

October 17, 2014

Submitted Electronically

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

R.e. Comments of Southern California Edison on the October 2, 2014 Proposed Amendment to the Regulation for Mandatory Reporting of Greenhouse Gas Emissions.

Southern California Edison (SCE) respectfully submits these comments regarding the regulatory changes published on October 2, 2014 to the Regulation for Mandatory Reporting of Greenhouse Gas Emissions (MRR).

SCE agrees that for specified facilities or units whose operators are not subject to reporting under the MRR, the emissions shall be based on the GHG emissions reported to the U.S. EPA. Thus under Section 95111(b)(2)(B), the strikeout should be removed so that the section reads:

95111(b)(2)(B) For specified facilities or units whose operators are not subject to reporting under this article, Esp shall be based on GHG emissions reported to ***the US EPA pursuant to 40 CFR Part 98***. Emissions from combustion of biomass derived fuels will be based on EIA data until such time the emissions are reported to the US EPA.

Under 95111(g), the proposed new sentence states that the ***operator*** is responsible to register a specified source. SCE suggests that the term ***operator*** (two occurrences of such in this sentence) should be replaced with the phrase ***reporting entity*** because the reporting entity, not the operator, is responsible for registering specified sources of electricity.

Also under 95111(g), the proposed new sentence states, “If an operator fails to register a specified source by the June 1 reporting deadline specified in section 95103(e), the operator must use the emission factor provided by ARB for a specified facility or unit in the emissions data report required to be submitted by June 1 of the same year.” SCE believes the opening phrase of this sentence references the wrong MRR section. The registration of specified sources is governed by this same section 95111(g) (in the preceding sentence to the proposed new sentence). It is not governed by section 95103(e), which specifies the reporting deadlines for the annual emissions reports (April 10 and June 1). Accordingly, SCE proposes the following edits:

If an operator fails to register a specified source by the ~~June 1 reporting deadline specified in section 95103(e)~~ **February 1 registration deadline specified in this section 95111(g)** the operator must use the emission factor provided by ARB for a specified facility or unit in the emissions data report required to be submitted by June 1 of the same year

SCE appreciates the opportunity to submit these comments and looks forward to working with ARB staff further on the MRR.

Sincerely,

Frank Harris
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Southern California Edison