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November 4, 2019

David Mehl
Manager - Short-Lived Climate Pollutant Enforcement Section
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95828

Re: California Municipal Utilities Association's Support for the Draft Enforcement Policy Amendment for Renewable Procurement Standard Enforcement

Dear Mr. Mehl,

The California Municipal Utilities Association (CMUA) is pleased to offer its support for the draft amendment to California Air Resources Board's (CARB) Enforcement Policy for the Renewable Procurement Standard (RPS) for Publicly Owned Utilities (POUs).

CMUA is a statewide organization of local public agencies in California that provide electricity and water service to California consumers. CMUA membership includes publicly-owned electric utilities ("POUs") that operate electric distribution and transmission systems. In total, CMUA members provide approximately 25 percent of the electric load in California. California's POUs are committed to, and have a strong track record of, providing safe, reliable, affordable and sustainable electric service.

CMUA appreciates the approach that CARB staff and leadership has taken in developing this amendment. Throughout this process, CARB staff has provided stakeholders the opportunity to present concerns with the proposed policy via workshops and other stakeholder group meetings. CMUA members appreciate the open and transparent interaction CARB staff and leadership have facilitated. To this point, CMUA looks forward to continued discussions about locating Supplemental Environmental Projects within a POU's service territory.

The draft Enforcement Policy Amendment reflects an informed and cooperative policymaking process that addresses the bulk of CMUA member concerns.

Respectfully submitted,

/s/

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