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*Comment Received From: Jason Maruca
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City of Burbank Comments

Additional submitted attachment is included below.



**WATER AND
POWER**

October 20, 2025

California Energy Commission
715 P Street
Sacramento, CA 95814

RE: RPS Eligibility Guidebook, Tenth Edition, CEC Docket #21-RPS-02

Dear CEC Commissioners and Commission Staff,

Burbank Water and Power (BWP) is a publicly owned utility serving more than 52,000 metered customers and over 103,000 residents in the City of Burbank. Our City Council has adopted a goal of achieving a 100% zero-carbon power supply by 2040—five years ahead of California’s statewide mandate.

We appreciate our strong working relationship with the California Energy Commission (CEC) staff. However, we have concerns about the Draft Renewable Portfolio Standard (RPS) Eligibility Guidebook not designating hydrogen derived with renewable power as RPS eligible.

BWP is pursuing an “all the above approach” to meeting the state’s climate goals. Hydrogen derived from renewable power (also known as green hydrogen) offers several advantages. It can provide dispatchable baseload power when other renewable resources (such as wind and solar) are not providing power. Green hydrogen also has the ability to provide critical in-basin generation, which is essential for grid reliability, especially if transmission lines are inoperable.

Finally, green hydrogen provides a pathway for utilities such as BWP to repurpose natural gas facilities. BWP operates the Magnolia Power Project (MPP), a 320 megawatt (MW) combined-cycle natural gas plant, on behalf of the Southern California Public Power Authority (SCPPA). MPP provides in-basin baseload power to BWP and five other SCPPA members. BWP is studying how to convert MPP as well as Lake One, a 45 MW natural gas peaker plant.

Utility ratepayers have made substantial investments in natural gas facilities. Supporting a transition to green hydrogen would protect ratepayer affordability by ensuring these assets remain valuable rather than becoming stranded.

For these reasons, we respectfully urge the CEC to reconsider its position and recognize hydrogen derived from renewable power as RPS-eligible. Additionally, we believe the CEC should include zero-carbon resources as RPS-eligible. Doing so will support local utilities like BWP in advancing California’s clean energy transition while maintaining the reliability and resiliency our communities depend upon.

Burbank Water and Power