Golden State
Power Cooperative
The Power of Cooperatives
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May 14, 2018

Rajinder Sahota, Assistant Division Chief
Industrial Strategies Division
California Air Resources Board
1001 I Street
Sacramento, CA 95812

Re: Draft Staff Report on *Senate Bill 350 Integrated Resource Planning Electricity Sector Greenhouse Gas Planning Targets*

Dear Ms. Sahota:

The Golden State Power Cooperative (GSPC) appreciates the opportunity to provide CARB staff with these comments on the April 2018, Draft Staff Report: *Senate Bill 350 Integrated Resource Planning Electricity Sector Greenhouse Gas Planning Targets*.

GSPC supports the Draft Staff Report's recognition that 1.7% of the state's electricity sector greenhouse gas (GHG) emissions come from entities not required to prepare integrated resource plans (IRPs) under SB 350. As the Draft Staff Report recognizes, the legislature crafted specific parameters for the entities required to submit integrated resource plans. Specifically, Public Utilities Code section 454.52(e) provides that the IRP requirements apply to "an electrical cooperative, as defined in Section 2776, only if the electrical cooperative has an annual electrical demand exceeding 700 gigawatt hours (GWh), as determined on a three-year average commencing with January 1, 2013." GSPC represents electrical cooperatives that provide electric service to their member-customers living in rural communities that were previously unserved or underserved by for-profit investor-owned utilities. The cooperatives are owned and governed by local, member-elected boards selected from the communities they serve. Collectively, California's electric cooperatives serve just over 300 GWh of electricity in California, accounting for less than 0.1% of California's total electricity use, and all fall under the statutory threshold.

The legislature clearly intended to exclude entities below this threshold from the requirements set forth in Section 454.52. While the emissions associated with entities below this threshold are properly included in the total electricity sector-wide target, it is not necessary for an entity-specific target to be assigned to them. GSPC appreciates the Draft Staff Report's explicit recognition of the differences between the various electrical distribution utilities (EDUs), and the fact that entities below the statutory threshold do not have an IRP filing requirement and therefore do not require a GHG planning target. (Draft Staff Report, p. 25) The express exclusion of these smaller entities from the IRP requirements recognizes the administrative burden on these entities associated with the preparation of the IRPs, and the fact that their total load represents a *de minimus* share of the total sector wide emissions. These entities are still required to comply with a broad range for programs and measures that make certain their ongoing procurement planning takes into account total GHG emissions, ensuring that they are not exempted from playing a vital role in helping the state meet its GHG reduction targets. Accordingly, the Draft Staff Report correctly refrains from assigning entity-specific targets to these entities.

Respectfully submitted,

C. Susie Berlin

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