











SMUD Cap and Trade

Procurement

- Currently expected to receive more free allowances than have compliance obligation due to:
- Early investment in renewables
- Aggressive energy efficiency
- Efficient natural gas generation
- Nonetheless, expect to procure offsets up to 8% limit if price advantage outweighs perceived risks
 - Planning solicitation for this summer
- Regulatory risks will likely drive offset type and terms of contracts in the near-term
- As program continues, diversification will likely emerge as best protection





