# Comment 1 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 45 Day.

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

Subject: Commetns on proposed Mandatory Reporting Regulation Amendments
Comment:

```
Please find comments in attached PDF file.
```

Attachment: www.arb.ca.gov/lists/com-attach/1-ghg2013-WjtVIVQ3AAxRNABv.pdf

Original File Name: ARB Comments MRR 10-24-13.pdf

Date and Time Comment Was Submitted: 2013-10-03 10:35:11

No Duplicates.

# Comment 2 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 45 Day.

First Name: Clare
Last Name: Breidenich
Email Address: cbreidenich@aciem.us
Affiliation: Western Power Trading Forum

Subject: Comments on Amendments to the MRR
Comment:

```
Please find attached comments of the Western Power Trading Forum on
Proposed Amendments to the Mandatory Reporting Regulation.

Thank you,
Clare Breidenich
GHG Committee Director
WPTF
```

Attachment: www.arb.ca.gov/lists/com-attach/2-ghg2013-U2IBN1F9VzxQewg5.pdf

Original File Name: 10-8-13 Final WPTF on MRR amendments.pdf

Date and Time Comment Was Submitted: 2013-10-08 09:36:44

No Duplicates.

# Comment 3 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 45 Day.

First Name: John
Last Name: Nagle
Email Address: john.nagle@ejgallo.com
Affiliation: E&J Gallo Winery

Subject: Definition correction needed
Comment:

```
The following changes need to be made in order to correct two
definitions in Appendix A to the staff report:

95102 Definitions, b (1) “Activin” is a brand name and not an
accurate description of the material.  The most accurate name of
this product is “Grape Seed Extract.”  Please change 95102 b (1) to
“Grape Seed Extract.”

95102 Definitions, b (25) “Crystal Color Concentrate” Crystal is a
brand and not an accurate description of the material.  “Dry Color
Concentrate” is a more accurate descripting of this product.
Please change 95102 b (25) to “Dry Color Concentrate.”
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-10-11 11:30:27

No Duplicates.

# Comment 4 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 45 Day.

First Name: John
Last Name: Nagle
Email Address: john.nagle@ejgallo.com
Affiliation: E&J Gallo Winery

Subject: Appendix C New and Modified Product-Based Benchmarks Table 2 correction
Comment:

```
The following changes need to be made to correct two definitions in
Appendix C New and Modified Product-Based Benchmarks staff report.

On page 9 Table2: Proposed Product Definitions for Beverage Sector
(NAICS 312120 and 312130)

Crystal is a brand and not an accurate description of the material.
 “Dry Color Concentrate” is a more accurate descripting of this
product.  Please change Crystal Color Concentrate “Dry Color
Concentrate.”

 “Activin” is a brand name and not an accurate description of the
material.  The most accurate name of this product is “Grape Seed
Extract.”  Please change Activin “Grape Seed Extract.”
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-10-11 16:51:25

No Duplicates.

# Comment 5 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 45 Day.

First Name: Braydon
Last Name: Boulanger
Email Address: braydon_boulanger@transalta.com
Affiliation: TransAlta

Subject: Amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions
Comment:

```
Please find attached comments on the proposed amendments to the
Regulation for the Mandatory Reporting of Greenhouse Gas Emissions.

Thank you for your time,

Braydon Boulanger
```

Attachment: www.arb.ca.gov/lists/com-attach/6-ghg2013-VyNRJQFhVGlQJQVk.pdf

Original File Name: TransAlta Comments on MRR revisions October 7 2013.pdf

Date and Time Comment Was Submitted: 2013-10-14 09:47:24

No Duplicates.

# Comment 6 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 45 Day.

First Name: Sarah
Last Name: Deslauriers
Email Address: SDeslauriers@carollo.com
Affiliation: CA Wastewater Climate Change Group

Subject: CWCCG Comments on the Amendments to the MRR of GHG Emissions
Comment:

The California Wastewater Climate Change Group (CWCCG) appreciates the opportunity to comment on the Potential Amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions and we appreciate the leadership of the California Air Resources Board (CARB) on climate change issues. The focus of our comment letter is the amended language in § 95101(b)(2).

Please review our attached comments and contact me if you have any questions at (925) 705-6404 or sdeslauriers@carollo.com. We welcome the opportunity to further discuss the wastewater community's position.

Sincerely,
Sarah Deslauriers
CWCCG Program Manager

Attachment: www.arb.ca.gov/lists/com-attach/7-ghg2013-UjEAcQRmAjJRMABf.pdf

Original File Name: CWCCG MRR Comment Letter_Final.pdf

Date and Time Comment Was Submitted: 2013-10-14 13:00:56

No Duplicates.

# Comment 7 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 45 Day.

First Name: Keith
Last Name: Adams
Email Address: adamskb@airproducts.com
Affiliation: Aur Products and Chemicals, Inc.

Subject: Comments regarding CA MRR proposed amendments
Comment:

```
Regarding Proposed Amendments to the California Mandatory Reporting
Regulation (Released 4 September 2013)
```

Attachment: www.arb.ca.gov/lists/com-attach/8-ghg2013-VTRRPgNwAg4GcANx.pdf

Original File Name: Air Products Comments - 2013 MRR Amendments.pdf

Date and Time Comment Was Submitted: 2013-10-15 13:55:30

No Duplicates.

# Comment 8 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 45 Day.

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

Subject: WSPA GHG Comments
Comment:

```
Please see attached Western States Petroleum Association Comments
on Proposed Amendments to the Regulation for Mandatory Reporting of
Greenhouse Gas Emissions; 45-day Draft Comment.
Thank you.
```

Attachment: www.arb.ca.gov/lists/com-attach/11-ghg2013-UjNWMgY0WDkGXwZh.pdf

Original File Name: AB32 GHG Emissions (2).pdf

Date and Time Comment Was Submitted: 2013-10-15 22:08:53

No Duplicates.

# Comment 9 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 45 Day.

First Name: Claire
Last Name: Halbrook
Email Address: cehu@pge.com
Affiliation: PG&E

Subject: PG&E Comments on the 45-day Amendments to the MRR
Comment:

```
PG&E Comments on the 45-day Amendments to the MRR
```

Attachment: www.arb.ca.gov/lists/com-attach/13-ghg2013-B3dSMwFfADYDWgNg.pdf

Original File Name: PG&E Comments on MRR 45 day language.pdf

Date and Time Comment Was Submitted: 2013-10-16 16:46:34

No Duplicates.

# Comment 10 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 45 Day.

First Name: Lloyd
Last Name: Avram
Email Address: LloydAvram@chevron.com
Affiliation: Chevron Corporation

Subject: Comments on the October 7 Workshop to Discuss Refineries and Related Industries
Comment:

```
Chevron is pleased to submit our comments on the October 7 workshop
which include comments on proposed CWB MRR definitions.
```

Attachment: www.arb.ca.gov/lists/com-attach/14-ghg2013-B2QGaFA0AyZXI1I9.pdf

Original File Name: Chevron Comments October 7 Refinery Benchmark Workshop Final.pdf

Date and Time Comment Was Submitted: 2013-10-16 18:35:13

No Duplicates.

# Comment 11 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 45 Day.

First Name: Harry
Last Name: Singh
Email Address: harry.singh@gs.com
Affiliation: J. Aron & Co. / Goldman Sachs

Subject: Comments on Amendments to Mandatory Reporting Regulation
Comment:

```
Please find comments on proposed amendments to the MRR in attached
PDF file.
```

Attachment: www.arb.ca.gov/lists/com-attach/15-ghg2013-WzFTClExUHEBaABu.pdf

Original File Name: J Aron Comments on MRR Changes October 2013.pdf

Date and Time Comment Was Submitted: 2013-10-17 07:24:07

No Duplicates.

# Comment 12 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 45 Day.

First Name: Lily
Last Name: Mitchell
Email Address: lmitchell@hanmor.com
Affiliation: SCPPA

Subject: SCPPA comments on 45-day changes to MRR
Comment:

```
Please find attached the comments of the Southern California Public
Power Authority on the proposed changes to the Mandatory Reporting
Regulation released for 45-day comment on September 4, 2013.
```

Attachment: www.arb.ca.gov/lists/com-attach/16-ghg2013-BTZcalVkVTQHMwA2.pdf

Original File Name: 300226001lmm10171301 SCPPA comment to ARB on 090413 MRR changes.pdf

Date and Time Comment Was Submitted: 2013-10-17 13:36:46

No Duplicates.

# Comment 13 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 45 Day.

First Name: Robert
Last Name: Ehlers
Email Address: robert.ehlers@valero.com
Affiliation: Valero

Subject: Comment Letter on MRR Proposed Order
Comment:

```
In response to ARB's release of Proposed Amendments to the
Regulation for Mandatory Reporting of Greenhouse Gas Emissions,
please see the attached comment letter from Valero.  A copy was
also e-mailed to appropriate ARB staff.  If you have any questions,
feel free to contact me.
```

Attachment: www.arb.ca.gov/lists/com-attach/17-ghg2013-AHYAZ1U4AjRRJVI9.pdf

Original File Name: Valero MRR cmt ltr 10-17-13.pdf

Date and Time Comment Was Submitted: 2013-10-17 14:17:55

No Duplicates.

# Comment 14 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 45 Day.

First Name: Robert
Last Name: Ehlers
Email Address: robert.ehlers@valero.com
Affiliation: Valero

Subject: Valero incorporation of WSPA comments
Comment:

```
Valero submitted a comment letter separately.  Attached is the WSPA
letter that Valero incorporates by reference.
```

Attachment: www.arb.ca.gov/lists/com-attach/18-ghg2013-BWNRPlY5UGJXPVIN.pdf

Original File Name: Final WSPA Comments on MRR Amendments.pdf

Date and Time Comment Was Submitted: 2013-10-17 15:12:53

No Duplicates.

# Comment 15 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 45 Day.

First Name: Mary
Last Name: Wiencke
Email Address: Mary.Wiencke@PacifiCorp.com
Affiliation:

Subject: PacifiCorp Comments on Sept. 4 Proposed Amendments
Comment:

```
Please accept PacifiCorp's comments on the proposed amendments to
the mandatory reporting rule.
```

Attachment: www.arb.ca.gov/lists/com-attach/19-ghg2013-WipcO1U3VG5XNwhh.pdf

Original File Name: PacifiCorp Comments_ARB Sept 4 Proposed Amendments.pdf

Date and Time Comment Was Submitted: 2013-10-17 15:46:25

No Duplicates.

## Comment 16 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 45 Day.

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

# Comment 17 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 45 Day.

First Name: Kara
Last Name: Roeder
Email Address: Roeder.kc@pg.com
Affiliation:

Subject: Amendments to The Regulation For Mandatory Reporting of Greenhouse Gas Emissions
Comment:

```
Please see attached comment.
```

Attachment: www.arb.ca.gov/lists/com-attach/21-ghg2013-B3cGX1E3UFwKbwRr.pdf

Original File Name: P&G Comment - GHG Reporting Requirement.pdf

Date and Time Comment Was Submitted: 2013-10-18 11:45:31

No Duplicates.

# Comment 18 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 45 Day.

First Name: Courtney
Last Name: Olive
Email Address: jcolive@bpa.gov
Affiliation: Bonneville Power Administration

Subject: Comment of Bonneville Power Administration Regarding Proposed Changes to MRR of 9.4.13
Comment:

```
Attached please find Bonneville Power Administration's comments on
the proposed changes to the MRR that were released on 9.4.13
```

Attachment: www.arb.ca.gov/lists/com-attach/22-ghg2013-VzRXPgdrU21XNFU7.pdf

Original File Name: Comment to CARB re 9.4.13 MRR changes (FINAL).pdf

Date and Time Comment Was Submitted: 2013-10-18 14:13:16

No Duplicates.

# Comment 19 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 45 Day.

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

Subject: SMUD Comments to Proposed Amendments to the Cap-and-Trade Regulation and MRR
Comment:

```
Attached please find the Sacramento Municipal Utility District's
Comments to Proposed Amendments to the Cap-and-Trade Regulation and
MRR.  Because the comments are applicable to capandtrade13 and
ghg2013, the attached document is uploaded to both comment logs.
```

Attachment: www.arb.ca.gov/lists/com-attach/23-ghg2013-VztWNQRiAH4FMQAw.pdf

Original File Name: LEG-2013-0838-SMUD-Comments-Cap-and-Trade-MRR.pdf

Date and Time Comment Was Submitted: 2013-10-18 15:02:53

No Duplicates.

# Comment 20 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 45 Day.

First Name: Justin
Last Name: Thompson
Email Address: justin.thompson@aps.com
Affiliation:

Subject: Comments on Amendments to Mandatory Reporting Regulation
Comment:

```
Please find comments on proposed amendments to the MRR in the
attached word file. Thank you.
```

Attachment: www.arb.ca.gov/lists/com-attach/24-ghg2013-VzRRNlMgVWQGX1Az.docx

Original File Name: CARB comments 102113.docx

Date and Time Comment Was Submitted: 2013-10-21 10:20:14

No Duplicates.

# Comment 21 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 45 Day.

First Name: Cathy
Last Name: Karlstad
Email Address: Cathy.Karlstad@sce.com
Affiliation: Southern California Edison Company

Subject: SCE Comments on Proposed Changes to the Mandatory Reporting Regulation
Comment:

```
Attached are Southern California Edison Company's Comments on the
Proposed 2013 Regulatory Changes to the Regulation for the
Mandatory Reporting of Greenhouse Gas Emissions.
```

Attachment: www.arb.ca.gov/lists/com-attach/25-ghg2013-AXIGY1M3Aw8DZgZp.pdf

Original File Name: SCE Comments on Proposed 2013 Regulatory Changes to the Mandatory Reporting Regulation.pdf

Date and Time Comment Was Submitted: 2013-10-21 17:35:53

No Duplicates.

# Comment 22 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 45 Day.

First Name: Robert
Last Name: Ehlers
Email Address: robert.ehlers@valero.com
Affiliation: Valero

Subject: 'Atypical' refineries - Valero comment letter 2 on MRR Proposed Order
Comment:

```
In addition to the comment letter that Valero submitted on October
17th in response to CARB's release of "Proposed Amendments to the
Regulation for Mandatory Reporting of Greenhouse Gas Emissions,"
Valero would like to comment also on CARB's recently proposed
criteria for categorizing some refineries as "atypical."
```

Attachment: www.arb.ca.gov/lists/com-attach/27-ghg2013-BnBSNVc6VGILf1M8.pdf

Original File Name: Valero MRR ltr atypical 10-22-13.pdf

Date and Time Comment Was Submitted: 2013-10-22 08:09:48

No Duplicates.

# Comment 23 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 45 Day.

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

Subject: WSPA Comments on October 7, 2013 Refiner Workshop
Comment:

```
Please see attached WSPA Comments on October 7, 2013 Refiner
Workshop.

Thank you.
```

Attachment: www.arb.ca.gov/lists/com-attach/28-ghg2013-BXJRJFwtUWNSC1U2.pdf

Original File Name: WSPA Comments on October 7th, 2013 Refiner Workshop.pdf

Date and Time Comment Was Submitted: 2013-10-22 10:00:35

No Duplicates.

# Comment 24 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 45 Day.

First Name: Robert
Last Name: Schlingman
Email Address: robert.schlingman@united.com
Affiliation: United Airlines, Inc.

Subject: United Airlines, Inc.'s Comments
Comment:

Attached and submitted via email to Mr. Richard Bode please find United Airlines, Inc. ("United") comments on the proposed Amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas emissions (Mandatory Reporting Regulation, or "MRR"), which are scheduled for adoption by ARB on October 24, 2013. As discussed in detail on the attachment, United's principal concern is the proposed MRR amendment in section 95104(e). This proposed new section would require operators of affected facilities to report whether an increase in toxic air contaminants ("TACs") or criteria pollutants may have occurred from its facility, and to specify the reasons for such potential increases. Rather than including this new section in the MRR, United respectfully suggests that ARB should omit this proposed section and instead refer to the emissions inventory information that the California Air Districts and U.S. EPA maintain. United appreciates the opportunity to comment on the proposed MRR amendments and urges consideration of our comments.

Attachment: www.arb.ca.gov/lists/com-attach/30-ghg2013-VyJROQNrBCMEZ1I2.pdf

Original File Name: United_Airlines_GHG_MRR_Comments .pdf

Date and Time Comment Was Submitted: 2013-10-22 11:39:31

No Duplicates.

# Comment 25 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 45 Day.

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

Subject: AEPCO Comments on MRR Amendments
Comment:

```
Attached are AEPCO's comments on the Proposed Amendments to
the MRR.
```

Attachment: www.arb.ca.gov/lists/com-attach/31-ghg2013-UTBcPwFwAjIDalQL.pdf

Original File Name: AEPCO Comments on MRR Regulatory Amendments Oct 22 2013.pdf

Date and Time Comment Was Submitted: 2013-10-22 11:16:41

No Duplicates.

# Comment 26 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 45 Day.

First Name: Nico
Last Name: van Aelstyn
Email Address: nvanaelstyn@bdlaw.com
Affiliation: Beveridge & Diamond, PC

Subject: Powerex's Comments on Proposed MRR Amendments
Comment:

```
Please see the attached comments letter.  Thank you.
```

Attachment: www.arb.ca.gov/lists/com-attach/32-ghg2013-VGZTZVRkBGQELwIz.pdf

Original File Name: 2013-10-22 Powerex Comments on Proposed MRR Amendments.PDF

Date and Time Comment Was Submitted: 2013-10-22 12:34:59

No Duplicates.

# Comment 27 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 45 Day.

First Name: Elysia
Last Name: Treanor
Email Address: Elysia.Treanor@pgn.com
Affiliation: Portland General Electric Company

Subject: Comments of PGE on the Proposed Amendments to the Mandatory Reporting Regulation
Comment:

```
Portland General Electric Company appreciates the opportunity to
provide comments to California Air Resources Board on the Proposed
Amendments to the Mandatory Reporting Regulation.  Our comments are
attached and are directed at requirements specific to electric
power entities.
```

Attachment: www.arb.ca.gov/lists/com-attach/33-ghg2013-VDdUPQBsBzlXNFc5.pdf

Original File Name: Comments on CARB 2013 MRR Regulatory Changes.pdf

Date and Time Comment Was Submitted: 2013-10-22 13:34:32

No Duplicates.

# Comment 28 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 45 Day.

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

Subject: IEP Comments to CARB re Amendments to the MRR
Comment:

```
Attached Please Find IEP Comments to CARB re Amendments to the
Mandatory Reporting Regulation.
```

Attachment: www.arb.ca.gov/lists/com-attach/35-ghg2013-B24BYlYnAAwCZ1U6.pdf

Original File Name: IEP Comments to CARB re MRR Amendments FILED.pdf

Date and Time Comment Was Submitted: 2013-10-22 17:23:13

No Duplicates.

# Comment 29 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 45 Day.

First Name: Robert
Last Name: Lucas
Email Address: bob.lucas@calobby.com
Affiliation: CCEEB

Subject: Comments on Proposed Amendments to the Regulation for Mandatory Reporting of GHG Emissions
Comment:

```
Thank you for the opportunity to comment.  If you have any
questions, please call me at 916-444-7337.
```

Attachment: www.arb.ca.gov/lists/com-attach/36-ghg2013-UzBVPAdrUmwFZlU7.pdf

Original File Name: Comments on Proposed Amendments to the Regulation for Mandatory Reporting of GHG-45-day Draft Comment.pdf

Date and Time Comment Was Submitted: 2013-10-22 18:54:42

No Duplicates.

# Comment 30 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 45 Day.

First Name: Clare
Last Name: Breidenich
Email Address: cbreidenich@aciem.us
Affiliation: Western Power Trading Forum

Subject: Supplemental Comments on MRR Amendments
Comment:

```
Please find attached supplemental comments of the Western Power
Trading Forum on the 45 day proposed amendments to the Mandatory
Reporting Regulation.

Thank you,
Clare Breidenich
WPTF GHG Committee Director
```

Attachment: www.arb.ca.gov/lists/com-attach/37-ghg2013-VmdSZFxwWDlWY1B9.pdf

Original File Name: 10-23-13 WPTF Supplemental on C&T- RPS Adjustment.pdf

Date and Time Comment Was Submitted: 2013-10-23 08:51:58

No Duplicates.

# Comment 31 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 45 Day.

First Name: Susie
Last Name: Berlin
Email Address: berlin@susieberlinlaw.com
Affiliation: M-S-R Public Power Agency

Subject: Comments on Proposed Amendments
Comment:

```
Attached please find the M-S-R Public Power Agency (M-S-R) Comments
on the Proposed Amendments to the Mandatory Reporting Regulation.
```

Attachment: www.arb.ca.gov/lists/com-attach/38-ghg2013-UTwAK1QmA31QJFQL.pdf

Original File Name: M-S-R comments re 2013 MRR amendments (final).pdf

Date and Time Comment Was Submitted: 2013-10-23 08:38:39

No Duplicates.

# Comment 32 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 45 Day.

First Name: Ann
Last Name: Trowbridge
Email Address: atrowbridge@daycartermurphy.com
Affiliation: Day Carter & Murphy LLP

Subject: Comments on Proposed Revisions to Cap on GHG Emissions and Reporting of GHG Emissions
Comment:

```
Attached please find our Comments on Proposed Revisions to the
California Cap on Greenhouse Gas Emissions and Market-Based
Compliance Mechanisms and the Regulation for the Mandatory
Reporting of Greenhouse Gas Emissions.

Thank you.
```

Attachment: www.arb.ca.gov/lists/com-attach/39-ghg2013-UzBVPFY6BDoEZ1Q6.pdf

Original File Name: Comments on Proposed Revisions to Cap-and-Trade and GHG.pdf

Date and Time Comment Was Submitted: 2013-10-23 11:17:14

No Duplicates.

# Comment 33 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 45 Day.

First Name: Dan
Last Name: Severson
Email Address: dbseverson@tid.org
Affiliation:

Subject: TID Comments on Mandatory Reporting Regulation
Comment:

```
Dear Clerk of the Board:

Turlock Irrigation District submits the attached comments on the
September 4, 2013 Proposed Amendments to the Mandatory Reporting
Regulation.

Sincerely,

Dan B. Severson
Turlock Irrigation District
```

Attachment: www.arb.ca.gov/lists/com-attach/40-ghg2013-V2ZWY1BgWToEMAIx.pdf

Original File Name: 131023 TID Comments on 9.4 MRR (00193146).pdf

Date and Time Comment Was Submitted: 2013-10-23 11:20:07

No Duplicates.

# Comment 34 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 45 Day.

First Name: Katy
Last Name: Rosenberg
Email Address: klr@a-klaw.com
Affiliation: EPUC/CAC

Subject: GHG2013 Comments on the Mandatory Reporting Regulation
Comment:

```
EPUC/CAC Comments on the Mandatory Reporting Regulation attached.
```

Attachment: www.arb.ca.gov/lists/com-attach/41-ghg2013-AGcAbl07WDlVY1Rl.zip

Original File Name: ghg2013 EPUC CAC Comments.zip

Date and Time Comment Was Submitted: 2013-10-23 11:42:26

No Duplicates.

# Comment 35 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 45 Day.

First Name: Melinda
Last Name: Hicks
Email Address: mhicks@kernoil.com
Affiliation: Kern Oil & Refining Co.

Subject: Kern Oil Comments on MRR Amendments
Comment:

```
Kern Oil appreciates the opportunity to provide comments.
Please see attached.
```

Attachment: www.arb.ca.gov/lists/com-attach/42-ghg2013-BW4BYgBzV2oAWVU6.pdf

Original File Name: Kern Oil MRR Comments 2013 Amendments 10-23-13.PDF

Date and Time Comment Was Submitted: 2013-10-23 11:53:06

No Duplicates.

# Comment 36 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 45 Day.

First Name: John
Last Name: Larrea
Email Address: john@clfp.com
Affiliation: CA League of Food Processors

Subject: CLFP Comments on MRR 2013
Comment:

```
CLFP Comments on MRR 2013
```

Attachment: www.arb.ca.gov/lists/com-attach/43-ghg2013-WzgGbFcwU3AAWQhl.pdf

Original File Name: CLFP MRR Comments 2013.pdf

Date and Time Comment Was Submitted: 2013-10-23 11:55:26

No Duplicates.

# Comment 1 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013). (At Hearing)

First Name: Cindy
Last Name: Parsons
Email Address: Non-web submitted comment
Affiliation: LADWP

Subject: Comments
Comment:

```
Please see attached comments.
```

Attachment: www.arb.ca.gov/lists/com-attach/44-ghg2013-AGMHaFU6ADcGeQNc.pdf

Original File Name: Cindy Parsons.pdf

Date and Time Comment Was Submitted: 2013-10-29 09:19:49

No Duplicates.

# Comment 2 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013). (At Hearing)

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

Subject: comments
Comment:

```
Please see attached comments.
```

Attachment: www.arb.ca.gov/lists/com-attach/45-ghg2013-BnJQN1wwVmQCdgZn.pdf

Original File Name: Tamara Rasberry.pdf

Date and Time Comment Was Submitted: 2013-10-29 09:22:17

No Duplicates.

# Comment 3 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013). (At Hearing)

First Name: Ellen
Last Name: Wolfe
Email Address: Non-web submitted comment
Affiliation: WPTF

Subject: Mandatory Reporting Comments
Comment:

```
Please see attached comments.
```

Attachment: www.arb.ca.gov/lists/com-attach/47-ghg2013-Wj9TOQNuAjQKYlMM.pdf

Original File Name: Ellen Wolfe.pdf

Date and Time Comment Was Submitted: 2013-10-29 14:02:27

No Duplicates.

# Comment 1 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 15-1.

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

Subject: IEP's comments on CARB's 15-Day Revisions to the MRR
Comment:

```
Attached please find IEP's comments on CARB's 15-Day Revisions to
the Mandatory Reporting Regulation.
```

Attachment: www.arb.ca.gov/lists/com-attach/48-ghg2013-Bm9XNFAhVFhSN1U6.pdf

Original File Name: IEP comments on CARB 15 Day MRR Language FINAL.pdf

Date and Time Comment Was Submitted: 2013-10-30 10:53:02

No Duplicates.

# Comment 2 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 15-1.

First Name: Dave
Last Name: Duke
Email Address: duked@fosterfarms.com
Affiliation: Foster Farms

Subject: Comments on proposed changes to the mandatory reporting of greenhouse gas emissions
Comment:

We at Foster Farms have the following comments regarding the proposed changes to the regulation for the mandatory reporting of greenhouse gas emissions. Our comments are limited to certain new definitions appearing in the proposed regulation and are editorial in nature. The comments are intended to clarify the definitions and thereby facilitate compliance.

In Section 95102 we request the following changes to the definitions of “poultry deli products”, “protein meal” and “whole chicken and chicken parts”:

Revised the definition of “poultry deli product” as shown below to specifically include the term “franks”, and to account for the transfers of these products to other facilities for additional processing (e.g., sending franks to a facility where they will be further processed to become corn dogs). We recommend the following wording:

(62) “Poultry deli product” means the products, including corn dogs, sausages, and franks, that contain a significant portion of pre-processed poultry, that are cooked and sold wholesale or retail, or transferred to other facilities.

Revise the definition of “protein meal” to “protein meal and fat” to specifically include all significant rendered products including poultry fat and feather meal. We recommend the following wording:

(65) “Protein meal and fat” means meal meal, feather meal and fat rendered products from poultry tissues including meat, viscera, bone, blood, and feathers.

Revise the definition of “whole chicken and chicken parts” to provide additional examples of parts and to account for transfers to other facilities for additional processing (e.g., sending wings to another facility for seasoning and cooking). We recommend the following wording:

(89) “Whole chicken and chicken parts” means the whole chicken or chicken parts (including breasts, wings, drums, and thighs) that are packaged for wholesale or retail, or transferred to other facilities.

We understand that these comments may be too late for consideration

in this revision to the regulation. We do note that there was a limited comment period for this regulatory change before it was heard by the Board. If the comments cannot be considered for the current regulatory change we then request that they be considered in the development of compliance guidance documents for this regulation. We would be pleased to discuss any questions or concerns you may have regarding these comments. Thank you for your consideration of our requests.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-11-11 13:52:01

No Duplicates.

# Comment 3 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 15-1.

First Name: Laura
Last Name: Beane
Email Address: laura.beane@iberdrolaren.com
Affiliation: Iberdrola Renewables

Subject: Mandatory Reporting of Greenhouse Gas Emissions
Comment:

```
Attached please find Iberdrola Renewables' comments related to the
proposed amendments to the California Mandatory Reporting of
Greenhouse Gas Emissions regulation issued on October 28, 2013.
```

Attachment: www.arb.ca.gov/lists/com-attach/50-ghg2013-Vj8BZVE1VXQGZAFz.pdf

Original File Name: Iberdrola Renewables Comments - Cap and Trade Regulation November 2013.pdf

Date and Time Comment Was Submitted: 2013-11-14 12:52:06

No Duplicates.

# Comment 4 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 15-1.

First Name: Braydon
Last Name: Boulanger
Email Address: braydon_boulanger@transalta.com
Affiliation: TransAlta

Subject: MRR revisions Nov 15 2013
Comment:

```
I appreciate your consideration of these attached comments as you
finalize your amendments.
```

Attachment: www.arb.ca.gov/lists/com-attach/52-ghg2013-AXUHcwFhUWwDdgVk.pdf

Original File Name: TransAlta Comments on MRR revisions Nov 15 2013.pdf

Date and Time Comment Was Submitted: 2013-11-14 13:59:35

No Duplicates.

# Comment 5 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 15-1.

First Name: Melissa
Last Name: Poole
Email Address: MelissaP@paramountfarming.com
Affiliation:

Subject: Comment on the Proposed Amendments to Mandatory Reporting of GHG Emissions
Comment:

```
Please find comments attached.
```

Attachment: www.arb.ca.gov/lists/com-attach/53-ghg2013-AG0HYFM8VGNSNQZy.pdf

Original File Name: Mandatory Reporting of GHG Emissions.pdf

Date and Time Comment Was Submitted: 2013-11-14 15:09:08

No Duplicates.

# Comment 6 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 15-1.

First Name: Christene
Last Name: Klimek
Email Address: cklimek@nvenergy.com
Affiliation:

Subject: comment on MRR language
Comment:

See attached.

Attachment: www.arb.ca.gov/lists/com-attach/54-ghg2013-V2YGM1VlVzUBNgQ3.doc

Original File Name: 131113_NVE MRR ARB comments.doc

Date and Time Comment Was Submitted: 2013-11-15 10:28:45

No Duplicates.

# Comment 7 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 15-1.

First Name: Clare
Last Name: Breidenich
Email Address: cbreidenich@aciem.us
Affiliation: Western Power Trading Forum

Subject: Comments on 15 day MRR changes
Comment:

```
Please find attached comments of the Western Power Trading Forum.
Thank you,
Clare Breidenich
WPTF GHG Committee Director
```

Attachment: www.arb.ca.gov/lists/com-attach/55-ghg2013-WmtTZFd7VjQGNVB9.pdf

Original File Name: 11-15-13 WPTF on 15 day MRR final.pdf

Date and Time Comment Was Submitted: 2013-11-15 11:50:44

No Duplicates.

# Comment 8 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 15-1.

First Name: Dan
Last Name: Severson
Email Address: dbseverson@TID.ORG
Affiliation: Turlock Irrigation District (“TID”)

Subject: Comments on September 4, 2013 Proposed Amendments to the Mandatory Reporting Regulation
Comment:

```
Dear Clerk of the Board,

On behalf of Turlock Irrigation District ("TID"), please find
attached our comments on the September 4, 2013 Proposed Amendments
to the Mandatory Reporting Regulation.

We appreciate the opportunity to provide these comments.

Sincerely,

Dan B. Severson
Turlock Irrigation District
```

Attachment: www.arb.ca.gov/lists/com-attach/56-ghg2013-Wi5SPVw5BAhROlQm.pdf

Original File Name: TID MRR Comments (15Nov2013) (00195983).pdf

Date and Time Comment Was Submitted: 2013-11-15 11:18:19

No Duplicates.

# Comment 9 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 15-1.

First Name: Susie
Last Name: Berlin
Email Address: berlin@susieberlinlaw.com
Affiliation: M-S-R Public Power Agency

Subject: Comments on 15-Day Change
Comment:

```
Attached please find the comments on the M-S-R Public Power Agency
on the 15-day changes to the Regulation for the Mandatory Reporting
of Greenhouse Gas Emissions.
thank you
```

Attachment: www.arb.ca.gov/lists/com-attach/57-ghg2013-VDkFLgR2A31SJgRb.pdf

Original File Name: M-S-R comments re 2013 MRR 15-day changes (final 11-15-13).pdf

Date and Time Comment Was Submitted: 2013-11-15 11:57:31

No Duplicates.

# Comment 10 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 15-1.

First Name: Catherine
Last Name: Reheis Boyd
Email Address: cathy@wspa.org
Affiliation: Western States Petroleum Association

Subject: Comments on 15-day Amendments to the Regulation for Mandatory Reporting of Greenhouse Gas
Comment:

```
Attached are the Western States Petroleum Association's Comments on
ARB’s 15-day Amendments to the Regulation for Mandatory Reporting
of Greenhouse Gas Emissions.
```

Attachment: www.arb.ca.gov/lists/com-attach/58-ghg2013-BWhdKQR3BzdSOwhl.pdf

Original File Name: MRRcomments 11152013 FINAL.pdf

Date and Time Comment Was Submitted: 2013-11-15 12:02:23

No Duplicates.

# Comment 11 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 15-1.

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

Subject: Proposed Amendments to the Rgulation for Mandatory Reporting; Proposed 15-Day modificatio
Comment:

```
Attached please find comments of Morgan Stanley Capital Group Inc.
on the 15-day modification proposals for the Mandatory Reporting
Regulation.
```

Attachment: www.arb.ca.gov/lists/com-attach/59-ghg2013-AWBVIVMwVFhRZlBl.docx

Original File Name: ARB 15-day 11-12-13.docx

Date and Time Comment Was Submitted: 2013-11-15 12:33:15

No Duplicates.

# Comment 12 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 15-1.

First Name: Lily
Last Name: Mitchell
Email Address: lmitchell@hanmor.com
Affiliation: Hanna and Morton for SCPPA

Subject: SCPPA comments on MRR 15-day changes
Comment:

```
Please find attached the comments of the Southern California Public
Power Authority on the proposed changes to the Mandatory Reporting
Regulation released for 15-day public comment on October 28, 2013.
```

Attachment: www.arb.ca.gov/lists/com-attach/61-ghg2013-U2AHMV1sAmNWYgQy.pdf

Original File Name: 300226001lmm11151301 SCPPA comment to ARB on 102813 MRR changes.pdf

Date and Time Comment Was Submitted: 2013-11-15 13:39:45

No Duplicates.

# Comment 13 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 15-1.

First Name: Keith
Last Name: Adams
Email Address: adamskb@airproducts.com
Affiliation: Air Products and Chemicals

Subject: Air Products and Chemicals - Comments on proposed 15-Day Modifications of MRR
Comment:

```
Air Products and Chemicals - Comments on proposed 15-Day
Modifications of MRR
```

Attachment: www.arb.ca.gov/lists/com-attach/62-ghg2013-AWBXOFMgBAhXIQl7.pdf

Original File Name: Air Products Comments - 2013 MRR 15-day Changes.pdf

Date and Time Comment Was Submitted: 2013-11-15 14:08:35

No Duplicates.

# Comment 14 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 15-1.

First Name: Ann
Last Name: Trowbridge
Email Address: atrowbridge@daycartermurphy.com
Affiliation: Day Carter & Murphy LLP

Subject: Comments on Proposed Revisions to the Regulation for Mandatory Reporting of GHG
Comment:

```
Attached please find the Comments on Proposed Revisions to the
Regulation for the Mandatory Reporting of Greenhouse Gas Emissions.
```

Attachment: www.arb.ca.gov/lists/com-attach/63-ghg2013-B2RROFE9UmxQM1A+.pdf

Original File Name: Comments of Inergy to Proposed Revisions.pdf

Date and Time Comment Was Submitted: 2013-11-15 14:37:36

No Duplicates.

# Comment 15 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 15-1.

First Name: Barbara
Last Name: McBride
Email Address: Barbara.McBride@calpine.com
Affiliation: Calpine Corporation

Subject: Comments on 15-Day Proposed Amendments
Comment:

```
Please find attached the comments of Calpine Corporation on the
15-Day Proposed Amendments to the Regulation for the Mandatory
Reporting of Greenhouse Gas Emissions.  Thank you for the
opportunity to submit these comments.
```

Attachment: www.arb.ca.gov/lists/com-attach/64-ghg2013-UzAHbgdrUG4GZVU7.pdf

Original File Name: Comments on the 15-Day Proposed Amendments to the Mandatory Reporting Rule.pdf

Date and Time Comment Was Submitted: 2013-11-15 14:50:47

No Duplicates.

# Comment 16 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 15-1.

First Name: Courtney
Last Name: Olive
Email Address: jcolive@bpa.gov
Affiliation: Bonneville Power Administration

Subject: BPA's 15-day comments on proposed MRR amendments
Comment:

```
Attached please find BPA's 15-day comments on proposed MRR
amendments.
```

Attachment: www.arb.ca.gov/lists/com-attach/65-ghg2013-UGFSYVV5AzRVMlMq.pdf

Original File Name: 15-day comment of BPA_FINAL.pdf

Date and Time Comment Was Submitted: 2013-11-15 15:04:38

No Duplicates.

# Comment 17 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 15-1.

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

Subject: Sempra Utilities Comments on Modified Text of MRR
Comment:

```
Attached are comments from SDGE and SoCalGas.
```

Attachment: www.arb.ca.gov/lists/com-attach/66-ghg2013-UyAAY1UhBwtXNwZv.pdf

Original File Name: SEu Final 15 Day Modification MRR comment letter 11152013.pdf

Date and Time Comment Was Submitted: 2013-11-15 15:23:35

No Duplicates.

# Comment 18 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 15-1.

First Name: Cindy
Last Name: Parsons
Email Address: cindy.parsons@ladwp.com
Affiliation: LADWP

Subject: LADWP Comments on 2013 MRR Amendments, 15-day changes
Comment:

See attached comments.

Attachment: www.arb.ca.gov/lists/com-attach/67-ghg2013-AGwBZgdiV3MLfQhX.pdf

Original File Name: LADWP Comments on 2013 MRR Amendments, 15-day changes.pdf

Date and Time Comment Was Submitted: 2013-11-15 15:51:31

No Duplicates.

# Comment 19 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 15-1.

First Name: Nico
Last Name: van Aelstyn
Email Address: nvanaelstyn@bdlaw.com
Affiliation: Beveridge & Diamond, PC

Subject: Powerex Comments Proposed MRR 15-Day Modifications
Comment:

```
Please see attached.
```

Attachment: www.arb.ca.gov/lists/com-attach/68-ghg2013-VmRRZ1FhVjYKIVJj.pdf

Original File Name: 2013-11-15 - Powerex Comments on Proposed MRR Amendments.pdf

Date and Time Comment Was Submitted: 2013-11-15 15:34:32

No Duplicates.