



SOUTHERN CALIFORNIA PUBLIC POWER AUTHORITY
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October 15, 2014 | Submitted electronically

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: SCPPA Support for the 15-Day Modifications to the Proposed Amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions

The Southern California Public Power Authority (SCPPA) is pleased to offer its support for the modifications to the proposed amendments to the Mandatory Reporting Regulation released on October 2, 2014.

SCPPA is a joint powers authority consisting of eleven municipal utilities and one irrigation district. SCPPA members deliver electricity to approximately two million customers over an area of 7,000 square miles, with a total population of 4.8 million people. SCPPA Members include the municipal utilities of the cities of Anaheim, Azusa, Banning, Burbank, Cerritos, Colton, Glendale, Los Angeles, Pasadena, Riverside, and Vernon, and the Imperial Irrigation District.

We particularly appreciate the time and consideration ARB staff afforded to SCPPA Members and other Publicly Owned Utility stakeholders over the course of the past year, to listen to and address our concerns with the proposed amendments, and to share draft revisions for stakeholder comment.

SCPPA would like to take this opportunity to sincerely thank the following ARB staff for their willingness to meet and work with our Members: Brienne Aguila, Richard Bode, Mary Jane Coombs, Bill Knox, Wade McCartney, Rajinder Sahota, Craig Segall, and Holly Stout. We believe that the 15-day language reflects an earnest and cooperative rulemaking effort that resolves our concerns.

Respectfully submitted,

Tanya DeRivi
Director of Regulatory Affairs