



July 13, 2011

1029 J Street
Suite 450
Sacramento, CA 95814
916-554-5864 phone
916-442-8585 fax

lungusa.org/california

Robert Weisenmiller
Chair and Presiding Member
Integrated Energy Policy Report Committee
California Energy Commission
Dockets Office, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

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| DOCKET 11-IEP-1A | |
| DATE | JUL 13 2011 |
| RECD. | JUL 13 2011 |

RE: Docket No. 11-IEP-1A, California Clean Energy Future

Dear Chairman Weisenmiller:

On behalf of the American Lung Association in California (ALAC), I am writing to provide our organization's support for the *California Clean Energy Future* project. Our organization believes that this effort to integrate ARB, energy agencies and Cal ISO planning and actions is extremely important for reducing energy demand, boosting renewable energy and electrifying the transportation sector.

ALAC views these energy policy goals as critical to achieving many public health objectives, including reducing exposure to criteria pollutants, reducing climate change health impacts, as well as increasing community resiliency and ability to adapt to climate change impacts that do occur. With a focus on improving public health through our clean energy policies, we offer the following recommendations:

The document should specify criteria air pollution reduction as a metric to be measured and tracked as a key indicator of clean energy deployment. The public health burden of air pollution is placing a huge cost burden on our society. We believe that the *California Clean Energy Future* document should clearly identify California's clean air and public health goals as a specific policy focus of the document.

Increasing the levels of clean transportation technologies is key to clean air. A key area of focus within the report is the nexus between clean energy and clean transportation. These sectors are significant sources of pollution that contribute to a range of respiratory and heart illnesses, including premature deaths. Current health-based federal air quality standards and especially the upcoming revised ozone standard require rapid transition to zero emission combustion especially in South Coast and SJV.

The recent ALAC report, "The Road To Clean Air," found over \$7 billion in avoided health and other costs annually by transitioning the fleet to a mix of electric, plug in and advanced, cleaner vehicles. Moving to cleaner transportation and energy must go hand in hand to serve the best interests of public health in California. We also believe that a key aspect of reducing energy demand in the transportation sector is in aligning land use decisions in a more efficient manner that reduces Vehicle Miles Traveled (VMT) and this concept should also be included in the document.

The document should place a strong focus on 2050 GHG reduction goal and the need for a stronger emphasis on coordination among agencies to achieve electrification of transportation sector. The document should provide more specific list of action items for each agency, including ensuring that Cap and Trade regulation, the Clean Fuels Outlet regulation and Low Carbon Fuel Standard work together smoothly with other energy policies to incentivize development of necessary electric charging and hydrogen infrastructure. We believe that this effort also should promote the strong coordination of agencies with Plug-In Electric Vehicle Collaborative, and for a collaborative role to be included in documents.

Cleaning up non-renewable energy sources is also a clean air priority. ALAC is a strong supporter of doing everything possible to achieve 33 percent renewable levels by 2020 and even higher percentages beyond 2020. At the same time, we need to focus on cleaning up and scaling down the conventional energy sources that are needed to supplement renewables. The document should provide a clear roadmap for how much cleaner conventional power is needed to support renewables at 33 percent by 2020 and illustrate the pathway to scale conventional energy sources down to support that level.

Reference the interaction between climate justice issues and energy policy. ALAC recommends the inclusion of a section on the interaction of climate justice and energy policy issues. Such topics could include: providing funding to initiate or expand programs or projects that would ensure emission reductions, improving energy efficiency and production of renewable energy in disadvantaged communities; mitigating health impacts associated with air pollution and climate change; and improving the economic vitality of these communities. Within the context of the use of funds, the document should provide more detail on how Cap and Trade revenues can support renewable energy and efficiency goals, including more clear direction about use of funds in utility contingency fund in support of this plan.

Thank you for considering our recommendations to bolster the importance of clean air and public health considerations in our clean energy policy decisions. We look forward to working with you and participating agencies in the further development of this important plan for California's clean energy future.

Sincerely,



Bonnie Holmes-Gen
Senior Director, Policy and Air Quality
American Lung Association in California