



November 21, 2016

Richard Corey, Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Sonoma Clean Power Comments on Nov. 7, 2016 ARB AB 32 Scoping Plan Workshop

Dear Mr. Corey:

The Sonoma Clean Power Authority (SCPA)¹ submits these comments on the November 7, 2016 Air Resources Board (“ARB”) AB 32 Scoping Plan Workshop.² SCPA is a strong supporter of the State’s 2030 and 2050 GHG emission reduction targets. In addition to SCPA’s low carbon focus in energy procurement, SCPA is tackling vehicular emissions through its DriveEvergreen program,³ having as its goal the placement of 10,000 EVs in Sonoma County by 2020 and 100,000 by 2030. SCPA is also evaluating commercial and residential Zero Energy Building and end-use fuel switching programs, to encourage non-combustion technologies and electrification in buildings and in commercial and industrial processes within Sonoma County. SCPA is not alone; other existing Community Choice Aggregators (“CCAs”) are making similarly ambitious GHG reduction commitments. In addition to the five operational CCAs, we

¹ SCPA is a California joint powers authority operating a CCA program in Sonoma County. SCPA is the second operational CCA program in California, and currently serves about 198,000 accounts encompassing a population of approximately 450,000, which includes all of Sonoma County except for the City of Healdsburg, which has its own municipal utility. SCPA is governed by a nine-member Board of Directors comprised of appointees from the participating cities and the County of Sonoma. SCPA provides its customers with stable and competitive electric rates, providing a power portfolio with a higher renewable content (and lower greenhouse-gas emissions) than the incumbent utility. The reduction of greenhouse gas emissions in Sonoma County is one of the primary reasons for SCPA’s formation, under the joint powers agreement that formed SCPA. The electricity provided by SCPA to its customers exceeds the current Renewable Portfolio Standard requirements (supplied mainly by geothermal, wind, and photovoltaic sources), and almost 80% of the supply is from renewable or carbon free sources (such as large hydropower). SCPA has contracted for sufficient renewable sources to achieve 50% RPS in 2020, ten years ahead of the State’s requirements.

² See Nov. 7, 2016 ARB Staff Presentation, available at: <https://www.arb.ca.gov/cc/scopingplan/meetings/110716/scopingplanpresentation.pdf>

³ See Sonoma Clean Power Authority, DriveEvergreen website, available at: <http://sonomacleanpower.org/drive-evergreen/>

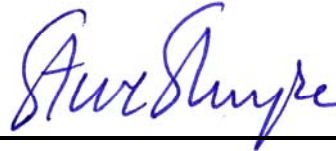
are aware of eight others scheduled to launch before 2020 and at least 20 others that are preparing feasibility studies.⁴

The purpose of this letter is to request that the January 2017 Draft Scoping Plan discuss CCAs and the current and potential role of the CCAs in meeting the 2030 targets. We also ask that the ARB not make final decisions on the three scenarios⁵ discussed at the November 7, 2016 workshop or in open rulemakings (e.g., the MRR and the Cap-and-Trade) without evaluating the significant positive role that CCAs can play in helping California meet its GHG reduction goals.

Finally, we do not believe this proceeding or other rulemakings should send signals to the regulated community that all policy choices will be locked in through 2030. These important public policies should be more dynamic, particularly in the energy sector. The 2030 climate change programs are a critical point in the State's history of being a climate leader. In light of the current political climate, California should both send a clear signal of its commitment to a low carbon future and provide certainty as to the general design of GHG reduction programs. The ARB should also balance the regulated community's desire for certainty with the ARB's statutory obligations under AB 32 to create programs that maximize emissions reductions and benefits for Californians.⁶ Working with the CCAs will help California meet those requirements. Sonoma Clean Power stands ready to do its part in achieving the State's climate goals, and we look forward to talking with you about how the State's GHG reduction programs can further the CCA's own goals.

Dated: November 21, 2016

Respectfully submitted,



Steven S. Shupe
General Counsel
Sonoma Clean Power Authority
50 Santa Rosa Avenue, Fifth Floor
Santa Rosa, California 95402
E-mail: sshupe@sonomacleanpower.org

⁴ See LEAN Energy US statistics: <http://www.leanenergyus.org/cca-by-state/california/>

⁵ See Nov. 7, 2016 ARB Staff Presentation, PDF P. 24, available at:
<https://www.arb.ca.gov/cc/scopingplan/meetings/110716/scopingplanpresentation.pdf>

⁶ Cal. Health and Safety Code Sec. 38562(b)(1).