

Comment Letter #92



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October 17, 2022

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Submitted Electronically to: AQMPteam@aqmd.gov

SUBJECT: Southern California Edison Company's Comments on South Coast Air Quality Management District's (SCAQMD) Revised Draft 2022 Air Quality Management Plan (AQMP)

Dear Dr. Rees:

Introduction

Southern California Edison (SCE) appreciates the opportunity to comment on the Revised Draft 2022 AQMP to address the attainment of the National Ambient Air Quality Standards (NAAQS) for Ozone in the South Coast Air Basin and the Coachella Valley, in alignment with the 2022 State Implementation Plan.

We want to underscore the significant efforts that the SCAQMD staff has taken in the many months leading up to the Revised Draft AQMP. We recognize the challenges and difficulties inherent in this process and express our continued support for a strategy that addresses federal requirements to attain the 70 parts-per-billion (ppb) standard by 2037, as well as economically feasible compliance approaches. We commend AQMD staff for their hard work, transparency, and communication during the AQMP process, as well as taking our comments on the Draft AQMP into consideration.

We would like to take this opportunity to provide additional comments, below.

Transformation to ZE Technology

SCE understands the magnitude of challenges to transition to ZE technology and the path to get there by 2037. It is attainable through advanced forward planning, increased industry coordination, and new collaborative approaches in data-sharing and cooperation between public and private stakeholders. It will require all hands on-deck to make it happen- and we commend the SCAQMD for the formation of a ZE Transportation Infrastructure control measure to study and support ZE infrastructure policymaking and deployment to support the fuel switch. SCE stands ready and willing to support those efforts, as we work with State Energy Agencies to prepare the grid for this transformation.

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As an electric utility serving a 50,000 square-mile area of central, coastal, and Southern California, SCE is planning for large-scale electrification of the grid in support of emissions reductions to help achieve the State's climate goals. Specifically, SCE is working closely with the State to ensure that the electric vehicle forecast used for grid planning is aligned with where state policies are moving. In addition SCE has commented on the proposed 2022 State SIP to ensure projections appropriately represents the number of ZEVs and chargers needed in 2030. SCE is also conducting scenario planning and working with fleets to assess where additional loads may occur to help improve the utility's planning processes in preparation for this clean energy transformation.

Certain grid infrastructure upgrades will be needed to support the clean energy transformation. SCE has been encouraging fleets within its territory to share their transportation electrification plans, in order to help the utility better understand where specific infrastructure upgrades are needed. SCE appreciates and commends the fleets that have already engaged with SCE to share their prospective plans, as well as AQMD's offer to share information through a public records request. This data will be used to appropriately identify and address necessary infrastructure upgrades required on the horizon.

Cost-Effectiveness

SCE supports SCAQMD's continued evaluation of cost-effectiveness for proposed AQMP control measures with the threshold of \$59,000 per ton of NO_x reduced, \$36,000 per ton of VOCs reduced for stationary sources, and \$200,000 per weighted ton for mobile sources. SCE also appreciates the introduction of a health-based cost/benefit screening tool for NO_x reduction to compare the potential societal benefits of a regulation against the overall costs. However, SCE is still considering the implications of this option and the proposed threshold of \$325,000 per ton of NO_x reduced, and may offer additional feedback during the comment period for the Socioeconomic Report.

Environmental Justice Communities

SCE appreciates SCAQMD aligning its definition of Environmental Justice (EJ) Communities with the State's Disadvantaged Communities (DAC) definition and updating its charts and calculations for consistency. However, the DAC definition on p. 8-1 is not consistent with the SB 535 (May 2022) definition. SCE suggests the following edits to clarify this language and the basis for the presented calculations and maps.

"While there is no universal definition for what constitutes an EJ community, one that is commonly used is the Senate Bill (SB) 535 definition of disadvantaged communities (DACs). These are defined as:

1. "Census tracts receiving the highest 25 percent of overall scores in CalEnviroScreen 4.0 (1,984 tracts);
2. Census tracts lacking overall scores in CalEnviroScreen 4.0 due to data gaps, but receiving the highest 5 percent of CalEnviroScreen 4.0 cumulative pollution burden scores (19 tracts);

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3. Census tracts identified in the 2017 DAC designation as disadvantaged, regardless of their scores in CalEnviroScreen 4.0 (307 tracts); and
4. Lands under the control of federally recognized Tribes.”¹
~~the “25% highest scoring census tracts in CalEnviroScreen” along with “22 census tracts that score in the highest 5% of CalEnviroScreen’s Pollution Burden, but do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data.” All calculations and maps in this section that refer to EJ communities are consistent with this updated definition. The map of disadvantaged communities as defined by SB 535 that are within the Basin and the Coachella Valley is presented in Figure 8-1.”~~

Conclusion

SCE thanks SCAQMD for its consideration of the above comments. We look forward to reviewing the Draft Final AQMP when it is released later this year. If you have any questions or would like to discuss these issues, please contact me (via telephone or at Dawn.Anaiscourt@sce.com) or Bethmarie Quiambao at Bethmarie.Quiambao@sce.com.

/s/

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