

DOCKETED

Docket Number:	18-IEPR-05
Project Title:	Climate Adaptation and Resiliency
TN #:	224915
Document Title:	Climate Adaptation and SMUD Comments on August 30, 2018 Workshop
Description:	N/A
Filer:	System
Organization:	SMUD/William Westerfield
Submitter Role:	Public Agency
Submission Date:	10/8/2018 3:54:04 PM
Docketed Date:	10/8/2018

Comment Received From: William Westerfield
Submitted On: 10/8/2018
Docket Number: 18-IEPR-05

Climate Adaptation and SMUD Comments on August 30, 2018 Workshop

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Additional submitted attachment is included below.

**STATE OF CALIFORNIA
BEFORE THE CALIFORNIA ENERGY COMMISSION**

In the matter of:)	Docket No. 18-IEPR-05
)	
Climate Adaptation and Resiliency)	Climate Adaptation and
)	SMUD Comments on
)	August 30, 2018 Workshop
)	
)	October 8, 2018

**Comments of the Sacramento Municipal Utility District
On Lead Commissioner Research Workshop on Climate Related Risks to
California’s Energy System and the Fourth Climate Change Assessment**

SMUD appreciates the opportunity to participate in the August 30th research workshop and to comment on the studies related to expected changes in weather-related extreme events. The Energy Commission performs a critical public service with its central role in planning and executing California’s Climate Science Assessments and its continued support for the outstanding Cal-Adapt website and tools. California’s utilities and the customers we serve benefit greatly from your leadership and support for better understanding of the physical impacts of climate change that we all face.

SMUD is an active member and leader of the Capital Region Climate Readiness Collaborative¹ (CRC), a public-private partnership designed to promote greater resilience through cross-sector capacity building and coordination at the regional and local levels across El Dorado, Placer, Sacramento, Sutter, Yolo, and Yuba counties. The CRC is a member of the larger Alliance of Regional Collaboratives for Climate Action (ARCCA), which represents leading collaboratives from across California that strive to build regional resilience to climate impacts. Energy utilities, including SMUD, PG&E, SDG&E, SoCal Edison and LADWP, are involved in most of the regional collaboratives, a reflection of their importance to utility climate readiness efforts and the benefit utility participation provides to other collaborative members.

SMUD’s involvement in the CRC stems from our recognition that improvements to SMUD’s internal readiness will be of limited benefit if the communities we serve are not similarly prepared. The CRC’s goal is to help local leaders come together within and across sector and jurisdictional boundaries to share information and best practices, leverage efforts and resources, avoid duplication, identify critical needs, and develop

¹ <http://climatereadiness.info/>

funding strategies to address the challenges of drought, extreme heat, extreme weather events, and wildfires influenced by a changing climate.

The CRC is one of seven formally organized and independently funded regional climate collaboratives in California which collectively address more than 80% of the state's population. In addition to the Capital Region, these collaboratives serve Los Angeles, San Diego, the Central Coast, the San Francisco Bay Area, the Sierra Nevada and the North Coast.² Two additional regional collaboratives are in the process of forming in the San Joaquin Valley and the Inland Empire. Regional organization in preparation for Climate Change is appropriate, as projected impacts span jurisdictional boundaries and most local governments in California lack sufficient resources to tackle these challenges alone. The collaboratives are relatively new, having formed within the last five years as awareness of the need to simultaneously mitigate greenhouse gas (GHG) emissions and adapt to projected changes has grown.

CRC and other regional organizations have been recognized by multiple state agencies as valuable sources of information about regional priorities and links to adaptation work on the ground at the local level. They are well positioned to continue to develop and assist in the execution of California's Climate Strategy because of their regional, cross-sector, and multi-disciplinary membership and approach.

Studies on Climate Adaptation and Preparedness

In preparation for the August 30th workshop, SMUD was asked to review and provide comment on multiple studies funded by the CEC, one of which is entitled "The Adaptation Blind Spot."³ This exploratory study, published by the CEC as part of the Fourth Climate Assessment, used a focus group exercise in Los Angeles to understand the interconnectedness of the electrical grid to upstream disruptions and downstream "community lifelines" (e.g., water, transportation, communications, public health systems) that depend on the grid. We anticipated that this study would not only address traditional emergency response planning, but also the challenging and significant institutional and cultural obstacles to climate adaptation that have been commonly experienced by organizations leading on these issues. The study does address these issues, and contains multiple suggestions for policy changes, pilot projects and exercises to address the gaps. However, we find that the study did not acknowledge past efforts to implement similar exercises, nor the current opportunities offered by the

² <http://arccacalifornia.org/>

³ Moser, S.C. and J.F. Hart, 2018, The Adaptation Blindspot: Teleconnected and Cascading Impacts of Climate Change in the Electrical Grid and Lifelines of Los Angeles. California's Fourth Climate Change Assessment, California Energy Commission. Publication number: CCA4-CEC-2018-008.

regional climate collaboratives. SMUD offered information on those efforts in our comments at the workshop, and now offers further thoughts below.

CEC- CaLEAP (2012-2013) and the California Adaptation Planning Guide

In 2012 and 2013, the Energy Commission gave local governments the opportunity to participate in its Local Energy Assurance Plans (CaLEAP⁴) project. CaLEAP designed an “all hazards” approach to build public and private partnerships and identify critical community assets and dependencies. SMUD participated in the initial meetings to discuss a Sacramento County project. Unfortunately, this effort failed to materialize due to constrained staff resources in the multiple agencies.

Around this time, the state published the California Adaptation Planning Guide⁵, which outlined a detailed and robust process for adaptation strategy development. The Guide emphasized regional approaches and the involvement of cross-sector, multi-disciplinary teams to improve outcomes. The Guide also addressed the importance of including distant impacts with local effects and addressing the sensitivities of dependent “Lifeline Utility Systems” (water, wastewater, fuel, communication systems, etc.). The ‘Adaptation Blindspot’ study would have benefited from acknowledging the content and intent of the Guide, including its use of language and terminology that would likely have been more familiar and less confusing to its LA participants.

Recommendations

The “landscape” of climate adaptation in California should include the continued growth and evolution of the regional climate collaboratives, with expanded partners and new regions becoming organized. As SMUD is invested and highly involved in our regional collaborative, we found it surprising that the Adaptation Blind Spot study did not include a discussion of ARCCA and member collaboratives. In our view, the paper would have benefited from addressing ARCCA’s Principles of Adaptation and Collaboration⁶ and the realm of activities actively pursued by the regional collaboratives.

We also recommend that additional research funds available to the CEC should be allocated to applied topics in the broad category of “institutional transformation” surrounding climate response.

⁴ <http://www.caleap.org/index.php>

⁵ http://resources.ca.gov/docs/climate/01APG_Planning_for_Adaptive_Communities.pdf

⁶ <http://arccacalifornia.org/about/>

Specifically, we recommend future research to:

- Investigate specific obstacles that hindered past efforts, such as CaLEAP, and identify realistic options to help either overcome them or make them more transparent, so that they can be revisited as conditions change;
- Prioritize lists of suggested climate adaptation measures for cost-effectiveness, likely difficulty, political feasibility, and level of impact;
- Identify integrated solutions that can engage multiple funding streams and produce multiple co-benefits, while encouraging political and market transformations required to make such integration the norm;
- Support issues identified by the growing network of climate adaptation professionals in the regional collaboratives. ARCCA is a source of expert input on future research proposals.

As an example of policies that support climate adaptation work, the passage of SB 1072 (Levy, Statutes of 2018) is intended to support regional climate collaboratives and drive greater engagement within the state's disadvantaged communities. The bill's proponents advocated that implementing this new law would provide an opportunity for expanded scope and funding for some or all of the regional collaboratives. Energy utilities will benefit from awareness of this effort, as it may alter their approaches to program development and delivery within frontline communities. It would be useful for the CEC to coordinate with the Strategic Growth Council to support this effort, monitor the implementation of SB 1072, and understand any new research questions or case study subjects that may result from it.

Additionally, during the workshop we shared information about the Living Future Project Accelerator⁷ that SMUD created last year with Arch Nexus and the International Living Future Institute (ILFI). Buildings certified by ILFI are regenerative, all-electric and fossil-free with onsite generation, onsite water treatment and a preference for locally sourced, non-toxic materials. Certification requires audited performance to the standards for one full year, not simply a good design that is slightly better than business-as-usual. These are structures intended to improve the health and productivity of their occupants and expand community resilience. Because of the rigorous review process necessary, and the breadth of the requirements, the complex process of designing, sourcing, permitting and constructing these advanced buildings highlights many of the cross-sector regulatory and market practices that can often hinder effective climate planning and response. Studying this process can uncover multiple regulatory, market and policy

⁷ <https://www.smud.org/en/Corporate/About-us/Research-and-Development/Living-Future-Project-Accelerator>

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hurdles –within utilities, local governments, special districts and the state—that would benefit from coordinated review and analysis.

We urge the Commission to leverage the presence in Sacramento of the Arch Nexus project and California’s first Certified Living Building, which is also the only Certified Adaptive Reuse project in the world. The results of the SMUD Living Future Project Accelerator, which will be posted soon⁸demonstrate strong desire within a segment of the development community to embrace the most ambitious response to climate challenges. Cultivating this ambition will inform policies that could reduce the cost of enabling technologies, expand knowledge of the benefits of regenerative design, reduce the overall cost of these structures and make them accessible to all Californians.

Thank you again for the opportunity to participate at the workshop and comment on the topics discussed.

/s/

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cc: Corporate Files (LEG 2018-0438)

⁸ The results of the project will be posted to smud.org