**Cap-and-Trade Regulation Amendment Request**

NOTE: Please use this form to highlight a request to amend a specific section (or related sections) of the Cap-and-Trade Regulation. Submission of this form aids staff in tracking requests and **does not mean** staff will ultimately propose an amendment in the version of the amendments noticed pursuant to the Administrative Procedure Act. This form is intended only as an additional tool ARB will use to evaluate requested changes to the regulation. Amendment requests may be for reasons of policy, clarity, or errors, etc. Staff may contact you if we need more information. Additionally, submission of this form will be a public record, and will be included in the ultimate rulemaking file related to these amendments, but may not be specifically answered in the Final Statement of Reasons. (Government Code section 11346.9(a)(3).) Please complete this form (with as much detail as possible, though it need not be formal regulatory language) and mail or email (preferred) to:

David Allgood ([dallgood@arb.ca.gov](mailto:dallgood@arb.ca.gov))

Stationary Source Division

P.O. Box 2815

Sacramento, CA 95812

**General Information**

|  |
| --- |
| August 2, 2013 |

Date:

|  |
| --- |
| Bill Buchan, Market Potential, Inc. |

|  |
| --- |
| Cardinal Cogen, Inc. |

Submitted by: Affiliation:

|  |
| --- |
| Buchan@mktpotential.com |

|  |
| --- |
| 510 928 5786 |

Contact Phone: E-mail:

**Section**

|  |
| --- |
| 95830(c)(1) |

Primary section(s):

|  |
| --- |
|  |

Related section(s):

**Amendment Request**

Type of amendment: xPolicy ☐Error ☐Clarity

|  |
| --- |
| It is overly burdensome with no clear value to specify all management personnel during registration even if some personnel have no involvement in cap and trade. This requirement is particularly excessive for large global organizations where the list of management personnel is extensive. Directors, officers, and persons controlling the voting rights of a large global entities are unlikely to have direct knowledge of cap and trade issues for a California subsidiary. New VAE language requests identification of corporate associations making extensive personnel requests from covered entities unnecessary. |

Reason for amendment:

|  |
| --- |
| 1. Request that 95830(c)(1)(B) be changed to read: Names and addresses of entity’s management personnel who are directly involved in cap and trade related decisions.  2. Request that 95830(c)(1)(C) be deleted as unnecessary and burdensome. |

Additional information: