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Rajinder Sahota  
Chief, Industrial Strategies Division  
California Air Resources Board  
1001 "I" Street, Sacramento, CA 95814

Amber Mahone  
Energy and Environmental Economics  
44 Montgomery Street, Suite 1500  
San Francisco, CA 94104

**RE: Pacific Gas and Electric Comments on Public Workshop to Discuss Achieving Carbon Neutrality in California: A Report by E3**

Pacific Gas and Electric Company (PG&E) appreciates this opportunity to comment in response to the California Air Resources Board (CARB) Public Workshop on August 19, 2020, to discuss Energy and Environmental Economics (E3)'s Draft Report: Achieving Carbon Neutrality in California.

PG&E is deeply committed to California's bold vision for a sustainable energy future. We currently have one of the cleanest energy portfolios in the nation and strongly support the drive to transform our energy supply and scale-up clean energy solutions to reduce greenhouse gases. This transformation also must be sustainable, which means energy has to not only be low- or zero-carbon, at the same time it has to be reliable and affordable for the people of California.

To this end, we encourage E3 to publish the underlying summary cost estimates from its Pathways model for each of the three scenarios. While these estimates are highly uncertain – as any estimates of transforming the energy system through mid-century necessarily are – we believe publishing the model cost results, with appropriate disclaimers, would improve transparency and provide helpful information to stakeholders in assessing the scenarios, especially relative to one another. It would also be helpful to include more detail on the assumptions underlying the cost ranges for the advanced mitigation measures and negative emissions technologies needed to achieve the "last 20%" of emissions reductions.

We note that E3 has published summary scenario costs for its prior deep decarbonization studies using the Pathways model for both the CARB and the California Energy Commission, and we encourage E3 to follow that precedent here.

We appreciate CARB and E3 holding the public workshop to share the E3 study, and look forward to seeing additional details in the final report so stakeholders can better analyze and compare the results, especially as they relate to cost outcomes.

Thank you for the opportunity to provide these comments and we look forward to continued dialogue with E3 and CARB in future carbon neutrality discussions

Sincerely,

/s/

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