

## DOCKETED

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**Comments on Docket No. 16-OIR-05, AB 1110 Implementation**

*Additional submitted attachment is included below.*



## Californians for Energy Choice

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California Energy Commission  
1516 Ninth Street, MS-29  
Sacramento, CA 95814-5512

Re: Docket No. 16-OIR-05, AB 1110 Implementation

Dear Commissioners,

I write on behalf of Californians for Energy Choice, a statewide coalition of organizations and stakeholders that has worked since 2010 to expand the adoption and installation of distributed clean renewable electricity generation and efficiency measures in California through ensuring that as many California communities as possible, as rapidly as possible, engage Community Choice Aggregation programs to achieve these objectives. Californians for Energy Choice worked diligently in 2015 and 2016 to ensure that AB 1110 (Ting - 2016) was amended and passed in a final form that serves this end.

We urge you to be fully comprehensive in establishing the most accurate, environmentally sound State rules possible on greenhouse gas emissions accounting and reporting. We also urge you to ensure that these rules empower clean energy and efficiency-based Community Choice Aggregation programs to rapidly emerge, thrive and grow, so that California can achieve the most rapid possible clean energy transition. Community Choice Aggregation is the most powerful tool in California law with which to achieve this transition and so must be carefully nurtured through this rulemaking process.

AB 1110 was passed to ensure accurate full lifecycle accounting to the public of the greenhouse gas impacts of all electricity provided to Californians. Consumers and communities must be provided with the clearest and most in-depth emissions analyses in order to make sound decisions about their electricity sources and use.

To serve this purpose, we ask that you incorporate the following criteria in your decisionmaking:

- 1) The Commission must engage a fully open and publicly accessible process, and all public input must be carefully and comprehensively considered before final rules are established.
- 2) The full lifecycle emissions of all electricity sources, storage methods, supply and delivery must be accounted for, including but not limited to:
  - a) all emissions associated with the manufacture, transport, construction, installation, operation, and maintenance of all devices, and power plant components, including the extraction and refining of all materials and fuels used - especially in regard to nuclear power sources which are often misrepresented as 'greenhouse gas free'
  - b) all emissions associated with the full lifecycle of natural gas-based electricity, including leaks, accidents and other fugitive releases of natural gas, as it is extracted, produced, transported and used for electricity generation
  - c) all emissions associated with manufacturing and installing new power transmission lines to deliver power from large centralized generation sources
  - d) all deforestation and other environmental carbon storage loss, and other emissions associated with clearing or disturbing land to make way for new facilities and transmission lines.
- 3) Because the California Renewable Portfolio Standard (RPS) does not include important low-carbon energy sources (for example, a great many rooftop solar panels are not counted toward the RPS), the RPS must therefore never be used as a shortcut or shorthand to establish greenhouse gas accounting or reporting standards. Direct measurement and analysis must be applied to all electricity sources.

- 4) Because electricity line loss can be as much as 15% and averages 5-6% when electricity is transported over long distance transmission lines, this loss must be accounted for by the Commission. In the case of fossil fuel generation, line loss triggers more fossil fuel burning, while line loss reduces the ability of cleaner sources to reach electricity users, thereby increasing the greenhouse gas intensity of all electricity delivered over long distances.
- 5) Black Carbon emitted through power generation must be treated as a greenhouse gas and factored into the standards to account for its recognized role in worsening global warming
- 6) Reductions in electricity use and/or load through IOU or Community Choice program funding of energy efficiency, demand response, storage and other technologies must be allowed to be accounted for in the full system accounting of the greenhouse gas emissions of all utilities and Community Choice Aggregators.
- 7) Because a comprehensive and trustworthy accounting of greenhouse gas emissions is fundamentally dependent on openly available data, the CEC must establish that no utility, Community Choice Aggregator, or other load-serving entity may obscure greenhouse gas emissions data by claiming it as "trade secrets" or "proprietary information."
- 8) Community Choice Aggregators are leading the way on clean, greenhouse gas free and renewable energy delivery in California. However, Investor Owned Utilities (IOUs) have superior market power and access to economies of scale, which makes it difficult for the much smaller Community Choice programs to compete with the IOUs. Therefore, in working out the timing for implementation of new greenhouse gas emissions standards, the CEC must be mindful of the needs of Community Choice programs to adjust to and adopt the new standards while remaining competitive. Decisions on AB 1110 implementation that would slow down the expansion of Community Choice could, in turn, slow down California's adoption of low-carbon electricity sources, which our state cannot afford.

Thank you, Commissioners, for your incorporation of these important factors in your rulemaking on greenhouse gas emissions accounting and reporting. Setting strong, accurate and supportive statewide standards is crucial to the rapid adoption of the lowest-carbon electricity sources and delivery that is possible in California.

Sincerely,

Eric Brooks, Co-Coordinator  
Californians for Energy Choice

