



Date: March 24, 2008

To: California Air Resources Board

From: Renewable Energy Marketers Association

Re: Early Action Workshop – Solicited Comments

Thank you for the ongoing opportunity to interact with the Board and submit comments on an “as needed” basis concerning the impact of AB 32 on the voluntary renewable energy market.

As you may be aware, the Renewable Energy Marketers Association (REMA) participated in the recent workshop held March 10, 2009 regarding early action. As part of your ongoing process, we are also aware that the Air Resources Board is soliciting additional comments as a follow up to that workshop. REMA has previously submitted comments to the CARB in reference to the Draft Scoping Plan (submitted August 1, 2008), with follow up comments on November 20, 2008.

The Renewable Energy Marketers Association (REMA) represents the collective interests of both for-profit and nonprofit organizations that sell or promote renewable energy products through voluntary markets, including renewable electricity and renewable energy certificates (RECs), to individuals, companies and institutions throughout North America.

Through out continuing conversations with CARB staff, we are aware of your plans to address one of our main concerns – the need to ensure that any cap-and-trade program supports the ability of voluntary renewable energy demand to reduce GHG emissions. To accomplish this objective, voluntary demand for renewable energy must result in either retirement of allowances or in lowering of the cap. Naturally, to be additional, emission reductions from voluntary sales should not be double-counted by both the customer and the utility.

With particular regard to early action and your current request for comments, in addition to our previous comments that we feel are germane to early action, we offer several observations and comments:

1. Early action can include the execution of long-term purchase agreement of renewable energy credits. To the extent that the intent of these voluntary purchases is the reduction of greenhouse gas emissions, we feel that the discussion regarding a set-aside mechanism for renewable energy is critical;
2. Early action can also include the installation of on-site renewable energy facilities. We believe that any early action protocols established by CARB should reward companies or individuals that installed these facilities before the implementation of the cap; and,

www.RenewableMarketers.org

Managed by SmartPower: 1120 Connecticut Avenue, NW Suite 1040, Washington, DC 20036

3Degrees • Bonneville Environmental Foundation • Community Energy • Conservation Services Group
Constellation NewEnergy • FPL Energy Power Marketing • Green Mountain Energy
Renewable Choice Energy • SmartPower • Sterling Planet • SunEdison
SunPower • Washington Gas Energy Services

3. The discussion of voluntary renewable energy markets has not been scheduled although, as we note, there are implications with regard to early action.

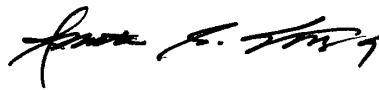
Therefore, for the above reasons and others, we respectfully request that the planned workshop to discuss set-aside mechanisms for renewable energy be scheduled as soon as practical in order for that discussion to inform other set-aside mechanisms currently being contemplated by the CARB.

Thank you for your dedication and hard work. We look forward to participating in the upcoming proceedings.

Respectfully Submitted,



Gabe Petlin, REMA President
Director, Regulatory Affairs & Carbon Markets
3Degrees
gpetlin@3degreesinc.com
(415) 595-1679



Jonathan Edwards, REMA Director
Vice President
SmartPower
jedwards@smartpower.org
(202) 775-2040

The views expressed by REMA in this letter do not necessarily represent the views of each individual member company.