

ATTACHMENT

For Item

#09

Wednesday,
May 24, 2023

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From: [Malinda Dickenson](#)
To: [BOS, District1Community](#); [Desmond, Jim](#); [Anderson, Joel](#); [Lawson-Remer, Terra](#); [FGG, Public Comment](#)
Subject: [External] Agenda Item 09, May 24, 2023 Board of Supervisors Meeting
Date: Monday, May 22, 2023 5:08:22 PM
Attachments: [2023-05-22 PCF letter to BoS re 5-24 Agenda Item 9 \(signed\).pdf](#)

Please see the attached letter from The Protect Our Communities Foundation regarding Agenda Item 09 for the May 24, 2023 Board of Supervisors meeting. Thank you.

Malinda Dickenson, Legal & Executive Director

The Protect Our Communities Foundation

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May 22, 2023

Chair Nora Vargas and Members of the Board of Supervisors
1600 Pacific Highway, Room 335
San Diego, California 92101

Re: Agenda Item 09,
May 24, 2023 Board of Supervisors Meeting

Chair Vargas and Members of the Board,

The Protect Our Communities Foundation (PCF) applauds the efforts of Supervisor Jim Desmond in bringing forward Agenda Item 09 at the May 24, 2023 Board of Supervisors meeting. Specifically, PCF agrees with Supervisor Desmond that “a better understanding of local conditions relating to existing residential, commercial and other infill renewable energy generation, with an emphasis on existing solar is needed,” including “an analysis of remaining rooftop and infill solar capacity in order to provide information that will inform and guide the Board in our decarbonization efforts.”¹ To ensure that the Regional Decarbonization Framework (RDF) “is reflective of local reality,” and that it “focuses on ratepayer control over their energy needs” and “the wellbeing of every community in the region, for both existing and future generations,”² PCF makes three recommendations the Board should incorporate before approving Agenda Item 09.

First, PCF recommends that the Board direct staff to postpone any further actions to implement the RDF, including consideration of the Implementation Playbook,³ until the necessary study has been completed. Supervisor Desmond’s recommended action states that the “study of renewable energy generation, transmission, distribution, and storage capacity in the San Diego region that considers resiliency from power outages, economic benefits and costs, and local community context”⁴ is critical to a complete and thorough analysis. PCF agrees. The Technical Report presented to the

¹ Desmond Agenda Item 09 for May 24, 2023, p. 2.

² Desmond Agenda Item 09 for May 24, 2023, p. 2.

³ Desmond Agenda Item 09 for May 24, 2023, p. 4 (Draft RDF “anticipated to return to the Board for further consideration in late 2023 or sometime next year”).

⁴ Desmond Agenda Item 09 for May 24, 2023, p. 3 (Recommendation No. 2).



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Board last August dramatically under-values the region's rooftop solar potential and the cost of transmission line construction; fails to quantify the benefits of customer generated solar or account for parking lot solar potential; and over-values the region's 2050 electricity demand and commercial rooftop solar costs. The Technical Report must be revised and updated to correct these deficiencies and incorporate the results of the study proposed by Supervisor Desmond.

Second, PCF recommends that the Board expedite the recommended analysis and direct completion of the study by the end of this year. No need exists for a two- or two-and-a-half-year contract⁵ -- the necessary analysis can and should be completed in weeks or months, not years. Expediting the study will help ensure that San Diego Gas & Electric Company (SDG&E) ratepayers are not burdened with unnecessary, expensive, and environmentally harmful new transmission line construction as described in recent reports that are envisioned by SDG&E.⁶ Investor-owned utility companies like SDG&E profit excessively from expensive capital projects and thus favor the development of remote, utility-scale projects that require new transmission line construction; to the detriment of ratepayers and the public.⁷ Expediting the study also remains critical to mitigate or avoid the worst climate change impacts.

Third, PCF recommends that the Board clarify that the "report back to the Board in 180 days on the progress of the study"⁸ shall be made to the Board at a Board of Supervisor's meeting, as opposed to in a memorandum or any other form that does not involve public notice and participation.

⁵ Desmond Agenda Item 09 for May 24, 2023, p. 3.

⁶ Joshua Emerson Smith, *Is San Diego's rooftop solar boom over? SDG&E eyes \$2B power line to Imperial Valley* (May 14, 2023), San Diego Union-Tribune, available at <https://www.sandiegouniontribune.com/news/environment/story/2023-05-14/san-diego-rooftop-solar-imperial-valley-transmission>.

⁷ See e.g. Howard Crystal, Roger Lin, Jean Su, *Why Net Metering is Good for People and the Planet and Why Monopoly Utilities Want to Kill It* (March 2023), Center for Biological Diversity, available at <https://www.biologicaldiversity.org/programs/energy-justice/pdfs/Rooftop-Solar-Justice-Report-March-2023.pdf>.

⁸ Desmond Agenda Item 09 for May 24, 2023, p. 3 (Recommendation No. 3).



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With the approval of the above recommendations, PCF fully supports Agenda Item 09. Adequately accounting for the greenhouse gas emissions reduction potential and other benefits of rooftop and parking lot solar, and the high costs of developing transmission lines needed for using power generated from remote, utility-scale renewable energy projects – will allow the County to ensure that its plan for the region reduces greenhouse gas emissions as quickly as possible and to the extent possible, will benefit communities of concern, and will provide maximum mitigation of adverse environmental impacts including climate change, land use, and human health impacts.

Kind regards,

Bill Powers, P.E.

Lori Saldana, President
Bill Powers, P.E., Secretary
Michael Pinto, PhD, Treasurer
Dianne Jacob, Director
Denis Trafecanty, Director