

Sarah Skikne
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Honorable Mary Nichols
Chair, California Air Resource Board
1001 I Street
Sacramento, CA 95814

November 20, 2008

Dear Chair Nichols and Honorable members of the Board,

Thank you for the opportunity to comment on the Proposed AB32 Scoping Plan on behalf of The Climate Group.

We are an international NGO that works with over 50 of the world's most influential corporations and governments, including corporations based in California, the city of Los Angeles, and the State of California itself. Our goal is to accelerate the transition to a low-carbon, prosperous future.

California should continue leading on climate action by adopting robust climate policy in December, which will not only allow, but encourage the growth of California's economy. In particular, we support the use of market-based incentives and a cap-and-trade program that encourage innovation. Our corporate members appreciate cost-saving and energy efficiency measures that protect them from volatile energy prices and allow their businesses to thrive.

Leading businesses have already taken advantage of the economic benefits of climate action in California. As described in our publication *Business Guide to the Low Carbon Economy: California*, any business can make cost effective energy use and emissions reductions. For example:

- Cenveo Anderson Lithograph makes \$90,000 per month by selling electricity produced at their clean cogeneration facility to Southern California Edison.
- Fresh & Easy's stores, which were designed with help from Savings By Design, are 30% more energy efficient, and therefore save them 30% on energy costs, compared to the average supermarket.
- British Telecommunications utilized California Solar Initiative rebates to help fund an on-site solar installation at their US headquarters in El Segundo, which will guarantee its electricity supply at a predictable and affordable price.

The adoption of a strong Scoping Plan in December will provide all California businesses with the certainty they need to make such impressive actions an everyday part of business strategy. We urge the state of California to establish a strong regulatory framework for emissions reductions, lead the nation and set an example for other regions around the world.

Thank you for your consideration of our remarks and for your work on this comprehensive plan. We look forward to continuing to be involved in the AB32 process.

Sincerely,



Sarah Skikne

Corporate Research Analyst
The Climate Group