

December 10, 2010

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

Dear Clerk of the Board:

These comments are directed to Air Resources Board's (ARB) upcoming consideration of Mandatory Reporting of Greenhouse Emissions. Once again, I request that just one ounce of common sense be used in your consideration of this matter by exempting non-emitters from reporting their zero emissions.

The Trinity Public Utilities District's (TPUD) load, at least for the next several decades, is met 100% by clean and renewable hydroelectricity. The TPUD will have NO greenhouse gas emissions to report until long after global cooling, once again, becomes more fashionable than global warming. The TPUD should not be required to waste five minutes worth of our ratepayer's money each year, to learn how to report a zero to the ARB. Yet the proposed regulation requires that those hours be wasted.

The following statement in the hearing notice speaks volumes as to what is wrong with out of control regulators in California. It would be comical, if it was not so depressing:

"Staff anticipates that the additional costs for reporting can be easily absorbed under existing operating expenses for most facilities and suppliers, even those for whom the reporting is new."

The operative word in the forgoing statement is "easily". From someone that has never had to look a single mother living on less than \$20,000 a year in the eye and tell her that her electric bills are going up, I guess the word "easily" might make sense. Or from someone with a household income that is many times more than that of the single mothers, the word "easily" might make sense. But sadly, the word "easily" was used because of a mindset that does not care about wasting money, as long as it is someone else's.

Besides the tortured use of the word "easily", the quote also suggests that the cost of reporting will materialize out of thin air. No, I am sorry, the cost will be "absorbed". From what will the costs be "absorbed"? It will not be "absorbed" by the salaries of the ARB or utility staff. Vendors will not reduce their prices to utilities to "absorb" the costs. The only thing left is the retail customers and yes, they will in fact "absorb" the cost by paying more for their electric service.

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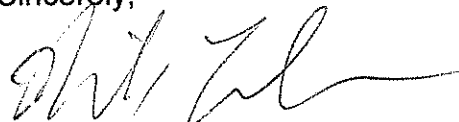
Has "Staff" attempted to estimate the total cost of everyone, across the State, completing the reports? Has "Staff" even attempted to estimate the costs for "Staff" to write the regulations, amend them with great frequency, enforce them and do whatever they are going to do with the data reported? Not coincidentally, the single mother will eventually be paying some portion of both sides of this reporting process.

As is far too common and growing increasingly so, the focus of the proposed regulations is regrettable. Clearly, in drafting the regulations the top priorities were to add justification for the existence of ARB, along with making the processes easy for ARB to implement and expand. What is best for the citizens of California was a distant, if not trivial consideration. However such is almost always the nature of any regulatory agency that has been given broad discretion and authority, with the luxury of several levels of insulation between the agency and the citizenry that pays for those costs.

If in the end ARB demands that the TPUD report zero emissions each year, I will attempt to do so if you provide me with a hard copy of the form the TPUD is required to complete. I will NOT respond electronically and I will NOT try to learn how to use the internet for ARB to teach me how to fill out the form. I will reconsider the stances on electronic filling, IF the ARB were to provide the infrastructure needed to make low cost, reliable, high-speed internet access as available in Trinity County as it is to ARB in Sacramento.

Again any Board with a shred of common sense would not ask a zero emitter to spend time and effort to report zero emissions.

Sincerely,



Rick Coleman
General Manager

RC/kp