

Memorandum

Date: July 26, 2024

To: Gregg Coffin, Chair
Water and Light Advisory Board

From: 
Leanne Tippett Mosby, Chair
Climate and Environment Commission

Subject: Comments on the Renewable Energy Ordinance

On behalf of the CEC, I want to express our appreciation for the opportunity to provide input to the WLAB's document entitled "Renewable Energy Ordinance Recommendation (DRAFT FOR BOARD DISCUSSION)" dated June 29, 2024. Generally, the CEC found the WLAB's comment thoughtful and thorough. The following comments were adopted by a vote of the Climate and Environment Commission at their meeting on Tuesday, July 23.

Questions and comments on specific points in the document:

- 1) c. - the CEC would like to ensure that the *annual report* will reflect what is operational, and thus requests clarification of this point.
- 2) a. - the CEC assumes this language is additive and the existing ordinance language will remain. Can the WLAB confirm?
- 3) a. - the CEC believes the ordinance should align the long-term goal with those established in the Climate Action and Adaptation Plan and that, in addition, incremental goals be established in the ordinance for every 3 to 5 years – similar to the current ordinance.
- 3) g. - consider other types of renewable projects or distributed generation in addition to solar, where appropriate
- 5) Remove rate cap consistent with CAAP action E-1.3.1, which states, "Remove 3% rate cap to allow for increased investment by Water & Light in renewable energy resources."

General comments:

Rates: the rate evaluation should take into consideration payment models that might make things more affordable for customers that may not already be captured in the life cycle cost analysis. The rate structure should also evaluate affordability impacts to low-income households.

Thank you again for your consideration of these comments and we look forward to continued collaboration on this and other topics of common interest to the CEC and WLAB.