

November 20, 2009

Ms. Mary Nichols, Chairman
Mr. James Goldstene, Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: 3Degrees Comments on RES Concept Outline

Dear Chairman Nichols and Executive Officer Goldstene:

I write to you on behalf of 3Degrees, a renewable energy credit (REC) and carbon offset provider headquartered in San Francisco. We would like to direct the Air Resources Board's (ARB) attention to the comments submitted by the Renewable Energy Marketers Association (REMA) and express our strong support of REMA's positions.

In summary of REMA's comments, 3Degrees advocates for the following:

- 3Degrees strongly supports the eligibility of unbundled RECs
- To prevent double-counting, voluntary purchases by end-use customers of renewable electricity or RECs should not be counted towards RES compliance.
- In relation to a federal RES, ARB should ensure that a federal REC is retired for every non-federal REC used to satisfy California's RES or to supply a voluntary renewable energy product.
- Measurement and tracking of progress should be based on MWh, not CO2
- All RECs should initially belong to the generators that created them

3Degrees appreciates the opportunity to comment and looks forward to working with the ARB during this accelerated rulemaking process.

Sincerely,



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