July 29, 2020

Re: Climate and Environment Commission Response to the Draft Renewable Energy Report, 2020

To: Columbia Mayor and City Council

The Climate and Environment Commission (CEC) commends Columbia Water and Light on achieving over 15% renewable, clean energy in the production of electricity for the City of Columbia as established in ordinance 27-106. Additionally, the Columbia Water and Light programs to promote energy efficiency have helped reduce the demand for energy.

The CEC would like to encourage Columbia Water and Light to move ahead with great urgency to achieve the next milestone of 25% of electric retail usage well before the deadline specified in the ordinance of December 31, 2022. Clean energy costs have dropped rapidly. An urgent transition to increase clean, renewable energy in the production mix will help achieve the city's greenhouse gas emissions reduction goals and perhaps even positively impact electricity costs for the consumer.

The Columbia Climate Action and Adaptation Plan (CAAP), which was adopted unanimously by the City Council in June of 2019, has a stated goal to achieve 100% renewable clean energy for electricity by 2035. Although this goal has yet to be formalized in an ordinance, we encourage Columbia Water and Light to utilize this goal in all planning. We look forward to working with the Integrated Electric Resource Master Plan (IERMP) Task Force and the Water and Light Advisory Board to submit a revision to B27-106 Renewable Energy Standard before year end 2020 to achieve 100% renewable clean energy by 2035 or earlier.

Upon review of the draft Renewable Energy Report, the CEC makes the following recommendations:

- **Expand the "Future Renewable Energy Production" section of the report to provide more detail on how new sources of renewable energy will help Columbia reach our ordinance goal of 25% by 2022 or earlier.** The report indicates achievement of 15.21% of the portfolio in 2020. The CEC would like to see faster progress given this is only 0.21% over the goal from 3 years ago. Current renewable energy investments according to the report and the current calculation method have only resulted in an additional cost of 53.51% of what is allowed by the renewable energy ordinance. We can move faster. We need a documented plan to get to the 25% goal.
- **Revisit the need for the 3% rate cap.** CAAP action E-1.2.1 states "Remove the 3% rate cap to allow for increased investment by Water & Light in renewable energy resources." In anticipating how the city can meet the ordinance goal for 2022, an analysis of the anticipated rate impact will be helpful. Assumptions of future prices and demand should be clearly documented. This information will help inform how rapidly the city can move to the next milestone of 25%.
- **Plan for the 100% renewable clean energy goal for electricity generation by 2035 or**

earlier as recommended in the CAAP. Although the CAAP was adopted by the City Council in 2019, it is not mentioned in the 2020 Renewable Energy Report. The CEC recommends adding a section regarding the CAAP and anticipated impacts on renewable energy for Columbia.

- **Abandon any potential renewable energy project to use wood or wood waste.** Burning wood generates up to 50% more upfront carbon emissions per unit of energy generated than coal. "A molecule of CO2 emitted today has the same impact on radiative forcing whether it comes from coal or biomass." [1, 2] Additionally, burning wood increases air pollution of volatile organic compounds (VOCs) and Nitrogen Oxides. These can interact together to produce ground level Ozone, the nation's most widespread outdoor pollutant. Ozone pollution is anticipated to get worse as the climate continues to warm over the coming decades. These pollutants will impact not only Columbia but downwind communities - raising the risk of environmental justice litigation. The CEC will not support any biomass energy production that generates more greenhouse gas emissions or air pollutants for the life cycle of the fuel than alternative sources such as wind, solar, geothermal and energy storage or even natural gas. A United Nations Intergovernmental Panel on Climate Change (IPCC) report indicates we must all collectively take aggressive action to reduce greenhouse gas emissions "by about 45 percent from 2010 levels by 2030".[5] Solutions that increase emissions in the short term while possibly achieving emissions payback in 10 or more years are no longer viable options.
- **All references in the draft report to the Environment and Energy Commission should be updated to the Climate and Environment Commission.**

The Climate and Environment Commission appreciates the opportunity to comment on the draft Renewable Energy Report, 2020.

Sincerely,

Carolyn Amparan

Chair

Columbia Climate and Environment Commission

References

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5. IPCC, 2018: Summary for Policymakers. In: Global warming of 1.5°C. An IPCC Special Report on the impacts of global warming of 1.5°C above pre-industrial levels and related global greenhouse gas emission pathways, in the context of strengthening the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty [V. Masson-Delmotte, P. Zhai, H.O. Pörtner, D. Roberts, J. Skea, P.R. Skula, A. Priani, W. Moufouma-Okia, C. Péan, R. Pidcock, S. Connors, J.B.R. Matthews, Y. Chen, X. Zhou, M.I. Gomis, E. Lonnoy, T. Maycock, M. Tignor, T. Waterfield (eds.)]. World Meteorological Organization, Geneva, Switzerland, 32 pp. https://www.ipcc.ch/sr15/