



President Marybel Batjer
Commissioner Martha Guzman Aceves
Commissioner Darcie Houck
Commissioner Cliff Rechtschaffen
Commissioner Genevieve Shiroma
California Public Utilities Commission

Dear President Batjer and Commissioners:

We appreciate your efforts to advance a clean energy agenda, which will benefit California's climate through greenhouse gas savings, California's economy through growth in the renewable energy sector, and California's communities through avoided localized air pollution from fossil fuel power plants. We particularly applaud the Commission's recent signals to move to a 38 Million Metric Tons of CO₂ equivalent basis in the 2019-20 IRP System Plan. This represents an important and necessary step towards achieving California's grid decarbonization goals.

Today, we write to urge you to exercise your regulatory discretion in a way that will further advance that agenda, by choosing a greenhouse gas goal of 30 Million Metric Tons of CO₂ equivalent (30 MMT) by 2030 within the 2021-22 planning cycle for the Integrated Resource Planning (IRP) proceeding currently being considered at the Commission (R.20-05-003).

In August, the Administrative Law Judge (ALJ) for the proceeding issued a ruling providing a summary of the analysis conducted by Commission Staff to recommend key elements of the Preferred System Plan to implement SB 350, the legislation which directed consideration of greenhouse gas emissions relative to Integrated Resource Planning, which this proceeding addresses. The Commission develops a Reference System Portfolio every alternate year to be used as a guide for the (IRP) for individual load serving entities. Significantly, the recent ruling revealed that the Commission Staff analyzed a 30 MMT

scenario for evaluating the cost of different scenarios. What this analysis yielded was even more telling: it found that the 30 MMT with high electrification demand scenario was the *cheapest* in terms of levelized average rate (cents/kWh) compared with higher MMT scenarios (including 38 and 46 MMT). The mix of resources assumed to be needed in the 30 MMT scenario was an additional 25,237 MW of procurement, including solar and battery storage, in- and out-of-state wind, and demand response.

The Commission is not the only California state agency considering 2030 scenarios. Recently, the Air Resources Board analyzed four alternatives for greenhouse gas reduction goals by 2030 as part of the work it is doing to update the AB 32 Scoping Plan in 2022. They looked at three scenarios with a 30 MMT target and one with a 23 MMT target for 2030. This shows that the agency with the responsibility for implementing legislation to achieve our greenhouse gas goals thinks we should be more ambitious than the 46 MMT and 38 MMT targets considered in the ALJ's ruling. It also suggests that cross-agency collaboration would facilitate consideration, and possibly adoption, of a 30 MMT target.

We urge you to be bold. A 30 MMT target would drive procurement of renewable energy and help California's environment, economy, and communities. The analysis done to date demonstrates this would not negatively impact California consumers; instead, it would create thousands more clean energy jobs and accelerate our transition to a clean energy economy. We ask you to vote for this target when you decide on the outcome of this proceeding.

Best regards,

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Silicon Valley Leadership Group

Amisha Rai
Advanced Energy Economy

Sachu Constantine
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