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September 23, 2014

California Air Resources Board
Regulatory Assistance Section
Attention: Chris Gallenstein
505 Van Ness Avenue, 4th Floor
San Francisco, CA 94102-3298

Re: Comments of Marin Clean Energy Regarding California Compliance Plan for U.S. EPA Proposed Carbon Pollution Emissions Guidelines

Dear California Air Resources Board Staff:

On September 9, 2014, California Air Resources Board (or ARB) staff held a scoping meeting to discuss the U.S. EPA Proposed Carbon Pollution Emissions Guidelines for Existing Electric Utility Generating Units – 111(d). The presentation provided at this meeting identified items such as (i) increasing “zero and low-emitting power sources,” (ii) increasing “demand-side energy efficiency,” and (iii) continued implementation of the State’s Cap-and-Trade program as means towards reaching the greenhouse gas (or GHG) reduction requirements within these U.S. EPA guidelines.

Marin Clean Energy (MCE) supports leveraging all three of these means towards that objective, but also wishes to call ARB staff’s attention to the potential GHG-reducing impacts associated with green Community Choice Aggregators (or CCAs). As ARB staff drafts its statewide plan to comply with the U.S. EPA’s emission targets, MCE recommends staff include the facilitation of CCA formation and growth through the State of California as another means towards complying with these federal emissions mandates.

MCE is California’s first operational CCA and has been serving its customers since May 2010. Currently, MCE serves as the default electricity generation service provider throughout the County of Marin (including all cities and towns therein) and the City of Richmond. MCE continues to expand its service territory. MCE will begin providing its services to the County of Napa in February 2015

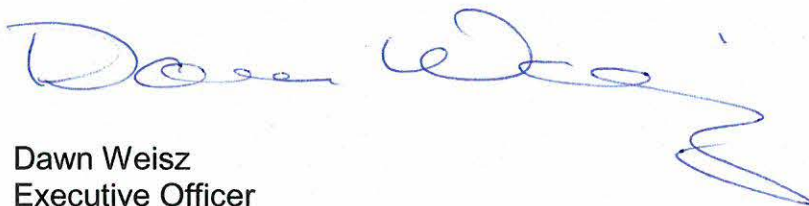
and the City of San Pablo in May 2015. Communities such as the City of Benicia and the City of El Cerrito are also taking formal steps to consider joining MCE's service territory in 2015.

MCE provides customers in its service territory with meaningful choices regarding where their electricity comes from. MCE offers its customers three different generation products beyond the basic electricity supply portfolio offered by the incumbent Investor-Owned Utility. MCE's products include: (i) Light Green – 50% renewable content electricity, (ii) Deep Green – 100% renewable content electricity, and (iii) Sol Shares – 100% local, solar electricity. MCE also offers uniquely innovative Energy Efficiency programs to all ratepayers within its service territory. Additionally, MCE is undertaking steps to provide enhanced Demand Response and Electric Vehicle programs to MCE's customers in the coming year. MCE is a green CCA dedicated to facilitating the reduction of GHG emissions throughout the communities that it serves by empowering its customers with greener electricity programs and choices.

In addition to MCE, Sonoma Clean Power (or SCP) has launched its green CCA service for the County of Sonoma in early 2014 with plans to enroll customers throughout its service territory in late 2014 and early 2015. The City of Lancaster has also taken formal steps towards forming its own green CCA to service its community, including submitting its Implementation Plan to the California Public Utilities Commission for review and certification.

Green CCAs are on the rise in California and they will continue to provide the State with targeted, effective means of reducing greenhouse gas emissions throughout the state. However, there are many barriers remaining that inhibit widespread adoption of green CCAs, and the State should take further decisive steps to facilitate the spread of green CCAs. When drafting the State's compliance plan, MCE urges ARB staff to recognize the need to support and facilitate the formation and growth of green CCAs throughout the State of California as an effective and strategic means towards complying with the U.S. EPA Proposed Carbon Pollution Emissions Guidelines.

Respectfully Submitted,



Dawn Weisz
Executive Officer