “Install Level 2 EV charging stations in the unincorporated County through a partnership with San Diego Gas & Electric (SDG&E)” under Measure T-3.3. This supporting effort is intended to leverage the SDG&E program to install residential charging stations under the SB 350 filing. The supporting effort will be clarified to include the suggested language from SDG&E. In addition, in response to comments, the County has added a new measure, GHG Reduction Measure T-3.5 Install Electric Vehicle Charging Stations, which will result in the installation of 2,040 Level 2 charging stations in priority public locations by 2030. This comment does not raise an environmental issue related to the adequacy of the Draft SEIR. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the project.</p> <p>L3-6 The comment indicated SDG&E is seeking to install grid-integrated public charging at for park-and-ride facilities. The comment suggests adding an additional supporting effort of “Promote the Electric Vehicle Climate Credit.” In response to comments, the County has added a new measure, GHG Reduction Measure T-3.5 Install Electric Vehicle Charging</p>
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Stations, which will result in the installation of 2,040 Level 2 charging stations in priority public locations by 2030. This comment does not address the adequacy of the Draft SEIR. The comment will be included in the Final EIR and made available to the decision makers prior to a final decision on the project.

<p>the Northwest Corner of the Interstate 15 and Highway 76 in northeastern San Diego county. The other three will be located in the cities of Chula Vista, Oceanside and National City. A decision on the public charging stations is expected in 2018.</p> <p>We suggest the County add an additional supporting effort: <i>Promote the Electric Vehicle Climate Credit.</i></p> <p>Comments: The Electric Vehicle Climate Credit is part of a statewide greenhouse gas reduction program administered by the California Air Resources Board and offers a \$200 SDG&E credit for driving a clean vehicle. The program is not funded by utility rates but by regulation meant to increase the adoption of clean-vehicle fuels such as electricity.</p> <p><u>T-3.4 Reduce the County's Fleet Emissions, page 3-35</u> We suggest the County add a supporting effort: <i>Enhance site support of County's Fleet transition through a partnership with SDG&E.</i></p> <p>Comments: SDG&E is working with County General Services staff to install 86 electric vehicle (EV) charging stations at County locations including North County Regional Center, Medical Examiner's Office and the South Bay Regional Center, as part of our Power Your Drive Program. These charging stations will help the County implement its Green Fleet Action Plan.</p> <p><u>E-1.1: Improve Building Energy Efficiency in New Development, page 3-43</u></p> <p>Comments: SDG&E's Codes and Standards group can be leveraged to help provide studies and additional building code proposals (Reach Codes) that can be considered, including providing support for Zero Net Energy (ZNE). SDG&E can also assist in the development of specific ordinances, as well as best practices by leveraging the Statewide Energy Efficiency Collaborative (SEEC) through the County's formal Local Government Partnership.</p> <p><u>E-1.2: Use Alternately-powered Water Heaters in Residential Development, page 3-45</u></p> <p>Supporting Effort - <i>Continue to implement the County's Green Building Incentive Program.</i></p> <p>Comments: SDG&E's Marketplace currently offers rebates for select water heating units, and provides customers with comparative pricing and energy scores for water heaters, so customers will be able to identify which unit best fits their budget. SDG&E's Home Upgrade also provides assistance and incentives for energy efficient home improvement projects, including water heaters.</p> <p><u>E-1.3: Improve Building Energy Efficiency in Existing Development, page 3-47</u></p> <p>Supporting Effort - <i>Collaborate with regional partners to provide no- or low-cost energy efficiency audits</i></p>	<p>L3-6 cont.</p> <p>L3-7</p> <p>L3-8</p> <p>L3-9</p> <p>L3-10</p> <p>L3-11</p> <p>L3-7 The comment offers information about the Electric Vehicle Climate Credit. In response to comments, the County has added a new measure, GHG Reduction Measure T-3.5 Install Electric Vehicle Charging Stations, which will result in the installation of 2,040 Level 2 charging stations in priority public locations by 2030. This comment does not address the adequacy of the Draft SEIR. No further response required.</p> <p>L3-8 The comment indicates SDG&E is working with the County's Department of General Services staff to install 86 electric vehicle charging stations at County facilities and will help the County implement its Green Fleet Action Plan. The comment suggests adding an additional supporting effort of "Enhance site support of County's Fleet transition through partnership with SDG&E." In response to comments, the County has added a new measure, GHG Reduction Measure T-3.5 Install Electric Vehicle Charging Stations, which will result in the installation of 2,040 Level 2 charging stations in priority public locations by 2030. This comment does not address the adequacy of the Draft SEIR. The comment will be included in the Final EIR and made available to the decision makers prior to a final decision on the project.</p> <p>L3-9 The comment indicates that SDG&E can help provide studies and additional building code proposals for County consideration. The County appreciates the outreach efforts from SDG&E and will continue to coordinate with SDG&E on this, and other issues moving forward. This comment does not address the adequacy of the Draft SEIR. The comment will be included in the Final EIR and made available to the decision makers prior to a final decision on the project.</p> <p>L3-10 The comment offers information on SDG&E's Marketplace that offers energy efficiency rebates. The County acknowledges this comment. This comment does not address the adequacy of the Draft SEIR. The comment will be included in the Final EIR and made available to the decision makers prior to a final decision on the project.</p> <p>L3-11 The comment offers information on SDG&E's Business Energy Solutions program and Comprehensive Audit Program. The</p>
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County acknowledges this comment. This comment does not address the adequacy of the Draft SEIR. The comment will be included in the Final EIR and made available to the decision makers prior to a final decision on the project.

<p>Comments: SDG&E provides its non-residential customers with both the Business Energy Solutions (BES) program and Comprehensive Audit Program (CAP), which are intended to provide non-residential customers with no-cost energy audits that can be utilized to identify deep energy savings. The BES program can also be leveraged to identify and install no-cost energy efficiency measures. Residents within the unincorporated County can also utilize the Home Energy Survey through “My Account” to receive personalized suggestions on ways to reduce their energy use. In addition to these programs, customers may also be eligible for rebates that will reduce the costs of making their homes and businesses more energy efficient.</p>		<p>L3-12 The comment offers information on SDG&E’s Non-Residential programs and EcoChoice program. The County acknowledges this comment. This comment does not address the adequacy of the Draft SEIR. The comment will be included in the Final EIR and made available to the decision makers prior to a final decision on the project.</p>
<p>E-1.4: Reduce Energy Use Intensity at County Facilities. page 3-49</p> <p>Supporting Effort - <i>Reduce Energy Use Intensity at County Facilities</i></p> <p>Comments: SDG&E can help the County identify the savings goals represented in the CAP by utilizing SDG&E’s Non-Residential Programs. Through the recently-filed Energy Efficiency Business Plan, SDG&E can assess the needs of the County’s municipal buildings as a part of the larger Public Sector, and tailor program offerings to meet these needs. An energy audit can help the County make prudent investments that reduce GHG but also lower long-term operational costs of its facilities, especially the older ones.</p> <p>EcoChoice offers an immediate and cost-effective way to reduce carbon emissions through the purchase of up to 100 percent clean renewable energy directly from SDG&E. EcoChoice requires no construction or upfront costs. Public agency customers, like the County, can designate eligible individual County facilities (i.e., court facilities, parks, libraries, etc.) on EcoChoice to receive between 50 and 100 percent of the energy they use to come from renewable sources.</p>	<p>L3-11 cont.</p> <p>L3-12</p>	<p>L3-13 SDG&E recommends adding additional categories to the “Utility Funding” section of the CAP. The County appreciates the input and has revised the CAP accordingly (see Table 5.2). This comment does not address the adequacy of the Draft SEIR. The comment will be included in the Final EIR and made available to the decision makers prior to a final decision on the project.</p> <p>L3-14 The comment requests that the CAP clarify that the Go Solar California program is administered through the Center for Sustainable Energy and not SDG&E. The County agrees with this clarification and has revised the CAP accordingly (see Table 5.2). This comment does not address the adequacy of the Draft SEIR; therefore, no further response is required.</p>
<p>Table 5.2 – Potential Utility Funding Sources to Support Greenhouse Gas Reduction Measures</p> <ol style="list-style-type: none"> a. The County’s CAP provides two funding sources to support GHG emission reductions; SDG&E would recommend including the following in the “Utility Funding” section of the CAP: <ol style="list-style-type: none"> i. Local Government Partnership funding; ii. On Bill Financing and other financing pilots; and iii. Business Rebates and Incentive programs b. The County’s CAP also identifies the “Go Solar Initiative” as a utility funding source. SDG&E believes that the County is referring to the “Go Solar California” program also known as “California Solar Initiative.” This program is supported through ratepayer dollars, but administered through the Center for Sustainable Energy, not SDG&E. Clarification is requested. c. On Bill Financing, although mentioned as part of the Go Solar initiative, has been utilized by the County, and should have its own line item as a program under “Utility Funds.” 	<p>L3-13</p> <p>L3-14</p> <p>L3-15</p>	<p>L3-15 The comment states that On Bill Financing discussed in the CAP should have its own line item as a program under “Utility Funds.” The County appreciates the input and has revised the CAP accordingly (see Table 5.2). This comment does not address the Draft SEIR. The comment will be included in the Final EIR and made available to the decision makers prior to a final decision on the project.</p>

Other Comments on the CAP and Associated Documentation:

- It isn't clear that the best way to "update" the CAP Guidelines is to allow staff to do so solely administratively. There should be a mechanism to allow such changes to be made over time without undue Board of Supervisors oversight, but still provide for an "appeal" or similar elevation to the Board in case of conflict serious enough to warrant Board review. L3-16

- The Multiple Species Conservation Program (MSCP) has been a success for twenty years, and its benefits continue to accrue in the County, and not just for the conservation San Diego's virtually unique diversity of habitats and species. SDG&E's pioneering NCCP/HCP has acted both to facilitate and complement MSCP-type plans throughout its service territory. Indeed, working with the County and State and Federal wildlife agencies, SDG&E acquired the first properties for the San Diego National Wildlife Refuge, and its rights-of-way provide the only viable preserve linkages in some areas. L3-17

The County does not take enough credit for the MSCP's achievement in the reduction of GHG. The largest wildlife preserve in the United States located in an urban-suburban setting provides the benefit of sequestering enormous and measurable amounts of carbon dioxide in the roots of such vegetation as chaparral and riparian areas. Chaparral is the largest percentage of native vegetation in the unincorporated area. Work by Michael F. Allen, Ph.D., at the U.C. Riverside Center for Conservation Biology has proven and allows quantification of this benefit, which is considerable even taking into account development. The County was not obligated to create the MSCP, and as such should derive GHG credit for so doing.

- The County correctly notes that it is impossible to predict the kinds of changes in the future which can reduce GHG. There should be a strong consensus that is the reality, and responding prudently to these unknowns offers the best chance of meeting the CAP's reduction targets. L3-18

We appreciate the opportunity to comment on the County's draft Climate Action Plan and Environmental Impact Report. SDG&E is committed to continuing our partnership with the County and pleased to lead several customer initiatives that directly support the County's CAP objectives. L3-19

Sincerely,



Eugene "Mitch" Mitchell

L3-16 The comment states that updates of the CAP shouldn't be a solely administrative action and that there should be a mechanism to allow appeal or elevation to the Board. As described on page 5-6 of the CAP, the County will prepare a CAP update every five years beginning in 2025. The CAP update will be presented to the County Board of Supervisors for review, amendment, and/or adoption. Coupled with this update of the CAP, the County will determine whether additional environmental review would be required consistent with the requirements of CEQA Guidelines Sections 15162 through 15164 based on the changes proposed. As such, the public will have an opportunity to provide input to the County Board of Supervisors. In addition, many CAP measures include the development of programs, ordinances, and initiatives that, as part of CAP implementation, will be considered by the Board at future dates. This provides the public additional opportunity to provide comment during periods between five-year CAP updates.

L3-17 The comment states the County does not take enough credit for GHG reductions from the County's Multiple Species Conservation Program. Specifically, the comment recommends that carbon sequestration benefits of conserved lands should be credited in the CAP. Please refer to Master Response 11 related to carbon sequestration.

L3-18 The comment offers concluding remarks. No further response is required.