Date of Hearing: June 19, 2024

ASSEMBLY COMMITTEE ON UTILITIES AND ENERGY
Cottie Petrie-Norris, Chair
SB 1420 (Caballero) – As Amended May 16, 2024

SENATE VOTE: 30-1

SUBJECT: Hydrogen

SUMMARY: Defines "qualified clean hydrogen" and "qualified clean hydrogen projects," as specified; sets content targets of 33.3% by 2025 and 60% by 2045 for qualified clean hydrogen for use in the transportation sector; and allows qualified clean hydrogen projects to access two existing pathways for streamlining regulatory review of infrastructure projects. Specifically, **this bill**:

1) Creates two new definitions for certain types of hydrogen:
   a) "Qualified clean hydrogen" for the purposes of hydrogen fueling station delivery means hydrogen produced from non-fossil fuel feedstocks through a process that results in:
      i) Well-to-gate lifecycle greenhouse gas (GHG) emissions less than 4 kilograms (kg) carbon dioxide-equivalent emissions (CO2e) per kg of hydrogen produced; and
      ii) A carbon intensity (CI) less than or equal to the annual average CI of the electricity from the California electrical grid, as determined by CARB.

   b) "Qualified clean hydrogen projects" for the purposes of utilizing SB 149 (Caballero, Chapter 60, Statutes of 2023) and AB 205 (Committee on Budget, Chapter 61, Statutes of 2021) processes to mean hydrogen produced from non-fossil fuel feedstocks through a process that results in:
      i) Well-to-gate lifecycle GHG emissions less than 4 kg CO2e per kg of hydrogen produced;
      ii) A CI less than or equal to the annual average CI of electricity from the California electrical grid, as determined by CARB; and
      iii) That any eligible electrolysis project must use specified renewable energy resources in a manner that does not result in resource shuffling in the electricity sector.

2) States that it is the policy of the state that hydrogen produced for use in fuel cell electric vehicles (FCEVs) has a CI less than or equal to that of the annual average for grid electricity, and sets content targets specifically:
   a) By January 1, 2025, have at least 33.3% of the retail hydrogen at transportation fueling stations be qualified clean hydrogen with a CI less than or equal to the annual average CI of electricity from the California state grid (and makes no stipulations for the nature of the remaining 66.7% of the hydrogen at those stations); and

   b) By December 31, 2045, have at least 60% of the retail hydrogen used in transportation be qualified clean hydrogen, as specified above (and makes no stipulations for the nature of the remaining 40% of the hydrogen at those stations).

3) Makes changes to the projects eligible to be considered "energy infrastructure projects" under SB 149 (Caballero, Chapter 60, Statutes of 2023) thereby granting access to the streamlining provisions created by the measure, specifically: removing a prohibition on resources using biomass fuels, except for combustion; removing a prohibition on projects utilizing hydrogen as a fuel; and adding qualified clean hydrogen projects, as defined.

4) Expands the definition of "facility" under AB 205 (Committee on Budget, Chapter 61, Statutes of 2021) to include qualified clean hydrogen projects, thereby making such projects eligible for the environmental review streamlining provisions created the measure.

EXISTING LAW:

1) Defines a " renewable electrical generation facility" as a facility that uses biomass, solar thermal, photovoltaic, wind, geothermal, fuel cells using renewable fuels, small hydroelectric generation of 30 megawatts (MW) or less, digester gas, municipal solid waste conversion, landfill gas, ocean wave, ocean thermal, or tidal current. To meet the definition of a renewable electrical generation facility, the facility must be in state, have its first point of connection to the transmission network of a balancing authority area primarily located within the state, or has its first point of interconnection to the transmission network outside the state, within the Western Electricity Coordinating Council (WECC) and meets certain specified requirements. (Public Resources Code § 25741)

2) Defines an "eligible renewable energy resource" as an electrical generating facility that meets the definition of a "renewable electrical generation facility," subject to specified conditions. (Public Resources Code § 399.12)

3) Establishes the Renewables Portfolio Standard (RPS) program and establishes a goal of procuring at least 60% of total retail sales of electricity from renewable energy resources by December 31, 2030, with specified benchmarks up to that date. Existing law requires the California Public Utilities Commission (CPUC) to oversee electrical corporations' compliance with renewable energy procurement mandates and requires the California Energy Commission (CEC) to oversee publicly owned electric utility renewable energy procurement compliance. (Public Utilities Code § 399.11 et. seq.)

4) Defines a renewable energy credit (REC) and requires the CEC to design and implement an accounting system to verify electric utilities' compliance with the RPS, to ensure that electricity generated by an eligible renewable energy resource is counted only once for the purpose of meeting the RPS, to certify RECs produced by eligible renewable energy resources, and to verify retail product claims. (Public Utilities Code § 399.25)

5) Defines "green electrolytic hydrogen" as hydrogen gas produced through electrolysis and does not include hydrogen gas manufactured using steam reforming or any other conversion technology that produces hydrogen from a fossil fuel feedstock. (Public Utilities Code § 400.2)

6) Requires the CPUC, CEC and California Air Resources Board (CARB) to consider green electrolytic hydrogen an eligible form of energy storage and consider its potential uses. (Public Utilities Code § 400.3)

7) Establishes an "opt-in" framework for specified clean energy projects to seek consolidated permitting at the CEC by June 30, 2029, if they adhere to specified labor standards, including the use of skilled and trained workforce, and provide community benefits, as specified. Existing law specifies that this consolidated permitting process shall not supersede the authorities of the Lands Commission to require leases and receive lease revenues, if applicable, or the authority of the California Coastal Commission, the San Francisco Bay Conservation and Development Commission, the State Water Resources Control Board, or the applicable regional water quality control boards. Existing law specifies that the following types of facilities are eligible for this consolidated permitting:

    a) A solar or terrestrial wind facility with a generating capacity of 50 MW or more and associated facilities.
    b) An energy storage system capable of storing 200 MW or more of energy, as specified.
    c) A stationary thermal electrical generating powerplant, with a generating capacity of 50 MW or more that does not use or rely on fossil or nuclear fuels.
    d) Certain renewable energy component manufacturing facilities and transmission lines to certain renewable energy facilities. (Public Resources Code § 25545)

8) Establishes a framework for providing certain infrastructure projects with expedited judicial review of appeals and litigation related to the California Environmental Quality Act (CEQA), subject to specified conditions. Existing law limits eligibility for these streamlining provisions to certain energy, transportation, water, and semiconductor projects. Existing law explicitly excludes projects that use hydrogen as a fuel from the list of eligible projects. (Public Resources Code § 21189.80)

9) Requires CARB to evaluate by June 1, 2024, market barriers to accelerate the use of green hydrogen, potential beneficial uses of hydrogen, and an estimate of GHG emissions reductions that can be achieved through deploying green hydrogen in various settings. Existing law requires CARB's evaluation to include an analysis of life-cycle GHG emissions from various forms of hydrogen, including green hydrogen. (Health and Safety Code § 38561.8)

10) Requires the CEC to administer a program to provide financial incentives to hydrogen projects that produce, process, deliver, store, or use hydrogen. Existing law specifies that hydrogen projects are only eligible for these incentives if the hydrogen is derived from water using RPS-eligible energy resources, or hydrogen derived from RPS-eligible energy resources. Existing law specifies that the CEC may only provide these financial incentives to projects that help reduce sector-wide emissions, as determined by the CEC. (Public Resources Code § 25664–25664.1)

11) Authorizes the Governor's Office of Business and Economic Development (GO-Biz) to take steps necessary to apply for federal regional clean hydrogen hubs funding. Existing law defines "clean hydrogen" for the purposes of the clean hydrogen hub funding as hydrogen produced from RPS-eligible energy resources and otherwise consistent with federal law for the clean hydrogen hub program. (Government Code § 12100.161–12100.162)

FISCAL EFFECT: According to the Senate Committee on Appropriations, this bill will lead to unknown, ongoing costs – likely in the hundreds of thousands of dollars annually – to both the CEC and CARB to implement.

BACKGROUND:

Hydrogen today. California has ambitious statutory, regulatory and administrative goals to reduce its emissions of GHG. The state has had some success in this effort, though the emissions from some sectors have proven stubbornly sticky and, arguably, the greatest challenges, and costs, lie ahead. The use of hydrogen has the potential to help the state achieve its climate goals. This is because hydrogen can displace other energy sources used in electricity generation, transportation, space heating and other applications, depending on the energy source displaced and how the hydrogen that is displacing it is produced. For example, hydrogen can be used to generate electricity from a fuel cell. Or, hydrogen can store energy generated by electricity produced from renewable energy sources, such as the sun and wind.

Hydrogen is extremely abundant on earth; however, it is rarely found in isolation. Rather, hydrogen is usually bound in a compound, such as water (hydrogen and oxygen) or methane (hydrogen and carbon). The CI of a hydrogen application depends upon, at least, the source of the hydrogen (water, natural gas, etc.) and the source of the energy used to "split" the hydrogen from its compound. For example, hydrogen sourced from water and split from oxygen molecules using electricity generated by a zero-carbon resource may have a very low CI. Conversely, hydrogen produced from methane using heat, carried by steam generated by burning a fossil fuel, would have a fairly high CI.

An informal color wheel's worth of labels exists to succinctly characterize the varying CI of hydrogen. At one end is "black" hydrogen, which generally uses coal as its feedstock and the most carbon-intensive sources of energy to split the hydrogen. At the other extreme is "green" hydrogen, which generally uses excess electricity produced from renewable energy to split hydrogen from water. Between these two extremes are grey, brown, blue and, according to some, pink and turquoise hydrogen, each of which describes a hydrogen with a relatively greater or less CI. Nearly all hydrogen produced for use in California today is the relatively dirty gray variety.

Federal Hydrogen Incentives. In recent years, the concept of using hydrogen to decarbonize certain hard-to-abate sectors has gained greater attention. However, effectively using hydrogen as a decarbonization strategy depends upon the ability to produce large quantities of hydrogen without relying on fossil fuels or increasing emissions through the hydrogen production process. Currently over 90% of the hydrogen used in the United States is produced from fossil fuels – specifically, using steam methane reforming.

Both California and the federal government have taken steps to encourage the development of clean hydrogen. In 2021, President Biden signed the Infrastructure Investment and Jobs Act (IIJA), which included $8 billion to the federal Department of Energy (DOE) to establish regional clean hydrogen hubs across the nation. In 2022, the Legislature passed AB 157 (Committee on Budget, Chapter 570, Statutes of 2022), which authorized GO-Biz to take steps to prepare and submit an application to receive funding from the regional clean hydrogen hubs program. This legislation led to the establishment of California’s clean hydrogen hub administrator, known as the Alliance for Renewable Clean Hydrogen Energy Systems (ARCHES).

In addition to funding provided under the IIJA, President Biden also signed the Inflation Reduction Act (IRA). The IRA provides a number of production tax credits for certain types of clean energy and manufacturing acceleration projects. The IRA tasked the federal Treasury Department with developing a federal tax credit to incentivize the production of clean hydrogen,

otherwise known as the 45V production tax credit. The 45V tax credit is structured to provide up to a $3 tax credit per kg of hydrogen produced, with higher credits granted to lower-CI hydrogen. In December 2023, the Treasury Department released its draft proposal, which included a version of the "three pillars," which are principles intended to ensure that hydrogen production supports decarbonization and does not result in an increase in emissions. These pillars include the following:

- Additionality/Incrementality: the hydrogen must be produced from new units of renewable electric generation to prevent hydrogen from diverting clean energy resources away from the grid.
- Deliverability: the hydrogen must be regionally deliverable to ensure that the hydrogen is not being produced from dirty resources that cannot be verified or are so far away as to never being delivered to the facility.
- Hourly Matching: the hydrogen's production must match a clean power supply on an hourly basis to ensure that hydrogen production does not increase demand for fossil fuel generation.

The generous 45V tax credit has the potential to shape the growth of the hydrogen industry. However, even as this industry is drawing these incentives to scale up production, the development of the 45V tax credit has also elevated a debate about the hydrogen industry's ability and willingness to comply with the three pillars. Several researchers and environmental organizations have asserted that without the three pillars, hydrogen production could lead to substantial grid emissions and reliability impacts by increasing consumption of electricity generated from fossil fuels, including fossil electricity used to meet peak demand when renewable generation declines. To the extent that hydrogen increases fossil fuel consumption, decarbonization benefits associated with using that hydrogen would be limited.

COMMENTS:

1) *Author's Statement.* According to the author, "Senate Bill 1420 ensures the highest environmental standards on hydrogen for transportation fuel and enable California to scale clean hydrogen production to meet this ambition transportation fuel standard that supports California's climate change goals. The California Air Resources Board states that California cannot reach its emission goals without expanding hydrogen production by 1,700 times the present status of production. SB 1420 supports this significant market growth by enabling California to fully leverage its federally awarded Hydrogen Hub status with private sector investment of over $10 billion in projects in California. Furthermore, SB 1420 aligns definitions with the Inflation Reduction Act to support investment in decarbonized hydrogen that is necessary to drive emissions reductions across the economy and specifically in the transportation sector."

2) *The Definition Debate.* This bill can broadly be considered as two separate policy goals: to reduce the CI of hydrogen used for transportation over time and to include hydrogen-related projects in two existing expedited permitting pathways. One unifying element to both policy goals is the CI consideration in the definition provided for "qualified clean hydrogen." Taken together in the units California typically uses to discuss CI, "qualified clean hydrogen" is hydrogen produced with a CI no higher than either 33.34 gCO2e/MJ or the average CI of electricity from the grid. Today, the 33.34 gCO2e/MJ threshold is

much lower than the average grid CI of 80.55 gCO2e/MJ, but as the grid gets greener, the grid CI is anticipated to become the operant limit.

This bill seeks to build statewide policy goals around the CI of hydrogen. The sponsors of this measure note how the CI standard in this bill is "rigorous," stating that "no jurisdiction in the world has adopted stronger production requirements."[1] The opposition disputes this assertion, stating the bill's definition is "weak and harmful," noting that CARB's Low Carbon Fuel Standard (LCFS) has already declined below this CI.[2] Of particular concern is the ability to meet CI compliance through a paper standard – using fossil gas as the actual feedstock, but separately procuring renewable attributes from landfill or dairy gas to meet compliance. According to the opposition, this practice is currently allowed in the LCFS, and would be unchanged by this bill, even with the bill's expressed prohibition on fossil fuel feedstocks.

In practice, the CI standard is only as robust as the inputs and tracking used to verify compliance, which is not articulated in this measure. This is in contrast to the intense debate around the three pillars happening at the federal level to limit complex and indirect energy supply impacts from hydrogen production, which may ultimately lead to increased GHG emissions. Notably, amendments taken in the Senate include a specific prohibition preventing "resource shuffling" for qualified clean hydrogen electrolysis projects seeking permit streamlining in this measure. This concept broadly encompasses some of the concerns surrounding the three pillars (e.g. how using clean energy for hydrogen production should avoid additional non-clean energy being used to meet other needs), but is less specific. On one hand, the "no resource shuffling" definition provides added flexibility for CARB to determine solutions more tailored to California's policies. On the other hand, the greater specificity afforded by the three pillars framework could be a more certain guarantee that indirect electrical sector emission impacts are avoided.

Given the disparate positioning around these definitions of hydrogen, the activity at the federal level in crafting which hydrogen to incentivize (not mandate) via tax credits, and the fact that this measure is for the most part voluntary (i.e., the permit streamlining provisions are optional paths, not required; and the transportation content requirement only encompasses at most 60% of retail at fueling stations, leaving both the wholesale market and the remaining 40% retail to be any color of hydrogen it desires), it may be premature to include the definition put forward in this measure. The sponsors note the importance in creating a statewide standard, however that is not what is being achieved with this definition. Moreover, a survey of current, and varied, definitions of hydrogen in statute and regulation include a multitude of different definitional options,[3] none of which has settled the definition debate. *The committee thus recommends amendments to strike the definitions of "qualified clean hydrogen" and "qualified clean hydrogen project" used in this measure.*

3) *Speedy Permitting.* In 2022, the Legislature passed AB 205 (Committee on Budget, Chapter 61, Statutes of 2022), which enables certain non-fossil energy projects to seek consolidated permitting through the CEC – rather than local governments – by June 30,

[1] June 12, 2024 letter from the California Hydrogen Coalition, and others.
[2] June 11, 2024 letter from the Utility Reform Network
[3] See Utilities and Energy Committee analysis for AB 1550 (Bennett, 2023) from April 11, 2023.

2029. The following year, as part of Governor Newsom's 2023 Infrastructure Package, existing Environmental Leadership Development Project (ELDP) expedited judicial review provisions were extended under SB 149 (Caballero, Chapter 60, Statutes of 2023) to an array of energy, water, transportation, and semiconductor projects. Taken together, these two measures help create an alternative, accelerated permitting pathway for certain favored projects in the state. This pathway could be useful in making California more competitive for certain federal funding opportunities, including the federal hydrogen incentives mentioned earlier. Given that California's hub, ARCHES, was awarded up to $1.2 billion in October 2023 for funding hydrogen projects across California, [4] and that project development timelines for federal hub monies are typically 8-12 years, there may be merit in the state including some hydrogen projects in the streamlining as put forward by this measure. However, without a definition for what an eligible hydrogen project might be, the accelerated pathway provided in this bill may become clogged with projects California does not wish to prioritize. *As such, the committee recommends limiting the accelerated permit pathway provided in Sections 2 and 3 to projects receiving ARCHES funding, or other state or federal funding support.*

4) *Best Fit for Hydrogen's Future Use.* California will likely rely on hydrogen to decarbonize certain targeted sectors. However, despite decades of active investment and support across different use cases and technologies, the majority of hydrogen demand in the state today remains in the form of petroleum refining and ammonia production, and upwards of 95% of that hydrogen is sourced from fossil fuels. Hydrogen *can* be used to decarbonize the power sector, transportation, industry, and buildings, but whether it *should* be used in certain cases across each of those sectors (due to considerations of economics, efficiency, etc.) remains an unsettled debate, and one the ARCHES hub is meant to help elucidate.

   CARB's 2022 Scoping Plan Update provided one plausible future for hydrogen. The Update stated that the scale of California's energy transition would include about 1,700 times the amount of current hydrogen supply by 2045. It is unclear exactly how that 1,700-fold increase breaks down between uses. Some of the roles for hydrogen envisioned in the Scoping Plan are unsurprisingly in "difficult-to-decarbonize" sectors: aviation, ocean-going vessels, rail and passenger freight, and chemical production. However, the Scoping Plan also assumes that (after ramping up between 2030 and 2040), 20% of the entire gas pipeline network in the state will be blended hydrogen. This is done to reduce the GHG emissions associated with natural gas for buildings and industry by roughly 7%. That is a lot of hydrogen for seemingly modest benefits.

   Under SB 1075 (Skinner, Chapter 363, Statutes of 2022), the Legislature called for CARB, in consultation with the CEC and CPUC, to prepare an evaluation by June 1, 2024, of market barriers to accelerate the use of green hydrogen, potential beneficial uses of hydrogen, and an estimate of GHG emissions reductions that can be achieved through deploying green hydrogen in various settings. This evaluation is meant to detail the impact of hydrogen in various sectors.[5] Until such an evaluation can be fully analyzed and assessed, and the work at ARCHES is underway, it may be premature to pick a sector

[4] https://archesh2.org/what-they-are-saying-california-awarded-up-to-1-2-billion-to-advance-hydrogen-roadmap/
[5] https://ww2.arb.ca.gov/our-work/programs/sb-1075-hydrogen

– such as transportation as put forward under this bill – as the best end use for hydrogen. *As such, the committee recommends striking the entirety of Section 1 from this bill.*

5) *Related Legislation.*

AB 2204 (Bennett) establishes a goal, by an unspecified date, for all in-state hydrogen production, and specifically excludes any fossil fuel use as either a feedstock or energy source in the production process. Also requires the hydrogen to show the use of new and incremental renewable generation, temporal matching, and geographic deliverability. Status: in the Assembly Committee on Utilities and Energy.

SB 993 (Becker) requires the CPUC, after making certain findings, to establish a tariff to encourage new, grid-responsive electricity consumption exclusively for electrolytic hydrogen production and electrifying industrial heat processes. Status: Held – the Senate Committee on Appropriations.

SB 1018 (Becker) exempts sellers of wind and solar generation from the definition of an "electrical corporation" if that generation is transmitted over private lines for electrolytic hydrogen production or industrial heat processes. Recent amendments add requirements on the CPUC to establish a tariff, similar in kind to what was encouraged under SB 993. Status: *set for hearing* on July 1st in this committee.

6) *Prior Legislation.*

SB 149 (Caballero) extended the sunset on the Jobs and Economic Improvement Through Environmental Leadership Act of 202, made certain changes to CEQA, and established an expedited judicial review process for CEQA considerations pertaining to certain energy, transportation, water, and semiconductor projects. Status: Chapter 60, Statutes of 2023

SB 663 (Archuleta, 2023) would have defined renewable hydrogen and added renewable hydrogen as a renewable energy resource under the RPS. The bill would also have established criteria for renewable hydrogen acquired from a dedicated or on-site pipeline to meet RPS standards. Status: – died in the Senate.

AB 1550 (Bennett, 2023) would have established a clean fuel requirement for all hydrogen produced or used in California for electrical generation or vehicle refueling, starting on January 1, 2045. The bill's clean fuel standard would have required all hydrogen to be "renewable hydrogen of biological origin" or "renewable hydrogen of nonbiological origin," as specified. The bill would have added renewable hydrogen of biological origin and renewable hydrogen of nonbiological origin to the list of RPS-eligible resources. Status: Died – Assembly third reading.

SB 1075 (Skinner) required CARB and the CEC to analyze options for using hydrogen as part of decarbonization strategies. Status: Chapter 363, Statutes of 2022

AB 157 (Committee on Budget) authorized GO-Biz to take steps to prepare and submit an application to receive funding from the regional clean hydrogen hubs program or to

otherwise participate in the regional clean hydrogen hubs program. The bill also established a definition of clean hydrogen. Status: Chapter 570, Statutes of 2022

AB 205 (Committee on Budget) among other provisions, establishes a framework for specified clean energy projects to seek consolidated permitting at the CEC by June 30, 2029, if they adhere to specified labor standards, including the use of skilled and trained workforce, and provide community benefits, as specified. Status: Chapter 61, Statutes of 2022

AB 209 (Committee on Budget) among other provisions, establishes a hydrogen funding program at the CEC to support projects that produce, process, deliver, store, or use hydrogen. Status: Chapter 251, Statutes of 2022

7) *Double referral.* This bill is double referred; upon passage in this Committee, this bill will be referred to the Assembly Committee on Natural Resources.

REGISTERED SUPPORT / OPPOSITION:

Support

Abound Food Care
Agricultural Energy Consumers Association
Altasea At the Port of Los Angeles
Antelope Valley Air Quality Management District
Antelope Valley Community College District
Association of California Cities - Orange County (ACC-OC)
Bakersfield, California State University
Bioenergy Association of California
Bizfed Central Valley
Boys & Girls Clubs of The Los Angeles Harbor
Building Industry Association of Southern California
California Association of Sanitation Agencies
California Biomass Energy Alliance
California Center for Public Policy
California Chamber of Commerce
California Construction & Industrial Materials Association
California Hydrogen Business Council
California Hydrogen Car Owners Association
California Hydrogen Coalition
California Renewable Transportation Alliance
Capstone Green Energy
Cars are Basic
Center for Transportation and The Environment
Central City Association
Central Valley Business Federation
City of Lancaster
Clean Energy
Clean Energy Institute At University of California Irvine
Cleanearth4kids.org

Coalition of Labor, Agriculture and Business
County of Fresno
Dana Point Chamber of Commerce
Desert Valleys Builders Association
Econalliance
Fontana Chamber of Commerce
Fresno County Board of Supervisors
Garden Grove Chamber of Commerce
Glendora Chamber of Commerce
Greater Bakersfield Chamber of Commerce
Greater Irvine Chamber of Commerce
Greater Ontario Business Council
Green Hydrogen Coalition
Habor Association of Industry & Commerce
Imperial Valley Economic Development Corporation
Inland Action
Iwatani
LA Verne Chamber of Commerce
Larta Institute
Los Angeles Area Chamber of Commerce
Los Angeles County Business Federation (BIZFED)
Los Angeles County Sanitation Districts
Los Angeles Harbor College Eops
Mega Toys
Mexican American Opportunity Foundation
Monarch
Moreno Valley Chamber of Commerce
Murrieta Temecula Group
National Fuel Cell Research Center
North Orange County Chamber of Commerce
Omnitrans - San Bernardino County Public Transit
Ontario International Airport
Orange County Business Council
Orange County Conservation Corps
Orange County Taxpayers Association
Palo Verde Valley Transit Agency
Redondo Beach Chamber of Commerce
Reedley College
Renewable Natural Gas Coalition
Resource Recovery Coalition of California
San Bernardino International Airport
San Diego Gas and Electric Company
San Gabriel Valley Economic Partnership
Santa Barbara South Coast Chamber of Commerce
Santa Clarita Valley Chamber of Commerce
Santa Maria Valley Chamber of Commerce
Solvang Chamber of Commerce
South Bay Association of Chambers of Commerce
South Orange County Economic Coalition

Southern California Gas Company
Southwest California Legislative Council
State Center Community College District
The Coalition of Labor, Agriculture & Business - Santa Barbara
The Greater Coachella Valley Chamber of Commerce
The Transport Project
Toyota Motor Company
Tri County Chamber Alliance
United Chambers of Commerce
Valley Industry and Commerce Association (VICA)
Via Care Community Health Center
Visalia; City of
Westside Council of Chambers of Commerce (WC3)
Yosemite Clean Energy

Support If Amended

City of Palmdale
Coachella Valley Economic Partnership
Venice Chamber of Commerce

Oppose

350 Bay Area Action
350 Humboldt
350 Southland Legislative Alliance
Action Asian Pacific Environmental Network
California Environmental Justice Alliance (CEJA) Action
California Environmental Voters
Californians Against Waste
Center for Biological Diversity
Center for Community Action and Environmental Justice
Center on Race, Poverty and The Environment
Climate Action California
Communities for A Better Environment
Democrats of Rossmoor
Earthjustice
Environmental Working Group
Leadership Council for Justice and Accountability
Nrdc
Physicians for Social Responsibility - Los Angeles
Sierra Club California
Sustainable Rossmoor
The Climate Center
The Greenlining Institute

Oppose Unless Amended

The Utility Reform Network (TURN)

Analysis Prepared by: Laura Shybut / U. & E. / (916) 319-2083