



November 23, 2020

Rajinder Sahota
California Air Resources Board
1001 I Street
Sacramento, CA 95812

Submitted online

Re: *American Wind Energy Association (AWEA) California Comments on Senate Bill 350 Integrated Resource planning Electricity Sector Greenhouse Gas Planning Targets: Draft 2020 Update.*

Dear Ms. Sahota:

AWEA-California provides the following comments in response to the California Air Resources Board's ("ARB") release of the Draft 2020 update to the IRP targets captioned above ("Draft 2020 IRP Target Update").

AWEA-California is a project of the American Wind Energy Association, representing companies that develop, own, and operate utility-scale wind, solar, storage, offshore wind, and transmission assets. Our focus is on driving immediate and sustained development of new utility-scale renewable energy capacity to propel California toward a carbon-free electric future. In January of 2021, AWEA will merge with a new organization to become the American Clean Power Association.

AWEA-California is filing these comments in the California ARB's Cap-and-Trade rulemaking as well, due to the intersection of these two proceedings. AWEA-California strongly supports the ARB's efforts to fight climate change, however we are deeply concerned by the ARB's proposal to adopt a Draft 2020 IRP Target Range that would guide electricity-sector planning without reflecting the SB 100 targets. In order to maintain consistency with existing State law and recent determinations by the ARB regarding the need to accelerate renewable energy and clean capacity procurement, we strongly encourage the ARB to finalize the IRP Target Updates to include a statewide range of 44 – 30 MMTCO_{2e}.

The adoption of the IRP targets is a critical decision point in the state's progress towards deep decarbonization. In a November 19, 2020 presentation to the Board, the ARB staff concludes that it is "imperative to act now" and that one of the "Immediate Least Regret Actions" is to "[a]ccelerate zero-carbon electricity goals in SB 100.¹ The adoption of the IRP target range is an integral decision point in the state's pathway to SB 100. As set forth in Section

¹ See ARB Staff Presentation at November 19, 2020 Board Meeting, *California's Greenhouse Gas Goals and Deep Decarbonization*, at slide 16, available at: <https://ww3.arb.ca.gov/board/books/2020/111920/20-12-5pres.pdf>.



454.52 of the California Public Utilities Code, the CPUC relies on the target range in establishing IRP filing requirements and setting planning standards that will enable the utilities to “procure at least 60 percent eligible renewable energy resources by December 31, 2020.” In other words, the IRP filing requirements will in turn establish the planning necessary to set the state on a near term trajectory that meets longer term decarbonization goals. The proposal to adopt an IRP Target Range that would not achieve the SB 100 targets is inconsistent with the ARB’s own findings and should be rectified as a matter of policy and law. In order to maintain consistency with existing state law, the ARB must modify the IRP Targets to set a 44 – 30 MMTCO_{2e} range.

California has long relied on the transition to renewable energy as a cornerstone of our greenhouse gas reduction strategy. A 2020 report from the Legislative Analyst’s Office cited the electricity sector as a primary driver of greenhouse gas emission reductions, with annual emissions from the sector declining by about 40 million metric tons (40%) over the last decade.² As the State continues to lean on electrification strategies to reduce greenhouse gas emissions from the building and transportation sectors, it will be critical to set appropriate planning targets. We therefore urge the Air Resources Board to consider much more aggressive greenhouse gas reduction targets to initiate accelerated action to achieve 100% clean energy for the State.

Respectfully submitted,

/s/

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² Petek, Gabriel. Legislative Analyst’s Office. Assessing California’s Climate Policies – Electricity Generation. January 2020. <https://lao.ca.gov/Publications/Report/4131>.