

# **NCPA Statement to CARB Regarding Wildfire Management CARB Board Meeting – December 17, 2015**

## ***FINAL***

### **Regarding 15-10-3: Public Hearing on the Cap-and-Trade Auction Proceeds Draft Second Investment Plan (Fiscal Years 2016-17 through 2018-19)**

NCPA appreciates this opportunity to offer our thoughts on the draft Second Investment Plan. For Board members not familiar with NCPA, NCPA is a Joint Powers Agency that has been actively involved in the development of the state's climate program. We represent 15 member systems in northern and central California, including 13 public power municipal utilities and one rural electric cooperative. Our members provide reliable and affordable electricity to approximately 600,000 Californians.

As a general matter, the Investment Plan goes a long way in meeting its objective to provide a useful set of recommendations for the state legislature as it considers during the FY17 budget cycle how to best allocate funds from the Greenhouse Gas Reduction Fund. However, NCPA is concerned that not enough emphasis (and potential funding) is being placed on critical wildfire prevention practices that protect the many electric generating facilities across the state that are presently helping California reduce its GHG emission profile and meet the state's climate goals. California will not meet its GHG emission reduction goals without a concerted, coordinated, and statewide effort to improve the approaches used to manage the forests and other wildlands and the assurance of adequate resources to prevent and fight these wildfires and avoid undue GHG emissions.

Without question, the proper preservation and management of natural lands will be crucial to California meeting its 2030 GHG target, as well as the continued safe and reliable delivery of renewable electricity resources located in forested areas. To the latter point, NCPA has first-hand experience about how California wildfires can impact renewable and/or carbon-free generation and their associated transmission facilities, as well as our employees.

Last September, the Valley Fire in Lake County burned more than 70,000 acres, releasing significant levels of GHG emissions into the atmosphere. In addition to having four of our employees actually lose their homes, the fire damaged several geothermal electric generation facilities as well as transmission lines at the Geysers, reducing the availability of clean, renewable energy to California consumers not to mention jeopardizing a highly-successful wastewater disposal mechanism for Lake County. With the aid of NCPA members who sent crews to Lake County to help, we were able to bring our geothermal plant operations back online with a week of the fire, but we lost the ability to generate approximately 9,400 megawatt hours of renewable power. However, our geothermal neighbors were not so fortunate. Five

of the 14 units operated by Calpine in the Geysers are still too damaged to operate and may be offline for several months if not longer, which reduces the availability of clean geothermal power to California consumers by about 100 megawatts.

The Butte Fire, which affected Amador and Calaveras Counties, emitted significant levels of GHG into the air while threatening to shut down and potentially destroy our 250 megawatt hydroelectric plant located in Calaveras County. Wildfires such as the Rim Fire in 2013 and the King Fire in 2014 are already having impacts on hydroelectric generation in California, producing hundreds of thousands of fire-ravaged acres of runoff each year, with the sediments from these fires finding their way into the various reservoirs that make up California's extensive system of hydroelectric resources. This can reduce hydroelectric generating capacity, a carbon-free resource that provides critical operational flexibility to a grid more reliant than ever on intermittent resources to meet the needs of the California economy.

Although these examples are specific to NCPA, the potential impacts and consequences are not unique to NCPA and its renewable electric generation and transmission facilities. The compound threats of greater GHG emissions from the fires themselves, coupled with the reduction in generation from renewable facilities and the need to replace that power with higher GHG-emitting resources impacts the entire state. NCPA has raised these concerns with the California utilities participating in the Joint Utility Group, and we understand that many of these utilities (including LADWP, SCPPA and SMUD) share our concerns. To that end, we support an appropriate allocation of revenues from the Greenhouse Gas Reduction Fund to the various agencies and programs that address wildfire prevention in California.

We hope you highlight this for the state legislature as it begins its FY2017 budget deliberations next month. Thank you for your time and consideration of our concerns.