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Clerk of the Board
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

RE: Pacific Gas and Electric Supports the Foam Blowing Agents Offset Protocol

Pacific Gas and Electric Company (PG&E) understands that the American Carbon Registry (ACR) methodology "**Transition to Advanced Formulation Blowing Agents in Foam Manufacturing Use, Version 2.0**" has been recommended to be added to the list of approved methodologies for the creation of Air Resources Board Offset Credits (ARBOCs). PG&E supports this methodology, and recommends that ARB consider and approve this methodology in its upcoming rulemaking proceedings.

The benefits of this methodology include the following:

- The potentially significant volume of offsets that can be generated. To date, two projects have already registered over 100,000 voluntary offsets.
- The opportunity for foam manufacturing businesses located in California to reduce emissions in the state and in lower-income and disadvantaged communities.
- The ability to reduce fluorinated gases, which are short-lived climate pollutants (SLCPs).

In addition, the adoption of more high-quality ARB offset protocols is an important part of the process to continually improve the effectiveness of AB 32 and assist with the goal of meeting the 2030 GHG reduction targets set by the state of California.

Please feel free to contact me if you have any questions or concerns.

Sincerely,
Fariya Ali
Expert Representative, State Agency Relations
Pacific Gas and Electric Company