



Sarah Talbert <sarah.talbert@como.gov>

WLABPublic: NEW Sierra Club Input on Renewable Energy Ordinance

Sierra Club Mid-Missouri Group <sc.midmo.group@gmail.com>

Tue, Feb 13, 2024 at 9:10 PM

To: wlabpublic@como.gov, Philip Fracica <philip@renewmo.org>, Tom Jensen <thomasrjensen@yahoo.com>, David Switzer <dswitzer70@gmail.com>

Dear Water and Light Advisory Board and Utility Staff,

Please find below NEW input from the Mid-Missouri Sierra Club regarding the discussion of revisions to Columbia's Renewable Energy Ordinance. I apologize for sending this with such a short lead time. We were in discussions through Tuesday.

The Sierra Club executive committee has revised the group's input based on the information provided by TEA, information acquired from MISO and other considerations. Additionally, we have met with multiple city council members to gather their input.

Regarding the timeline for data and the report:

Sierra Club supports moving the reporting timeline to the fiscal year. Therefore we support having the report available annually after December 1, allowing two months to collect the final data and produce the report.

Note the above timeline is also supported by the 100% by 2030 Coalition.

Regarding the definition of renewable energy and the criteria:

Sierra Club supports this definition for renewable energy used by the National Sierra Club: "renewable energy" is defined to include facilities generating electricity from naturally replenishing sources like wind, solar, geothermal, and waves or tides. This definition specifically excludes fossil fuels, nuclear technology, incineration of municipal and medical waste, combustion of biomass, or large-scale future hydroelectric development." Renewable energy credits are also excluded.

Note the above definition is also supported by the 100% by 2030 Coalition.

Regarding timing of renewable energy targets:

Sierra Club supports extending the target for 100% renewable energy beyond 2030 to allow additional time to resolve grid congestion and other issues that are currently impacting renewable energy prices and availability for solar and wind. Sierra Club desires for Columbia to set a target of 100% renewable energy equivalent to Columbia Water & Light annual retail usage achieved before or in the year of 2035. The interim target for 2029 or 2030 should be 80% or 85%.

Regarding timing of achieving renewable energy targets.

The deadline of Dec. 31 for achieving a target has been confusing to the citizens of the community. Sierra Club would like to see more clarity on this definition of when a target is to be achieved. The language of the ordinance needs to be clear that the target is for the full year in which the target date occurs. For example, if the deadline is Sept. 30, 2029 to achieve 85%. Then the renewable energy attainment should be 85% for the full year retail usage equivalent not just for the final month of the time period.

Note the above definition is also supported by the 100% by 2030 Coalition.

Regarding the rate cap on cost difference between renewable energy costs and coal energy costs:

Remove the 3% cap. Replace the ordinance language to convey something along the lines of the following: When new renewable energy power purchase agreements, contracts, or capital expenditures are presented to the City Council for consideration and approval, the CWL Utility staff shall provide to the City Council and analysis of the expected impact of the new expenditure on rates with particular focus on the impact for a median usage residential household. When and if household income data should become available, the Utility staff shall also provide the City Council an estimate of the rate impact on low income households, with low income households being defined as households with income falling below the median income for Columbia.

Note the above language is also supported by the 100% by 2030 Coalition.

Regarding construction projects timing and lost contracts:

Sierra Club desires the ordinance to specify language as follows: City should have annual plans in place to achieve near term and longer term targets. If contracts fall through within 24 months of a target date, the Utility should make all reasonable efforts to replace the planned renewable energy that is lost with other sources.

Note the above language is also supported by the 100% by 2030 Coalition.

Regarding the definition of 100% renewable energy and the Columbia Energy Center and Municipal Power Plant:

Sierra Club supports adding language to the ordinance to clearly establish that 100% renewable energy equivalent to 100% of electric retail usage does not require the closure of the CEC or the Municipal Power Plant. The goal is not to need them to meet Columbia's energy demand because Columbia will have purchased or generated sufficient renewable energy but of course the grid is always a consideration as well. "This ordinance allows for the maintaining and operating of natural gas generators at the Columbia Energy Center and the Municipal Power Plant for capacity, peaking and back-up for as long as they are deemed necessary by the Midcontinent Independent System Operator (MISO) for the reliability of grid operations or until such time as the City of Columbia and MISO agree they may be closed and cease operation."

Note the above language is also supported by the 100% by 2030 Coalition.

Miscellaneous

The name of the Climate and Environment Commission needs to be updated in the new ordinance.

Sincerely,
Carolyn Amparan
Chair
Mid-Missouri Group
Missouri Sierra Club