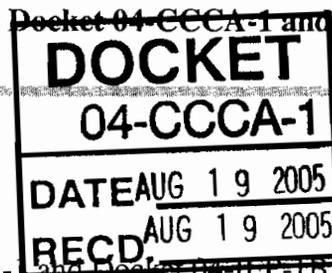


**Docket Optical System - Silicon Valley Leadership Group comments for Docket 04-CCCA-1 and Docket 04-IEP-1B and Climate Change**



**From:** "Parkhurst, Robert" <robert\_parkhurst@hp.com>  
**To:** <docket@energy.state.ca.us>  
**Date:** 8/19/2005 3:08 PM  
**Subject:** Silicon Valley Leadership Group comments for Docket 04-CCCA-1 and Docket 04-IEP-1B and Climate Change  
**CC:** "Susan Brown" <Sbrown@energy.state.ca.us>, "Margaret Bruce" <mbruce@svlg.net>

Dear Sir or Madam:

Please see attached documents from the Silicon Valley Leadership Group for inclusion in Docket 04-CCCA-1 and Docket 04-IEP-1B and Climate Change. I am submitting them on behalf of Margaret Bruce who is on vacation.

Regards,

Robert

**Robert Parkhurst**  
Global Environmental Program Manager  
Environment, Health, and Safety  
Hewlett-Packard Company  
650-857-2334  
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**Climate Change Principles**  
**Silicon Valley Leadership Group**  
**June 8, 2005**

SVLG was founded on the premise that local employers should be actively involved in working with government to find innovative solutions to regional and global concerns such as climate change. Silicon Valley companies recognize that addressing climate change will require creative solutions and collaboration between companies, governments and citizens. Companies that respond to climate change see multiple benefits from their actions beyond good corporate citizenship or an opportunity to mitigate future business risk. Many see it as good for business because reducing emissions and energy consumption is a key to reducing operating expenses thereby helping to maintain their competitive edge.

The majority of SVLG member companies contribute indirectly to greenhouse gas emissions through their consumption of energy (primarily electricity and natural gas). These companies recognize that their products, fleets and employees contribute to climate change through their use of transportation. They support technologies such as teleconferencing and videoconferencing to reduce the need to travel. PFC use from semi-conductor manufacturing only accounts for a fraction of emissions. Thus, climate change policies and programs that assist SVLG companies with reducing their energy use will be the most effective. Above all, actions should be designed to serve both the long-term economic well-being of California as well as the goal of climate stabilization in a cost effective manner.

**Conservation**, avoiding the generation or use of energy, **energy efficiency**, getting more service per unit of energy, and low-GHG electric power **generation** are all important in positively affecting climate change.

SVLG believes the following are essential principles and actions for responding to climate change:

**1) Conservation**

- a) Promote energy conservation voluntarily beyond codes through incentives, and strengthening standards.
- b) Support public and corporate awareness campaigns and education programs.
- c) Encourage real-time metering and sub-panel metering to increase the information available for making energy management decisions.

**2) Efficiency**

- a) Continue to fund and improve successful utility incentive and rebate programs.
- b) Encourage technologies and building techniques to reduce load at both peak and non-peak periods.
- c) Support revision and enforcement of building codes and appliance standards to encourage adoption of new energy efficient technology.
- d) Support research and development that increases the efficiency of products and services.
- e) Streamline the process for incentive programs by reducing bureaucracy to encourage broader participation. Ensure that funds are timely and readily available.

**3) Low-GHG Generation**

- a) Support innovation that leads to marketable and cost effective products and services. Include pilot demonstrations and technology transfer.
- b) Support development of new generation, including distributed generation, building of transmission lines, and distribution facilities, by taking advantage of the cleanest forms of power first.
- c) Promote cost effective renewable energy and on-site generation, where appropriate including Combined Heat and Power, on-site solar, and wind.
- d) Encourage the reduction of institutional barriers to implement cogeneration and on-site generation solutions.
- e) Support and encourage technologies that will be most effective during peak demand.
- f) Support streamlining the approval process for Low-GHG Generation projects to encourage broader participation.



2005

August 19,

California Energy Commission  
Dockets Unit  
1516 Ninth Street, MS-4  
Sacramento, CA 95814-5512

Attn: Docket No. 04-CCCA-1 and Docket No. 04-IEP-1B

Dear Sir or Madam:

The Silicon Valley Leadership Group commends the California Energy Commission for forming the Climate Change Advisory Committee. This diverse committee has provided valuable input into the process of developing policies to reduce California's greenhouse gas emissions and achieve the ambitious targets set by the State. We are pleased to be represented on the Committee by Robert Parkhurst from HP who is co-chair of our Environment Committee. We have reviewed the recommendations of the Committee and offer these thoughts and analysis of those recommendations for inclusion in the 2005 Integrated Energy Policy Report.

#### **No "silver bullet"**

California is fortunate to have a diverse economy. This diversity provides many opportunities for emissions reduction. We encourage the state to consider a broad range of options that address multiple sectors of the economy. As the Committee has done, all the contributing factors to California's climate change emissions should be evaluated and initiatives with the largest potential impact should be implemented. The state should consider an array of policy approaches for reducing greenhouse gas emissions, including technology-based approaches, intensity standards and benchmarks, cap-and-trade programs, pollution fees, monitoring and reporting requirements, negotiated agreements, incentive programs, voluntary programs, education and assistance, removal of barriers to GHG reductions, policy changes, and research and development.

#### **Technology-based standards**

These standards are an effective tool for our member companies. They help to speed the adoption of technology that can dramatically improve operational efficiency and reduce greenhouse gas emissions. Consideration should be given to voluntary standards, such as Energy Star, which have encouraged the development of efficient appliances, lighting, and computers. Incentives and rebates should also be taken into account for technologies that have the potential to allow an overall reduction in climate change emissions, such as, telecommuting, video conferencing, and streaming media.

#### **Cap-and-Trade considerations**

Cap-and-trade is a popular topic when discussing climate change policies, but it should not be the only approach under consideration. The state needs to focus on broad opportunities that impact multiple sectors of the economy. We believe that there are other options that will achieve more cost effective and certain emission reductions.

As described in our Climate Change Guiding Principles (attached), we encourage the Commission to:

- o Continue to promote the conservation as the state has done through the Flex Your Power program;
- o Support implementation of energy efficiency through continued funding of energy R&D, commercialization, and utility incentive programs; and
- o Continue to encourage low-GHG generation through programs like the Renewable Portfolio Standard.

We urge caution in developing a state-based cap-and-trade system that would increase already high energy prices. A national based system administered by an independent organization would be more effective, but only as a part of a broader, economy-wide effort.

We appreciate the opportunity to provide these comments. If you have any questions about them, please contact me at (408) 501-7858.

Sincerely,

A handwritten signature in cursive script that reads "Margaret Bruce". The signature is written in black ink and is positioned above the typed name.

Margaret Bruce  
SVLG Environmental Programs Director  
(enc.)