

December 4, 2007

Submitted Electronically

Comments on the Proposed AB32 GHG Mandatory Reporting Regulation

From: Solar Turbines Incorporated
Contact: Anthony Pocengal
9330 Sky Park Court
MZ: SP3-Q
San Diego, CA 92123-5398
Phone: 858.505.8554
Fax: 858.694.6715
pocengal_anthony@solarturbines.com

Solar is a manufacturer of industrial gas turbines [(1-22 MW (1,500 to 30,000 hp)] with headquarters in San Diego. Solar's fleet includes over 12,000 combustion turbines in over 90 countries. Our domestic fleet consists of approximately 6,000 combustion turbines. For the past 30 years, Solar's industrial gas turbines have been used in a wide range of power generation and oil and gas applications.

Solar appreciates the opportunity to provide comments on the draft reporting regulation.

Comment 1:

In the section titled 'Summary of Industry Sector Reporting Requirements' hospitals, primary and secondary schools are exempt from reporting. It is not clear if or how an exempt source such as these may elect to voluntarily opt-in to AB32 if they so choose. Solar recommends CARB consider adding some language to clarify how exempt sources could voluntarily opt-in to report emissions and gain access to participate in the AB32 process.

Comment 2:

In Appendix A, Table 6, N2O emissions factors are proposed per fuel type. N2O emissions are highly dependent on combustion techniques as well as the fuel combusted. For example, N2O emissions from gas turbines are negligible for both natural gas and petroleum oil combustion. Solar recommends that CARB further classify N2O emissions by source category and exempt gas turbines and other source categories as appropriate from N2O reporting requirements.

Comment 3:

The proposed regulation is silent on how far back in time a facility may go in defining its 'base year' for emissions reporting. This item should be considered carefully in the context of AB32 as a whole and with particular regard to how future GHG emissions allocations may be distributed. Though reasonable boundary limits should be established, a 'one size fits all' approach may prevent operators from demonstrating emissions reductions realized in previous years. We recommend CARB consider this issue for further discussion at the upcoming meetings.