



**THE SOLAR  
ALLIANCE MEMBER  
COMPANIES**

American Solar Electric

Applied Materials

Borrego Solar

BP Solar

Conergy

Evergreen Solar

First Solar

FRV

Kyocera

Oerlikon Solar

Mainstream Energy

Mitsubishi Electric

Sanyo

Schott Solar

Sharp Solar

SolarCity

Solaria

Solar Power Partners

SolarWorld

SPG Solar

SunEdison

SunPower

SunRun

Suntech

Tioga Energy

Trinity Solar

UniRac

United Solar Ovonic

Xantrex

Ms. Mary Nichols, Chairwoman  
California Air Resources Board  
1001 I Street  
Sacramento, California, 95814

January 11, 2010

Dear Chairwoman Nichols:

On behalf of the Solar Alliance, I am writing to submit comments on the Preliminary Draft Regulation for a California Cap-and-Trade Program. The Solar Alliance<sup>1</sup> is a national association of solar photovoltaic manufacturers, integrators, and financiers dedicated to accelerating the deployment of solar electric power in the United States by promoting cost-effective state-based policies.

We applaud you and the Air Resources Board for your significant efforts in establishing the Preliminary Draft Regulations for a California Cap-and-Trade Program. Climate change regulation is a very complex topic with many variables, and your efforts in tackling these issues in a comprehensive way are to be commended. The Solar Alliance would specifically like to thank you for recommending an off-the-top carbon allowance allocation approach, that is the set aside and retirement of carbon allowances for voluntary purchases of renewable energy. We appreciate your recognition of this important issue as it reflects the role forward thinking businesses, governments and individuals can play in reducing carbon emissions.

Many organizations, households, farms, schools, local governments and businesses have installed on-site solar generation or purchased renewable electricity or renewable energy certificates as part of their social commitment to helping to reverse global warming. By

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<sup>1</sup> The comments contained in this filing represent the position of the Solar Alliance as an organization, but not necessarily the views of any particular member with respect to an issue.

administratively setting aside and retiring carbon allowances on their behalf to avoid double counting, these stakeholders will be encouraged to continue this socially responsible behavior and assist California in meeting its greenhouse gas reduction targets and renewable technology development goals. The voluntary renewable power market has been an important and growing driver of clean energy development in California.

With this set aside and retirement of allowances for voluntary renewable energy purchases, ARB will ensure that all renewable power generation delivers on its full promise to reduce emissions – not arbitrarily use some forms of renewable power investments to reduce compliance for other stakeholders. In this way cap-and-trade design can encourage all – individuals, business, government, schools and nonprofit actors – who choose to invest in clean renewable solar and wind energy to help the State meet its emission reduction goals. Again, thank you for your recognition and recommendation of this important policy within the California Cap-and-Trade Program.

Best Regards,

A handwritten signature in cursive script, appearing to read "Sara Birmingham".

Sara Birmingham

Director of Western Policy, The Solar Alliance