



Dorothy Rothrock  
Vice President, Government Relations

**DOCKET**

**11-IEP-1A**

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July 20, 2011

Mr. Robert B. Weisenmiller  
Chairman and Presiding Member  
Integrated Energy Policy Report Committee  
California Energy Commission

Ms. Karen Douglas  
Commissioner and Associate Member  
Integrated Energy Policy Report Committee  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

**Re: California Clean Energy Future  
Docket Number 11-IEP-1A**

Dear Chairman Weisenmiller and Commissioner Douglas:

The California Manufacturers & Technology Association represents large and small manufacturers in the state. The state's clean energy goals, including achieving the 33% renewable portfolio standard and AB 32 emission reductions, will impose new costs on manufacturers which could threaten their ability to compete in global markets. To the extent our clean energy goals include job creation and reducing greenhouse gas emissions, any loss of manufacturing due to higher costs will undermine achievement of those goals.

Without a sound metric to measure this impact, leakage of GHG emissions to other states and countries due to higher costs would make it appear that California has reduced emissions, but in fact it will have simply shifted the emissions somewhere else for no environmental benefit and will hurt the economy in the bargain. In fact, if efficient production in California cannot compete in the marketplace and less efficient manufacturing in other locations is therefore able to increase market share, environmental goals would be set back. Metrics to track levels of leakage are crucial to ensure that we are not claiming success when in fact we are losing ground.

In addition, during the workshop it was recommended that job creation be included as a metric for measuring the success of clean energy policies. This will only be meaningful if we also count all the jobs that will be lost as a result of a policy. Therefore our job creation goal, and the metric to measure it, should only count net new jobs.

Thank you for considering these comments.

Sincerely yours,

A handwritten signature in black ink that reads "Dorothy Rothrock".

Dorothy Rothrock