



A JOINT INITIATIVE OF
CEJA & THE SIERRA CLUB



August 18, 2023

California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Draft 2023 Update – Electricity Sector Greenhouse Gas Planning Targets

The Regenerate California Coalition (“Regenerate”) is a partnership of the California Environmental Justice Alliance (CEJA) and the Sierra Club who, together, share a vision for California where we run on 100% clean renewable energy, ensuring our children grow up breathing clean air and the most impacted communities have access to renewable energy and local jobs. Regenerate supports the California Air Resources Board’s (“CARB”) efforts to update the greenhouse gas (GHG) emissions target for the electricity sector for load serving entities (“LSE”) as part of the Integrated Resource Planning (“IRP”) process.

Regenerate supports CARB’s direction in updating existing GHG planning targets from July 2018 to the current 2022 Scoping Plan as part of Board Resolution 18-26. **However, we recommend that CARB set a GHG target no higher than 30 million metric tons (“MMT”) by 2030 for the electric sector in order to match the target in the Public Utilities Commission’s (“CPUC”) Decision 23-02-040.** If CARB must set a target range, that range’s upper bound should be 30 MMT, in order to reflect emissions reduction targets that are *at minimum* consistent with limits set by the CPUC in its IRP process.

The CPUC, the California Energy Commission (“CEC”), and the California Independent System Operator (“CAISO”) are all planning for a 30 MMT target by 2030 across resource deployment, transmission planning, and load forecasting. Aligning CARB’s GHG targets with agencies implementing regulations is critical to actually achieving those reductions through agency action and coordination. The 30 MMT target is not only a key part of ensuring we are meeting our climate targets as required by SB 32 on the path to a zero GHG-emissions energy sector, it is also a significant driver of clean energy deployment and procurement across all LSEs.

California statutes require proactive advanced planning to reduce reliance on fossil resources, and renewable energy procurement and development often requires long lead times. CARB must set out a clear roadmap for emissions reductions, as planning is spread across three state energy agencies. All LSEs – Community Choice Aggregators, Investor-Owned Utilities, and Publicly-Owned Utilities – must plan for the same GHG targets in order to align and foster collaboration across energy and transmission planning in order to reduce redundancy and costs.

LSEs are already planning their procurement out to 2035, and Senate Bill (“SB”) 887 requires that reductions of non-preferred resources in local capacity areas occur “no later than 2035.”¹ Consistent GHG targets will foster the necessary collaboration across agencies and LSE’s to bring to fruition long standing transmission needs as well as the integration and acceleration of renewable deployment such as community solar and storage and long-duration battery technology.

The electric sector is the backbone of the clean energy economy. As other sectors electrify, we must ensure the electric sector is no longer a source of greenhouse gas and co-pollutant emissions to fully realize the benefits of decarbonization. Without a collective and aligned approach to direct all LSEs to meet the 30 MMT target by 2030, we run the risk of failing to achieve it.

Thank you for your consideration of these comments. We look forward to continuing to work with you.

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¹ Public Utilities Code Section 454.57(e)(4).