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Deliver speed and scale greenhouse gas reductions, starting in California.

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July 3, 2019

The Honorable Laura Friedman  
Chair, Assembly Natural Resources Committee  
State Capitol, Sacramento, CA 95814

**RE: SB 155 Bradford. California Renewables Portfolio Standard Program/  
Integrated Resource Plans. OPPOSE**

Dear Chair Friedman and Committee Members:

I am writing on behalf of the Center for Climate Protection (Center) to oppose SB 155. The Center is a nonprofit organization founded in 2001 with a mission to reduce greenhouse gas emissions at speed and scale. The Centers' combined supporters and subscribers among our several programs add up to nearly 10,000 individuals.

As currently written, SB 155 would undermine the intent of California's landmark greenhouse gas emissions reduction law, SB 350 (de León, 2015), by converting that law's planning process into a set of restrictive energy procurement mandates.

We are particularly concerned about how this bill will impact the 19 operational and many emerging Community Choice Agencies (CCAs) throughout the state. SB 155 would effectively force CCAs to prematurely lock in procurement decisions for 10 years, limiting their flexibility to meet the State's climate goals.

The Center believes strongly in the goals of SB 350, which requires the CPUC to ensure that all load-serving entities (LSEs) contribute to California's greenhouse gas reductions goals, in part via Integrated Resource Plans (IRPs).

LSEs were required to submit their first IRPs in 2018 to the CPUC, which is currently in the process of certifying those plans. Since the IRP process has only just begun, we believe it is premature to require LSEs to procure specific resources, for years at a time, when the CPUC is still trying to determine which resource mix is optimal and how to align each provider's procurement with its optimal plan.

Before considering SB 155, the legislature should allow the IRP proceeding to reach a conclusion about the timing, quantity, and location of any needed procurement beyond that procured by individual LSEs, as well as the collective procurement needed to meet statewide GHG, reliability, and cost efficiency goals.

Please join us in opposing SB 155. We urge your "no" vote.

Sincerely,

Ann Hancock, Executive Director

cc:

Members & Staff, Assembly Natural Resources Committee  
Hon. Senator Steven Bradford, SD-25