Comment 1 for Cap-and-Trade Market Related Reporting and Cost Containment (reportcostcontain-ws) - 1st Workshop.

First Name: Lisa
Last Name: Jacobson
Email Address: ljacobson@bcse.org
Affiliation: President

Subject: BCSE's Comments on the 6/25 CARB Workshop on Mkt-Related Reporting & Cost Containment
Comment:

Dear Board Members:

The Business Council for Sustainable Energy commends the California Air Resources Board (CARB) for convening a series of public workshops this summer regarding possible changes to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms. BCSE commends CARB for recognizing the importance of offsets as a tool to ensure cost-effective compliance with the Cap-and-Trade Program. As you contemplate possible regulatory amendments, we urge you to consider the measures suggested below to ensure an ample supply of high-quality offsets is available to regulated entities.

The Business Council for Sustainable Energy is a coalition of companies and trade associations from the energy efficiency, natural gas and renewable energy sectors, and also includes independent electric power producers, investor-owned utilities, publicly-owned utilities, and commercial end-users. Founded in 1992, the Council advocates for policies that expand the use of commercially available clean energy technologies, products and services. The coalition's diverse business membership is united around the revitalization of the economy and the creation of a secure and reliable energy future for America. BCSE includes a number of members in the State of California, including regulated entities that are subject to the requirements of AB 32; offset providers; and offset verifiers. The Council and its members have participated in the development of AB 32 since its inception. A document about BCSE, as well as a document about the Council's recently-released Sustainable Energy in America Factbook 2013, is attached for your reference.

The Council has long supported enactment of comprehensive and market-based climate change and energy legislation and believes a key feature of any program should be the ability for entities to generate and purchase offset credits. While the Council encourages covered entities to undertake internal emission reduction activities, such as deploying renewable energy and energy efficiency, to the greatest extent possible, our members recognize offset purchases as an important complementary tool to help covered entities manage compliance costs, widen the scope of environmental benefits and lower economic costs for energy consumers.

As CARB reviews and updates the Cap-and-Trade Program, BCSE

encourages the following:

- CARB should closely monitor the offset market to ensure there is an adequate supply of offsets;
- CARB should continue its efforts to adopt additional offset protocols, while ensuring that the process for selection of project types and development of offset protocols is streamlined and transparent;
- CARB should, to the extent possible, build on existing high-quality offset protocols developed by voluntary greenhouse gas emission reduction programs;
- CARB should enable compliance entities to carry over any unused portion of their Quantitative Usage Limit to the next compliance period;
- If the Allowance Price Containment Reserve (APCR) is being depleted, CARB should consider expanding the use of offsets as a cost containment mechanism.

The protocols for offset projects that have been approved by the state of California -- in forestry, urban forestry, livestock, and ozone depleting substances, as well as those pending approval in rice cultivation and mine methane capture – will provide environmental benefits, create new economic opportunities and spur innovation, as well as serve as an important cost containment tool. In addition to these protocols, BCSE believes CARB will need to continue to develop and approve further protocols to ensure an adequate supply. In particular, we urge CARB to consider high-bleed pneumatic controller retrofits, nitrous oxide from fertilizer management in agriculture, organic waste composting and digestion, grazing land and livestock management improvements, avoided conversion of grasslands to agriculture, wetlands conservation and restoration, and similar project types, as activities likely to deliver high-quality greenhouse gas reductions, provide economic and environmental benefits within California, and generate significant potential offset supply from across the United States.

CARB’s currently adopted offset protocols are generally geographically limited to projects within the United States. However, the defining text for offsets in the Cap and Trade regulation allows CARB to adopt offset protocols with a wider geographic basis, including Canada and Mexico, and includes a mechanism for including other international offsets when protocols for these are developed and adopted. BCSE believes that as CARB considers new offset protocols, there should be consideration of expanded geographic eligibility for projects, in order to facilitate greater offset supply. An expanded offset supply will be particularly important should allowance prices rise to the APCR prices.

It is in California’s interest to allow for expanded opportunities for offset developers to invest in the deployment of clean technologies for producing long-term greenhouse gas reductions. Furthermore, the expanded use of offsets is a key cost containment strategy. If the APCR is being depleted, regulated entities should be able to manage compliance costs through a reasonable expansion of use of high-quality offsets. In order to keep allowances prices at or below the highest tier of the APCR, ARB could also consider selling additional allowances at the highest tier of the APCR while preserving environmental integrity by investing the proceeds to obtain a commensurate amount of emissions reductions via offsets or other emission reduction activities.

BCSE appreciates your efforts to move forward with the AB 32 program to reduce greenhouse gas emissions. We look forward to working with you as you review the program and offer our assistance to reach out to stakeholders in the State of California regarding the positive role of offsets in meeting the State's greenhouse gas emission reduction goals.

Please feel free to contact me in the Council's offices with any comments or questions.

Sincerely,

Lisa Jacobson
President

Attachment: www.arb.ca.gov/lists/com-attach/1-reportcostcontain-ws-BWdQNVwuAzUDWgll.pdf

Original File Name: BCSE Letter to CARB re Public Workshops 6 21 2013 (2).pdf

Date and Time Comment Was Submitted: 2013-06-26 06:14:58

No Duplicates.

Comment 2 for Cap-and-Trade Market Related Reporting and Cost Containment (reportcostcontain-ws) - 1st Workshop.

First Name: Dallas
Last Name: Burtraw
Email Address: Burtraw@RFF.org
Affiliation: Resources for the Future

Subject: Cost Containment Workshop - Comments
Comment:

```
Attached are written comments about options for cost containment in
the cap-and-trade program.
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Attachment: www.arb.ca.gov/lists/com-attach/3-reportcostcontain-ws-WjhQI1IhVnEAdFU0.pdf

Original File Name: Burtraw Comments 130625.pdf

Date and Time Comment Was Submitted: 2013-06-27 09:47:53

No Duplicates.

Comment 3 for Cap-and-Trade Market Related Reporting and Cost Containment (reportcostcontain-ws) - 1st Workshop.

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

Subject: LADWP Comments - CARB GHG Cap & Trade Regulation
Comment:

```
Attached are LADWP's comments related to CARB's GHG Cap & Trade
Regulation.
```

Attachment: www.arb.ca.gov/lists/com-attach/4-reportcostcontain-ws-VDhQN1cyVnJQJlIN.pdf

Original File Name: LADWP Comments on CARB GHG Cap & Trade Program.pdf

Date and Time Comment Was Submitted: 2013-07-09 12:10:48

No Duplicates.

Comment 4 for Cap-and-Trade Market Related Reporting and Cost Containment (reportcostcontain-ws) - 1st Workshop.

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

Subject: Comments on June 25 Workshop
Comment:

```
Attached please find comments of Morgan Stanley Capital Group, Inc.
on June 25 Workshop
```

Attachment: www.arb.ca.gov/lists/com-attach/5-reportcostcontain-ws-UDFUIFAzBQlXI1A1.doc

Original File Name: ARB Retirement Order Comments 7-9-13.doc

Date and Time Comment Was Submitted: 2013-07-09 13:35:59

No Duplicates.

Comment 5 for Cap-and-Trade Market Related Reporting and Cost Containment (reportcostcontain-ws) - 1st Workshop.

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

Subject: IEP Comments to CARB regarding Cost Containment
Comment:

```
Attached are IEP's comments to CARB on the Cap and Trade Program
Workshop on Cost Containment, Compliance Requirements and Public
Information Sharing.  Thank you.
```

Attachment: www.arb.ca.gov/lists/com-attach/6-reportcostcontain-ws-AmsBYlEgAw8DZgNs.pdf

Original File Name: IEP Comments to CARB re Cost Containment FILED.pdf

Date and Time Comment Was Submitted: 2013-07-09 14:17:22

No Duplicates.

Comment 6 for Cap-and-Trade Market Related Reporting and Cost Containment (reportcostcontain-ws) - 1st Workshop.

First Name: Dan
Last Name: Riley
Email Address: Daniel.T.Riley@tsocorp.com
Affiliation: Tesoro

Subject: Comments on the Proposed Amendment to the Cap and Trade Regulation
Comment:

July 9, 2013

Via web: http://www.arb.ca.gov/cc/capandtrade/comments.htm

Ms. Rajinder Sahota
Cap and Trade Program
California Air Resources Board
1001 I Street,
Sacramento, CA 95814

Subject: Comments on the Proposed Amendment to the Cap and Trade Regulation

Dear Ms. Sahota:

Thank you for an opportunity to comment on the proposed amendment to the Cap and Trade regulation. Tesoro has been working with ARB staff regarding an appropriate cap adjustment factor and benchmark for the Tesoro Wilmington Calciner (former BP Wilmington Calciner). Tesoro recommends the following changes to the proposed amendment:

1. The Cap Adjustment Factors for Allowance Allocation (Table 9-2) should be revised to include calciners along with the other identified sectors and activities that have process emissions greater than 50%. The recommended change would be to add another row under those activities with process emissions greater than 50% to include:

Sector	NAICS	Activity
All Other Petroleum and Coal Products Manufacturing	324199	Coke Calcining

Emissions from calcining operations are mainly process emissions. At the Tesoro Wilmington Calciner, process emissions make up more than 90% of the total emissions. Tesoro suggests calcining be treated consistent with the other activities with process emissions greater than 50%.

2. The Coke Calcining benchmark shown in Table 9-1 should be revised to be consistent with the benchmark methodology outlined in the ISOR, which is based on the higher of:

a. 90% of the average benchmark of California calciners, or
b. Benchmark of the California best-in-class calciner

The benchmark in the existing Cap and Trade Regulation does not accurately represent the California calciners and should be changed to reflect California specific calciners. Furthermore, the benchmark for the calciner should not in any way be impacted by the power produced by the bottom-cycling cogeneration plant.

Tesoro looks forward to working with ARB staff on the proposed rule amendment. If you have questions or need additional information, please contact Ron Ricks at (310) 847-5647.

Sincerely

Daniel T. Riley

Attachment: www.arb.ca.gov/lists/com-attach/7-reportcostcontain-ws-WzgBZlMgWGkGLVc0.pdf

Original File Name: CARB-Comments on the Proposed Amendment to the Cap and Trade Regulation.pdf

Date and Time Comment Was Submitted: 2013-07-09 14:38:55

No Duplicates.

Comment 7 for Cap-and-Trade Market Related Reporting and Cost Containment (reportcostcontain-ws) - 1st Workshop.

First Name: Shelly
Last Name: Sullivan
Email Address: ssullivan@onemain.com
Affiliation: AB 32 Implementation Group

Subject: AB 32 IG Comments Market Related Reporting & Cost Containment
Comment:

Good Afternoon:

Attached please find comments submitted on behalf of the AB 32 Implementation Group regarding CARB's June 25, 2013 'Market Related Reporting & Cost Containment' workshop.

If you have any questions or need anything further, please feel free to contact me at (916) 858-8686.

Attachment: www.arb.ca.gov/lists/com-attach/8-reportcostcontain-ws-AGlVNFYIWGhVPFck.pdf

Original File Name: IG Cost Containment Comments 7_9_2013.pdf

Date and Time Comment Was Submitted: 2013-07-09 14:43:20

No Duplicates.

Comment 8 for Cap-and-Trade Market Related Reporting and Cost Containment (reportcostcontain-ws) - 1st Workshop.

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

Subject: Turlock Irrigation District's Comments on 6/25 Mkt-Related Reporting & Cost Containment WS
Comment:

```
Dear Dr. Cliff:

Please find attached TID's Comments on the June 28th Cap-and-trade
Workshop on Compliance Retirement, Market-Related Reporting and
Cost Containment.

If you have any follow up questions, please feel free to contact
me.  Thank you.

Kind regards,
Dan Severson
```

Attachment: www.arb.ca.gov/lists/com-attach/9-reportcostcontain-ws-UmNUYVxtVzMEMgI7.pdf

Original File Name: 130709_TID Comments on 6-28 ARB Workshop (00166219).PDF

Date and Time Comment Was Submitted: 2013-07-09 14:51:35

No Duplicates.

Comment 9 for Cap-and-Trade Market Related Reporting and Cost Containment (reportcostcontain-ws) - 1st Workshop.

First Name: Etta
Last Name: Lockey
Email Address: Etta.Lockey@PacifiCorp.com
Affiliation:

Subject: PacifiCorp's comments to June 25, 2013 Staff Proposal
Comment:

```
Dear Dr. Cliff,

PacifiCorp respectfully submits these comments in response to the
June 25, 2013 presentation of the California Air and Resources
Board regarding Cap-and-Trade compliance and information
requirements.

If you have any questions regarding these comments, please contact
Etta Lockey at (503) 813-5701.

Best regards,

Etta Lockey
```

Attachment: www.arb.ca.gov/lists/com-attach/10-reportcostcontain-ws-AXFRNlMxBD5SMgZv.pdf

Original File Name: PacifiCorp comments on 6 25 13 CARB Staff Proposal 7 9 13.pdf

Date and Time Comment Was Submitted: 2013-07-09 15:33:48

No Duplicates.

Comment 10 for Cap-and-Trade Market Related Reporting and Cost Containment (reportcostcontain-ws) - 1st Workshop.

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

Subject: SCPPA comments on 6/25/13 cap and trade workshop
Comment:

```
Please find attached the comments of the Southern California Public
Power Authority on the ARB's 6/25/13 cap and trade workshop on
compliance obligations, information sharing and cost containment.
```

Attachment: www.arb.ca.gov/lists/com-attach/11-reportcostcontain-ws-VGcCNAQ1UzJRZVdh.pdf

Original File Name: 300226001lmm07091301 SCPPA comment to ARB on 62513 cap and trade workshop.pdf

Date and Time Comment Was Submitted: 2013-07-09 15:49:02

No Duplicates.

Comment 11 for Cap-and-Trade Market Related Reporting and Cost Containment (reportcostcontain-ws) - 1st Workshop.

First Name: Nancy
Last Name: Allred
Email Address: nancy.allred@sce.com
Affiliation: Southern California Edison Company

Subject: SCE Comments on Cost Containment and Market-Related Reporting Workshop
Comment:

```
Please see attached.
```

Attachment: www.arb.ca.gov/lists/com-attach/12-reportcostcontain-ws-U2EHMQExBWVRegY2.pdf

Original File Name: 2013-07-09 Comments to CARB on Market-Related Report and Cost Containment Workshop.pdf

Date and Time Comment Was Submitted: 2013-07-09 15:51:46

No Duplicates.

Comment 12 for Cap-and-Trade Market Related Reporting and Cost Containment (reportcostcontain-ws) - 1st Workshop.

First Name: Ralph
Last Name: Moran
Email Address: moranrj1@bp.com
Affiliation: BP America, Inc

Subject: BP America Comments on 6/25/13 Cap and Trade Workshop
Comment:

```
BP America comments
```

Attachment: www.arb.ca.gov/lists/com-attach/13-reportcostcontain-ws-AWNQJgNdBTUBaAdq.pdf

Original File Name: BP comment ltr on CARB cap and trade workshp 6 13.pdf

Date and Time Comment Was Submitted: 2013-07-09 15:52:58

No Duplicates.

Comment 13 for Cap-and-Trade Market Related Reporting and Cost Containment (reportcostcontain-ws) - 1st Workshop.

First Name: Ann
Last Name: Trowbridge
Email Address: atrowbridge@daycartermurphy.com
Affiliation:

Subject: Comments of Inergy West Coast LLC Re June 25 CARB Workshop on Compliance Retirement et al
Comment:

```
Please see the attached Comments of Inergy West Coast LLC Regarding
June 25 CARB Workshop on Compliance Retirement, Market-Related
Reporting, and Cost Containment.  Please contact me if you have
difficulties with the attachment.  I can be reached at 916-570-2500
ext. 100.  Thank you.
```

Attachment: www.arb.ca.gov/lists/com-attach/14-reportcostcontain-ws-BmVSOwZqUG4KaVA+.pdf

Original File Name: Comments of Inergy Re June 25 CARB Workshop.pdf

Date and Time Comment Was Submitted: 2013-07-09 16:10:07

No Duplicates.

Comment 14 for Cap-and-Trade Market Related Reporting and Cost Containment (reportcostcontain-ws) - 1st Workshop.

First Name: Susie
Last Name: Berlin
Email Address: berlin@susieberlinlaw.com
Affiliation: Northern California Power Agency (NCPA)

Subject: NCPA Workshop Comments
Comment:

```
Attached please find the Northern California Power Agency Comments
on the June 25 Cap-and-Trade Workshop.
```

Attachment: www.arb.ca.gov/lists/com-attach/15-reportcostcontain-ws-Uz1TNlIjAzELUgJh.pdf

Original File Name: NCPA comments re 6-25-13 Workshop (final 7-9-13).pdf

Date and Time Comment Was Submitted: 2013-07-09 16:21:04

No Duplicates.

Comment 15 for Cap-and-Trade Market Related Reporting and Cost Containment (reportcostcontain-ws) - 1st Workshop.

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

Subject: M-S-R Comments on June 25 Workshop
Comment:

```
attached please find the M-S-R Public Power Agency Comments on the
June 25 Cap-and-Trade Workshop.

thank you.
```

Attachment: www.arb.ca.gov/lists/com-attach/16-reportcostcontain-ws-Uz5cd1EjVigHcwNc.pdf

Original File Name: M-S-R comments re 6-25-13 CARB Workshop (final 7-9-13).pdf

Date and Time Comment Was Submitted: 2013-07-09 16:24:56

No Duplicates.

Comment 16 for Cap-and-Trade Market Related Reporting and Cost Containment (reportcostcontain-ws) - 1st Workshop.

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

Subject: Comments on the Cap & Trade Program - June 25th Workshop
Comment:

```
Please see CMUA's attached comments.

Thanks.
```

Attachment: www.arb.ca.gov/lists/com-attach/17-reportcostcontain-ws-WzhXPAF1VGZSCwhr.pdf

Original File Name: CMUA_Comments_ARB_Information Sharing_and_cost_containment_07_09_2013_Final.pdf

Date and Time Comment Was Submitted: 2013-07-09 16:32:41

No Duplicates.

Comment 17 for Cap-and-Trade Market Related Reporting and Cost Containment (reportcostcontain-ws) - 1st Workshop.

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

Subject: PG&E Cost Containment Comments
Comment:

```
Attached are PG&E's comments on ARB's cost containment workshop.
```

Attachment: www.arb.ca.gov/lists/com-attach/18-reportcostcontain-ws-USFWN1wCUmQGX1c0.pdf

Original File Name: PG&E Comments on Cost Containment Workshop.pdf

Date and Time Comment Was Submitted: 2013-07-09 16:38:53

No Duplicates.

Comment 18 for Cap-and-Trade Market Related Reporting and Cost Containment (reportcostcontain-ws) - 1st Workshop.

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

Subject: Comments on June 25 Information Sharing Workshop
Comment:

```
Please review the attached comments submitted on behalf of Calpine
Corporation.
```

Attachment: www.arb.ca.gov/lists/com-attach/19-reportcostcontain-ws-BzVQZlJiUzMFLgk5.pdf

Original File Name: 2013-07-09 Calpine Comments on Information Sharing Workshop.pdf

Date and Time Comment Was Submitted: 2013-07-09 16:44:28

No Duplicates.

Comment 19 for Cap-and-Trade Market Related Reporting and Cost Containment (reportcostcontain-ws) - 1st Workshop.

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

Subject: PG&E Comments on Compliance and Information Requirements
Comment:

```
Attached are PG&E's comments on ARB's Compliance and Information
Requirements workshop.
```

Attachment: www.arb.ca.gov/lists/com-attach/20-reportcostcontain-ws-WytcPVcJVmAGXwZl.pdf

Original File Name: PG&E Comments on Compliance and Information Requirements.pdf

Date and Time Comment Was Submitted: 2013-07-09 16:50:13

No Duplicates.

Comment 20 for Cap-and-Trade Market Related Reporting and Cost Containment (reportcostcontain-ws) - 1st Workshop.

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

Subject: Comments on June 25th Workshop issues
Comment:

```
Please find attached comments of the Western Power Trading Forum on
issues discussed at the June 25th workshop.

Thank you,
Clare Breidenich
GHG Committee Director
Western Power Trading Forum
206.697.4946
```

Attachment: www.arb.ca.gov/lists/com-attach/21-reportcostcontain-ws-VWJTeFRkUjEGLQMy.pdf

Original File Name: 7-10-13 WPTF to CARB on June 25th workshop issues.pdf

Date and Time Comment Was Submitted: 2013-07-09 17:03:41

No Duplicates.

Comment 21 for Cap-and-Trade Market Related Reporting and Cost Containment (reportcostcontain-ws) - 1st Workshop.

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

Subject: SMUD Comments on June 25th Workshops
Comment:

```
Attached please find SMUD's Comments on Compliance and Information
Requirements and Cost Containment Options In California’s
Cap-and-Trade Program & Comments On ARB Cost Containment White
Paper.
```

Attachment: www.arb.ca.gov/lists/com-attach/22-reportcostcontain-ws-VSYCaQRwBTIKIQZl.pdf

Original File Name: SMUD-Comments-June-25th-Workshops.pdf

Date and Time Comment Was Submitted: 2013-07-09 17:22:14

No Duplicates.

Comment 22 for Cap-and-Trade Market Related Reporting and Cost Containment (reportcostcontain-ws) - 1st Workshop.

First Name: Amy
Last Name: Mmagu
Email Address: amy.mmagu@calchamber.com
Affiliation: CalChamber

Subject: June 25 Cap-and-Trade public meeting
Comment:

```
Comments Attached
```

Attachment: www.arb.ca.gov/lists/com-attach/24-reportcostcontain-ws-UDMCZV0wU2MFa1c2.pdf

Original File Name: CalChamberCost Containment Comments 07 09 13.pdf

Date and Time Comment Was Submitted: 2013-07-10 10:02:05

No Duplicates.

Comment 23 for Cap-and-Trade Market Related Reporting and Cost Containment (reportcostcontain-ws) - 1st Workshop.

First Name: Tim
Last Name: O'Connor
Email Address: toconnor@edf.org
Affiliation: EDF

Subject: Re: Cost Containment of the AB 32 Cap-and-trade regulation
Comment:

```
see attachment
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Attachment: www.arb.ca.gov/lists/com-attach/25-reportcostcontain-ws-Wj8BYwFmAg5QNQBv.pdf

Original File Name: EDF cost containmment letter.pdf

Date and Time Comment Was Submitted: 2013-07-11 07:40:14

No Duplicates.

There are no comments posted to Cap-and-Trade Market Related Reporting and Cost Containment (reportcostcontain-ws) that were presented during the Workshop at this time.