

November 19, 2021

Rajinder Sahota
Deputy Executive Officer for Climate Change and Research
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: 2022 Scoping Plan – Power Sector Scenario Inputs Technical Workshop

Dear Ms. Sahota,

I am writing on behalf of the following groups to provide comments in response to CARB's 2022 Scoping Plan Update workshop on the electricity sector.

Overall, we are pleased that all four scenarios under consideration achieve a power sector greenhouse gas (GHG) emissions target of 30 million metric tons (MMT) or lower by 2030. We encourage CARB to stick with the emissions targets in the draft scenarios and ensure that 30 MMT is the upper limit in the scenarios being considered in the scoping plan. These 2030 emissions targets are much more ambitious than current electric sector planning targets (30-53 MMT by 2030),¹ and we believe that a more aggressive 2030 emissions target for the electric sector will better enable California to achieve its economy-wide carbon neutrality goals. As a result, **we ask that 30 MMT be set as the upper bound when CARB establishes an updated GHG emissions range for the state's electric sector as part of the 2022 Scoping Plan Update.**

Sticking to a maximum 30 MMT target will drive procurement of renewable energy that strengthens California's economy, protects the environment, and reduces air pollution in California communities. We know that the most feasible and affordable path to achieve the zero-carbon electricity target in SB 100 is to rapidly decarbonize the grid and electrify other sectors. As electric loads increase, the pace at which California reduces the carbon intensity of its power mix will determine the pace of reductions across the economy. Thank you for considering our views on this element of the 2022 Scoping Plan Update.

Sincerely,

Erin Rodriguez
CA Policy Advocate
Union of Concerned Scientists

V. John White
Executive Director
Center for Energy Efficiency and Renewable Technology

Fran Pavley
Environmental Policy Director
USC Schwarzenegger Institute

Michael Colvin
Director Regulatory and Legislative Affairs, CA Energy Program
Environmental Defense Fund

Lauren Cullum
Policy Advocate
Sierra Club California

Ari Eisenstadt
Regenerate California Campaign Manager
California Environmental Justice Alliance

¹ CARB, *California's 2017 Climate Change Scoping Plan (November 2017)*, p. 31.
https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf

Tim McRae
Vice President, Energy & Environment
Silicon Valley Leadership Group

Mohit Chhabra
Senior Scientist, Climate & Clean Energy Program
Natural Resources Defense Council

Ameen Khan
Regulatory Affairs Advocate
California Environmental Voters

Sofi Magallon
Policy Advocate
Central Coast Alliance United for a Sustainable Economy

Faraz Rizvi
Special Projects Coordinator
Center for Community Action and Environmental Justice

Laura Deehan
State Director
Environment California Research and Policy Center