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CMUA.org

January 10, 2023

The Honorable Mayor and Members
Glendale City Council
613 E. Broadway
Glendale, CA 91206

Subject: Support for Glendale Water & Power's Biogas Renewable Generation Project

Dear Mayor and Councilmembers,

The California Municipal Utilities Association (CMUA) represents the interests of the state's publicly owned electric utilities that provide power to 25% of the state. In our capacity as a statewide trade association, we have unique insight into California's energy and climate policies adopted by the Legislature and regulatory agencies. As outlined below, the GWP Biogas Project is a textbook example of a community-owned utility taking advantage of a locally available resource to meet its state obligations and goals, reduce its carbon footprint and maintain reliable service.

Through this project the City of Glendale would be taking bold action to address climate change, and for this reason we recommend it move forward.

California leads the nation and the world in adopting ambitious policies that reduce greenhouse gas (GHG) emissions to alleviate the impacts of climate change. This leadership was emphasized during the 2022 Legislative session, during which a suite of new climate laws was adopted, including a law that enshrines a commitment to statewide carbon neutrality by 2045. The California Air Resources Board (ARB) in December also adopted an unprecedented climate action plan that aims to reduce petroleum use by 94%.

The state has established numerous requirements and goals for electric utilities to reduce their GHG emissions. Most prominently, electric utilities must procure increasing amounts of renewable energy so that by 2030 at least 60% of their supply is renewable. Utilities must also plan for 90% renewable and zero-carbon energy by 2035, 95% by 2040, and 100% by 2045. Accomplishing these goals will take tremendous planning, investments, and coordination. Initial state studies suggest that over \$100 billion will need to be invested over the next two decades to triple the amount of renewable and zero-carbon generation and to build new long-distance power lines.

While utilities like GWP are planning and implementing their renewable and clean energy goals, the state is facing an extraordinary reliability challenge. In August 2020, utilities in the California Independent System Operator (CAISO) balancing authority area footprint were forced to initiate short-term rotating outages due to a sustained heatwave and energy capacity shortfalls. A similar heatwave descended on California in September 2022, but due to tremendous coordination and actions by countless organizations and individuals, outages were narrowly avoided. The California Energy Commission predicts that there will be capacity shortfalls during August and September through at least 2026.

While many challenges make maintaining electric reliability difficult, there are two challenges in particular that make reliability more difficult to maintain in the summer. The first is persistent West-wide heat storms that cause business and residents to max-out their air conditioners simultaneously,

limiting the ability of states to share electric energy resources across transmission lines. The second challenge is meeting the “net peak” when both utility-scale solar farms and rooftop solar panels on over one million homes in the state produce less electricity as the sun sets, but customer demand persists due to excessive heat into the evening. Firm generating resources that can come online in minutes are used to meet the net peak demand, such as natural gas power plants, hydroelectric generation, and increasingly, batteries.

Many factors are needed to meet California’s climate and clean energy commitments, while addressing electric reliability challenges. One factor of paramount importance is the ability of utilities like GWP to procure firm, diverse generating and storage resources that reflect their operating needs. The Biogas Renewable Generation Project at the Scholl Canyon Landfill, which will capture the methane that is being produced and currently flared into the atmosphere, will provide three important and primary benefits:

1. **It will provide around-the-clock, reliable power for 11,000 homes.** The project will result in 11 MWs of power being produced 24 hours each day, regardless of weather conditions. This firm resource will help GWP maintain reliability for its residents. It’s a tremendous asset that will produce power during the net peak when solar goes offline and the electric grid is stressed.
2. **It will help GWP meet its renewable energy obligations.** Only certain generating resources count towards a utility’s legally binding obligation to procure increasing amounts of renewable energy. As a biogas power project, all of the electric generation will count towards GWP’s obligation to procure 60% renewable energy by 2030.
3. **It is a local resource.** Importantly, the School Canyon landfill is located in Glendale, meaning it is a local energy source that doesn’t require long-distance power lines. This makes the resource highly reliable and avoids incurring electric transmission costs. Many utilities around the state seek to use locally sourced energy resources. For example, many utilities in Northern California rely on geothermal generation from The Geysers, which is essentially in their backyard.

As California moves towards economywide carbon neutrality, clean electricity will become the fuel of choice. The ARB estimates that electricity usage will increase by 76% by 2045. This is yet another reason why utilities such as GWP must procure or build projects that deliver power around the clock as close to customers as possible. Utilities must plan and prepare to meet their renewable and clean energy requirements and goals, address reliability during the net peak, and prepare to provide more electricity to their customers. It’s common sense. The Biogas Renewable Generation Project at the Scholl Canyon Landfill will help GWP address these issues. It is a model local project that will address climate change and improve our planet. For all these reasons, we respectfully urge you to approve the project.

If you have any questions about our letter, please contact me at 916-326-5801 or bmoline@cmua.org.

Sincerely,



Barry Moline
Executive Director

From: [Abajian, Suzie](#)
To: [Cortes, Karen](#)
Subject: FW: Scholl Biogas - Agenda 20230124
Date: Tuesday, January 24, 2023 9:00:17 AM
Attachments: [image001.png](#)
[image003.png](#)

Suzie Abajian, Ph.D. | City Clerk | City of Glendale
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From: Kurt Sawitskas <kurt.sawitskas@outlook.com>
Sent: Monday, January 23, 2023 12:43 PM
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Subject: Scholl Biogas - Agenda 20230124

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January 23, 2023

Honorable Mayor Kassakhian and Councilmembers,

I am writing in support of the GWP Scholl Canyon Landfill Biogas Renewable Generation Project on your January 24 agenda. Having reliable electric power is critical and should be a prime objective of your duty to our citizens. I am concerned that a very small number of residents in opposition will delay or derail your support of this vital infrastructure project.

This project is now more vital to Glendale than ever because Council chose to fit Grayson with only 3 Wartsila generators. Adoption of local solar and consumer energy use-reduction remain stubbornly underperforming. Scholl Biogas will provide a vital base resource to our power plan 24/7/365 for several decades to come. And, as the landfill has been closed and the gas diminishes, the project will naturally sunset as other local renewable sources escalate to take its place. The Scholl Biogas project is a bridge toward our future.

There are many red-herring arguments against this project. Fire, earthquake, noise, air pollution, and continuing the use of carbon fuels. But it is not a dangerous or dishonest project. It is a well-engineered effort to use an otherwise wasted resource to make a significant improvement to

Glendale's infrastructure, and it will help keep the lights on and utility rates down for all of us. I urge your support of the complete project without delay.

Kurt Sawitskas

Glendale

September 20, 2022

Good evening Mayor Kassakhian and Councilmembers,

I'm Kurt Sawitskas. My wife and I chose Glendale nearly 30 years ago to buy our home and raise our children. Like most of the other residents of our city, we've been able to ignore the power infrastructure because it was reliable. But our city is now faced with the difficulties of being a power island with only one limited lifeline from outside. Further confounding our system reliability is the aging Grayson plant, and the complications of our transition to clean energy.

It may seem to some that the Scholl Canyon Biogas project is counterproductive to the clean energy goal. I see it as a necessary bridge to that future. The Scholl Canyon landfill is almost as old as I am, and we have been collecting and flaring the methane gas byproduct for about fifty years. At this time, we're flaring about 12MW of gas on a 24/7/365 basis. That's not just a waste of energy, it's adding heat to our atmosphere, which is also not good for our city, or planet.

The biogas electric generation project will convert most of that wasted heat into electricity. I believe the project will actually reduce the local fire hazard and improve overall local air quality.

Scholl Canyon Landfill will continue to produce methane gas for several decades after its closure. The gas collection and mitigation will have to remain in place for a long time. We should convert that waste into the baseline 24/7/365 electricity that we need during our energy transition. Each Watt of electricity generated using waste gas at Scholl directly offsets the need to burn new gas at Grayson to produce a Watt. We are in transition to a newer cleaner system, but that's a long process. Wishful thinking and narrow environmental positions are not a viable option.

For the silent majority of citizens, please do what is needed to ensure that we have reliable electricity.

Thank you.



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January 23, 2023

Via Email (AKassakhian@Glendaleca.gov; anajarian@glendaleca.gov;
dbrotman@glendaleca.gov; easatryan@glendaleca.gov; pdevine@glendaleca.gov)

City Council
City of Glendale
633 E. Broadway, Room 103
Glendale, CA 91206

Re: Comments re Supplemental Environmental Review for Approval of
Biogas Plant Contracts; Agenda Item 8b

Honorable Councilmembers:

On behalf of the Glenoaks Canyon Homeowners Association¹ (GOCHA), we write to address the need for subsequent environmental review for the Biogas Renewable Generation Project ("Project" or "Biogas Project") prior to the Council's approvals of a purchase and implementation agreement for the Project.

The decisions currently before the Council are discretionary approvals to which the California Environmental Quality Act's (CEQA's) requirements for environmental review apply. (Pub. Resources Code § 21080.) While an environmental impact report (EIR) was previously prepared for the Biogas Project, CEQA requires subsequent environmental review where there are changes in the project, changes in circumstances or if new information becomes available. (Pub. Resources Code § 21166.) If those changes are substantial or the new information discloses significant impacts not identified in the EIR, preparation of a subsequent EIR is required. (*Ibid.*) If the changes or new information do not show a new significant impact, CEQA requires the lead agency to prepare an addendum to the EIR. (CEQA Guidelines § 15164.)

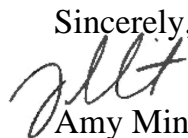
¹ GOCHA, a non-profit mutual benefit corporation (503(c)(4)), is an alliance of volunteer canyon homeowners and residents. GOCHA's mission is to preserve, protect and enhance the beautiful Glenoaks Canyon, while fostering a strong sense of community. The Association achieves this mission by (1) monitoring proposed new development, (2) evaluating the City's ongoing plans with the Scholl Canyon Landfill, (3) working closely with Neighborhood Watch, (4) preparing disaster preparedness plans, and (5) organizing various community events.

Here, since the certification of the EIR, new information has become available demonstrating that the EIR substantially underestimated the greenhouse gas (GHG) emissions associated with the Biogas Plant. The threshold of significance for GHG emissions is 10,000 metric tons (MT) carbon dioxide equivalent (CO₂e) per year. (Draft EIR p. 4.198.) The draft EIR assessed the Project has having only 4,806 MT CO₂e annually during operation. (Draft EIR p. 4.199.) The final EIR claimed an even lower level of GHG emissions above the baseline at only 310 MT CO₂e. During discussions of the Project subsequent to the EIR certification, it was disclosed that the Project would instead generate new GHG emissions at or near the 10,000 MT CO₂e threshold. This new information demonstrates the potential for the Project to exceed the threshold of significance, requiring analysis of this impact, and potentially imposition of mitigation, in a subsequent EIR, or at a minimum in an addendum to the EIR. Neither such document has been prepared, and as such, approval of the Biogas Project at this time is improper under CEQA.

This subsequent environmental review is particularly important given that new information has also recently become available regarding the benefits and feasibility of use of the landfill gas for renewable natural gas (RNG), an alternative to the Project. The Biogas Plant EIR disclosed that the RNG alternative would have lower GHG emissions. If the Biogas Project's GHG emissions do exceed the threshold of significance, less impactful alternatives such as RNG must be carefully considered. (Pub. Resources Code § 21081.)

Additionally, there has been a change in circumstances since the certification of the EIR that necessitates additional environmental review. The Eagle Rock Tiny Home Village was opened in 2022 to provide temporary housing for 93 individuals in 48 houses. The noise impacts of the Project on these new sensitive receptors should be evaluated in a subsequent EIR or Addendum.

Thank you for your time and consideration in this matter.

Sincerely,

Amy Minter

cc: Dr. Suzie Abajian, City Clerk (Sabajian@glendaleca.gov)
Michael Garcia, City Attorney (mjgarcia@glendaleca.gov)



Southern California Public Power Authority
1160 Nicole Court
Glendora, CA 91740
(626) 793-9364

The Honorable Mayor and Members
Glendale City Council
613 E. Broadway
Glendale, CA 91206

Subject: Support for Biogas Renewable Generation Project at Scholl Canyon

Dear Mayor and Councilmembers:

I am writing to express strong support for Glendale Water and Power's proposed Biogas Renewable Generation Project at the Scholl Canyon Landfill (Scholl Canyon Project). This project is directly aligned with California's policies to decarbonize the grid and is consistent with other near-term energy policies focused on promoting affordable, reliable generation resources.

It is well recognized that investments in firm clean energy resources are necessary as California moves toward a 100% clean energy grid by 2045.¹ Unlike wind and solar that depend on the weather, or batteries that have limited duration, firm clean energy resources like the Scholl Canyon Project can be dispatched whenever needed and for as long as needed to support grid reliability. This is particularly important as California experiences more frequent and intense extreme weather event, such as the September 2022 heat wave. According to Governor Gavin Newsom, "As we have seen from the past two summers, climate change is causing unprecedented stress on California's energy system. *Action is needed now to maintain reliable energy service* as the State accelerates the transition to clean energy."² (Emphasis added). In addition to the reliability benefits of a firm resource, the Scholl Canyon Project is local. This means Glendale's access to 11 MW of renewable electricity cannot be interrupted by transmission outages. The reliability attributes of the Scholl Canyon Project make it the type of resource that the electricity grid currently needs to help ensure the lights stay on, especially as we take more aggressive steps to transition away from natural gas generation.

The Scholl Canyon Project is also a valuable resource under the state's Renewable Portfolio Standard (RPS) program. The RPS is a cornerstone of California's ambitious clean energy policies

¹Environmental Defense Fund study highlighting the importance of clean firm resources <https://www.edf.org/sites/default/files/documents/SB100%20clean%20firm%20power%20report%20plus%20SI.pdf>; SB 423 (Stern, Statutes of 2022) promoting the quick and effective deployment of firm, clean resources https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=202120220SB423

² Governor Newsom's statement on reliability <https://www.gov.ca.gov/wp-content/uploads/2022/06/6.30.2022-AB-205-signing-message.pdf>

The Members of Southern California Public Power Authority work together to power sustainable communities.



and requires electric utilities to procure increasing amounts of eligible renewable energy so that at least 60 percent of their supply is renewable by 2030. By capturing and using the methane that is released by the existing Scholl Canyon Landfill - which is currently flared into the atmosphere - this project will add enough renewable energy to power approximately 11,000 households and account for 9 percent of GWP's Renewable Portfolio.

Lastly, California is facing an energy affordability crisis. On average, California's residential electricity rates are approximately 67 percent more than national average.³ Affordable electricity rates are critical to protecting working class families and businesses in California communities. Low rates are also key to our clean energy future by financially motivating consumers to switch to clean technologies, such as electric vehicles and appliances. As such, there must be a focus on developing clean energy generation projects that help keep rates affordable for customers. The Scholl Canyon Project is a unique opportunity for Glendale to bring on a firm clean energy resource at a low cost to customers, in large part because the city already owns the fuel source.

For the reasons stated above, I respectfully urge you to support the Scholl Canyon Project.

Sincerely,



Michael S. Webster
Executive Director

³ Energy Information Agency data on average state residential electricity rates
https://www.eia.gov/electricity/sales_revenue_price/xls/table5_a.xlsx