

Staff Recommendations/Challenges with Renewable Ordinance:

1. The current renewable energy data is based on a calendar year, not fiscal year. This can be confusing for everyone including staff when we are trying to communicate with the board and public.
 - a. Staff recommendation: change the renewable ordinance to be based on fiscal year.
2. Sec. 27-106 (e), states *"each year prior to February 1, the water and light department shall publicly release a renewable energy plan detailing a proposal for how the city would comply with this section during the following year."*

Since the renewable energy data is based on a calendar year, city staff is still receiving December data up until the last week of January. Receiving this data so late in the month makes the turnaround time for the draft renewable plan to be posted by February 1st a challenge.

- a. Staff recommendation: changing the renewable ordinance to be based on the fiscal year would allow more time for city staff to receive all of the data and prepare the draft renewable plan.
3. Sec. 27-106(c), states, *"Eligible renewable energy generation may be provided by wind power, solar energy, bio-energy sources or other renewable sources which meet the environmental criteria approved by the city council...."*

This section of the ordinance should be more detailed to explain what the City Council's environmental criteria would be for renewable energy generation or sources. Does this include renewable energy credits (RECs), hydro, batteries, etc?

- a. Staff recommendation: determine what "environmental criteria" that the City Council wants and include more detailed information in this section. City staff agrees with the WLAB that RECs should not be considered; however, if that is the preference we can incorporate them.
4. Timing of construction projects - for example the Ironstar (Grainbelt) project PPA was signed several years ago with an anticipated delivery of energy in 2021/2022. Due to circumstances out of our control the project has now been pushed out to 2028, possibly 2030. Should situations like this be considered when determining compliance with the ordinance?
 - a. Staff recommendation: consider circumstances that are out of staff control when setting milestones for renewable energy sources.

