

To: CARB Staff

From: UCS, NRDC, CalWEA, CEC, CCA, CEERT, EDF, CRS, Environmental CA, Breathe California, Sierra Club California

Subject: Draft Scoping Plan comments on 33 percent RPS by 2020

The undersigned organizations thank the California Air Resources Board (CARB) for the opportunity to comment on the preliminary recommendations within the AB 32 draft scoping plan. Together, we represent the interests of millions of Californians who support strong state and federal policies to significantly reduce greenhouse gas (GHG) emissions in California and the United States. We applaud the draft scoping plan's endorsement of the 33 percent by 2020 statewide Renewables Portfolio Standard (RPS), and strongly urge CARB to keep the 33 percent RPS in the final AB 32 scoping plan.

The passage of AB 32 underscores the need for policy measures that will provide substantial in-state GHG reductions. A 33 percent by 2020 RPS is not only consistent with our AB 32 goal, but will bring significant co-benefits to the state. These benefits include reducing air pollutants that harm public health, solidifying California's role as a leader in renewable energy development, invigorating the state's booming clean tech investment community, and creating a new source of "green collar" jobs. A 33 percent by 2020 RPS will also put the electricity sector on the path to achieving the much deeper emission reductions required beyond 2020.

While a GHG cap-and-trade program may encourage some additional investment in renewable resources, a higher RPS mandate is essential to drive the changes in government policy, utility practices, and capital-intensive investments that are necessary to overcome the transmission, siting, and other market barriers to developing renewable energy in the state. In addition, a 33 percent RPS will provide a clear and long-term signal to the financial community to continue supporting infrastructure investments that will significantly increase the amount of renewable generation serving California. For these same reasons, it is also essential that the percent RPS obligation on retail sellers be firm, and not subject to reductions through any cap and trade program. Achieving much higher levels of renewables will not happen organically – it requires a firm RPS policy mandate.

The draft scoping plan's endorsement of the 33 percent by 2020 RPS is also entirely consistent with California's existing policy goals. In 2005, the Energy Action Plan II (EAP II) reinforced the Governor's stated goal of achieving 33 percent of electricity sales from renewable energy by 2020.¹ Similarly, the California Public Utilities Commission (CPUC) instructed the state's three investor-owned utilities to identify planning decisions that must be made within their 2006 long-term procurement plans to achieve 33 percent renewables by 2020.² Since then, the California Energy Commission (CEC), the CPUC, the California Independent System Operator (CAISO), and several federal agencies have undertaken studies and workshops to resolve the transmission, permitting, and grid reliability issues that must be overcome to achieve significantly higher levels of renewable energy.

¹ See CEC/CPUC Energy Action Plan II, September 21, 2005, p. 6.

² See CPUC Scoping Ruling for R.06-02-013, September 25, 2006, p. 20.

We acknowledge that reaching a 33 percent renewable energy goal by 2020 is a challenge that will require unprecedented coordination among state agencies, policymakers, and stakeholders. The undersigned organizations are working diligently with these parties to identify and overcome the barriers to increasing renewable energy in California. We are working with the Legislature to establish effective 33 percent RPS legislation that will benefit California consumers, stimulate economic activity within the state, and help California to achieve the goals of AB 32.

We commend CARB for its leadership in advancing clean energy to meet the goals of AB 32, and strongly support the inclusion of a 33 percent RPS in the final scoping plan.

Sincerely,

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