Comment 1 for Cap & Trade Public Meeting (june-3-ng-ws) - 1st Workshop.

First Name: Wade
Last Name: Carrigan
Email Address: wade@abpackers.net
Affiliation: American Beef Packers, Inc.

Subject: Cap-and-Trade
Comment:

June 13, 2013

Steven Cliff, Ph.D.
Chief - Climate Change Market Branch
California Air Resources Board
1001 I Street
Sacramento, CA 95812-2828

Re: American Beef Packers' Comments on the Air Resources Board Cap-and-Trade Public Meeting to Discuss Natural Gas Suppliers Under the Cap-and-Trade Program

Dear Dr. Cliff:

American Beef Packers appreciates the opportunity to submit these comments on the Air Resources Board's (ARB) June 3rd public meeting to discuss how the natural gas supplier's will be treated under the cap-and-trade program.

American Beef Packers is a significant user of natural gas. In this difficult economy, it is important that we manage our operating costs. Our natural gas bill is an important part of our on-going operating costs. If the full cost of carbon is passed through to natural gas customers, our natural gas utility bill will increase by 16%. This would present a significant challenge to my business and our competiveness with businesses outside of California.

For nearly 25 years, California's leadership in the area of air quality has contributed to significant improvements in the reduction of emissions. Many years before AB32, the natural gas sector stepped up to the challenge by advancing energy efficiency programs and standards. As the utility representatives discussed at the June 3rd workshop, natural gas utility customers in California have already spent over $2 billion on energy efficiency programs aimed at reducing natural gas use and associated greenhouse gas (GHG) emissions. As a result, the natural gas sector is already below its 1990 GHG emissions levels years before the AB32 goal for 2020.

American Beef Packers is one of the many businesses in California that has participated in one of SoCalGas' energy efficiency programs. We have invested in a boiler replacement and new pipe insulation. Through this partnership with SoCalGas, we have reduced our natural gas use by a total of 55,327 therms. In addition, our

business has added 210 jobs to the community of Chino.

While, we recognize the challenge California has to meet its 2020 goal. We believe the contributions already made by the natural gas sector should be acknowledged by ARB and factored into its plans for providing allowances to the natural gas suppliers.

We support the joint utility proposal for ARB to provide the utilities with 100% of their allowances in 2015 with a small decline in free allowance through 2020. This proposal will allow a phasing in of the carbon price to natural gas customers, while rewarding the sector for taking early actions to reduce emissions.

Thank you again for the opportunity to submit these comments. We look forward to continuing our work with ARB and other stakeholders to ensure the successful implementation of Assembly Bill (AB) 32.

Very truly yours,

Wade Carrigan, President
American Beef Packers, Inc.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-06-13 09:48:51

No Duplicates.

Comment 2 for Cap & Trade Public Meeting (june-3-ng-ws) - 1st Workshop.

First Name: Aaron
Last Name: Jenkins
Email Address: ajenkins@ashland.com
Affiliation:

Subject: Re: Ashland Inc.'s Comments on the Air Resources Board Cap-and-Trade Public Meeting to Dis
Comment:

June 17, 2013

Steven Cliff, Ph.D.
Chief - Climate Change Market Branch
California Air Resources Board
1001 I Street
Sacramento, CA 95812-2828

Re: Ashland Inc.'s Comments on the Air Resources Board Cap-and-Trade Public Meeting to Discuss Natural Gas Suppliers Under the Cap-and-Trade Program

Dear Dr. Cliff:

Ashland Inc. appreciates the opportunity to submit these comments on the Air Resources Board's (ARB) June 3rd public meeting to discuss how the natural gas supplier's will be treated under the cap-and-trade program.

Ashland is a significant user of natural gas. In this difficult economy, it is important that we manage our operating costs. Our natural gas bill is an important part of our on-going operating costs. If the full cost of carbon is passed through to natural gas customers, our natural gas utility bill will increase by up to 16%. This would present a significant challenge to my business and our competiveness with businesses outside of California.

For nearly 25 years, California's leadership in the area of air quality has contributed to significant improvements in the reduction of emissions. Many years before AB32, the natural gas sector stepped up to the challenge by advancing energy efficiency programs and standards. As the utility representatives discussed at the June 3rd workshop, natural gas utility customers in California have already spent over $2 billion on energy efficiency programs aimed at reducing natural gas use and associated greenhouse gas (GHG) emissions. As a result, the natural gas sector is already below its 1990 GHG emissions levels years before the AB32 goal for 2020.

Ashland is one of the many businesses in California that has participated in one of SoCalGas' energy efficiency programs. We were invested in equipment modernization, including steam traps and heat recovery systems. Through this partnership with SoCalGas, we have reduced our natural gas use by a total of 328,270 therms so

far.

While, we recognize the challenge California has to meet its 2020 goal. We believe the contributions already made by the natural gas sector should be acknowledged by ARB and factored into its plans for providing allowances to the natural gas suppliers.

We support the joint utility proposal for ARB to provide the utilities with 100% of their allowances in 2015 with a small decline in free allowance through 2020. This proposal will allow a phasing in of the carbon price to natural gas customers, while rewarding the sector for taking early actions to reduce emissions.

Thank you again for the opportunity to submit these comments. We look forward to continuing our work with ARB and other stakeholders to ensure the successful implementation of Assembly Bill (AB) 32.

Very truly yours,

Aaron Jenkins, PE
Plant Engineer

Ashland Performance Materials
Division of Ashland, Inc
6608 E 26st Street
Los Angeles, CA 90040

Attachment: www.arb.ca.gov/lists/com-attach/3-june-3-ng-ws-VzYHcl00Aj0CZQhm.docx

Original File Name: Ashland Comments.docx

Date and Time Comment Was Submitted: 2013-06-14 11:01:32

No Duplicates.

Comment 3 for Cap & Trade Public Meeting (june-3-ng-ws) - 1st Workshop.

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

Subject: Natural Gas Suppliers Allowance Allocation Proposal
Comment:

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Attached are CLFP's comments support the joint utility proposal
regarding 100% allowance allocations for natural gas suppliers.
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Attachment: www.arb.ca.gov/lists/com-attach/4-june-3-ng-ws-UDNRO1E2ACNQCQJh.pdf

Original File Name: CLFP Comments - CARB Nat Gas Workshop 06142013.pdf

Date and Time Comment Was Submitted: 2013-06-14 16:17:51

No Duplicates.

Comment 4 for Cap & Trade Public Meeting (june-3-ng-ws) - 1st Workshop.

First Name: Ryan
Last Name: Young
Email Address: ryany@greenlining.org
Affiliation:

Subject: Natural Gas Suppliers Under the Cap
Comment:

```
Please see the attached comments.
```

Attachment: www.arb.ca.gov/lists/com-attach/5-june-3-ng-ws-UjVUIAZiAjQDawll.pdf

Original File Name: Greenlining Comments on Nat Gas Under Cap.ARB.June172013_Final.pdf

Date and Time Comment Was Submitted: 2013-06-17 16:26:32

No Duplicates.

Comment 5 for Cap & Trade Public Meeting (june-3-ng-ws) - 1st Workshop.

First Name: Alex
Last Name: Jackson
Email Address: ajackson@nrdc.org
Affiliation: NRDC

Subject: NRDC & EDF Comments on NG Suppliers Workshop
Comment:

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Please find attached NRDC & EDF's comments on the June 3, 2013 NG
suppliers workshop.
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Attachment: www.arb.ca.gov/lists/com-attach/6-june-3-ng-ws-AmwFcQNmV2cFXANc.pdf

Original File Name: NRDC & EDF Comments on June 3 Cap and Trade NG Suppliers Workshop.pdf

Date and Time Comment Was Submitted: 2013-06-17 16:48:50

No Duplicates.

Comment 6 for Cap & Trade Public Meeting (june-3-ng-ws) - 1st Workshop.

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

Subject: IEP Comments on Natural Gas Supplier Workshop
Comment:

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IEP Comments on Natural Gas Supplier Workshop
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Attachment: www.arb.ca.gov/lists/com-attach/7-june-3-ng-ws-UThUNwZ3WFRVMARr.pdf

Original File Name: IEP Comments to CARB on Natural Gas Supplier Workshop FINAL.pdf

Date and Time Comment Was Submitted: 2013-06-17 17:26:21

No Duplicates.

Comment 7 for Cap & Trade Public Meeting (june-3-ng-ws) - 1st Workshop.

First Name: Mark
Last Name: Krausse
Email Address: mckd@pge.com
Affiliation:

Subject: Gas Utility Comments
Comment:

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Attached is the Gas Utility comments.
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Attachment: www.arb.ca.gov/lists/com-attach/8-june-3-ng-ws-Wj1TNF0vV1tXJAh8.pdf

Original File Name: Gas Utility Comments Final.pdf

Date and Time Comment Was Submitted: 2013-06-17 18:04:02

No Duplicates.

There are no comments posted to Cap & Trade Public Meeting (june-3-ng-ws) that were presented during the Workshop at this time.