

Date of Hearing: July 10, 2023

ASSEMBLY COMMITTEE ON NATURAL RESOURCES

Luz Rivas, Chair

SB 253 (Wiener) – As Amended June 30, 2023

SENATE VOTE: 24-9

SUBJECT: Climate Corporate Data Accountability Act

SUMMARY: Requires any partnership, corporation, limited liability company, or other U.S. business entity with total annual revenues in excess of \$1 billion and that does business in California to publicly report their annual greenhouse gas (GHG) emissions, as specified by the California Air Resources Board (ARB).

EXISTING LAW:

- 1) Requires ARB, pursuant to California Global Warming Solutions Act of 2006 [AB 32 (Núñez), Chapter 488, Statutes of 2006], to adopt a statewide GHG emissions limit equivalent to 1990 levels by 2020, and (Health & Safety (HSC) Code 38500 *et seq*):
 - a) Requires the reduction of GHGs to 40% below 1990 levels by 2030 and to 85% below 1990 levels by 2045, and:
 - b) Authorizes ARB to adopt a regulation that establishes a system of market-based declining annual aggregate emission limits for sources or categories of sources that emit GHG emissions, applicable until December 31, 2030. Under this authority, ARB adopted a cap and trade regulation that applies to large industrial facilities and electricity generators emitting more than 25,000 metric tons of carbon dioxide equivalent per year, as well as distributors of fuels, including gasoline, diesel, and natural gas.
 - c) Requires the monitoring and annual reporting of GHG emissions from GHG emission sources beginning with the sources or categories of sources that contribute the most to statewide emissions, and dictates that for the cap-and-trade program established pursuant to AB 32, entities that voluntarily participated in the California Climate Action Registry prior to December 31, 2006, and had developed a GHG emission reporting program, they would not be required to significantly alter their reporting or verification program except as necessary for compliance.
- 2) Declares, pursuant to SCR 53 (McGuire), Res. Chapter 119, Statutes of 2022, that a climate emergency threatens the state, the nation, the planet, the natural world, and all of humanity.
- 3) Requires corporations in California to report specified operating information to the Secretary of State (SOS). (California Corporations Code 100 *et seq.*)

THIS BILL:

- 1) Establishes the Climate Corporate Data Accountability Act.
- 2) Defines the following terms:

- a) “Emissions reporting organization” as a nonprofit emissions reporting organization contracted by ARB that both:
 - i) Currently operates a GHG reporting organization for organizations operating in the United States; and,
 - ii) Has experience with GHGs disclosure by entities operating in California.
 - b) “Reporting entity” as a partnership, corporation, limited liability company, or other business entity formed under the laws of this state, the laws of any other state of the United States or the District of Columbia, or under an act of the Congress of the United States with total annual revenues in excess of \$1 billion and that does business in California.
 - c) “Scope 1 emissions” as all direct GHGs that stem from sources that a reporting entity owns or directly controls, regardless of location, including, but not limited to, fuel combustion activities.
 - d) “Scope 2 emissions” as indirect GHGs from consumed electricity, steam, heating, or cooling purchased or acquired by a reporting entity, regardless of location.
 - e) “Scope 3 emissions” as indirect upstream and downstream GHG emissions, other than Scope 2 emissions from sources that the reporting entity does not own or directly control and may include, but are not limited to purchased goods and services, business travel, employee commutes, and processing and use of sold products.
- 3) Requires, on or before January 1, 2025, ARB to develop and adopt regulations to require a reporting entity to annually disclose to the emissions reporting organization and verify all of the reporting entity’s Scope 1 emissions, Scope 2 emissions, and Scope 3 emissions. Requires ARB to ensure that the regulations require all of the following:
- a) That a reporting entity, starting in 2026 on or by a date to be determined ARB, and annually thereafter on or by that date, publicly disclose to the emissions reporting organization all of the reporting entity’s Scope 1 emissions and Scope 2 emissions for the prior fiscal year.
 - i) That a reporting entity, starting in 2027 and annually thereafter, publicly disclose its Scope 3 emissions no later than 180 days after its Scope 1 emissions and Scope 2 emissions are publicly disclosed to the emissions reporting organization for the prior fiscal year.
 - ii) A reporting entity shall measure and report its emissions of GHGs in conformance with the Greenhouse Gas Protocol standards and guidance, including the Greenhouse Gas Protocol Corporate Accounting and Reporting Standard and the Greenhouse Gas Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard developed by the World Resources Institute (WRI) and the World Business Council for Sustainable Development, including guidance for Scope 3 emissions calculations that detail acceptable use of both primary and secondary data sources, including the

- use of industry average data, proxy data, and other generic data in its Scope 3 emissions calculations.
- iii) During 2029, ARB is required to review, and on or before January 1, 2030, ARB is required to update as necessary, the public disclosure deadlines to evaluate trends in Scope 3 emissions reporting and consider changes to the disclosure deadlines to ensure that Scope 3 emissions data is disclosed to the emissions reporting organization as close in time as practicable to the deadline for reporting entities to disclose Scope 1 emissions and Scope 2 emissions data.
 - iv) The reporting timelines shall consider industry stakeholder input and shall take into account the timelines by which reporting entities typically receive Scope 1, Scope 2, and Scope 3 emissions data, as well as the capacity for independent verification to be performed by a third-party auditor.
- b) That a reporting entity's public disclosure is made in a manner that is easily understandable and accessible to residents, investors, and other stakeholders of the state.
 - c) That a reporting entity's public disclosure includes the name of the reporting entity and any fictitious names, trade names, assumed names, and logos used by the reporting entity.
 - d) That the emissions reporting is structured in a way that minimizes duplication of effort and allows a reporting entity to submit to the emissions reporting organization reports prepared to meet other national and international reporting requirements, including any reports required by the federal government, as long as those reports satisfy all of the specified requirements.
 - e) That a reporting entity's public disclosure is independently verified by a third-party auditor. The reporting entity is required to ensure that a copy of the complete, audited GHG inventory, including the name of the third-party auditor, is provided to the emissions reporting organization as part of or in connection with the reporting entity's public disclosure.
- i) Scope 1 emissions and Scope 2 emissions are required to be audited at a limited assurance level beginning in 2026 and at a reasonable assurance level beginning in 2030.
 - ii) During 2026, ARB is required to review and evaluate trends in third-party verification requirements for Scope 3 emissions. On or before January 1, 2027, ARB is authorized to establish an assurance requirement for third-party audits of Scope 3 emissions. Scope 3 emissions shall be audited at a limited assurance level beginning in 2030.
 - iii) A third-party auditor is required to be an expert in the emission of GHGs because of significant experience in measuring, analyzing, reporting, or attesting to the emission of GHGs. A third-party auditor is required to have sufficient competence and capabilities necessary to perform engagements in accordance with professional standards and applicable legal and regulatory requirements and to enable the auditor to issue reports that are appropriate under the circumstances and independent with

- respect to the reporting entity, and any of the reporting entity's affiliates for which it is providing the verification report, during the verification and professional engagement period. During 2029, ARB is required to review, and on or before January 1, 2030, ARB is required to update as necessary, the qualifications for third-party auditors to evaluate trends in education relating to the emission of GHGs and consider updating guidance on third-party auditors.
- iv) ARB is required to ensure that the verification process minimizes the need for reporting entities to engage multiple auditors and ensures sufficient auditor capacity, as well as timely reporting implementation.
 - f) That a reporting entity, upon filing its disclosure, is required to pay an annual fee that may not exceed the reasonable regulatory costs of ARB for the administration and implementation of this bill. The annual fee imposed on a reporting entity may not exceed \$1,000.
 - i) The proceeds of the fees are required to be deposited in the Climate Accountability and Emissions Disclosure Fund, which the bill creates in the State Treasury. Requires the money in the fund to be continuously appropriated to ARB for the costs of administering and implementing this bill.
- 4) Requires ARB to contract with an emissions reporting organization to develop a reporting program to receive and make publicly available disclosures.
 - 5) Authorizes ARB to adopt or update any other regulations that it deems necessary and appropriate to implement this bill.
 - 6) Requires ARB, in developing the regulations, to consult with all of the following:
 - a) The Attorney General;
 - b) Other government stakeholders, including, but not limited to, experts in climate science and corporate carbon emissions accounting;
 - c) Investors;
 - d) Stakeholders representing consumer and environmental justice interests; and,
 - e) Reporting entities that have demonstrated leadership in full-Scope GHG emissions accounting and public disclosure and GHG reductions.
 - 7) Provides that nothing in this bill requires additional reporting of emissions of GHGs beyond the reporting of Scope 1 emissions, Scope 2 emissions, and Scope 3 emissions required pursuant to the Greenhouse Gas Protocol standards and guidance.
 - 8) Requires, on or before July 1, 2027, ARB to contract with the University of California, the California State University, a national laboratory, or another equivalent academic institution to prepare a report on the public disclosures made by reporting entities to the emissions reporting organization and the regulations adopted by ARB. Requires, in preparing the

report, consideration to be given to, at a minimum, GHGs from reporting entities in the context of state GHG reduction and climate goals. Requires the entity preparing the report to not require reporting entities to report any information beyond what is required pursuant to this bill or the regulations adopted by ARB.

- 9) Requires ARB to submit the report to the emissions reporting organization to be made publicly available on the digital platform required to be created by the emissions reporting organization.
- 10) Requires the emissions reporting organization, on or before the date determined by ARB, to create a digital platform, which shall be accessible to the public that will feature the emissions data of reporting entities in conformance with the regulations adopted by ARB and the report prepared for ARB. Requires the emissions reporting organization to make the reporting entities' disclosures and ARB's report available on the digital platform within 30 days of receipt.
- 11) Requires the digital platform to be capable of featuring individual reporting entity disclosures, and to allow consumers to view reported data elements aggregated in a variety of ways, including multiyear data, in a manner that is easily understandable and accessible to residents of the state. Requires all data sets and customized views to be available in electronic format for access and use by the public.
- 12) Requires the emissions reporting organization to submit, within 30 days of receipt, the report prepared for ARB to the relevant policy committees of the Legislature.
- 13) Provides that ARB's enforcement of AB 32 compliance does not apply to a violation of this bill.
- 14) Requires ARB to adopt regulations that authorize it to seek administrative penalties for nonfiling, late filing, or other failure to meet the requirements of this bill. Prohibits the administrative penalties imposed on a reporting entity from exceeding \$500,000 in a reporting year. Requires ARB, in imposing penalties for a violation, to consider all relevant circumstances, including both of the following:
 - a) The violator's past and present compliance; and,
 - b) Whether the violator took good faith measures to comply and when those measures were taken.
- 15) Provides that a reporting entity shall not be subject to an administrative penalty for any misstatements with regard to Scope 3 emissions disclosures made with a reasonable basis and disclosed in good faith.
- 16) Provides that this bill applies to the University of California only to the extent that the Regents of the University of California, by resolution, make any of these provisions applicable to the university.
- 17) Provides that the provisions of this bill are severable.

FISCAL EFFECT: According to the Senate Appropriations Committee, this bill would result in unknown ongoing costs, likely in the millions of dollars annually (General Fund) for ARB to implement the provisions of this bill. These costs would be offset by revenues from an annual filing fee on reporting entities.

COMMENTS:

1) Author's statement:

California has been at the forefront of climate policy in recent decades, establishing a successful cap and trade program, committing to preserve 30% of California's lands in their natural state, and setting and achieving ambitious emission reduction targets. These reductions were partially met, and continue to be bolstered by the emission reporting requirements as laid out in the California Global Warming Solutions Act. These requirements, however, only apply to electricity generators, industrial facilities, fuel suppliers, and other major emitters, missing many sources of corporate pollution. Without the same requirements for these corporate entities, California is left without proper information and will not be able to accurately regulate and reduce these emissions. Filling this gap with detailed data regarding corporate activities is a crucial next step for the state to ensure that we continue to decrease the rampant GHGs that are destroying our planet.

California, like the rest of the world, is already deeply impacted by climate change ... We no longer have the time to rely on massive corporations to voluntarily report their emissions, and cannot afford any possibility that the emissions we are being told about have been altered or manipulated to ensure a positive public-facing appearance for a particular company. Rather, these corporations must be required to transparently report their activities and the emissions associated with them. Californians are watching their state get irrevocably harmed by climate change, and they have a right to know who is at the forefront of the pollution causing this. SB 253 would bolster California's position as a leader on climate change, will allow for consumers to make informed decisions regarding their patronage of these corporations, and will give policymakers the specific data required to significantly decrease corporate emissions.

- 2) Reporting GHG emissions.** Under AB 32, the Mandatory Reporting of Greenhouse Gas Emissions regulation (MRR) requires hundreds of businesses, including electricity generators, industrial facilities, fuel suppliers, and electricity importers, to report GHGs to ARB. A summary of reported GHG emissions data reported under MRR is made public each year. ARB implements and oversees a third-party verification program to support mandatory GHG reporting. All GHG reports subject to the Cap-and-Trade Program must be independently verified by ARB-accredited verification bodies and verifiers.

On a global scale, the "Scope" framework was introduced in 2001 by the WRI and World Business Council for Sustainable Development as part of their Greenhouse Gas Protocol Corporate Accounting and Reporting Standard. The goal was to create a universal method for companies to measure and report the emissions associated with their business. The three

Scopes allow companies to differentiate between the emissions they emit directly into the air, which they have the most control over, and the emissions they contribute to indirectly.

Scope 1 covers all direct GHGs that stem from sources that a reporting entity owns or directly controls, regardless of location, including, but not limited to, fuel combustion activities.

Scope 2 covers indirect GHGs from consumed electricity, steam, heating, or cooling purchased or acquired by a reporting entity, regardless of location.

Scope 3 includes all other indirect emissions that occur in a company's value chain, such as purchased goods and services, business travel, employee commuting, waste disposal, use of sold products, transportation and distribution (up- and downstream), investments, and leased assets and franchises.

Scope 1 and 2 emissions alone have shortcomings. First, Scope 1 and 2 emission sums can be manipulated. For example, a company that was once vertically integrated can procure materials from outside suppliers. Thus, the emissions produced during the making of an input material could be moved off the company's balance sheets and excluded from measurement. This would hide the true amount of carbon emitted throughout the organization's value chain and thwart the asset owner's efforts to estimate climate risk. In addition, Scope 1 and 2 emissions are under-inclusive. These deficiencies can be addressed through the inclusion of Scope 3 emissions.

Recent research from CDP (formerly the Carbon Disclosure Project) found that Scope 3 supply chain emissions are on average 11.4 times greater than operational (Scope 1 and 2) emissions, which is more than double the previous estimate.

- 3) **This bill.** SB 253 would require companies to use the Greenhouse Gas Protocol Corporate Accounting and Reporting Standard and the Greenhouse Gas Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard to detail its Scope 3 emissions calculations.

The emissions disclosures would need to be independently verified by an outside auditor, and businesses would pay an annual fee of up to \$1,000 to cover state administrative costs.

According to Ceres, one of the sponsors of the bill, of the 5,300 U.S. corporations that would have to report their emissions, about 73% are private companies. Many publicly traded companies already report climate risks in their financial disclosure reports.

Some of those companies, including Dignity Health, IKEA, Patagonia, Sierra Nevada Brewing Co., and Seventh Generation support the bill, saying:

California is on track to be the fourth-largest economy in the world and this bill would set a global standard for emissions disclosure. SB 253 would level the playing field by ensuring that all major public and private companies disclose their full emissions inventory, creating a pathway for collective reduction strategies.

- 4) **Disclosing Scope 3 GHGs won't come easily.** There are challenges in acquiring comprehensive and consistent Scope 3 emissions data. The GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard sorts Scope 3 emissions into 15 categories. Companies need to discern whether to tabulate all or which of these categories of indirect emissions.

Businesses will have to report not only the GHGs emitted globally from their operations and energy use, but also from indirect sources, such as emissions from their supply chains, contractors and use of their products. These Scope 3 emissions have raised the concerns of business groups. A 2021 article in the Harvard Business Review said such protocols could lead to the same emissions being reported multiple times by different companies, a critique that CalChamber echoes.

The author contends that double counting in the context of climate emissions accounting is a consideration when there is a need for one comprehensive global or national system level accounting to track aggregate progress and/or implement carbon markets, and there are multiple different entities with GHG emissions chains that are interconnected. In that context, the author believes it is important to have a clear understanding of the actual total emissions contributed by those entire systems, further stating:

In the case of SB 253, the fact that a corporation would report the GHG emissions associated with the purchase of electricity as part of its Scope 2 emissions, while the producer of that energy would report those same emissions in its Scope 1 inventory is not "double counting" - an issue relating to comprehensive systems accounting with multiple interconnected entities. The goal of SB 253 is to provide a clear understanding of the total emissions of an individual corporation meeting certain requirements, to ensure accountability and catalyze their decarbonization efforts.

Additionally, the bill allows additional time – a year and a half more – for the disclosure of Scope 3 emissions over Scope 1 and 2 emissions, and gives ARB flexibility to evaluate trends in Scope 3 emissions reporting and adjust the disclosure deadlines.

- 5) **Avoiding duplication.** Last March, the U.S. Securities and Exchange Commission (SEC) announced plans to enhance and standardize climate-related disclosures for investors, as part of a growing awareness of the importance of environmental, social & governance (ESG) issues among public companies. The new disclosure rules would require listed companies to not only disclose risks that are “reasonably likely to have a material impact on their business, results of operations, or financial condition,” but also “to disclose information about its direct GHG emissions (Scope 1) and indirect emissions from purchased electricity or other forms of energy (Scope 2),” as well as certain types of GHG emissions “from upstream and downstream activities in its value chain (Scope 3).”

Furthermore, there are layers of international standards that impact many of the companies that would be covered under this bill. The International Sustainability Standards Board (ISSB), an independent, private-sector body, developed the IFRS Sustainability Standards that are topic-specific and require an entity to disclose certain information in respects to climate-related risks and opportunities and will result in a comprehensive global baseline of sustainability disclosures. These were developed in response to a strong desire to address a fragmented

landscape of voluntary, sustainability-related standards and requirements that add cost, complexity and risk to both companies and investors.

The United Kingdom already requires companies to report their emissions and the European Union will begin requiring companies to track emissions next year and report them in 2025. There is an “alphabet soup” of other climate-related financial disclosure requirements across Europe.

This bill provides that the emissions reporting is structured in a way that minimizes duplication of effort and allows a reporting entity to submit to the emissions reporting organization reports prepared to meet other national and international reporting requirements, including any reports required by the federal government, as long as those reports satisfy all of the requirements of the bill.

The business community that is governed under the AB 32 MMR regulation argues that regulation is likely the most comprehensive GHG reporting regulation in the world subject to rigorous oversight and enforcement. The regulation, developed and amended over 15 years, consists of hundreds of pages of detailed regulatory requirements and supporting appendices, guidance, and related materials impacting nearly 800 businesses. The author envisions that, to avoid costly and unnecessary duplication, an AB 32-regulated entity could include that information as part of their overall corporate climate accounting report that would be submitted pursuant to this bill.

6) **Value of disclosure.** Disclosure itself creates transparency that can have myriad benefits, including:

- Enable more informed government investment – including by the California State Teachers’ Retirement System and California Public Employees’ Retirement System, who are under state mandates to consider climate-related financial risk.
- Reputation enhancement– disclosure builds trust by responding to rising environmental concerns amongst the public.
- Competitive advantage – disclosure can give a company a performance edge on the stock market and access to capital (California’s Greenhouse Gas Reduction Fund resulting from AB 32 has billions in annual investments to make)
- Uncover risks and opportunities —a company can’t change what it doesn’t measure.

It bears mentioning that these benefits come with concerns. CalChamber worries the emissions estimates could be inaccurate, resulting in misguided public policy, while putting an onerous burden on companies. Also, there are concerns the reports would include vulnerabilities to shareholder value, consumer demand, supply chains, employee safety, loans and other economic threats that may be amplified by changing climate and more extreme weather events.

7) **Penalties.** Under the bill, ARB is required to adopt regulations that authorize administrative penalties, up to \$500,000, for nonfiling, late filing, or other failure to meet the disclosure requirements.

ARB would be required to consider, among other things, a company's good faith effort to comply, and provides that a company would not be subject to an administrative penalty for any misstatements with regard to Scope 3 emissions disclosures made with a reasonable basis and disclosed in good faith.

8) **Committee amendments.** The *Committee may wish to consider* the following amendments to:

- a) Clarify applicability of reporting entities based on revenue in U.S. dollars and that applicability shall be determined based on the reporting entity's revenue for the prior fiscal year.
- b) Allow reporting entities that are required to report mandatory industrial emissions pursuant to AB 32 to provide that data with the disclosure required pursuant to this bill.
- c) Require ARB's regulations to consider that a reporting entity's disclosure takes into account acquisitions, divestments, mergers, and other structural changes that can affect the greenhouse gas emissions reporting, and is disclosed in a manner consistent with the Greenhouse Gas Protocol standards and guidance.

9) **Related legislation.**

- a) SB 261 (Stern) requires companies that do business in California and have gross revenues exceeding \$500 million annually, excluding insurance companies, to report on their climate-related financial risk, and requires ARB to contract with a qualified climate reporting organization to review and publish an analysis of those reports, as specified. This bill is scheduled to be heard in this committee on July 10.
- b) SB 260 (Weiner, 2022) was nearly identical to SB 253. It failed on the Assembly Floor.
- c) SB 449 (Stern) was nearly identical to SB 261. It was held in the Senate Appropriations Committee.

REGISTERED SUPPORT / OPPOSITION:

Support

1000 Grandmothers for Future Generations
350 Bay Area Action
350 Conejo / San Fernando Valley
350 Marin
350 Sacramento
Active San Gabriel Valley
Alameda County Democratic Party
Asian Pacific Environmental Network
Audubon California
Avocado Green Brands
California Calls
California Environmental Justice Alliance

California Environmental Voters
California Faculty Association
California Green New Deal Coalition
California Health+Advocates, Subsidiary of
The California Primary Care Association
California Interfaith Power and Light
California Nurses for Environmental Health
and Justice
California Reinvestment Coalition
Californians Against Waste
Californians for Energy Choice
CALPIRG

Cascadia Climate Action Now
Center for Biological Diversity
Center for Climate Change and Health
Ceres
Citizens' Climate Lobby Santa Cruz
Cleaneearth4kids.org
Climate Action California
Climate Action Campaign
Climate Equity Policy Center
Climate Hawks Vote
Climate Reality Project, Los Angeles
Chapter
Climate Reality Project, San Fernando
Valley
Climateplan
Coalition for Clean Air
Courage California
Culver City Democratic Club
Dignity Health
Earthjustice
Eileen Fisher
Elders Climate Action, Norcal and Socal
Chapters
Environment California
Environmental Defense Fund
Environmental Working Group
Everlane
Fossil Free California
Friends Committee on Legislation of
California
Friends of The Earth
Green New Deal At UC San Diego
Greenbelt Alliance
Grove Collaborative
Hammond Climate Solutions Foundation
Human Impact Partners
IKEA
Indivisible Ca: Statestrong
Lawyers Committee for Civil Rights of The

San Francisco Bay Area
Lawyers' Committee for Civil Rights of The
San Francisco Bay Area
League of Women Voters of California
Microsoft Corporation
Mono Lake Committee
Move LA
Natural Resources Defense Council
Nextgen California
Patagonia
Pesticide Action Network
Planning and Conservation League
Plastic Pollution Coalition
Progressives for Democracy in America
Public Citizen
REI
Sacramento Area Congregations Together
Salesforce.com, INC.
San Diego 350
San Francisco Baykeeper
Save the Bay
SEIU California
Seventh Generation
Sierra Club California
Sierra Nevada Brewing Company
Solano County Democratic Central
Committee
Sunflower Alliance
Sunrise Movement San Diego
Sustainable Rossmore
Techequity Collaborative
The Climate Center
The Nature Conservancy
This! Is What We Did
Transformative Wealth Management LLC
University Professional and Technical
Employees
Voices for Progress

Opposition

Advanced Medical Technology Association
African American Farmers of California
Agricultural Council of California
Agricultural Energy Consumer Association
American Bakers Association
American Beverage Association

American Chemistry Council
American Composites Manufacturers
Association
American Council of Life Insurers
American Pistachio Growers
American Property Casualty Insurance

Association
Antelope Valley Chambers of Commerce
Association of California Life and Health
Insurance Companies
Bank Policy Institute
Building Owners and Managers Association
of California
Cal Asian Chamber of Commerce
CalCIMA
California Apartment Association
California Apple Commission
California Bankers Association
California Blueberry Association
California Blueberry Commission
California Building Industry Association
California Business Properties Association
California Business Roundtable
California Cattlemen's Association
California Cement Manufacturers
Environmental Coalition
California Chamber of Commerce
California Construction & Industrial
Materials Association
California Cotton Ginners & Growers
Association
California Credit Union League
California Date Commission
California Food Producers
California Forestry Association
California Fresh Fruit Association
California Fuels and Convenience Alliance
California Hispanic Chamber of Commerce
California Hospital Association
California Independent Petroleum
Association
California Life Sciences
California Manufactures & Technology
Association
California Mortgage Bankers Association
California Poultry Federation
California Railroads
California Restaurant Association
California Retailers Association
California Taxpayers Association
California Trucking Association
California Walnut Commission
California Water Association
Carlsbad Chamber of Commerce
Chemical Industry Council of California

Chino Valley Chamber of Commerce
Citrus Heights Chamber of Commerce
Costa Mesa Chamber of Commerce
Credit Union National Association
Danville Area Chamber of Commerce
Far West Equipment Dealers Association
Financial Services Institute
Greater High Desert Chamber of Commerce
Insured Retirement Institute
LA Canada Flintridge Chamber of
Commerce
Long Beach Area Chamber of Commerce
Los Angeles Area Chamber of Commerce
Los Angeles County Business Federation
Naiop California
National Association of Mutual Insurance
Companies
Nisei Farmers League
North San Diego Business Chamber
Oceanside Chamber of Commerce
Olive Growers Council of California
Orange County Business Council
Pacific Merchant Shipping Association
Palos Verdes Peninsula Chamber of
Commerce
PCI West-chapter of The Precast/Prestressed
Concrete Institute
Personal Insurance Federation of California
Plumbing Manufacturers International
Rancho Cordova Chamber of Commerce
San Diego Gas and Electric Company
Santa Barbara South Coast Chamber of
Commerce
Santee Chamber of Commerce
Securities Industry and Financial Markets
Association
Simi Valley Chamber of Commerce
Southern California Gas Company
Specialty Equipment Market Association
(SEMA)
Technet
Tenaska
The Association of General Contractors of
America
Torrance Area Chamber of Commerce
Truck and Engine Manufacturers
Association
Walnut Creek Chamber of Commerce
West Ventura County Business Alliance

Western Agricultural Processors Association
Western Growers Association
Western Plant Health Association

Western States Petroleum Association
Wine Institute

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