November 4, 2016

California Air Resources Board

1001 I Street

Sacramento, CA 95814

**RE: Comments of Community Choice Aggregators Regarding the Proposal to Continue the RPS Adjustment after 2020**

Dear California Air Resources Board Staff:

On October 21, 2016, the California Air Resources Board (ARB) staff held the Mandatory Greenhouse Gas (GHG) Reporting and Cap-and-Trade Program Workshop. During this workshop, the ARB staff indicated that the RPS Adjustment will continue with the existing reporting and verification requirements after 2020.[[1]](#footnote-1)

The Community Choice Aggregators (CCAs) appreciate the ARB staff’s willingness to adjust the original proposal in response to stakeholder comments. The CCAs encourage the ARB staff to maintain this proposal and submit it for the ARB board approval in 2017. As expressed in the comments of CCAs on the proposed Cap-and-Trade regulations,[[2]](#footnote-2) the RPS Adjustment has been an important tool to support CCA procurement of cost-effective renewable energy products within California and throughout the Western United States. The growth of California CCAs with a renewable energy focus is possible because existing regulations provide CCAs with the flexibility to choose from different types of renewable products, each of which has different cost structures and economic development benefits.

By maintaining the RPS Adjustment, CCAs can continue to invest in supply portfolios that exceed the existing RPS procurement mandates. The RPS Adjustment will also allow more communities to consider and form CCAs, with the objective to provide more competitive clean energy options to consumers.

**Conclusion**

The CCAs thank the ARB staff for taking the time to review these comments. Should questions arise, please feel free to contact C.C. Song, Regulatory Analyst of MCE at csong@mcecleanenergy.org. The CCAs look forward to continue open dialogues with the ARB staff to create regulations that optimize the environmental and energy goals of California.

Sincerely,

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1. Mandatory GHG Reporting and Cap-and-Trade Program Workshop, slide 42. [↑](#footnote-ref-1)
2. Comments of CCAs at pages 2 and 4, submitted on September 19, 2016. [↑](#footnote-ref-2)