

Proposed Public Participation Process for CPS Energy Resource Planning

Meaningful, inclusive and timely public participation is needed to develop a resource plan that has the support of and reflects the values of the San Antonio community, including appropriate response to the climate crisis.

TIMELY

- The public process should start before any proposals have been developed (as soon as the idea of developing a resource plan is discussed).
- A regular schedule of resource planning updates would help everyone know when to expect this process to initiate.
- The public should be notified when the process starts and at critical junctures. A proposed timeline for the process should be published.
- For now, we would like to start immediately, since CPS Energy's Flexible Path plan was developed without any meaningful public participation and fails to address community concerns about the climate crisis, air pollution, water pollution or affordability.

MEANINGFUL

- Meaningful public participation requires that members of the public are able to have detailed, two way conversations with CPS staff about modeling assumptions, scenarios, confidence intervals of projected economic outcomes, and environmental outcomes.
- We suggest that a City Council-appointed working group be formed and that bi-weekly meetings be scheduled over several months to share information and ideas, evaluate modeling results, and make recommendations. These meetings should include opportunities for public comment from those not on the working group. Meeting agendas and minutes, as well as other resources shared with the working group should be posted on a public website.

INCLUSIVE

- Public events with ample opportunity for anyone who wishes to share their views will be important to get buy-in from the community. CPS Energy staff should provide a basic overview of the process, as well as some current information about the costs of various energy resources.
- Events should be held around the city at times that enable working people to attend (evenings and weekends).
- Public comments should be recorded and specific requests for information should receive a public response whenever possible.

For more information or questions, please contact Kaiba White (kwhite@citizen.org, 607-339-9854) and Chrissy Mann (chrissy.mann@sierraclub.org, 512-413-8346).

- CPS Energy has started holding some public input sessions over the past year, but has failed to respond to the ideas presented by the public at those sessions. The timing and location of those sessions has also not been conducive to broad participation.

Integrated Resource Planning for Investor Owned Utilities Outside of Texas

- IOUs operating across the country typically have to submit an Integrated Resource Plan (IRP) for approval by a state Public Utility Commission or governing body.
- The IRP functions to create accountability and transparency in the resource planning of a utility for the captured customer base.
- An IRP process should identify the lowest practical costs at which a utility can deliver reliable energy services to its customers and can incorporate policy goals into the analysis. Alternatives should be evaluated. Data should be presented.
- Select Examples:
 - In New Mexico, for example, Xcel Energy’s most recent plan identifies the most reasonable cost-effective resource portfolio to meet all applicable regulatory requirements and to supply the energy needs of New Mexico customers during the 2019-2038 Planning Period (“Planning Period”); and provides an Action Plan discussing 2018 IRP implementation from 2019-2022 (“Action Plan Period”).
 - In Colorado, Xcel proposed the Colorado Energy Plan,¹ which secures low-cost power for customers while adding significant renewable energy resources and retiring dirty coal. Importantly, this occurred as the result of diverse stakeholders participating in a formal planning process (Electric Resource Plan²) in Colorado. Stakeholders were able to challenge utility assumptions and propose solutions. This resulted in the utility and stakeholders joining together to support Xcel’s Colorado Energy Plan.
 - In North Carolina, Duke Energy is required to submit integrated resource plans for approval through a Public Utility Commission (PUC) process that allows for public comment and the PUC can open up a hearing process for stakeholder participation³.

Why compare CPS to Investor owned utilities (IOUs)?

- CPS considers the utility is being run as an IOU, not necessarily as a community asset.⁴
- CPS Energy, like an IOU, has a monopoly and a service territory that does not allow for choice of electric providers.

¹<https://www.xcelenergy.com/staticfiles/xe-responsive/Company/Rates%20&%20Regulations/Resource%20Plans/CO-Energy-Plan-Fact-Sheet.pdf>

² <https://www.xcelenergy.com/staticfiles/xe/PDF/Attachment%20AKJ-1.pdf>

³

<https://www.utilitydive.com/news/duke-defends-irp-as-greens-push-north-carolina-regulators-to-reassess/550112/>

⁴ “We are running this utility like any other [investor-owned utility],” Gold-Williams said in a July 26 interview at the Rivard Report office. “It is the same.”

<https://therivardreport.com/what-san-antonios-top-utility-officials-make-and-what-it-says-about-energy-and-water/>.

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