

Post-Workshop Comments of the Natural Resources Defense Council (NRDC)
on the
Implementation of SB 1368 Emission Performance Standard
Staff Issue Identification Paper

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The Natural Resources Defense Council (NRDC) appreciates the opportunity to offer additional comments on the California Energy Commission's (CEC) *Implementation of SB 1368 Emission Performance Standard* Staff Issue Identification Paper, Publication #CEC-700-2006-011 (Staff Paper), following the workshop held on the topic on December 8, 2006.

We again commend the CEC for the leadership role it has taken in establishing a statewide greenhouse gas (GHG) emission performance standard (EPS), which the Commission advanced as one of its primary recommendations in the 2005 *Integrated Energy Policy Report*. We strongly support the Commission's efforts to design and implement the EPS, which is an essential regulation that will protect Californians from the significant financial and reliability risks associated with additional investments in highly carbon-intensive generating technologies and help meet California's GHG reduction goals.

At the end of the December 8, 2006 workshop, Commissioner Byron and CEC staff requested follow-up comments on the issues discussed during the workshop by today, December 13, 2006. However, the California Public Utilities Commission (CPUC) just issued its Proposed Decision (PD) on their implementation of SB 1368 late this afternoon, and we have not yet had a chance to review its contents. Given that much of the discussion at the workshop focused on ensuring that the CEC's implementation of the EPS will be as consistent as possible with the CPUC's implementation of the EPS, we would like the opportunity to review the PD before submitting our post-workshop comments to the CEC. We plan to file our complete set of post-workshop comments, placing them in context with the details from the CPUC's PD, by Friday, December 15, 2006.