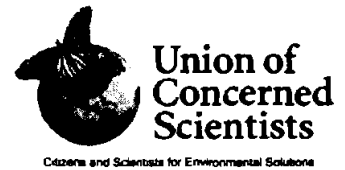




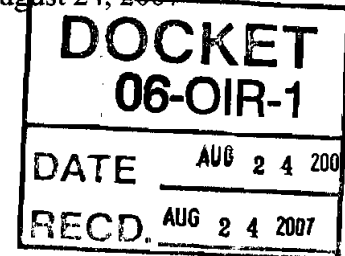
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ENVIRONMENTAL DEFENSE
finding the ways that work



Via E-Mail at DOCKET@energy.state.ca.us

Docket Unit
California Energy Commission
Docket No. 06-OIR-1
1516 Ninth Street, MS 4
Sacramento, California 95814-5512

August 24, 2007



Re: Docket No. 06-OIR-1 – Proposed Adoption of 15-day Language

Dear Commissioners,

The Center for Energy Efficiency and Renewable Technologies (CEERT), Environmental Defense (ED), the Natural Resources Defense Council (NRDC), Sierra Club California, and the Union of Concerned Scientists (UCS) appreciate this opportunity to provide our strong support of the California Energy Commission's (Commission or CEC) "Revisions to Proposed Regulations Establishing and Implementing a Greenhouse Gases Emission Performance Standard for Local Publicly Owned Electric Utilities" (15-day language, or proposed regulations), issued on August 10, 2007. We commend the Commission staff, the Electricity Committee, and all the stakeholders for working diligently together over the past several months to develop these proposed regulations. We believe that the revisions to the proposed regulations adequately address the concerns raised by the Office of Administrative Law's (OAL) June 29, 2007 disapproval decision, and that no additional changes are necessary.

NRDC is a non-profit membership organization, with more than 124,000 Californian members, with a long-standing interest in minimizing the societal costs and environmental impact of the reliable, affordable energy services that a healthy California economy needs. UCS is a leading science-based non-profit working for a healthy environment and a safer world. Its Clean Energy Program examines the benefits and costs of the country's energy use and promotes energy solutions that are sustainable both environmentally and economically. ED is a leading national nonprofit organization representing more than 500,000 members. Since 1967, ED has linked science, economics and law to create innovative, equitable and cost-effective solutions to society's most urgent environmental problems. The Sierra Club is a non-profit, member-supported, public interest organization that promotes the conservation of our natural environment by influencing public policy decisions. Sierra Club California lobbies the State Legislature, the Administration, and state government agencies to protect California's natural resources and to improve the health and safety of Californians. CEERT is a coalition

of environmental organizations, renewable energy developers, and energy efficiency and ultra-clean distributed generation providers who share the policy goal of improving air quality in the electric generation sector in California through increased reliance on energy efficiency and renewable resources.

The Emission Performance Standard (EPS) is essential regulation that will protect Californians from the significant financial and reliability risks associated with additional investments in highly GHG-intensive generating technologies and help meet California's GHG reduction goals. While AB 32 will not be enforced until 2012, the adoption of these SB 1368 implementing regulations will ensure that California's global warming leadership will be felt immediately and that the standard will be applied statewide in a consistent manner. Adoption of the proposed regulations at the Commission's August 29, 2007 business meeting will ensure that enforcement of the standard will not be delayed any further.

The proposed regulations are consistent with SB 1368 and are consistent with the rules adopted by the California Public Utilities Commission, as directed by the law. By ensuring that utilities make long-term commitments to clean energy sources, the Commission is protecting our economy and environment from the effects of global warming. The proposed regulations will shield customers of California's publicly-owned utilities from hundreds of millions of dollars in extra costs due to regulation of global warming pollution.

We strongly support the proposed regulations, and we urge your prompt adoption of them at the Commission's upcoming business meeting on August 29, 2007.

Sincerely,



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