



August 7, 2015

AB 32 Implementation Group Comments CARB Renewables Symposium

The AB 32 Implementation Group is a coalition of employers and taxpayer groups advocating for policies to achieve greenhouse gas emission reductions in a manner that will protect jobs and the economy.

The AB 32 Implementation Group (AB 32 IG) is submitting these comments regarding the July 9th public symposium to discuss energy principles, renewable generation and clean energy as outlined by Governor Brown in his January 2015 inaugural speech.

The symposium demonstrated to us that the California Air Resources Board (CARB) is aggressively moving forward to reinforce and implement these 2030 energy efficiency goals without any consideration to the cost or job loss associated with these yet-to-be determined regulations.

While it is important, in concept, to include renewable energy policy goals for California's future, the AB 32 IG opposes *mandating* these principles that will be detrimental to California's business and consumers.

Current energy policies have significantly increased costs to ratepayers. California's industrial energy price per kilowatt hour is already fourth highest in the nation and 70 percent higher than the national average. Additionally, the state's energy efficiency standards are already currently among the strongest. Mandating upgrades to meet increased energy efficiency standards while increasing the cost of energy will make California businesses less competitive.

As you proceed with future symposiums that may influence climate change policies for the State, you should include experts that can speak to the additional real costs surrounding the expansion of our energy related programs.

It's easier to set ambitious goals than it is to achieve them without harmful and unintended consequences. Our best chance of making California the model for other states and countries on climate change is to make our California policies a success at the same time we plan for the years beyond 2020.

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California is staying the course on the reduction of greenhouse gas emissions and looking to increase its commitment while other nations are just starting out on their path to lower emissions. It would serve our interests to ensure that future goals are realistic and achievable and encourage others to catch up with California.

Should you have any questions or need anything further from us, please feel free to contact Shelly Sullivan at (916) 858-8686.