



**POSEIDON SURFSIDE**

a Poseidon Water company



February 27, 2017

Chairman Felicia Marcus  
California State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814

***Re: Public Comment on Climate Change Resolution No. 2017-***

Dear Chairman Marcus:

I am writing to respectfully request an amendment to the State Water Board's draft Climate Change Resolution that would promote increased access to renewable energy for water treatment and conveyance facilities including seawater desalination plants.

As a leader in the industry, Poseidon has voluntarily committed to offsetting 100% of the proposed Huntington Beach Desalination Plant's direct and indirect GHG emissions from the electricity grid through either the purchase of renewable power or the purchase of carbon offsets. While the reverse osmosis process to be used by Poseidon's seawater desalination facility does not emit greenhouse gases, electricity purchased from the grid may incur a carbon footprint for which Poseidon has developed a protocol for identifying, securing, monitoring and updating measures to eliminate GHG impact. While Poseidon is proud of our unprecedented commitment, more can be done with help from the state.

State requirements that regulated utilities generate 50 percent of their electricity from renewable energy sources by 2030 create both opportunities and challenges for matching supply and demand. The procurement of renewable power for water facilities is currently a challenging prospect given current regulations and limited direct access. With legislative support, renewable powered water infrastructure would improve water supply diversification, reduce greenhouse gas emissions, and support energy grid stability.

Water treatment facilities like seawater desalination plants are ideal for utilizing renewable power sources given their ability to match energy consumption with intermittent renewable generation. For example, treatment facilities can operate at full capacity during hours of solar generation. By incorporating water reservoirs, storage tanks, and smart grid planning with facility design, the water industry is poised to take full advantage of the environmental benefits of renewable power, including potentially lower energy costs.

Furthermore, as more solar power is developed, California is faced with a worsening "duck curve" which describes an oversupply of solar generation during

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17011 Beach Blvd., Suite 900 Huntington Beach, California 92647 Phone: (714) 596-7946 Fax: (714) 596-7947  
[www.poseidonwater.com](http://www.poseidonwater.com)

the day and a power supply deficit in the evening. This mismatch in supply and demand compels more carbon intensive conventional power to ramp up generation to overcome this deficit. By acting as "water batteries", water treatment facilities will be able to store the inherent energy used in water production and thus shift power demand away from energy grid supply challenges.

A legislative solution focused on the nexus between the development of water and renewable power projects that will help accomplish the state's goals of reducing greenhouse gases and diversifying water supplies strained by years of drought. Towards this end, Poseidon recommends the State Water Board include the following directive in the final Climate Change Resolution:

**I. Reduce Greenhouse Gas Emissions**

**F. Renewable Energy Legislation**

**6. Direct the State Water Resource Control Board staff to work with the state legislature and the water industry to develop and introduce legislation that would provide direct and affordable access to renewable power that reduces the GHG emissions associated with the treatment, conveyance and storage of drinking water.**

A Climate Change Resolution that includes the aforementioned language around renewable powered water infrastructure will provide the framework needed for the public and private sectors to combine renewable power projects with water infrastructure and allow the State to accomplish its goals of reducing greenhouse gases and diversifying water supplies that have been, and will continue to be, constrained by climate change-induced drought.

We applaud the California State Water Board for working on the Climate Change Resolution in the face of California's growing population and water scarcity.

We respectfully urge you to take our proposed amendment into consideration. Thank you for your consideration.

Sincerely,



Scott Maloni  
*Poseidon Water Vice President*

**CC: Frances Spivy-Weber  
Tam M. Doduc  
Steven Moore  
Dorene D'Adamo**