

April 4, 2014

**Comments of the Independent Energy Producers Association on the
California Cap on Greenhouse Gas Emissions and
Market-Based Compliance Mechanisms
Released March 21, 2014**

The Independent Energy Producers Association (IEP) supports the Amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms, released March 21, 2014. With regards to these proposed amendments, IEP's primary issue has been the treatment of legacy contracts without a means for greenhouse gas cost recovery. We are pleased to report that IEP's concerns with regards to legacy contracts have been resolved.

IEP appreciates CARB's attention and willingness to work on the legacy contract issue with us. We wish to take this opportunity to commend the staff and management for their efforts to address and resolve the important issues associated with legacy contract holders which were so critical to the continued operations of these entities. The staff and management worked with IEP and others in detail, and we certainly appreciate their focus and willingness to consider viable solutions. We look forward to working with CARB staff in the future.

Respectfully Submitted,



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