



January 24, 2021

Paul Lau  
Chief Executive Officer and General Manager  
SMUD  
P.O. Box 15830  
Sacramento, CA 95852-0830  
VIA EMAIL

Re: Sacramento County Climate Action Plan

Dear Paul:

We represent several local environmental organizations involved in reviewing and providing feedback to Sacramento County on the drafts of its Climate Action Plan (CAP) published during 2021. We are informed the County is working on a new draft that will be released in early February. SMUD commented on the first draft of the CAP but did not comment on the September 2021 draft. This may be due to a recent departure of the staff person who provided prior comments. In any event, we strongly encourage SMUD to comment on the next draft of the CAP.

We applaud SMUD for its 2030 Zero Carbon Plan and appreciate SMUD's recognition of the urgent need for aggressive action to address climate change. We also recognize SMUD's ability to accomplish this plan is not guaranteed. We therefore are concerned the County's draft CAP relies too heavily upon SMUD's reductions and requires insufficient action by the County to reduce emissions.

However, insofar as the County plans to make SMUD a major component of its plan, we want to be sure the amount of reductions the County assumes will result from SMUD's transition to clean energy sources is accurate. To this end, we ask that SMUD review and provide feedback to the County on the assumptions it makes about SMUD in its CAP.

Specifically, we would like SMUD to verify the reduction of 1,855,433 metric tons of carbon dioxide (MTCO<sub>2e</sub>) by 2030 – the sum of 1,059,458 metric tons resulting from California Renewables Portfolio Standards and 852,975 metric tons resulting from SMUD's 2030 Clean Energy Vision and Zero Carbon Plan.

- The 1,855,433 metric tons is more than 50% of the original SMUD 1990 baseline of 3.5 MTCO<sub>2e</sub>, while the unincorporated population and number of households constitute only 38% of the total.
- Is 852,975 metric tons roughly the emission reductions SMUD anticipates will occur in the County if SMUD achieves its 2030 Zero Carbon goal?

In addition to verifying these numbers, we would appreciate your supporting documentation and calculations. We request this information be provided to the County as well as to our organizations.

The following is an excerpt from Chapter 1.2 Table 2 of the County's draft CAP showing the reductions described above.<sup>1</sup>

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<sup>1</sup> <https://planning.saccounty.net/PlansandProjectsIn-Progress/Documents/Climate%20Action%20Plan/Final%20Draft%20CAP%20and%20Appendices%20Sept%202021.pdf>

**Table 2: Legislation or Regional Policies Resulting in County GHG Emissions Reductions by 2030**

Policy	Description	GHG Emissions Reductions by 2030 (MT CO <sub>2e</sub> )
California Renewables Portfolio Standards	The RPS requires energy utility providers to procure 33 percent of electricity from renewable sources by 2020, 50 percent renewable by 2026, 60 percent renewable by 2030, and 100 percent zero-carbon by 2045.	1,059,458
SMUD 2030 Clean Energy Vision and 2030 Zero Carbon Plan.	Plan adopted in April 2021 outlining SMUD's strategy for region-wide electricity generation to be zero carbon by 2030 <sup>1</sup> .	852,975

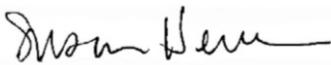
Also, we would like to ask SMUD to check the conversion factor the County is using to calculate GHG savings for replacement of gas appliances with electric. In CAP Measures GHG-04 – GHG-07, a natural gas reduction conversion factor of 0.00676 metric tons of carbon dioxide equivalent gas (MTCO<sub>2e</sub>) is used.<sup>2</sup> We believe the correct factor is the industry standard of 0.00531 and that by relying on the higher factor the CAP overestimates the conversion savings by 22%. We ask that SMUD check this factor and provide feedback to the County with a copy to our organizations.

Finally, we believe that more standardization of the climate action planning process would benefit jurisdictions in the Sacramento region and across the State, including emissions inventories provided to the jurisdictions by CARB, and checks on the climate action plans by the metropolitan planning organizations, air districts, and utility providers. Standardization would likely lead to more credible plans and a more level economic playing field for jurisdictions. We would like to ask SMUD to help in two ways:

- SMUD could develop and release electricity usage information by city and unincorporated county, perhaps even at a zipcode level. The information could include the number of residential households and commercial operations, together with average annual kWh use and whether the accounts are all-electric. For example, we know that some communities including Rancho Murieta, Wilton and Sheldon have no PG&E gas extensions. This information would be useful in addressing future electrification efforts and SMUD is in the best position to supply this information.
- SMUD could raise the issue of standardization with governmental and civic leaders, and if necessary, help to get state legislation passed to require it.

Thank you very much for your help. We look forward to communicating with you further about these issues.

Sincerely,



Susan Herre  
President, Environmental Council  
of Sacramento



Barbara Leary  
Chair, Sierra Club-Sacramento  
Group

cc:  
Brandon Rose, Ward 1, Board  
President  
Nancy Bui-Thompson, Ward 2  
Gregg Fishman, Ward 3  
Rosanna Herber, Ward 4  
Rob Kerth, Ward 5  
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Heidi Sanborn, Ward 7, Board  
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Oscar Balaguer  
Cap Team Co-Chair, 350  
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Jill Peterson  
Local Issues Lead, Citizens'  
Climate Lobby

<sup>2</sup> [Sacramento County Climate Plan, Appendix 4.1](#). The emissions factor is listed under “Calculation Assumptions” for GHG-04 through GHG-7 measures.