



*A Unified Voice for the 15 Cities of
Santa Clara County, California*

August 12, 2016

Assembly Member Phil Ting
State Capitol
Sacramento, CA 95814

RE: Assembly Bill 1110 (Ting): Emissions Reporting – OPPOSE UNLESS AMENDED

Dear Honorable Members:

The Cities Association of Santa Clara County submits this letter of opposition to AB 1110 (Ting) as amended on August 4, 2016, which if passed will lead to inaccurate calculations of greenhouse gas emissions (GHGs), contradict existing regulations like the California Renewable Portfolio Standard (RPS), and discourage the construction of new local renewable energy developments. If this bill is approved it could result in the following fundamental problems for Community Choice Aggregators (CCAs), renewable energy providers, and all energy customers in California:

1. Creates conflicting and confusing standards for customer GHG disclosures and compliance with state RPS rules;
2. Discourages communities from launching CCA programs; and
3. Has not been properly vetted; the current language of the bill prescribes a specific methodology without a regulatory proceeding structure that requires transparent input from market participants or experts in the field, which limits the ability to align GHG reporting with existing reporting practices. The amendments seen in August 2016 are a departure from the bill's content in 2015, which was seen in committee. In fact, the proposed amendments should go back to committee.

The Cities Association is a collaboration of the 15 cities in Santa Clara County that advocates for positive action to enhance the quality of life for the people of our county. Several of our membership cities have joined efforts to form Silicon Valley Clean Energy Authority, an entity of local governments that procures, develops and sells electrical power to local residents and commercial customers within Santa Clara County. SVCEA will bring residents and businesses 100% carbon free electricity at lower costs when it begins

operation in 2017. California currently has three other operating CCA programs (Marin Clean Energy, Sonoma Clean Power, and Lancaster Choice Energy). Dozens of other jurisdictions throughout California are investigating prospects for CCA programs because of their potential to provide “greener” energy services and develop renewable projects in local communities.

The Cities Association opposes AB 1110 as amended because it will lead to inaccurate calculations of GHGs, proscribes an unworkable methodology not vetted by technical experts, and would discourage CCAs from exceeding State RPS standards, which is antithetical to the State's environmental and energy policies. However, if the Legislature moves ahead with a bill, the Cities Association supports the bill modifications proposed by Marin Clean Energy, Sonoma Clean Power, and Silicon Valley Clean Energy Authority.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink that reads "James R. Griffith". The signature is written in a cursive style with a blue ink color.

Jim Griffith
President, Cities Association of Santa Clara County
Council Member, City of Sunnyvale

CC: Cities Association Board of Directors, Senator Pro Tem Kevin De Leon, Senator Bob Wieckowski, Senator Jim Beall, Senator Jerry Hill, Senator Bill Monning