

Amendment 1: Clarifying language about Carbon Free Goal

Change A: On page 2, under the “Executive Summary” edit the first check mark line to read:

“ ✓ Continued progress and clear commitment to an industry-leading goal of 100% carbon-free energy by 2035.”

Change B: make the same change to the Summary on Page 60.

“ ✓ Continued progress and clear commitment to an industry-leading goal of 100% carbon-free energy by 2035.”

Amendment 2: Related to Local Air Quality and Non-Attainment

Change A: On Page 2, Add a new bullet point under “Current Risks” that states:

- Travis County is at risk of exceeding local air quality standards set by the U.S. Environmental Protection Agency — specifically for ozone. Exceeding this standard may put the county in “non-attainment.”

Change B: On page 15, under the “THE ERCOT Energy Landscape” section, just above the paragraph on “New Generation and Retirements in ERCOT”, add this language:

Local Air Quality and Non-Attainment

Travis County is close to exceeding local air quality standards set by the U.S. Environmental Protection Agency (EPA) — specifically for ozone. Some generation resources — like those burning natural gas — produce pollutants such as NOx. According to 2021 data from Air Central Texas, about 54% of NOx emissions come from vehicles, 26% from industrial facilities, and the remaining 19% come from a variety of smaller sources in the area.

Exceeding the ozone standard may put the county in “non-attainment,” requiring state and local governments to develop a plan to reduce levels. That plan would include strategies aimed at reducing emissions from major NOx sources like vehicles, industrial facilities, and generation resources.

NOx limits are built into the air permits for all existing and new generation. These are Federal Clean Air Act requirements enforced by the Texas Commission on Environmental Quality. To meet those limits, Austin Energy’s existing generators at Sand Hill and Decker have NOx emissions controls. For example, the Sand Hill peakers have selective catalytic reduction (SCR) technology to reduce those emissions by 80% to 95%. Also, support of electric vehicle adoption helps reduce the region’s largest source of NOx.

As Austin Energy looks to address the community’s energy needs, the utility will continue to factor air quality and risk of non-attainment into its operations and path forward.

Change C: On Page 19, under the “Generation Retirements” paragraph, add this language:

“They weren’t as efficient, and maintenance was an increasing challenge. Like a vintage car, parts weren’t always available, and repairs were expensive. It was time for these units to retire.

Air quality also factored into these retirement decisions. By taking the Decker steam units offline, Austin Energy removed its highest-emitting local sources of pollution from the area.”

Change D: On page 54, add language under the “Protect Local Air Quality Section”

“Protect Local Air Quality

Austin Energy works to minimize emissions from our local generating units and improve local air quality. For example, our existing units at Decker and Sand Hill have NOx emissions controls — with the Sand Hill peakers using Selective Catalytic Reduction (SCR) technology to reduce those emissions by 80% to 95%. Austin Energy will also assess the use of other pollution control technologies including combustion controls and low NOx burners. Austin Energy will use SCR technology on any new peakers, and we will continue to assess emerging pollution control technologies to further reduce local emissions. In addition, Austin Energy’s support of beneficial electrification and electric vehicle adoption will help further reduce NOx emissions. When taken together, these efforts have the possibility to create a net reduction in emissions while providing reliable and affordable power. We will also look for innovative partnerships and opportunities to support our progress in this area, including~~As part of these efforts, we will seek to leverage state and federal grant funding.”~~

Amendment 3: Related to Solar on City-owned Property

On Page 52, add language to the end of the “Prioritize Customer Energy Solutions.”

Prioritize Customer Energy Solutions

A holistic approach to addressing the need for local solutions begins with reducing or managing demand. As a public power utility, we are uniquely positioned to manage all sides of the supply and demand equation. Austin Energy exists to serve the community, and part of that service is making the most of DSM opportunities and benefits. Continuing from the previous resource generation plan, Austin Energy will continue to take the lead with other City departments to maximize DSM and load shifting opportunities within City of Austin operations. [The City of Austin commits to exploring how to maximize the siting of solar generation on City-owned land and properties where it makes environmental and economic sense.](#)

Amendment 4: Related to Guardrails

Change A: On Page 53, under the section “Additional, More Efficient, Natural Gas Peaker Units”, edit the following language at the end of that paragraph:

Once [For when](#) these new [additional](#) units are placed in service, Austin Energy will [develop and updated](#) guardrails to the operations of all peaker units to reduce the negative effects on the environment. More on this below. [These guardrails will be shared with the Council and EUC as updated.](#)

Change B: Also on page 54, under the “Develop Emissions Guardrails for All Peakers” add this language

“Once additional peaker units are placed in service, we will develop [updated](#) emissions limits for all peakers that will result in the strictest run time restrictions on the highest emitting units.”