



CALPINE CORPORATION

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April 29, 2022

Rajinder Sahota
Deputy Executive Officer, Climate Change & Research
California Air Resources Board

Re: Comments on the 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop

Calpine Corporation (Calpine) appreciates this opportunity to provide comments in response to the California Air Resources Board (CARB) 2022 Scoping Plan Update: Initial Air Quality & Health Impacts and Economic Analyses Results Workshop held on April 20, 2022. The workshop provided helpful analysis on the impacts on the state's health and wealth in a decarbonized future. However, one element of the Scoping Plan process would still benefit from further clarification.

While Calpine understands why the alternatives that CARB developed and analyzed are not optimized, this lack of economy-wide optimization has potentially perverse outcomes. In particular, all of the alternatives rely extensively on carbon dioxide removal (CDR) while still allowing for significant emissions from unabated gas generation in the electricity sector. This result is perverse because it is generally acknowledged that the cost of deploying carbon capture and storage (CCS) to reduce emissions in the electricity sector is significantly lower than the cost of CDR.

Calpine appreciates staff's acknowledgement that models such as PATHWAYS are imperfect and cannot predict the future. Consequently, Calpine encourages staff to give greater consideration to the application of CCS to the electricity sector in the final Scoping Plan, especially in light of extensive reliance on more expensive CDR in the modeling results.

Calpine appreciates the opportunity to provide input on the Initial Scoping Plan Modeling Results and looks forward to ongoing engagement with CARB and all stakeholders throughout the 2022 Scoping Plan Update process, particularly with respect to the electricity sector.

Sincerely,

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