



Governor Gavin Newsom
1021 O Street, Suite 9000
Sacramento, CA 95814

Chair Lauren Sanchez
1001 I Street
Sacramento, CA 95814

CARB Board Members
1001 I Street
Sacramento, CA 95814

RE: Electricity Affordability by Adopting a More Ambitious Transition of the Natural Gas to Electric CC to reduce high summer electricity bills

Dear Gavin Newsom, Chair Sanchez and CARB Board Members:

The Affordable Energy Campaign is a new statewide effort that brings together dozens of consumer, climate and environmental justice advocates working to make sure that Californians have an electric system that is clean, affordable, and accountable to the communities it serves.

As we review the regulatory proposals for the Cap-and-Invest (C&I) program, we urge the Board to prioritize reducing high electricity bills and saving households money. Most notably, by adopting a more ambitious transition of the natural gas to electric climate credit to reduce high summer electricity bills.

AB 1207 required CARB to transition “support from gas corporations to electrical distribution utilities... on or before January 1, 2031” while minimizing ratepayers impacts and encouraging early climate action. The C&I amendments propose to transition climate credit allocations from gas corporations to electric distribution utilities between 2029 through 2036, delaying the transition years beyond the timeline required by AB 1207. Delaying the transition of the natural gas climate credit means foregoing savings during high-billed electricity months, when relief is

needed most, and also needlessly discourages switching from gas to electric appliances by reducing operational cost savings from heat pumps and other zero-emission electric technologies.

Accordingly, CARB should complete the natural gas climate credit transition by C&I compliance year 2031 for the electric IOUs, in line with AB 1207. For other covered electricity utilities who require more lead time to introduce new technology systems to distribute the climate credit, we support providing reasonable flexibility to ensure smooth, equitable implementation with a public input process that delivers a meaningful credit to provide electricity consumers relief as soon as possible.

A successful transition will invest critical affordability revenues from C&I into lowering residential electricity bills, rather than continuing to invest in the natural gas bill climate credits.

Thank you for your consideration of the above comments. We look forward to working collaboratively to implement these recommendations into the final Cap & Invest regulation.

Sincerely,

Jose Torres
Executive Director, **Affordable Energy Campaign**

Eric Lerner
The Alliance of Californians for Community Empowerment (ACCE)

Alexis Sutterman
Senior Policy Manager, **Brightline Defense**

Tekira Briscoe
Alliance Operations Coordinator, **California Alliance for Community Energy**

Gracyna Mohabir
Clean Air & Energy Regulatory Advocate, **California Environmental Voters**

Jenn Engstrom
State Director, **CALPIRG Education Fund**

Jose Torre-Bueno
Executive Director, **Center for Community Energy**

Sabrina Molina
Environmental Justice Policy Analyst, **The Center on Race, Poverty & the Environment (CRPE)**

Jenna Roper, PhD

Senior Policy Associate, **Central California Asthma Collaborative**

Ayn Craciun
Policy Director, **Climate Action Campaign**

Carmelita Miller
Energy Strategist, **Greenlining Institute**

John Farrell
Co-Director, **Institute For Local Self-Reliance**

Chloe Ames
Policy Advisor, **NextGen California**

Sneha Ayyagari
Director of Policy, **Rising Sun Center for Opportunity**