Comment 1 for Cap and Trade Regulation (capandtrade2012) - 45 Day.

First Name: Steve
Last Name: Huhman
Email Address: Steven.Huhman@morganstanley.com
Affiliation: Morgan Stanley

Subject: Comments on Proposed Regulation Order for Cap-and-Trade program, Appendix A.1
Comment:

```
Attached are detailed comments of Morgan Stanley Capital Group,
Inc. on proposed amendments to the Cap-and-trade regulation
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Attachment: www.arb.ca.gov/lists/capandtrade2012/6-arb_6-28-12_amendment_comments.pdf

Original File Name: ARB 6-28-12 amendment comments.pdf

Date and Time Comment Was Submitted: 2012-06-13 12:01:44

No Duplicates.

Comment 2 for Cap and Trade Regulation (capandtrade2012) - 45 Day.

First Name: Norman
Last Name: Pedersen
Email Address: npedersen@hanmor.com
Affiliation: SCPPA

Subject: SCPPA comments on non-linking changes to Cap and Trade Regulation
Comment:

```
Please find attached the comments of the Southern California Public
Power Authority on the non-linking changes to the Cap and Trade
Regulation released in May 2012.
```

Attachment: www.arb.ca.gov/lists/capandtrade2012/8-300226001lmm06181202_scppa_comment_to_arb_on_may_cap_and_trade_changes.pdf

Original File Name: 300226001lmm06181202 SCPPA comment to ARB on May cap and trade changes.pdf

Date and Time Comment Was Submitted: 2012-06-18 18:17:47

No Duplicates.

Comment 3 for Cap and Trade Regulation (capandtrade2012) - 45 Day.

First Name: Kassandra
Last Name: Gough
Email Address: Kassandra.Gough@calpine.com
Affiliation: Calpine Corporation

Subject: 6/21/2012 Calpine Corporation's Comments on Proposed Amendments
Comment:

```
Attached are Calpine Corporation's Comments on Proposed Amendments
to the California Cap on Greenhouse Gas Emissions and Market-Based
Compliance Mechanisms.
```

Attachment: www.arb.ca.gov/lists/capandtrade2012/9-6-21-2012_calpine_comments_re_cap-and-trade.pdf

Original File Name: 6-21-2012 Calpine Comments re Cap-and-Trade.pdf

Date and Time Comment Was Submitted: 2012-06-21 14:05:27

No Duplicates.

Comment 4 for Cap and Trade Regulation (capandtrade2012) - 45 Day.

First Name: Jodean
Last Name: Giese
Email Address: jodean.giese@ladwp.com
Affiliation: LADWP

Subject: LADWP Comments on Amendments to Cap-and-Trade Regulation
Comment:

```
Please see attached comments.
```

Attachment: www.arb.ca.gov/lists/capandtrade2012/10-ladwp_-_comments_on_carb_amendments_to_california_cap_on_greenhouse_gas_emissions_and_market-based_compliance_mechanisms.pdf

Original File Name: LADWP - Comments on CARB Amendments to California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms.pdf

Date and Time Comment Was Submitted: 2012-06-22 10:28:28

No Duplicates.

Comment 5 for Cap and Trade Regulation (capandtrade2012) - 45 Day.

First Name: Tamara
Last Name: Rasberry
Email Address: trasberry@semprautilities.com
Affiliation:

Subject: Sempra Energy utilities Comments on Proposed Change to Cap-and-Trade Regulation
Comment:

```
For the June 28 Board Meeting
```

Attachment: www.arb.ca.gov/lists/capandtrade2012/12-seu_commts-prop_chgs_to_cap-and-trade_reg_6.22.12.docx

Original File Name: SEu Commts-Prop Chgs to Cap-and-Trade Reg 6.22.12.docx

Date and Time Comment Was Submitted: 2012-06-22 16:28:23

No Duplicates.

Comment 6 for Cap and Trade Regulation (capandtrade2012) - 45 Day.

First Name: Katie
Last Name: Sullivan
Email Address: sullivan@ieta.org
Affiliation: IETA

Subject: IETA Comments on Proposed Amendments
Comment:

```
Attached, please find comments from the International Emissions
Trading Association (IETA) on the "proposed amendments to the
California cap on greenhouse gas emissions & market-based
compliance mechanisms to allow for the use of compliance
instruments issued by linked jurisidictions", released by ARB in
May 2012.
```

Attachment: www.arb.ca.gov/lists/capandtrade2012/13-ieta_comments_to_arb_on_draft_linking_amendments_23june2012.pdf

Original File Name: IETA Comments to ARB on Draft Linking Amendments_23June2012.pdf

Date and Time Comment Was Submitted: 2012-06-24 10:43:35

No Duplicates.

Comment 7 for Cap and Trade Regulation (capandtrade2012) - 45 Day.

First Name: Zoltan
Last Name: Nagy-Kovacs
Email Address: znagy-kovacs@capitalpower.com
Affiliation: CP Energy Marketing (US) Inc.

Subject: Comments of CP Energy Marketing (US) Inc.
Comment:

```
To Whom it May Concern:  Attached please find the comments of CP
Energy Marketing (US) Inc. with respect to the ARB Cap and Trade
Regulations.
```

Attachment: www.arb.ca.gov/lists/capandtrade2012/14-comments_of_cp_energy_marketing__june_25_2012_.pdf

Original File Name: Comments of CP Energy Marketing (June 25 2012).pdf

Date and Time Comment Was Submitted: 2012-06-25 15:10:37

No Duplicates.

Comment 8 for Cap and Trade Regulation (capandtrade2012) - 45 Day.

First Name: Tony
Last Name: Andreoni
Email Address: tandreoni@cmua.org
Affiliation: CMUA

Subject: CMUA Comments on the Proposed Cap & Trade Program Amendments
Comment:

```
Please see our attached comment letter.
```

Attachment: www.arb.ca.gov/lists/capandtrade2012/15-arb_c_t_amendment_comments_doc_w_header_06_26_2012_letterhead_final.pdf

Original File Name: ARB C&T Amendment_Comments_doc w header 06_26_2012_letterhead_Final.pdf

Date and Time Comment Was Submitted: 2012-06-26 16:33:42

No Duplicates.

Comment 9 for Cap and Trade Regulation (capandtrade2012) - 45 Day.

First Name: Michael
Last Name: Gardner
Email Address: mgardner@gypsum.org
Affiliation: Gypsum Association

Subject: capandtrade2012
Comment:

The Industry Benchmark for the Gypsum Product Manufacturing Industry should be Revised from a Weight-Based Metric to a Production-Based Metric

When cap and trade regulations were established by the California Air Resources Board (CARB), the Gypsum Product Manufacturing (GPM) industry agreed to use a benchmark of metric tons CO2e per short ton of stucco used to produce wallboard. This permitted the CARB benchmark for gypsum board to be normalized with the EU ETS benchmark for plasterboard.

In the interim period since the establishment of the regulations, GPM industry manufacturers have modified formulations for some commodity products. The re-formulation process has resulted in the production of gypsum board materials that are characterized by a lighter average product weight than those produced a few years earlier. This trend in weight reduction is on-going and points toward a composite gypsum board product weight metric that will continue to decline on an annual basis for the foreseeable future.

The Gypsum Association believes the downward trend in product weight has created a scenario that will not allow the industry to take advantage of improvements in energy utilization. While formulation changes have permitted the GPM industry some reductions in energy consumption, the rate of energy consumption decrease has not kept pace with, and likely will not keep pace with, the rate of decrease in product weight.

The denominator in the product-based metric for gypsum board is weight-based. Conceptually, if product weight is continually decreased and energy usage does not decrease at a proportionate rate, members of the GPM industry may not be able to meet target CO2e allocations regardless of energy usage.

California is currently revising cap and trade regulations to harmonize its system with the cap and trade system that is being assembled by the Province of Quebec. Quebec has adopted a production-based metric for the GPM industry. In keeping with the goal to harmonize these two cap and trade systems, CARB should adopt industry benchmarks that are comparable wherever possible.

We propose that CARB work with the GPM industry through the Gypsum Association to solicit and establish a new production-based emissions benchmark for gypsum board production. The units of this benchmark should not be in terms of metric tons of stucco, but should reflect a

production-based metric, such as CO2e produced per a normalized unit or volume of board footage. The GPM industry is conducting an internal data review and intends to have a proposed metric available for presentation to CARB for review and discussion in the very near future. As with the Industry Assistance Factor, the Gypsum Association would appreciate being included in the stakeholder process to evaluate industry benchmarks in 2012.

(.pdf copy of statement attached)

Attachment: www.arb.ca.gov/lists/capandtrade2012/16-062712_carb_comments_-_final_capandtrade2012.pdf

Original File Name: 062712 CARB Comments - FINAL capandtrade2012.pdf

Date and Time Comment Was Submitted: 2012-06-27 08:22:07

No Duplicates.

Comment 10 for Cap and Trade Regulation (capandtrade2012) - 45 Day.

First Name: Carla
Last Name: Banks
Email Address: carla.banks@rocklandcapital.com
Affiliation: La Paloma Generating Company

Subject: Outstanding concerns with the cap and trade legislation.
Comment:

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Please see our comments provided in the attached file.
```

Attachment: www.arb.ca.gov/lists/capandtrade2012/17-board_meeting_comments_06262012.docx

Original File Name: Board Meeting comments_06262012.docx

Date and Time Comment Was Submitted: 2012-06-27 08:50:24

No Duplicates.

Comment 11 for Cap and Trade Regulation (capandtrade2012) - 45 Day.

First Name: Kyle
Last Name: Danish
Email Address: kwd@vnf.com
Affiliation: Van Ness Feldman

Subject: CERP Comments on Proposed Amendments
Comment:

```
Attached please find comments from the Coalition for Emission
Reduction Policy (CERP) on the Proposed Amendments to the
California Cap on Greenhouse Gas Emissions and Market-Based
Compliance Mechanisms to Allow for the Use of Compliance
Instruments Issued by Linked Jurisdictions. Out of an abundance of
caution, CERP has filed such comments in both ARB's open comment
dockets regarding the cap-and-trade program.
```

Attachment: www.arb.ca.gov/lists/capandtrade2012/18-cerp-arb_comments-june_2012.pdf

Original File Name: CERP-ARB Comments-June 2012.pdf

Date and Time Comment Was Submitted: 2012-06-27 09:46:35

No Duplicates.

Comment 12 for Cap and Trade Regulation (capandtrade2012) - 45 Day.

First Name: Catherine
Last Name: Reheis Boyd
Email Address: joey@wspa.org
Affiliation: WSPA

Subject: WSPA ARB Linkage Comments
Comment:

```
Per Cathy Reheis-Boyd, please see attached Western States Petroleum
Association Comments on the May 9, 2012 Amendments for Linking
California’s and Quebec’s Cap-and-Trade (C/T) Programs.
```

Attachment: www.arb.ca.gov/lists/capandtrade2012/19-wspa_ab_32_report_final_june19_2012.zip

Original File Name: WSPA AB 32 report FINAL June19 2012.zip

Date and Time Comment Was Submitted: 2012-06-27 10:12:54

No Duplicates.

Comment 13 for Cap and Trade Regulation (capandtrade2012) - 45 Day.

First Name: Stephen
Last Name: Burns
Email Address: Stephen.Burns@chevron.com
Affiliation: Chevron Corporation

Subject: Comments on the Proposed Amendment
Comment:

```
Chevron Corporation's comments on linkage and the genernal
amendments are attached.
```

Attachment: www.arb.ca.gov/lists/capandtrade2012/20-cvx_comments_on_final_linkage_and_general_amendments_6_27_12.pdf

Original File Name: CVX Comments on Final Linkage and General Amendments 6_27_12.pdf

Date and Time Comment Was Submitted: 2012-06-27 10:37:33

No Duplicates.

Comment 14 for Cap and Trade Regulation (capandtrade2012) - 45 Day.

First Name: Susie
Last Name: Berlin
Email Address: sberlin@mccarthylaw.com
Affiliation: Northern California Power Agency

Subject: NCPA Comments on Proposed Revisions
Comment:

```
Attached hereto, please find the Northern California Power Agency
comments on the Proposed Revisions to the Cap-and-Trade Regulation.
```

Attachment: www.arb.ca.gov/lists/capandtrade2012/21-ncpa_comments_re_5-9-12_cap-and-trade_reg_amendments__final_6-27-12_.pdf

Original File Name: NCPA Comments re 5-9-12 cap-and-trade reg amendments _final 6-27-12_.pdf

Date and Time Comment Was Submitted: 2012-06-27 10:43:22

No Duplicates.

Comment 15 for Cap and Trade Regulation (capandtrade2012) - 45 Day.

First Name: Amber
Last Name: Riesenhuber
Email Address: amber@iepa.com
Affiliation: IEP

Subject: IEP's comments on Amendments to cap and trade program
Comment:

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IEP's comments on Amendments tothe cap and trade program
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Attachment: www.arb.ca.gov/lists/capandtrade2012/23-iep_comments_on_amendments_to_cap_and_trade_program.pdf

Original File Name: IEP comments on Amendments to Cap and Trade Program.pdf

Date and Time Comment Was Submitted: 2012-06-27 11:11:46

No Duplicates.

Comment 16 for Cap and Trade Regulation (capandtrade2012) - 45 Day.

First Name: William
Last Name: Westerfield
Email Address: William.Westerfield@smud.org
Affiliation: Sacramento Municipal Utility District

Subject: Proposed Amendments to California Greenhouse Gas Emissions Cap-and-Trade Program
Comment:

```
Attached find SMUD's Comments on Proposed Amendments to California
Greenhouse Gas Emissions Cap-and-Trade Program and Market-Based
Compliance Mechanisms.
```

Attachment: www.arb.ca.gov/lists/capandtrade2012/24-smud_comments_on_proposed_mod_to_ca_cap_on_ghg_emissions.pdf

Original File Name: SMUD Comments on Proposed Mod to CA Cap on GHG Emissions.pdf

Date and Time Comment Was Submitted: 2012-06-27 11:14:47

No Duplicates.

Comment 17 for Cap and Trade Regulation (capandtrade2012) - 45 Day.

First Name: Douglas
Last Name: Davie
Email Address: ddavie@wellhead.com
Affiliation: Wellhead Electric Company, Inc.

Subject: Comments on May 9, 2012 Notice of Amendments to Cap-and-Trade Regulation
Comment:

Wellhead Electric Company, Inc. submits these comments to address the deletion of the Beneficial Holding Relationship provision (Section 95834) and the need for CARB to continue to evaluate and prepare for resolution of the issues faced by a very limited class of generators with pre-AB 32 contracts that have no available mechanism for recovery of AB 32 compliance costs. Wellhead suggests two regulatory amendments that will provide the CPUC and the CARB flexibility needed to address the matter should bilateral negotiations be unsuccessful. First, the CPUC should have the flexibility to not only create rules for revenue allocation, but also be able to adjust the disposition of allowances to utilities within its jurisdiction under a very limited set of circumstances. Second, CARB should enable the CARB Executive Director to adjust allowance allocations when an allocation to a utility fails to comport with Board intent and policy.

Attachment: www.arb.ca.gov/lists/capandtrade2012/25-120627_wellhead_comments_on_5.9.12_cap-and-trade_notice_vfin__00076417_.pdf

Original File Name: 120627_Wellhead Comments on 5.9.12 Cap-and-trade notice_VFIN (00076417).PDF

Date and Time Comment Was Submitted: 2012-06-27 11:20:51

No Duplicates.

Comment 18 for Cap and Trade Regulation (capandtrade2012) - 45 Day.

First Name: Paul
Last Name: Mason
Email Address: pmason@pacificforest.org
Affiliation: Pacific Forest Trust

Subject: Comments on proposed linking amendments
Comment:

```
Please see attached.
```

Attachment: www.arb.ca.gov/lists/capandtrade2012/26-6.27_pft_linking_comments.pdf

Original File Name: 6.27 PFT Linking comments.pdf

Date and Time Comment Was Submitted: 2012-06-27 11:47:28

No Duplicates.

Comment 19 for Cap and Trade Regulation (capandtrade2012) - 45 Day.

First Name: Brian
Last Name: Nowicki
Email Address: bnowicki@biologicaldiversity.org
Affiliation:

Subject: additional document
Comment:

```
BC forest protocol
```

Attachment: www.arb.ca.gov/lists/capandtrade2012/27-bc_forest_protocol_v1.pdf

Original File Name: BC_Forest_Protocol_v1.pdf

Date and Time Comment Was Submitted: 2012-06-27 11:59:08

No Duplicates.

Comment 20 for Cap and Trade Regulation (capandtrade2012) - 45 Day.

First Name: Angela
Last Name: Savnik
Email Address: Non-web submitted comment
Affiliation:

Subject: postcard comment
Comment:

```
see attachment card
```

Attachment: www.arb.ca.gov/lists/capandtrade2012/28-angelacommentcard.pdf

Original File Name: angelacommentcard.pdf

Date and Time Comment Was Submitted: 2012-07-03 11:39:39

No Duplicates.

Comment 21 for Cap and Trade Regulation (capandtrade2012) - 45 Day.

First Name: Dave
Last Name: Whelten
Email Address: Non-web submitted comment
Affiliation:

Subject: postcard comment
Comment:

```
see attached
```

Attachment: www.arb.ca.gov/lists/capandtrade2012/29-david.pdf

Original File Name: david.pdf

Date and Time Comment Was Submitted: 2012-07-03 11:49:46

No Duplicates.

Comment 22 for Cap and Trade Regulation (capandtrade2012) - 45 Day.

First Name: george
Last Name: Lehr
Email Address: Non-web submitted comment
Affiliation:

Subject: postcard
Comment:

see attached

Attachment: www.arb.ca.gov/lists/capandtrade2012/30-george.pdf

Original File Name: george.pdf

Date and Time Comment Was Submitted: 2012-07-03 11:52:50

No Duplicates.

Comment 23 for Cap and Trade Regulation (capandtrade2012) - 45 Day.

First Name: wm
Last Name: freeman
Email Address: Non-web submitted comment
Affiliation:

Subject: postcard
Comment:

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see attachment
```

Attachment: www.arb.ca.gov/lists/capandtrade2012/31-wm_freeman.pdf

Original File Name: wm freeman.pdf

Date and Time Comment Was Submitted: 2012-07-03 11:58:55

No Duplicates.

Comment 24 for Cap and Trade Regulation (capandtrade2012) - 45 Day.

First Name: H.H
Last Name: Freeman
Email Address: Non-web submitted comment
Affiliation:

Subject:
Comment:

see attahced

Attachment: www.arb.ca.gov/lists/capandtrade2012/32-h.h_freeman.pdf

Original File Name: H.H freeman.pdf

Date and Time Comment Was Submitted: 2012-07-03 12:04:07

No Duplicates.

There are no comments posted to Cap and Trade Regulation (capandtrade2012) that were presented during the Board Hearing at this time.