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REC Group comment to SB 100 Joint Agency Draft Report

Additional submitted attachment is included below.

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SOLAR'S MOST TRUSTED

December 18, 2020

California Energy Commission
Docket No. 19-SB-100
1516 Ninth Street
Sacramento, CA 95814

RE: Docket 19-SB-100 – SB 100 Joint Agency Draft Report

REC Group ("REC") appreciates the opportunity to submit comments on the SB 100 Draft Report that was presented at the December 4, 2020, Joint Agency Workshop. REC Group is encouraged by the leadership of the California Energy Commission (CEC), California Air Resources Board (CARB), and California Public Utilities Commission in crafting the first iteration of Joint Agency Report and supports California's tremendous effort to achieve 100% renewable electricity by 2045.

REC is a Norwegian-headquartered, international pioneering solar energy company. Founded in Norway in 1996, REC employs 2,000 people and has an annual solar panel capacity of 1.8 GW. REC has its headquarters in Norway, operational headquarters in Singapore, and regional offices in North America, Europe, and Asia-Pacific. Through its California-headquartered subsidiary, REC Americas LLC, REC has been active in the California market since 2010. In 2015, REC was the number one supplier of solar PV modules into the California residential market and REC typically ranks among the top ten suppliers to the residential segment in the State of California in any given year. In addition to manufacturing high-quality solar PV modules, REC also produces ultra-low carbon polysilicon at its hydro-powered production facility in Norway.

To achieve SB 100's clean energy goals by 2045, California may need as much as 67 GW of utility-scale solar, as well as 39 GW of customer solar installation.[1] This extraordinary build-out will have a significant climate protection impact, but as all solar is not created equal, it could offer far more benefit. Climate emissions of the solar supply chain should be considered as part of the clean energy transition.

As much as 400 million tons of additional CO2E emissions could be saved by using ultra low carbon solar in California's SB 100 buildout. These emission savings would at little or no additional cost. We, and other manufacturers along the solar supply chain are working to drive down climate emissions through efficient manufacturing and by relying on renewable energy to power their production processes. Recognizing these advances would send a powerful market signal to all solar stakeholders to reduce supply chain emissions. As carbon emissions linger in the atmosphere for years, CO2E eliminated from the supply chain will have a greater benefit per ton than emissions avoided over the life span of generating equipment. The opportunity to achieve these significant emissions reductions may be lost unless California's climate programs make avoiding supply-chain carbon emissions an explicit priority.

We encourage the Joint Agencies to consider opportunities to reduce the carbon embodied in supply chains in future iterations of the SB 100 report, particularly through the use of ultra-low

[1] SB 100 Joint Agency Report: Charting a path to a 100% Clean Energy Future

carbon solar. We also encourage CARB to consider opportunities to reduce supply chain emissions in its upcoming AB 32 Scoping Plan process.

Thank you for your consideration of these comments. We look forward to continuing to work with CEC, CARB, and CPUC in their efforts to implement SB 100 and make progress toward California's clean and equitable energy transition.

Sincerely,

Cary Hayes

President
REC Americas LLC