

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)
Stationary Source Division
P.O. Box 2815
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General Information

Date: August 2, 2013

Submitted by: Claire Halbrook

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Section

Primary section(s): 95833(f)(6)

Related section(s):

Amendment Request

Type of amendment: ☒ Policy ☐ Error ☐ Clarity

Reason for amendment:

Proposed language unnecessarily constrains an entity's ability to update information regarding corporate associations. Fails to recognize the sophisticated corporate structures of many of the entities being regulated under Cap and Trade.

Additional information:

(6) Entities with a direct corporate association may change their decision to consolidate accounts or opt-out of consolidation **provided the entity reports such changes at least 30 days prior to an auction in accordance with Section 95912(d)(2)** ~~only once each compliance period.~~