

August 18, 2016



www.cacommunityenergy.org

To: Senate President Pro Temp De Leon

From: California Alliance for Community Energy

Re: Oppose AB 1110

I'm writing on behalf of the California Alliance for Community Energy, a coalition of organizations, initiatives, and individuals that supports and defends Community Choice energy programs in California.

The Alliance joins with the operating Community Choice energy programs in California to urge you to oppose AB 1110, a bill that purports to initiate a transparent process for reporting Greenhouse Gas (GHG) emissions by retail energy suppliers throughout the State.

The Alliance's primary concern is that the AB 1110 will not result in an accurate accounting of GHG emissions from electricity sales. For instance, roof-top solar, a growing source of GHG-free electricity in the State's supply will not be counted. Both nuclear energy and natural gas have GHG emissions associated with their production and fuel transportation, which will not be counted.

The accounting requirements described above in AB 1110 will inflate GHG emission totals in some cases and undercount GHG emissions in others. In both situations the reporting is biased in favor of investor-owned utilities and against Community Choice energy programs.

Furthermore, the bill does not describe a process for determining GHG emissions that is transparent. The bill is convoluted in describing what energy can be counted and what can't. The process for determining the GHG emissions for each source of electricity is left up to two regulatory agencies, the California Energy Commission and the California Air Resource Board, without the opportunity for stakeholder input.

The California Alliance for Community Energy agrees that an accurate and consistent method for reporting GHG emissions is essential, both for transparency in reporting to customers and for gauging our progress in reducing California's GHG emissions. A process this important should not be decided at the last minute of the legislative session with so little time for the public to weigh in.

The California Alliance for Community Energy strongly opposes AB 1110, and urges you to vote no.

Sincerely,

A handwritten signature in black ink that reads "Al Weinrub". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Al Weinrub
Coordinator, California Alliance for Community Energy