



May 4, 2026

***Via Electronic Submission***

California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**Re: California Community Choice Association's Comments on Proposed 15-Day Amendments to the Regulation for the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms**

Dear California Air Resources Board:

The California Community Choice Association (CalCCA)<sup>1</sup> appreciates the opportunity to provide comments on the California Air Resources Board's (CARB) proposed 15-Day Amendments to the California Cap on Greenhouse Emissions and Market-Based Compliance Mechanisms (15-Day Amendments).<sup>2</sup> CalCCA's community choice aggregator (CCA) members are local, not-for-profit load-serving entities (LSE) that procure energy on behalf of their communities.<sup>3</sup> Collectively, CCAs serve more than 15 million Californians and play a critical role in the State's greenhouse gas reduction and clean energy goals.

CalCCA respectfully requests that if CARB adopts the 15-Day Amendments, it carve out an exemption to allow continued use of the Renewables Portfolio Standard (RPS) Adjustment through December 31, 2030, for Portfolio Content Category (PCC) -2 transactions in which the importer can demonstrate that the underlying contract was executed prior to the 15-Day Amendments.<sup>4</sup> The 15-Day Amendments revise Section 95852(b)(4)(F) to accelerate the sunset of eligibility for PCC-2 transactions to use the RPS Adjustment from December 31, 2030, to December 31, 2026.<sup>5</sup> This accelerated timeline

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<sup>1</sup> California Community Choice Association represents the interests of 24 community choice electricity providers in California: Apple Valley Choice Energy, Ava Community Energy, Central Coast Community Energy, Clean Energy Alliance, Clean Power Alliance of Southern California, CleanPowerSF, Desert Community Energy, Energy For Palmdale's Independent Choice, Lancaster Energy, Marin Clean Energy, Orange County Power Authority, Peninsula Clean Energy, Pico Rivera Innovative Municipal Energy, Pioneer Community Energy, Pomona Choice Energy, Rancho Mirage Energy Authority, Redwood Coast Energy Authority, San Diego Community Power, San Jacinto Power, San José Clean Energy, Santa Barbara Clean Energy, Silicon Valley Clean Energy, Sonoma Clean Power, and Valley Clean Energy.

<sup>2</sup> See CARB Notice of Public Availability of Modified Text and Availability of Additional Documents and/or Information, *Proposed Amendments to the Regulation for the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms* (Apr. 14, 2026), Attachment A-1; see also CARB Notice of Comment Period Extension (Apr. 28, 2026) (extending comment period to May 4, 2026).

<sup>3</sup> While the CCA procures electricity on behalf of its customers, the region's existing investor-owned utility (IOU) continues to deliver the power to customers.

<sup>4</sup> The importer can make such a demonstration by providing a contract dated within the eligibility window, with an attestation at the first RPS Adjustment claim.

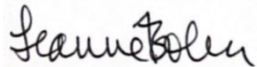
<sup>5</sup> Subsection (F) states that "RECs representing electricity generated during January 1, 2013 through December 31, 2030 [proposed to be changed to 2026 in the 15-Day Amendments], are eligible to be used towards the RPS adjustment. RECs representing electricity generated after December 31, 2030 [proposed to be changed to

represents a significant and abrupt departure from the framework set forth in the original 45-Day Amendments, which provide for the 2030 sunset. As CARB recognized in its Initial Statement of Reasons, providing regulated entities with “certainty and time to respond” to changes in eligibility for the RPS Adjustment is essential.<sup>6</sup> This change risks adversely affecting contracts executed in good faith prior to the 15-Day Amendments. These contracts may have been structured with the expectation that PCC-2 transactions would remain eligible for the RPS Adjustment. Accelerating the sunset to 2026 would retroactively alter the value and compliance treatment of these transactions, creating regulatory uncertainty and undermining contract stability.

To address these concerns, CalCCA recommends that if CARB adopts the 15-Day Amendments, it carve out an exemption to allow continued use of the RPS Adjustment through December 31, 2030, for PCC-2 transactions in which the importer can demonstrate that the underlying contract was executed prior to the 15-day Amendments. This limited exemption will protect reasonable reliance interests and contractual expectations.

CalCCA appreciates California Air Resources Board’s consideration of these comments.

Respectfully submitted,



Leanne Bober,  
Director of Regulatory Affairs and Deputy General Counsel

CALIFORNIA COMMUNITY CHOICE ASSOCIATION

cc: Mark Sippola, Branch Chief, Climate Change Program Evaluation Branch  
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2026 in the 15-day Amendments], must meet the requirements of California Public Utilities Code section 399.16(d) and if applicable section 399.30(c)(3) to be eligible for the RPS adjustment.” California Public Utilities Code section 399.16(d) refers to legacy contracts executed prior to June 1, 2010, known as PCC-0s. PCC-2 contracts (“firmed and shaped” transactions, or renewable electricity generated out of state with substitute unspecified imports delivered into California) currently are eligible for the RPS Adjustment. The 15-Day Amendments remove that eligibility, earlier than previously proposed (*i.e.*, now 2026 instead of 2030).

<sup>6</sup> CARB, *Staff Report: Initial Statement of Reasons* (Jan. 20, 2026), at 54.