



The Climate Registry

California Air Resource Board
California Climate Investments
Re: Draft Revised 2018 Funding Guidelines
Submitted Electronically

May 15, 2018

Re: Responses of The Climate Registry (TCR) on Draft Revised 2018 Funding Guidelines and supplementary materials

To Whom It May Concern:

The Climate Registry (TCR) appreciates this opportunity to provide feedback on the Funding Guidelines for Agencies that Administer California Climate Investments (Funding Guidelines) and supplementary materials including Priority Population Benefit Criteria Tables, and Reporting Templates.

TCR supports the California Air Resources Board's (CARB's) efforts to streamline program implementation and provide flexibility for a variety of project types in the 2018 Funding Guidelines. TCR encourages CARB to ensure that the Funding Materials that support the Funding Guidelines also contribute to these flexibility goals, while helping agencies to meet statutory requirements and transparency needs.

About TCR:

TCR was launched in 2007 as a 501(c)(3) nonprofit organization to continue the work of the California Climate Action Registry, which the State of California created in 2001. Today, TCR operates the most rigorous voluntary GHG reporting program in North America and assists organizations in measuring, reporting and verifying corporate GHG inventories and sector-specific metrics.

In March of 2018, California's Environmental Protection Agency (CalEPA) selected TCR to design, develop, and maintain a statewide voluntary Water-Energy Nexus Registry. Participants will measure, report, and track their carbon footprints alongside water information detailing their annual extraction, consumption, delivery, storage, and/or treatment. The Water-Energy Nexus Registry will also support the definition of GHG emissions intensity metrics (e.g., metric tons GHG/AF of water) for specific aspects of California's water use cycle. TCR is available to answer any questions the CARB may have about ongoing program development.

Reducing GHG emissions in California's water system:

The water sector accounts for 12 percent of the state's overall energy demand, and is identified as key sector to achieve reductions in the 2017 Scoping Plan. However, currently insufficient data exists to understand the full emissions profile of California's water system. The Water-Energy Nexus Registry can be used as a tool for incentivizing broad water sector participation in achieving the State's 2030 emissions reductions targets by building capacity to understand the emissions associated with each process in water management and identifying opportunities for GHG emissions reductions. Carbon footprint reporting alone has proven to significantly reduce GHG emission through TCR's long-running voluntary GHG registry where, on average, members reduce their emissions by 20 percent over the first five years of reporting.

Water, energy, food, and ecosystems are inextricably linked. Prioritizing strategies that help understand and manage the emissions associated with California's water system provides the opportunity to achieve many co-benefits. Through reporting, water suppliers will gain the information they need to achieve and maintain emissions reductions in their long-term plans while delivering safe, reliable, and affordable water to all Californians.

Feedback on existing California Climate Investment Water-Energy programs and associated materials:

1. TCR encourages CARB and DWR to expand the existing Water-Energy Grant program to make additional water-energy nexus projects eligible for funding since incentivizing water suppliers to consider emissions reductions in their operations and planning will have long-term benefits for the state's water system infrastructure.

In 2016, only commercial and institutional facility types and residential projects benefiting disadvantaged communities were eligible for the Water-Energy Grant Program. However, the Water-Energy Grant program can encourage emissions tracking and reductions from the supplier perspective, by providing opportunities for smaller water agencies, those that serve priority populations, or those that have fewer opportunities to cost effectively reduce the emissions in their operations.

2. TCR encourages CARB and CalEPA to consider revising the "Water Use and Energy Efficiency Co-benefits Evaluation Criteria for Providing Benefits to Priority Populations" documentation to provide opportunities for water suppliers to communicate the co-benefits of their GHG reduction efforts.

For example, reducing the emissions profile of a water treatment facility or groundwater management operations may not occur within a half mile of a priority population, but can offer co-benefits to that population.

Conclusion:

Thank you again for this opportunity to provide comment. Please do not hesitate to contact me with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Peggy Kellen", with a long horizontal flourish extending to the right.

Peggy Kellen
Director of Policy