



Californians for Energy Choice

1104 Polk Street - Suite 225 - San Francisco, CA 94109 - 415-756-8844

Members of the California Senate
State Capitol, Sacramento, CA

re: **AB 1110 – OPPOSE**

Dear Senator,

I am writing to let you know that Californians for Energy Choice strongly opposes Assembly Bill 1110 (Ting – Greenhouse Gas Reporting). Californians for Energy Choice is the statewide organization that led the charge in 2014 to successfully stop the monopoly utilities' AB 2145 attack on Community Choice energy.

AB 1110 is a similar attack.

AB 1110 is a solar jobs killer. It masquerades as an environmental bill, but in reality shockingly blocks rooftop solar from being labeled greenhouse gas free by exploiting a technicality in state law. AB 1110 also unacceptably obscures the full carbon emissions of the monopoly utilities' natural gas operations. The bill would undermine Community Choice clean energy programs by allowing monopoly utilities to greenwash their centralized fossil fuel generation and falsely claim that their energy mix is greener than superior community-based clean energy programs that rely heavily on local rooftop solar but would not be allowed to call rooftop solar greenhouse gas free under the bill. Monopoly utility allies who sponsored the failed AB 2145 attack are founding proponents of AB 1110.

AB 1110:

- **Blocks Rooftop Solar From Being Labeled Greenhouse Gas Free, Undercutting Solar Jobs** - Currently, technicalities in state law label most electricity from rooftop solar panels as “unbundled” renewables. AB 1110 cynically exploits this by blocking “unbundled” renewables from counting as greenhouse gas free. This would undermine community programs that compete with the monopoly utilities by installing rooftop solar and listing it as a clean energy source. So the bill would kill both solar jobs, and fair competition.
- **Fails To Mandate Tracking of Full Lifecycle Emissions of Natural Gas-Based Electricity** - AB 1110 has no mandates to require full lifecycle accounting of all greenhouse gas emissions of electricity generated using dirty natural gas. Incidents like the Aliso Canyon methane release and other fugitive emissions are known to be substantial, yet are not required to be counted in emission calculations under the bill.
- **Allows Monopoly Utilities to Hide Natural Gas Emissions Numbers Calling Them “Trade Secrets”** - AB 1110 has text that allows the monopoly utilities to obscure their greenhouse gas emissions by claiming that being required to show detailed greenhouse gas numbers would force them to reveal “trade secrets.”

Conclusion:

AB 1110 would kill solar jobs and undermine fair competition from community-based energy programs that provide cleaner and less expensive electricity to consumers. AB 1110 would allow the monopoly utilities to hide the full emissions numbers of their natural gas heavy electricity, and block rooftop solar from being labeled greenhouse gas free. Please vote NO on AB 1110!

Sincerely,

Eric Brooks, Legislative Coordinator
Californians for Energy Choice