AB 32 Scoping Plan 2014 Update

The Center for Energy Efficiency and Renewable Technologies supports the achievement of GHG reduction goals of the first scoping plan and development of a plan, policies and commitments to drive down greenhouse gas emissions into the future. California must continue its leadership for a cleaner energy economy.

Specifically CEERT supports:

1) **2030 Goal is essential.** Adoption of a 2030 goal that will continue the appropriate trajectory to achieve the GHG reductions that the IPPC says are needed. Sector specific targets that measure GHG reductions consistently across all sectors must be set.

   For example, California is on course to produce 33% of its energy from wind, solar thermal, solar photovoltaic and geothermal sources by 2020. But increasing penetration of renewables must be undertaken with greater attention to load balancing, geographic diversity, and a balanced and diverse renewable portfolio. We must be able to not only account for the amount of renewable energy procured but also the GHG reductions from those actions.

   We must determine if we should set a clean energy target for the electricity sector, expand the RPS target for another decade or count on increased renewable energy development to be stimulated by a Cap and Trade program.

   As we move to a lower carbon grid and reduced GHG emissions it is essential that the agencies responsible coordinate policies. The California Air Resources Board, the California Energy Commission, the California Public Utilities Commission and the California Independent System Operator must collaborate in planning and coordinate implementation to reduce barriers to system reliability and costs.

2) **Transparency and accountability needed.** Measurement transparency and accountability so that we know who will take reduction actions, when they will be taken and metrics so we can determine if we are on track for meeting the GHG reductions that have been predicted.

3) **Replacement power from SONGS should not increase GHG emissions.** Replacement power for SONGS and the pending retirement of once through cooling plants presents a challenge for GHG reductions. Finding the right balance between these sources of replacement power must be through the lens of long-term GHG reductions. We should retrofit and modernize select natural gas plants to make them more flexible and ensure grid reliability in order to avoid an electrical supply mix that will increase GHG emissions overtime. Recent adoption by the CPUC of a policy that replacement power be consistent with the loading order is a significant step in reducing GHG emissions.

4) **Energy Efficiency, Demand Response, Distributed Generation.** We must greatly expand targeted energy efficiency, demand response, renewables and clean distributed generation as the core strategy for meeting the load balancing needs of California's electric grid. If California is to successfully achieve greater reductions in GHGs and sustained orderly expansion of clean energy we must tear down the silos of energy planning and procurement and recognize the linkages between greenhouse gas emissions, renewables, reliability and affordability and adopt policies and planning to achieve those goals.

   We must extend energy efficiency measures through the building/appliance programs. We must adopt a zero or near zero carbon distributed generation policy framework to guide the evolution of intelligent local networks. Such a framework should start with: principles for open access to the distributed system, rate restructuring, and time of use pricing with a distribution charge to pay for upgrading and maintaining more capable local grids. An all technology feed-in tariff tied to GHG reductions should also be considered.

5) **Investment in Advanced Technologies**. Some of the Cap and Trade revenues should be invested in a new incentive program to jumpstart advanced technologies and preferred resources not currently being deployed or considered to help reduce the cost of future GHG emissions reductions and modernize the grid.

6) **Water Use of energy must be reduced**. Approximately 20% of the state's energy use comes from the deployment and heating of water. California must adopt an integrated program that will set a target for the reduction of this level of energy use and the related GHG emissions. This program must state which agencies have responsibility for which actions, when the policies will be implemented, and how the emission reductions will be measured.

7) **Short-lived climate pollutants integrated program is essential**. California must adopt a program to reduce black carbon and other short -lived climate pollutants because these actions will reduce global warming, improve air quality, and serve as a model for other areas of the nation and the world. CARB has committed to adopt this program by 2015.

   Methane is a potent greenhouse gas and ozone precursor and reductions should be aggressively targeted. CARB should develop a comprehensive accounting for the measurement, control, and reduction of methane emissions in California on a life-cycle basis to establish a credible inventory that quantifies the emissions by source and the impacts on climate change and air quality. This should include accurate measurement of natural gas production and use and the magnitude and extent of leaks from pipelines, compressors, and natural gas production. CARB, working with local air pollution control districts, should put in place the best available control technology and other emission control regulations to reduce methane leakage from landfills and oil and gas extraction and reduction.