

July 10, 2013

**Comments of the Independent Energy Producers Association on CARB's
Mandatory Reporting Workshop, Convened June 26, 2013**

The Independent Energy Producers Association (IEP) submits these comments on the California Air Resources Board (CARB) Mandatory Reporting Workshop, convened on June 26, 2013. IEP also submitted the points below as part of our comments on the Cap and Trade Program Workshop convened June 25, 2013. Our comments below primarily address the issue that was raised in both the Cap and Trade Workshop and the Mandatory Reporting Workshop regarding potential changes to the mandatory reporting timelines.

I. Potential Changes to the Mandatory Reporting Deadlines May Hinder Obligated

Entities' Ability to Provide the Most Accurate Data. During the June 25th Cap and Trade Workshop as well as the June 26th Mandatory Reporting Workshop, CARB staff discussed the potential for moving the emissions verification deadline up from September 3rd (current requirement) to August 15th (proposed change). In addition to moving up the deadline for emissions verification, CARB staff queried stakeholders as to whether the reporting deadline should also be moved up (approximately 15 days) in order to allow more people to know their final emissions obligation earlier so that they could participate in the APCR to obtain any residual allowances they may need before the compliance obligation is due.

Given CARB's intent to receive the most accurate reporting data from obligated entities, moving the emissions reporting and verification dates up, even if only by a few weeks, may hinder obligated entities' ability to provide the most accurate data. In order for CARB to obtain the most accurate information from obligated entities, IEP recommends against moving the reporting and verification deadlines up and suggests that the CARB maintain the status quo in terms of reporting deadlines. Moving the reporting deadlines forward will only create an additional burden on obligated entities.

IEP appreciates the opportunity to comment on the Mandatory Reporting Workshop and looks forward to working with CARB staff on these issues in the future.

Respectfully Submitted,



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