



March 9, 2026
 Chair Lauren Sanchez and Board Members
 California Air Resources Board
 1001 I Street
 Sacramento, CA 95814

Subject: Stop the Delay of Climate Credit Transition

Honorable Chair Sanchez and Members of the Board,

We, the undersigned organizations, represent an Orange County coalition of community, climate, faith-based, and environmental justice organizations from Orange County. We urge the California Air Resources Board (CARB) to oppose any delay in transitioning the Cap & Invest (C&I) climate credit from natural gas to electricity bills, as required under AB 1207 (Irwin).¹ Delaying this transition from 2031 to 2037 would be a missed opportunity to provide meaningful bill relief to millions of struggling California families. It would also result in six additional years of harmful health impacts in our communities, and deepen investments in stranded fossil fuel infrastructure and appliances. **For these reasons, we respectfully request that CARB maintain the original implementation timeline established by state law.**

The Public Advocates Office (PAO) recently published its Electric Rates Report for Q4 2025, which underscores the severity of the energy affordability crisis facing California families.² Statewide, the PAO reported that more than **1 in 5 households are behind on their electricity bills by an average of \$634, representing 2.4 million customers in arrears.**³ This widespread cost-of-living crisis is driven in large part by escalating rate increases by our state's Investor-Owned Utilities (IOUs), all of which continue their annual practice of raising their costs to ratepayers to pay for shareholder dividends. In fact, rate hikes by PG&E, SCE, and SDG&E represent a **76%, 101%, and 98% increase over the past decade,**

¹California State Assembly. *AB 1207: Climate change: market-based compliance mechanism: extension*. California State Assembly, 2025, https://calmatters.digitaldemocracy.org/bills/ca_202520260ab1207. Accessed 24 February 2026.

²Public Advocates Office (PAO). *Q4 2025 Electric Rates Report*. California Public Utilities Commission (CPUC), 2026, <https://www.publicadvocates.cpuc.ca.gov/-/media/cal-advocates-website/files/press-room/reports-and-analyses/260210-public-advocates-office-q4-2025-rates-report.pdf>. Accessed 24 February 2026.

³Ibid.

respectively.⁴ This situation is untenable for families wrestling with the already high cost-of-living in our state.

Delaying the bill transition would also undermine progress toward California's climate goals. AB 32 requires the state to reduce greenhouse gas emissions below 1990 levels by 2030 and charges CARB with the responsibility to lead this effort.⁵ CARB's 2022 Scoping Plan emphasizes the need to keep "all options on the table," including transitioning existing energy infrastructure toward zero-carbon electricity.⁶ Implementing AB 1207 on schedule is essential to fulfilling both the letter and the spirit of the Scoping Plan. **To consider delaying the bill credit transition from gas to electricity undermines the mission of CARB as outlined in state law.**

We thank you for your leadership and for the Board's continued commitment to advancing climate action while improving energy affordability for Californians. We respectfully reiterate our request that CARB oppose any delay to the transition of the C&I climate credit beyond 2031. California families are counting on state leaders to deliver both economic relief and climate progress, and adhering to the original intent of AB 1207 will help ensure those expectations are met.

Signed,

Amy Luna Capelle, Executive Director
Women for American Values and Ethics (WAVE)

Davis Alejandro Garcia, President
University of California, Irvine College Democrats

Mocanh Nguyen, Co-President
Irvine Valley College Democrats

Ryan Dack, Vice President
South Orange County Community College District Board of Trustees*

Tiffany Lwin, Secretary
Sunrise Movement Orange County

Max Wang, Co-Lead
Citizens' Climate Lobby, Orange County Central Chapter

Ayn Craciun, OC Policy Director
Climate Action Campaign

Jeff Starke
City of Irvine Planning Commissioner and Democrats of Greater Irvine Board Member*

Mari Fujii
Democrats of Greater Irvine, Vice Chair

⁴Ibid.

⁵California State Assembly. *AB-32 Air pollution: greenhouse gases: California Global Warming Solutions Act of 2006*. California State Assembly, 2006, https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=200520060AB32. Accessed 24 February 2026.

⁶California Air Resources Board (CARB). *2022 Scoping Plan for Achieving Carbon Neutrality*. CARB, 2022, <https://ww2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdf>. Accessed 24 February 2026.

*Title for identification purposes only

City of Irvine Transportation Commission, Chair

Kev Abazajian, Ph.D.

Democrats of Greater Irvine, Chair

City of Irvine Irvine Sustainability Commission, Chair

Charles Heath, Treasurer

Irvine United Congregational Church (IUCC)-Green Faith Committee

Miguel Miguel Director,

Sierra Club CA

Ginger Osborne, Chapter Leader

Citizens' Climate Lobby, Laguna Chapter

Tomas Castro, Chair

Orange County Climate Coalition (OCCC)

CC:

The Honorable Gavin Newsom, Governor of California

The Honorable Catherine Blakespear, California State Senate

Jack Christensen, Chief of Staff

Samantha Samuelsen, Legislative Director

The Honorable Henry Stern, California State Senate

Emily Berry, Chief of Staff

Gil Topete, Legislative Director

The Honorable Tony Strickland, California State Senate

Jennifer Carey, Chief of Staff

Shawn Kent, Legislative Director

The Honorable Steven Choi, California State Senate

David Orosco, Chief of Staff

Spencer Rhoades, Legislative Director

The Honorable Jacqui Irwin, California State Assembly

Brett Williams, Chief of Staff

Brandon Bjerke, Legislative Director

The Honorable Cottie Petrie-Norris, California State Assembly

Taylor Giroux, Chief of Staff

Jacob Moss, Legislative Director

The Honorable Laurie Davies, California State Assembly

Donna Cleary, Chief of Staff

Taylor Melody, Capital Director

The Honorable Sharon Quirk-Silva, California State Assembly

William Pond, Chief of Staff

Dawn Adler, Legislative Director

The Honorable Tri Ta, California State Assembly

Emanuel Patrascu, Chief of Staff

Adam Boman, Legislative Director

The Honorable Avelino Valencia, California State Assembly

Erinn Ryberg, Chief of Staff
Nathaly Teran, Legislative Director

Nidia Bautista, Chief Consultant, Senate Utilities and Energy Committee
Sarah Smith, Consultant, Senate Utilities and Energy Committee
Laura Shybut, Chief Consultant, Assembly Utilities and Energy Committee
Suman Tatapudy, Principal Consultant, Assembly Utilities and Energy Committee
Lina Malova, Senior Consultant, Assembly Utilities and Energy Committee
Sam Mahanes, Consultant, Joint Legislative Committee on Climate Change Policies