

**Comment 1 for Public Workshop on Cap-and-Trade Regulation
Amendments: Post-2020 Cap Setting and Allowance Allocation (caps-
allocation-ws) - 1st Workshop.**

First Name: Jim
Last Name: Roeder
Email Address: jroeder@kcc.com
Affiliation: Kimberly-Clark

Subject: Comments on Proposed Update to Tissue Benchmark
Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/com-attach/1-caps-allocation-ws-BzVVY1JiBGEFLINn.pdf

Original File Name: 2016-4-1 Kimberly-Clark Comments Ltr on CARB March 29 Puublic
Workshop& Tissue Benchmark.PDF

Date and Time Comment Was Submitted: 2016-04-01 14:31:38

No Duplicates.

**Comment 2 for Public Workshop on Cap-and-Trade Regulation
Amendments: Post-2020 Cap Setting and Allowance Allocation (caps-
allocation-ws) - 1st Workshop.**

First Name: Todd

Last Name: Jones

Email Address: todd.jones@resource-solutions.org

Affiliation: Center for Resource Solutions (CRS)

Subject: Comments of Center for Resource Solutions (CRS) in response to the March 29, 2016
Workshop

Comment:

Please find the comments of Center for Resource Solutions (CRS) in
response to the March 29, 2016 Workshop on Cap-and-Trade Regulation
Post-2020 Emissions Caps and Allowance Allocation attached.

Attachment: www.arb.ca.gov/lists/com-attach/3-caps-allocation-ws-VzQHcwNxUmIAaVQ5.pdf

Original File Name: CRScomment_3-29Workshop_4-12-2016.pdf

Date and Time Comment Was Submitted: 2016-04-12 11:21:29

No Duplicates.

**Comment 3 for Public Workshop on Cap-and-Trade Regulation
Amendments: Post-2020 Cap Setting and Allowance Allocation (caps-
allocation-ws) - 1st Workshop.**

First Name: Sarah

Last Name: Taheri

Email Address: staheri@scppa.org

Affiliation: Southern CA Public Power Authority

Subject: Southern CA Public Power Authority Comments on Post-2020 C&T Allowance
Allocation

Comment:

Please see attachment.

Attachment: [www.arb.ca.gov/lists/com-attach/4-caps-allocation-ws-
B3RVMFYnWHtXMFMM.pdf](http://www.arb.ca.gov/lists/com-attach/4-caps-allocation-ws-B3RVMFYnWHtXMFMM.pdf)

Original File Name: SCPPA Comments on ARB workshop - Allowance Allocations_Final.pdf

Date and Time Comment Was Submitted: 2016-04-15 09:39:57

No Duplicates.

**Comment 4 for Public Workshop on Cap-and-Trade Regulation
Amendments: Post-2020 Cap Setting and Allowance Allocation (caps-
allocation-ws) - 1st Workshop.**

First Name: Elvyra F.
Last Name: San Juan
Email Address: esanjuan@calstate.edu
Affiliation: CSU, Office of the Chancellor

Subject: California State University's comments regarding Cap-and-Trade Regulation 2016
Amendments:
Comment:

Good morning,

On behalf of Assistant Vice Chancellor Elvyra F. San Juan, please
find attached letter dated April 15, 2016 in reference to
California State University's comments regarding Cap-and-Trade
Regulation 2016 Amendments: Setting Post 2020 Emissions Caps.

Thank you,

HEATHER KING
Administrative Analyst for Architecture & Engineering

Capital Planning, Design & Construction
401 Golden Shore, 2nd Floor Long Beach, CA 90802-4210
Office: 562.951.4132 | Fax: 562.951.4921 | hking@calstate.edu
Please consider the environment before printing this email.

Attachment: www.arb.ca.gov/lists/com-attach/5-caps-allocation-ws-UDFdKQRnUFxQNQhn.pdf

Original File Name: ARB Comment letter allowances post 2000.pdf

Date and Time Comment Was Submitted: 2016-04-15 10:38:43

No Duplicates.

**Comment 5 for Public Workshop on Cap-and-Trade Regulation
Amendments: Post-2020 Cap Setting and Allowance Allocation (caps-
allocation-ws) - 1st Workshop.**

First Name: David

Last Name: Siao

Email Address: dsiao@roseville.ca.us

Affiliation: Roseville Electric

Subject: Roseville Electric Comments on March 29 CARB Post 2020 Cap and Allocation
Workshop
Comment:

Thank you for considering Roseville Electric's comments on the 1st
Workshop.

Attachment: www.arb.ca.gov/lists/com-attach/6-caps-allocation-ws-AXNVPAR2BDIBcQhh.pdf

Original File Name: Roseville Comments, March 29 CARB Post 2020 Cap and Allocation
Workshop.pdf

Date and Time Comment Was Submitted: 2016-04-15 10:56:13

No Duplicates.

**Comment 6 for Public Workshop on Cap-and-Trade Regulation
Amendments: Post-2020 Cap Setting and Allowance Allocation (caps-
allocation-ws) - 1st Workshop.**

First Name: Martin

Last Name: Caballero

Email Address: martin.caballero@mid.org

Affiliation: Modesto Irrigation District

Subject: March 29, 2016 CARB Workshop MID Comments

Comment:

MID respectfully submits the attached comments in response to the March 29, 2016 CARB workshop on proposed changes to the cap & trade program.

Attachment: www.arb.ca.gov/lists/com-attach/7-caps-allocation-ws-VDIQN1MgU19XYwU8.pdf

Original File Name: Mar 29 2016 CARB Workshop MID Comments.pdf

Date and Time Comment Was Submitted: 2016-04-15 12:42:14

No Duplicates.

**Comment 7 for Public Workshop on Cap-and-Trade Regulation
Amendments: Post-2020 Cap Setting and Allowance Allocation (caps-
allocation-ws) - 1st Workshop.**

First Name: Susie

Last Name: Berlin

Email Address: berlin@susieberlinlaw.com

Affiliation: Law Offices of Susie Berlin

Subject: NCPA Comments on March 29 Cap-Setting and Allowance Allocation Workshop
Comment:

Attached please find the Northern California Power Agency Comments
on the March 29 Cap-Setting and Allowance Allocation Workshop.

thank you

Attachment: [www.arb.ca.gov/lists/com-attach/8-caps-allocation-ws-
AW9RNFwtAjABWABj.pdf](http://www.arb.ca.gov/lists/com-attach/8-caps-allocation-ws-AW9RNFwtAjABWABj.pdf)

Original File Name: NCPA comments re March 29 Workshop (final 4-15-16).pdf

Date and Time Comment Was Submitted: 2016-04-15 14:09:52

No Duplicates.

**Comment 8 for Public Workshop on Cap-and-Trade Regulation
Amendments: Post-2020 Cap Setting and Allowance Allocation (caps-
allocation-ws) - 1st Workshop.**

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

Subject: IETA Comments on Post-2020 Caps & Allocation Workshop
Comment:

Dear Staff,

Attached, find IETA's comments on the 29 March Workshop on potential amendments to California's Cap-and-Trade Regulation related to post-2020 emissions caps and allowance allocation.

We appreciate this opportunity to share input.

Regards,

Katie

Director
International Emissions Trading Association (IETA)

Attachment: www.arb.ca.gov/lists/com-attach/9-caps-allocation-ws-VTwGZQRxUmBSC1c0.pdf

Original File Name: IETA Comments_ARB Post-2020 Cap-Allocation_15Apr2016.pdf

Date and Time Comment Was Submitted: 2016-04-15 15:11:48

No Duplicates.

**Comment 9 for Public Workshop on Cap-and-Trade Regulation
Amendments: Post-2020 Cap Setting and Allowance Allocation (caps-
allocation-ws) - 1st Workshop.**

First Name: Jerilyn Lopez

Last Name: Mendoza

Email Address: jmendoza5@semprautilities.com

Affiliation: SoCalGas and SDG&E

Subject: SoCalGas and SDG&E Comments on Cap Setting and Allowance Allocation
Comment:

Attached please find written comments submitted on behalf of
SoCalGas and SDG&E on the materials shared by the California Air
Resources Board at the March 29, 2016, workshop on Cap and Trade
Regulation Amendments: Post-2020 Cap Setting and Allowance
Allocation. Please contact me with any questions or concerns.
Thank you.

Jerilyn López Mendoza

SoCalGas

Environmental Affairs Program Manager - CARB

Energy and Environmental Affairs

and on behalf of SDG&E

555 W 5th St., GCT 17E5

Los Angeles, CA 90013

Jmendoza5@semprautilities.com

(desk) 213-244-5235

(cell) 213-700-0095

(fax) 213-244-8257

Attachment: www.arb.ca.gov/lists/com-attach/10-caps-allocation-ws-WilVPFIwBzVSOFI1.pdf

Original File Name: SoCalGas-SDG&E Comments on C&T Cap&Allowances 4-15-16.pdf

Date and Time Comment Was Submitted: 2016-04-15 15:32:50

No Duplicates.

**Comment 10 for Public Workshop on Cap-and-Trade Regulation
Amendments: Post-2020 Cap Setting and Allowance Allocation (caps-
allocation-ws) - 1st Workshop.**

First Name: Warren

Last Name: MacGillivray

Email Address: wmacgillivray@aresmgmt.com

Affiliation: Panoche Energy Center

Subject: PEC Comments

Comment:

Attached are PEC's comments to the March 29, 2016 workshop.

Attachment: www.arb.ca.gov/lists/com-attach/11-caps-allocation-ws-WytSMQFjU15XMgdm.pdf

Original File Name: PEC CARB Comments 4 15 16.pdf

Date and Time Comment Was Submitted: 2016-04-15 15:57:17

No Duplicates.

Comment 11 for Public Workshop on Cap-and-Trade Regulation Amendments: Post-2020 Cap Setting and Allowance Allocation (caps- allocation-ws) - 1st Workshop.

First Name: Bruce

Last Name: Ray

Email Address: bruce.ray@jm.com

Affiliation: Johns Manville

Subject: Comments of Johns Manville on CARB Post-2020 cap/allocation workshop on March 29, 2016

Comment:

Johns Manville (JM) operates a fiber glass insulation manufacturing plant in Willows in Glenn County about an hour north of Sacramento.

The JM Willows plant is designated ARB ID No. 104122 and falls within NAICS Code 327993 (mineral wool).

We attended the March 29, 2016 workshop on "Cap-and-Trade Regulation Post-2020 Emissions Caps and Allowance Allocation" and offer the following comments:

- The JM Willows plant participates in the current cap and trade program. At the end of the current program in 2020 we expect to be in allowance surplus. At the workshop I requested that staff confirm that JM can carry over our pre-2020 surplus into the post-2020 program for use in meeting our post-2020 compliance/surrender obligations. This was in fact confirmed by staff response and will guide our compliance strategy going forward.
- Clarification is needed on whether net electricity will be accounted for at the state-wide emission factor or at the individual provider's portfolio's numbers. It should be noted that those latter numbers may not be available in time for submittal to CITTS. CARB should also clarify if the statewide numbers will be adjusted year over year.
- For strategic planning purposes, the numbers CARB will use as electricity emission factors should be published well in advance.
- CARB should clarify how including direct allocation for purchased electricity will affect the current mandatory participation threshold of 25,000 MT CO₂e per year as well as the mandatory reporting threshold of 10,000 MT CO₂e per year.

At the March 29, 2016 workshop, staff announced that there will soon be scheduled a workshop on leakage risk. Industrial allowance allocations and leakage are closely related. Accordingly, we look forward to the leakage workshop and will be submitting additional comments on both leakage and industrial allocations.

Thank you,

Bruce D. Ray, Director of Governmental and Regulatory Affairs,
Associate General Counsel
Johns Manville

717 17th Street (80202) | Denver, Colorado 80217-5108
P: 303 810 9723

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-04-15 16:08:53

No Duplicates.

**Comment 12 for Public Workshop on Cap-and-Trade Regulation
Amendments: Post-2020 Cap Setting and Allowance Allocation (caps-
allocation-ws) - 1st Workshop.**

First Name: William

Last Name: Westerfield

Email Address: William.Westerfield@smud.org

Affiliation: SMUD

Subject: SMUD Comments On Post-2020 Cap-Setting and Allocation
Comment:

Please see attached comments.

Attachment: www.arb.ca.gov/lists/com-attach/13-caps-allocation-ws-AXJROlwoBTJSeVAz.pdf

Original File Name: SMUD-comments-capsettingallocation-LEG-16-0298.pdf

Date and Time Comment Was Submitted: 2016-04-15 16:21:16

No Duplicates.

**Comment 13 for Public Workshop on Cap-and-Trade Regulation
Amendments: Post-2020 Cap Setting and Allowance Allocation (caps-
allocation-ws) - 1st Workshop.**

First Name: Erica

Last Name: Morehouse

Email Address: emorehouse@edf.org

Affiliation: Environmental Defense Fund

Subject: Comments on Cap Setting and Allocation Post-2020

Comment:

Please accept EDF's comments on the March 29 Workshop.

Attachment: www.arb.ca.gov/lists/com-attach/14-caps-allocation-ws-UjFWfQN2Aw8BZANi.pdf

Original File Name: C-T Cap Setting and Allocation.pdf

Date and Time Comment Was Submitted: 2016-04-15 16:21:50

No Duplicates.

**Comment 14 for Public Workshop on Cap-and-Trade Regulation
Amendments: Post-2020 Cap Setting and Allowance Allocation (caps-
allocation-ws) - 1st Workshop.**

First Name: Claire

Last Name: Halbrook

Email Address: cehu@pge.com

Affiliation: Pacific Gas and Electric Company

Subject: PG&E Comments on 3/29 Cap Setting and Allocation Workshop
Comment:

PG&E Comments on 3/29 Cap Setting and Allocation Workshop

Attachment: www.arb.ca.gov/lists/com-attach/15-caps-allocation-ws-VydUNVQwVloAZVQ7.pdf

Original File Name: PGE Comments on allocation and cap setting workshop 4_15_16.pdf

Date and Time Comment Was Submitted: 2016-04-15 16:23:59

No Duplicates.

**Comment 15 for Public Workshop on Cap-and-Trade Regulation
Amendments: Post-2020 Cap Setting and Allowance Allocation (caps-
allocation-ws) - 1st Workshop.**

First Name: James

Last Name: Hendry

Email Address: jhendry@sfgwater.org

Affiliation: San Francisco PUC

Subject: Comments on post-2020 allowance allocation

Comment:

Attached are comments of the San Francisco PUC on the March 29th
CARB workshop on post-2020 allowance allocation issues. Thanks for
the opportunity to comment.

Attachment: [www.arb.ca.gov/lists/com-attach/16-caps-allocation-ws-
VDcAZ1AjVWQAWQFi.doc](http://www.arb.ca.gov/lists/com-attach/16-caps-allocation-ws-VDcAZ1AjVWQAWQFi.doc)

Original File Name: carb cap and trade post 2020 comment 041516.doc

Date and Time Comment Was Submitted: 2016-04-15 16:26:44

No Duplicates.

**Comment 16 for Public Workshop on Cap-and-Trade Regulation
Amendments: Post-2020 Cap Setting and Allowance Allocation (caps-
allocation-ws) - 1st Workshop.**

First Name: Shelly

Last Name: Sullivan

Email Address: ssullivan@onemain.com

Affiliation: Climate Change Policy Coalition

Subject: CCPC Comments Post-2020 Cap Setting
Comment:

Attached please find comments submitted on behalf CCPC regarding
ARB's Post-2020 Cap Setting workshop.

If you have any questions or need anything further please feel free
to contact me.

Attachment: www.arb.ca.gov/lists/com-attach/17-caps-allocation-ws-VjVVVMF0sBzdQCQd3.pdf

Original File Name: CCPC Post 2020 Cap Setting Comments_2_15_16.pdf

Date and Time Comment Was Submitted: 2016-04-15 16:38:10

No Duplicates.

**Comment 17 for Public Workshop on Cap-and-Trade Regulation
Amendments: Post-2020 Cap Setting and Allowance Allocation (caps-
allocation-ws) - 1st Workshop.**

First Name: Jerilyn

Last Name: Lopez Mendoza

Email Address: JMendoza5@semprautilities.com

Affiliation: SoCalGas Co

Subject: CA Joint NG Utility Group C&T Comment Letter

Comment:

These comments are respectfully submitted jointly on behalf of investor owned, natural-gas distribution utilities (IOUs): Southern California Gas Company (SoCalGas), Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric (SDG&E), Southwest Gas Corporation, and publicly-owned natural gas distribution utilities (POUs): serving the Cities of Palo Alto, Long Beach, and Vernon.

Attachment: www.arb.ca.gov/lists/com-attach/18-caps-allocation-ws-UWVXfFRkUDYLIAMy.pdf

Original File Name: 4-15-16 Final Comment letter-Gas Utilities Group_CARB_CT 3-29-16 wrkshp.pdf

Date and Time Comment Was Submitted: 2016-04-15 16:54:37

No Duplicates.

**Comment 18 for Public Workshop on Cap-and-Trade Regulation
Amendments: Post-2020 Cap Setting and Allowance Allocation (caps-
allocation-ws) - 1st Workshop.**

First Name: John

Last Name: Larrea

Email Address: john@clfp.com

Affiliation: CA League of Food Processors

Subject: Comments on C&T Regulation Amends for Post-202 Cap setting
Comment:

CLFP Comments on Post-202 cap set and allocation

Attachment: [www.arb.ca.gov/lists/com-attach/19-caps-allocation-ws-
WzhTOVQzAiEKUwZl.pdf](http://www.arb.ca.gov/lists/com-attach/19-caps-allocation-ws-WzhTOVQzAiEKUwZl.pdf)

Original File Name: CLFP comments April 15, 2016.pdf

Date and Time Comment Was Submitted: 2016-04-15 17:05:56

No Duplicates.

**Comment 19 for Public Workshop on Cap-and-Trade Regulation
Amendments: Post-2020 Cap Setting and Allowance Allocation (caps-
allocation-ws) - 1st Workshop.**

First Name: Alex

Last Name: Jackson

Email Address: ajackson@nrdc.org

Affiliation: NRDC

Subject: NRDC initial comments on cap setting & allocation post 2020

Comment:

See attached.

Attachment: www.arb.ca.gov/lists/com-attach/20-caps-allocation-ws-VzkFcVYzBzdRCFMw.pdf

Original File Name: NRDC Comments on Post 2020 Cap Setting Allocation.pdf

Date and Time Comment Was Submitted: 2016-04-19 13:23:36

No Duplicates.

**Comment 20 for Public Workshop on Cap-and-Trade Regulation
Amendments: Post-2020 Cap Setting and Allowance Allocation (caps-
allocation-ws) - 1st Workshop.**

First Name: Deric

Last Name: Wittenborn

Email Address: djw@eslawfirm.com

Affiliation: TID

Subject: TID Comments on the March 29th Cap-and-Trade Public Workshop
Comment:

See attached.

Attachment: www.arb.ca.gov/lists/com-attach/23-caps-allocation-ws-USVRPgBlBwsDZFU5.pdf

Original File Name: TID Allowance Allocation March 29 2016 Workshop.pdf

Date and Time Comment Was Submitted: 2016-04-19 13:23:36

No Duplicates.

**Comment 21 for Public Workshop on Cap-and-Trade Regulation
Amendments: Post-2020 Cap Setting and Allowance Allocation (caps-
allocation-ws) - 1st Workshop.**

First Name: Gerald
Last Name: Secundy
Email Address: jerrys@cceeb.org
Affiliation: CCEEB

Subject: CCEEB Cap-and-Trade March 29 Workshop Comment Letter
Comment:

See attached

Attachment: www.arb.ca.gov/lists/com-attach/24-caps-allocation-ws-UjECZ1YyV2FQNABf.pdf

Original File Name: CCEEB Cap-and-Trade March 29 Workshop Comments_4-22.pdf

Date and Time Comment Was Submitted: 2016-04-26 12:47:36

No Duplicates.

**Comment 22 for Public Workshop on Cap-and-Trade Regulation
Amendments: Post-2020 Cap Setting and Allowance Allocation (caps-
allocation-ws) - 1st Workshop.**

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

Subject: EPUC Comments on March 29 Workshop
Comment:

See attached

Attachment: www.arb.ca.gov/lists/com-attach/25-caps-allocation-ws-AWRRJ1cjUWEDWIIx.pdf

Original File Name: EPUC Comments March 29 Workshop.pdf

Date and Time Comment Was Submitted: 2016-04-26 12:47:36

No Duplicates.

**Comment 23 for Public Workshop on Cap-and-Trade Regulation
Amendments: Post-2020 Cap Setting and Allowance Allocation (caps-
allocation-ws) - 1st Workshop.**

First Name: Tamara

Last Name: Raspberry

Email Address: TRaspberry@semprautilities.com

Affiliation: SDGE

Subject: SDGE Comments to March 29 Workshop

Comment:

See attached.

Attachment: www.arb.ca.gov/lists/com-attach/26-caps-allocation-ws-UGIHMQExAGVXDgAw.pdf

Original File Name: 2016_04_13-SDGE-Comment-Cap-and-Trade-Post2020Workshop.pdf

Date and Time Comment Was Submitted: 2016-04-26 12:47:36

No Duplicates.

**Comment 24 for Public Workshop on Cap-and-Trade Regulation
Amendments: Post-2020 Cap Setting and Allowance Allocation (caps-
allocation-ws) - 1st Workshop.**

First Name: Mark

Last Name: Sedlacek

Email Address: ombcomm@arb.ca.gov

Affiliation: LADWP

Subject: LADWP Comments on 3-29-16 Workshop - Post 2020 Emissions Caps/Allowance
Allocation I

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/27-caps-allocation-ws-
AGxRNIUwUXUGcANc.pdf](http://www.arb.ca.gov/lists/com-attach/27-caps-allocation-ws-AGxRNIUwUXUGcANc.pdf)

Original File Name: LADWP Comments on Post 2020 Cap Setting Allowance Allocation April
2016.pdf

Date and Time Comment Was Submitted: 2016-05-04 10:37:46

No Duplicates.

**Comment 25 for Public Workshop on Cap-and-Trade Regulation
Amendments: Post-2020 Cap Setting and Allowance Allocation (caps-
allocation-ws) - 1st Workshop.**

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

Subject: WSPA comments on Cap & Trade Cost Containment
Comment:

See Attached

Attachment: www.arb.ca.gov/lists/com-attach/28-caps-allocation-ws-UyRSJ1cmADIEXQlq.zip

Original File Name: WSPA comment letter AB 32 Offsets Workshops_05_13_2016_final.zip

Date and Time Comment Was Submitted: 2016-05-16 13:31:03

No Duplicates.

There are no comments posted to Public Workshop on Cap-and-Trade Regulation Amendments: Post-2020 Cap Setting and Allowance Allocation (caps-allocation-ws) that were presented during the Workshop at this time.