

**STATE OF CALIFORNIA  
ENERGY RESOURCES CONSERVATION  
AND DEVELOPMENT COMMISSION**

In the Matter of: )  
)  
The Preparation of the 2005 Integrated )  
Energy Policy Report (2005 Energy Report) )  
\_\_\_\_\_ )

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

CLIMATE CHANGE

**04-CCCA-1**

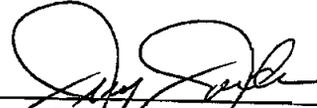
<b>DOCKET</b>	
<b>04-IEP-1B</b>	
DATE	OCT 11 2005
RECD.	OCT 12 2005

Comments  
Of  
The California Municipal Utilities Association  
On  
Climate Change

Attached are comments filed by the California Municipal Utilities Association with the Climate Action Team at the California Environmental Protection Agency.

Dated: October 11, 2005

Respectfully submitted:

A handwritten signature in black ink, appearing to read "Jerry Jordan", is written over a horizontal line.

Jerry Jordan  
Executive Director  
California Municipal Utilities Association  
915 L Street, Suite 1460  
Sacramento, CA 95814



# CALIFORNIA MUNICIPAL UTILITIES ASSOCIATION

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JERRY JORDAN, Executive Director

October 11, 2005

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Alan C. Lloyd, Ph.D.

Agency Secretary

California Environmental Protection Agency

1001 I Street, P.O. Box 2815

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RE: Climate Action Team

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Dear Secretary Lloyd:

The California Municipal Utilities Association and its member agencies support the Governors goal of reducing climate change emissions. We have been following the California Energy Commission Integrated Energy Policy Report process and working to develop sound policies that do not adversely impact California electric consumers.

The local elected boards of publicly owned utilities have long been on the front lines of air quality issues. Their constituents have demanded better local air quality. CMUA supports the results of the Power Sector Subcommittee of the Energy Commission's Climate Change Advisory Committee. Those recommendations include:

1. Provisions to take the financial risks of green house gas regulation explicitly into account during resource planning decisions
2. Quantification of dollar values for GHG emissions to be used in evaluating alternative sources
3. Development of utility action plans to meet the Governor's goals for GHG emission reductions. Those plans will be made available to the Cal EPA and will include
  - a. Impacts of climate change on each utility's service territory.
  - b. Current and projected GHG emissions in each service territory.
  - c. Policy options in each service territory to reduce GHG emissions including cost effective conservation measures, renewable energy targets, and improved efficiency of existing power plants.

An organization for the protection of municipally owned utilities.

C.M.U.A. members provide utility service to more than 70% of the people of California.

Alan C. Lloyd, Ph.D.  
October 11, 2005  
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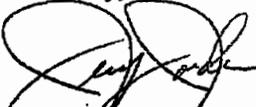
4. Parity between in-state and out-of-state sources.
5. Credit for past GHG emission reductions.
6. Environmental Justice consideration.

We believe it is possible to manage climate change emissions without adversely effecting California's competitive outlook with other states, or further harming low income rate payers who have suffered from California's electric market flaws.

According to the most recent information collected by the Energy Information Agency (2003), California's publicly owned utility electric rates are 30% higher than the national average, while California investor owned utility electric rates are 84% higher than the national average. Climate change emission improvement must be accomplished without further aggravating rates for California residents and businesses.

We look forward to working with the Governor and the California Environmental Protection Agency manage climate change emissions while protecting California electric consumers.

Sincerely,



Jerry Jordan, Executive Director  
California Municipal Utilities Association