



October 15, 2020

To: East Bay Community Energy Board Members

cc: EBCE Community Advisory Committee, Brilliant 100 Cities; Hayward, Albany & Piedmont

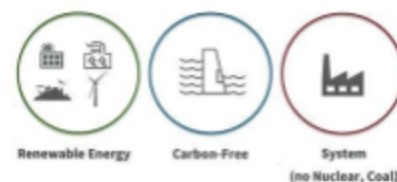
Subject: Keep EBCE's Brilliant 100, Nuclear Free

Dear EBCE Board of Directors,

East Bay Clean Power Alliance urges you to honor the Community's call to reject any proposal that would add nuclear energy to EBCE's power content label, including a proposal that would extend the life of the "Brilliant 100" product by accepting nuclear energy from PG&E's Diablo Canyon power plant. If the Board decides it is essential to continue a third product there are other options that staff could explore and present for the Board's consideration that would not endanger the public's opinion of EBCE.

In 2014 the Alliance began advocating with the support of Supervisor Scott Haggerty for the formation of an East Bay Community Choice program that would prioritize local clean energy resources to bring economic as well as environmental benefits to our communities in addition to other benefits like affordability. From the beginning of negotiations, it was assumed that this agency would promote renewable energy resources and not include coal or nuclear in its power mix. That assumption was still operating in January of 2018 as the Board worked to establish customer product options, power supply, and rates for the new agency.

EBCE Supply Options



EBCE Staff Presentation,
January 17, 2018

When the EBCE Board decided to reject PG&E's offer of nuclear energy in April of this year, it stood with eight of eleven Community Choice programs in PG&E's territory--a 75% rejection of

PG&E's nuclear energy offer. As a result of public outcry, several agencies went so far as to establish a policy banning nuclear energy as a possible power source.

COMMUNITY CHOICE AGENCY ACTION: PG&E 2020 NUCLEAR ENERGY			
REJECTED NUCLEAR	% OF PG&E OFFER	ACCEPTED NUCLEAR	% OF PG&E OFFER
<ul style="list-style-type: none"> East Bay Community Energy Sonoma Clean Power CleanPowerSF* MCE Clean Energy Peninsula Clean Energy Valley Clean Energy Monterey Bay Community Power* (Central Coast Community Energy) Redwood Coast Energy Authority* 	<ul style="list-style-type: none"> 18.5 7.5 9.3 15.7 10.7 2.0 9.4 1.9 	<ul style="list-style-type: none"> Silicon Valley Clean Energy Pioneer Community Energy San Jose Clean Energy 	<ul style="list-style-type: none"> 11.6 3.4 9.8
TOTAL	75%	TOTAL	25%
<p>* Signifies policy opposing nuclear energy</p> <p>The 75% rejection of PG&E's nuclear offer meant PG&E was able to dump only 5% of Diablo Canyon 2020 nuclear energy production on Community Choice agencies.</p>			

The Alliance has previously submitted a letter and fact sheet as to why nuclear energy has no place in EBCE's power mix. Below we have summarized the arguments as to why nuclear should not be included in EBCE's power supply as a means of extending the Brilliant 100 product and offer suggestions of alternatives for a third product that would be cleaner than Bright Choice and on rate parity with PG&E.

No Nuclear in Brilliant 100

- Reversing the Board's position to reject nuclear in April in order to maintain Brilliant 100 would amount to a violation of public trust and mar public confidence in East Bay Community Energy, especially after having heard overwhelming opposition to EBCE accepting PG&E's nuclear energy.

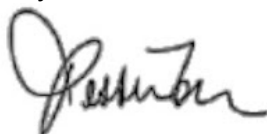
- Accepting nuclear to continue Brilliant 100, even if it is only used in a single product and for some cities in EBCE, adds PG&E's nuclear energy to EBCE's overall power mix. That nuclear energy would show up on EBCE's power content label at percentages much higher than the 1% nuclear in Bright Choice, which is an incidental part of power coming from asset controlling supplier (ACS).
- Accepting nuclear energy from PG&E's Diablo Canyon Nuclear Power Plant does not decrease California GHG emissions; that "carbon-free" electricity is generated at a constant level and is always
- placed on the grid. If EBCE "takes" electricity from Diablo Canyon, it is only an accounting shift from PG&E to EBCE. It will not increase the amount of carbon-free electricity available in the state nor off-set any additional GHG emissions.
- Because accepting the nuclear allocation would reduce EBCE's need to purchase other GHG free energy for Brilliant 100 it could result in a statewide increase in GHG emissions.
- Cities subscribing to a Brilliant 100 product does not reduce local emissions and therefore does not improve local health in Alameda County cities or in Tracy. Local GHG emissions in Hayward, Albany and any other Brilliant 100 city would remain the same.
- Cities that switch from **Brilliant 100** to **Bright Choice** will not increase local emissions, because EBCE would not be contracting with local power plants, such as the Russell City power plant in Hayward to provide the gas-fired power; it would come from the grid.
- There are other, less controversial ways to extend the ability of cities to access a third product such as **Brilliant 100** that should be presented by staff for Board consideration.

(in lbs CO ₂ e/MW)		Energy Resources	Renewable 100	Third Product	Bright Choice	CA Total Mix
City	State Average	Eligible Renewables ¹	100.0%	36.0%	41.0%	22.0%
	672	Biomass & biowaste	0.0%	0.0%	0.0%	3.0%
		Geothermal	0.0%	0.0%	0.0%	4.0%
		Eligible hydroelectric	0.0%	0.0%	0.0%	1.0%
		Solar	50.0%	33.0%	75.0%	6.0%
		Wind	50.0%	0.0%	0.0%	8.0%
		Coal	0.0%	0.0%	0.0%	6.0%
		Large Hydroelectric	0.0%	0.0%		5.0%
		Natural Gas	0.0%	0.0%	0.0%	44.0%
		Nuclear	0.0%	64.0%	0.0%	9.0%
		Other	0.0%	0.0%	0.0%	0.0%
		Unspecified Electricity ²	0.0%	0.0%		14.0%
		TOTAL	100.0%	100.0%	100.0%	100.0%
Retired as a percentage of these electricity portfolios' retail sales:			0%	0%	0%	0%
Credits issued for renewable generation. Unbundled renewable energy credits (RECs) represent renewable investments that are not reflected in the power mix or GHG emissions intensities above. The eligible renewable content is determined using a different methodology.						

At the EBCE Executive Committee meeting on September 25, staff estimated that it would cost **\$3 million to subsidize Brilliant 100 at rate parity with PG&E** for those accounts currently enrolled. Given that the EBCE Board approved a **Rate Stabilization Fund** in September, funded by a portion of the net position from last fiscal year, couldn't \$3 million from that fund be utilized to keep the Brilliant 100 product at rate parity with PG&E and avoid the damage to EBCE's reputation of including nuclear? We have heard Board members request the staff to present other options as well, such as a third product at rate parity with PG&E, that was higher GHG free content than Bright Choice.

Finally, as our Alliance has pointed out many times, nuclear energy does nothing to advance the goals of EBCE to create good jobs, stimulate local economies, provide clean, safe, and local renewable energy. In this time of increasing climate emergencies and power shut offs it becomes ever more urgent to address local energy resiliency as well. Only local solar, wind and battery storage, along with programs to reduce energy waste, such as those described in EBCE's Local Development Business Plan, can move us forward towards a sustainable and equitable future.

Sincerely,



Jessica Tovar, East Bay Clean Power Alliance