



April 4, 2023

Senate Transportation & Energy Committee
Colorado General Assembly
200 E. Colfax Avenue
Denver, CO 80203

Re: SB23-198 Clean Energy Plans

Dear Members of the Senate Transportation & Energy Committee:

My name is Ann Sutton, living in Westminster CO. This testimony represents the Support of the League of Women Voters of Colorado (LWVCO) for the bill to expand and define various entities in the electricity supply chain that are now required to submit Clean Energy Plans that will achieve clean energy targets. The bill appears to be filling gaps in the supply chain for which greenhouse gas emissions may not be adequately accounted and providing descriptions of resources and activities intended to reach clean energy targets.

In 2019 LWVCO supported the Climate Action Plan to Reduce Pollution that sets statewide greenhouse gas (GHG) reduction goals relative to 2005 statewide levels and requires the Air Quality Control Commission to adopt rules and regulations for statewide GHG reduction.

According to the *Colorado Greenhouse Gas Pollution Reduction* roadmap (2021) the 2005 baseline GHG emissions for the electricity generation sector were about 40 million metric tons of CO2 equivalents.

“Electricity generation emissions largely come from coal-fired power plants with a small portion from fossil methane gas-fired power plants. Achieving the 2030 goals will rely on deep reductions in pollution from electricity generation by continuing the transition to renewable energy....”

Coal plant retirements have contributed to progress in emissions reductions in the sector.

LWVCO supports the environmentally sound use of energy resources, with consideration of the entire cycle of energy production and action by appropriate levels of government to encourage the use of renewable resources through mandatory standards.

We encourage the collaborative approaches by the AQCC and PUC in addressing the urgent need for carbon-free electricity generation. We thank the sponsors for bringing this timely initiative to the legislature and the Committee for its careful consideration.

Sincerely,

A handwritten signature in blue ink that reads "Ann Sutton". The signature is written in a cursive style and is placed on a light blue rectangular background.

Ann Sutton Volunteer Lobbyist
League of Women Voters of Colorado
1410 Grant Street, Suite B-204
Denver, CO 80203

Senate Transportation & Energy

04/05/2023 01:30 PM

SB23-198 Clean Energy Plans

Typed Text of Testimony Submitted

Name, Position, Representing	Typed Text of Testimony
Katherine McCardwell For themselves	<p>I am writing in support of this bill because, as I understand it, it provides actionable benchmarks for entities along the way as they work toward their 2030 targets. Climate change is such a great threat to us, our kids (I have 2 young ones, and I worry what kind of world they will have when they are adults), and our planet as a whole, so it's imperative that we do everything we can to meet or even improve upon our 2030 goals. I believe that this bill lends itself to that success.</p>
Lauren Hafford For themselves	<p>I wholeheartedly support this bill! I'm a resident of Longmont, and I'm a mechanical engineer working with regenerative farmers who are rebuilding soil and sequestering carbon on large-scale farms in the CO Eastern Plains, managing thousands of acres each. I have been an E2 member since 2018.</p> <p>Colorado is a regional leader in the clean energy economy thanks in large part to strategic policy leadership over the last few years. At the end of 2021, there were over 61,000 full-time clean energy jobs in Colorado. The state's clean energy economy has been resilient and robust in the face of crushing economy-wide pressures during the pandemic. This bill will also support more good jobs in the clean economy.</p> <p>My utility is affected by this bill. Even though the upcoming massive global energy transition is going to have bumps and hurdles, it's going to be worth it. I'm so excited to live in a world with less pollution, less emissions, cleaner air, water, etc. SB23-198 sets up great guideposts to make sure that the utilities don't procrastinate until 2030 to realize that they aren't on track to meet their targets. We all need structure and guidelines - I do, my kids do, and utilities do too. Progress checks and transparent Plan verification are both needed to make sure we don't miss our targets in 2030.</p>



March 29, 2023

CREC Supports SB 23-198 – Clean Energy Plans

Dear Bill Sponsors:

Senator: Faith Winter and Representative: Mike Weissman; and the

Senate Transportation & Energy Committee Members:

Senators: Kevin Priola, Lisa Cutter, Tony Exum, Sonya Jaquez Lewis, Byron Pelton, and Cleave Simpson:

Thanks to the sponsors for bringing forth SB23-198: Clean Energy Plans. The Colorado Renewable Energy Society Policy Committee is pleased to support this bill and encourage its adoption.

CREC represents hundreds of Coloradans from many walks of life who are concerned about our state's future. We believe this bill represents a very important step forward.

While Colorado has adopted aggressive goals to reduce greenhouse gas emissions, a goal is of little value without a concrete plan for implementation. This bill requires that in addition to the 2030 targets, clean energy plans must also reach interim targets to ensure that reductions in greenhouse gases are occurring at the needed levels.

We believe SB23-198 will greatly increase the chances that Colorado's clean energy goals can actually be met, and hope you will support this measure.

Thanks for your consideration,

Sincerely,

Rebecca Cantwell and Vincent Calvano

For the Colorado Renewable Energy Society Policy Committee

Dear Chair and Committee Members,

I am Rebecca Curry, a Policy Counsel with Earthjustice. I ask for your support on SB-198.

SB- 198 will improve Clean Energy Plans submitted to the Public Utilities Commission in four ways. First, as Colorado's utility landscape changes, this bill will help ensure that the utilities sector maintains its critical role in meeting Colorado's climate and greenhouse gas emission goals. To reach Colorado's goal of a 50% reduction in greenhouse gas emissions by 2030, the state must hold *all* utilities accountable for their part in emissions reductions. Since the passage of House Bill 21-1266, there have been major changes to the Colorado utilities sector. In the coming years, new, independent utilities will form, and this bill will require these utilities to file Clean Energy Plans that support their GHG reductions.

Second, SB-198 will improve GHG emission accounting by requiring wholesale power marketers and owners of large greenhouse gas-emitting generating units to file Clean Energy Plans. For example, a loophole created by HB21-1266 resulted in 200,000 tons of CO₂ pollution from the Comanche 3 coal unit that went unaccounted for in Holy Cross Energy's Clean Energy Plan. This bill would remedy such gaps by holding the owners of such polluting plants accountable. Colorado is currently off-track for meeting statewide climate goals, and major sources of greenhouse gas emissions cannot go unchecked.

Third, SB-198 will improve transparency and procedural clarity in Clean Energy Plan processes. This bill will require the Air Pollution Control Division to issue a report on Clean Energy Plan coverage that identifies possible gaps in utility submission. The bill also clarifies procedural and substantive requirements for the verification of Clean Energy Plans by requiring that data be made publicly available and requiring minimum levels of public involvement. By the end of 2027, a progress check will ensure utilities are on track to implement their plans and reduce emissions.

Fourth, SB-198 will improve equity by tracking the impacts of power generation on disproportionately impacted communities. This bill will require the Air Pollution Control Division to provide a map of generation resources responsible for emissions overlaid with disproportionately impacted communities. The location of greenhouse gas-emitting electric plants can result in environmental and health inequities in disproportionately impacted communities. For example, at gas-fired power plants, gas combustion generates nitrogen oxides that increase asthma risk and aggravate chronic obstructive pulmonary disease. Nitrogen oxides also react with other chemicals in the air to form particulate matter and ozone, which result in health impacts like asthma attacks and heart problems. Given these impacts, mapping generation sources alongside disproportionately impacted communities will help ensure that environmental justice is being pursued as the state moved towards its greenhouse gas goals.

In sum, SB 198 will improve the tracking of emissions in the utilities sector, and it will improve accountability within the sector. These are much-needed steps if Colorado is to meet its climate goals while addressing equity. Please vote yes.