



Apple Valley Choice Energy

Clean Power Alliance

CleanPowerSF

Desert Community Energy

East Bay Community Energy  
Authority

Lancaster Choice Energy

MCE

Monterey Bay Community  
Power Authority

Peninsula Clean Energy

Pioneer Community Energy

PRIME

Redwood Coast Energy  
Authority

San Jose Clean Energy

Silicon Valley Clean Energy  
Authority

Sonoma Clean Power

Valley Clean Energy Alliance

March 23, 2018

California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**RE: Comments of California Community Choice Association on SB 350  
Integrated Resources Planning Workshop**

Dear California Air Resources Board Staff:

On March 2, 2018, the California Air Resources Board (ARB) staff held the SB 350 Integrated Resources Planning (IRP) Workshop. During this workshop, the ARB staff asked stakeholders to provide comments on Greenhouse Gas (GHG) target-setting process that involves coordination of the energy agencies.

As the trade association that represents California's community choice aggregators (CCA), CalCCA urges the ARB staff to take actions that adhere to the statutory authority SB 350 granted to the ARB. Specifically, Public Utilities Code Section 454.52(a)(1)(A) directs the ARB to establish GHG emissions reduction targets for Load Serving Entities (LSEs), in coordination with the energy agencies. CalCCA sees the ARB as the sole entity responsible for setting GHG emissions reduction targets, and has expressed this view repeatedly in its informal and formal comments at the CPUC.

While the ARB staff expressed that its five-year planning cycle may not sync with the CPUC's two-year IRP cycle, it is still imperative that the ARB set the requirements for LSEs. Aside from the legal obligation stated above, there are also practical implications that should motivate the ARB to set GHG emission targets. The ARB staff should ensure that the GHG targets are assigned and updated, and that each LSE's performance is measured against that target. The target-setting and the evaluation of LSE's planning and performance should be based on a singular and uniform methodology.

For instance, if the ARB staff believes that adopting a range for GHG emissions reduction is more consistent with its methodology of developing the overall GHG emissions target for the electricity sector, then each LSE should be apportioned a range instead of one single target within a range. From a practical perspective, it would create planning uncertainties for LSEs if there were two methodologies for GHG target-setting and two sets of targets. LSEs would be unable to determine whether compliance with one methodology and one set of targets would result in non-compliance with the other.

By defining a distinct methodology for GHG emissions target-setting, and apportioning the GHG planning targets to all LSEs, the ARB will meet its

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statutory responsibility set by SB 350. It would also streamline the planning and coordination process for SB 350 compliance, and provide the certainty LSEs need for their planning.

Sincerely,

Beth Vaughan  
Executive Director

