

## **Comment 1 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Sid

Last Name: Abma

Email Address: Sid@SidelSystems.com

Affiliation: Sidel Systems USA Inc.

Subject: Increase Natural Gas Energy Efficiency

Comment:

Is the goal of CARB to reduce Greenhouse Gas Emissions and to Reduce Air Pollution, and to continually improve California's/ America's Air Quality?

We are in a battle with Climate Change. What are the main items of Climate Change?

1) Global Warming

2) CO2 Emissions

3) Water Conservation

If we can control these 3 items, things will change to our and our future generations benefit.

Page 8 ~ top subject comes close to being what I believe to be almost the most important item of all pages. The other items are also very important, but what will/can make the biggest impact for the state/country.

We live in a very mild/warming climate, where natural gas for building space heating is possibly reducing in need. California still uses a lot of natural gas for industrial applications. We are America's Bread Basket, and all this food needs to be processed.

How much natural gas is consumed in California by commercial buildings and by industry and by the power plants? How much of that combusted energy is blown up chimneys as HOT exhaust into the atmosphere?

Why is this still being allowed? Might this be affecting our Global Warming issue?

The US DOE states that for every 1 million Btu's of heat energy recovered from these waste exhaust gases, and this recovered heat energy is utilized in the building or facility where it was combusted, 117 lbs of CO2 will Not be put into the atmosphere.

Can this make a difference?

In combusted natural gas there is Water, and in this Condensing Flue Gas Heat Recovery process this distilled water is being produced, and all this water is very usable.

This mineral free water will have a pH of between 4 and 4.5.

If the pH is reduced it can be used as pharmaceutical grade water.

If the pH is increased it can be used as potable water.

If it is injected into the buildings sanitary sewer lines, it will help to reduce bacteria growth.

Can this again, (1 more item) make a difference towards California's/ America's battle against Climate Change?

This is the last item, but it should be first.

Increased natural gas energy efficiency = Reduced utility bills = Profit.

We realize that natural gas prices are low today, but our oldest

unit turned 30 years old last year, and I plan to be there when it turns 50.

It has no moving parts to wear out. It requires little or no electricity to operate. It requires little or no maintenance. It is self cleaning on the flue gas side.

Sidel Systems USA Inc. is just now adding to it's "tool belt" the technology of Carbon Capture Utilization. This is a very exciting new offering we will be putting into operation early next year. With this Sidel CCU technology the CO<sub>2</sub> in combusted natural gas will be Captured and transformed into other usable profit streams for those employing this technology.

I am proud to live in and be a California based company. Lets together Make A Difference The World Is Waiting For!

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1-capandtrade13-USJQP1UwADZQOghX.html>'

Original File Name: Sidel Systems Info\_pack.html

Date and Time Comment Was Submitted: 2013-09-09 19:57:35

No Duplicates.

## **Comment 2 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Dell

Last Name: Majure

Email Address: dell.majure@kcc.com

Affiliation:

Subject: Comment On capandtrade 13 - Tissue Benchmark

Comment:

Kimberly-Clark Corporation is submitting comments on CARB's proposal to adjust the tissue benchmark.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/2-capandtrade13-UToHaF0xVGVXNFUn.pdf>'

Original File Name: Kimberly Clark Comment On capandtrade13 - Tissue Benchmark.pdf

Date and Time Comment Was Submitted: 2013-09-12 08:32:43

No Duplicates.

### **Comment 3 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Ellen

Last Name: Marden

Email Address: landofellen@yahoo.com

Affiliation: Calif. Farmer

Subject: Carbon Credits

Comment:

Please consider Agricultural Orchards as part of the available Carbon Credit program.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2013-09-23 07:29:36

No Duplicates.

## **Comment 4 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Jerry

Last Name: Bloom

Email Address: JBloom@winston.com

Affiliation: Winston & Strawn LLP

Subject: Comments of OLS Energy Chino, LLC on Proposed Amendments to Cap & Trade Regulation

Comment:

Please find attached the comments of OLS Energy Chino, LLC on the proposed amendments to the California Cap-and-Trade Regulation, as set forth in the September 4, 2013 Proposed Regulation Order.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/5-capandtrade13-VDtWPFQmBAGDZgVt.pdf>

Original File Name: OLS\_Chino\_Comments\_on\_(Sept)  
Proposed\_Amendments\_to\_Cap\_&\_Trade.pdf

Date and Time Comment Was Submitted: 2013-09-25 11:16:30

No Duplicates.

## **Comment 5 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Elizabeth  
Last Name: Nussbaumer  
Email Address: enussbaumer@fwwatch.org  
Affiliation: Food & Water Watch

Subject: Do Not Allow Offsets From Coalmine Methane Capture

Comment:

RE: Proposed Compliance Offset Protocol Mine Methane Capture Projects

Please see attached comment in opposition to generating offsets from Coal Mine Methane Capture.

Thank you.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/7-capandtrade13-WjkAaQZmVGtWDwdq.pdf>'

Original File Name: Coal Mine Methane Offsets Comment, Food & Water Watch.pdf

Date and Time Comment Was Submitted: 2013-09-26 14:32:33

No Duplicates.

**Comment 6 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: William  
Last Name: Buchan  
Email Address: buchan@mktpotential.com  
Affiliation: Graphic Packaging International, Inc.

Subject: Revised Recycled Boxboard Manufacturing Benchmark, Table 9-1, Section 95891  
Comment:

Attached letter from Graphic Packaging International, Inc.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/8-capandtrade13-Wj1TJV01V1tXMwhn.pdf>'

Original File Name: GPI boxboard benchmark comment ltr to ARB\_09-25-13x.pdf

Date and Time Comment Was Submitted: 2013-09-27 16:37:08

No Duplicates.

**Comment 7 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Steve

Last Name: Huhman

Email Address: Steven.Huhman@morganstanley.com

Affiliation: Morgan Stanley

Subject: Comments on Proposed Amendments to the Cap-and-Trade Regulation

Comment:

Please find detailed comments in the attached Word file.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/10-capandtrade13-BWQCdgNgBAGGYwdo.doc>'

Original File Name: ARB Comments C-A-T 10-24-13.doc

Date and Time Comment Was Submitted: 2013-10-03 10:38:33

No Duplicates.

**Comment 8 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Curtis

Last Name: Swanson

Email Address: [cswanson@centralsan.org](mailto:cswanson@centralsan.org)

Affiliation: Central Contra Costa Sanitary District

Subject: Central Contra Costa Sanitary District's Comments

Comment:

Please see attached comment letter.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/12-capandtrade13-AWICawdrUmwHZARq.pdf>'

Original File Name: Comment Letter.pdf

Date and Time Comment Was Submitted: 2013-10-04 11:00:40

No Duplicates.

## **Comment 9 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: NARINDER

Last Name: SINGH

Email Address: Narinder.PalSingh@olamnet.com

Affiliation:

Subject: Comments of Olam Spices and Vegetables, on Proposed Amendments to Cap & Trade Regulation

Comment:

Please find attached the comments of Olam Spices and Vegetables, Inc. on the proposed amendments to the California Cap-and-Trade Regulation, as set forth in the September 4, 2013 Proposed Regulation Order.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/13-capandtrade13-BmkBdFYhBD4BWFMj.docx>'

Original File Name: OSVI Public Comment Letter to CARB on Cap and Trade Amendmnts.docx

Date and Time Comment Was Submitted: 2013-10-09 11:53:23

No Duplicates.

## **Comment 10 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Charles

Last Name: White

Email Address: cwhite1@wm.com

Affiliation: Waste Management

Subject: Proposed Reg Amendments to Cap & Trade Regs - Legacy Contracts

Comment:

The attached comment letter is sent on behalf of Chuck White at Waste Management.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/14-capandtrade13-BXJVPIIMBCABCwlg.pdf>'

Original File Name: WM WTI ARB Legacy Ammendment Comments 10 9 13.pdf

Date and Time Comment Was Submitted: 2013-10-10 11:58:04

No Duplicates.

**Comment 11 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Nathan

Last Name: Voegeli

Email Address: nvoegeli@yuroktribe.nsn.us

Affiliation: Yurok Tribe

Subject: 2013 cap and trade regulatory amendments

Comment:

See attached comment letter.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/15-capandtrade13-UT1UNwdyBSIKaQNx.pdf>'

Original File Name: Letter re Cap and Trade Proposed 2013 Reg Amend\_v1.pdf

Date and Time Comment Was Submitted: 2013-10-14 08:50:17

No Duplicates.

**Comment 12 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Erica

Last Name: Morehouse

Email Address: emorehouse@edf.org

Affiliation: Environmental Defense Fund

Subject: Comments on 2013 Amendments to the C&T Program

Comment:

Please find attached EDF's comments on the proposed C&T amendments.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/16-capandtrade13-UTRRM1M0BDQDWIUh.pdf>'

Original File Name: EDFC&TAmendmentComments10-14-13.pdf

Date and Time Comment Was Submitted: 2013-10-14 13:48:53

No Duplicates.

## **Comment 13 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Jon

Last Name: Costantino

Email Address: jcostantino@manatt.com

Affiliation:

Subject: 10-7-13 Refinery Workshop Comments

Comment:

Please find attached the comments from the Coalition for Fair and Equitable Allocation.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/17-capandtrade13-UDNcNQdnWWZWOQl9.pdf>'

Original File Name: Coalition Refinery Workshop Comments 10-14-13.pdf

Date and Time Comment Was Submitted: 2013-10-14 16:24:43

No Duplicates.

## **Comment 14 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Grant

Last Name: Aguinaldo

Email Address: gaguinaldo@worldoil.net

Affiliation: Lunday-Thagard Company

Subject: Comments on Refinery Allocation Under Cap-and-Trade

Comment:

Please see attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/18-capandtrade13-BmoFd1wvAw8FMVJi.pdf>'

Original File Name: LTR 2013-10-14 CARB GHG Comments on Refinery Allocation Under Cap-and-Trade Proposed 2013 Amendments (FINAL).pdf

Date and Time Comment Was Submitted: 2013-10-14 16:26:48

No Duplicates.

## **Comment 15 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Jennifer  
Last Name: Haley  
Email Address: [jhaley@caseyoil.com](mailto:jhaley@caseyoil.com)  
Affiliation: Kern Oil & Refining Co.

Subject: October 7, 2013 Workshop

Comment:

Attached are Kern Oil & Refining Co's comments on the October 7, 2013, workshop regarding refinery allocation under Cap-and-Trade.

Jennifer Haley  
Kern Oil & Refining Co.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/19-capandtrade13-BzYCNABeAGIDMQZZ.pdf>'

Original File Name: 10\_14\_13 KOR Comments 10\_7 Workshop.pdf

Date and Time Comment Was Submitted: 2013-10-14 16:48:14

No Duplicates.

## **Comment 16 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Peter

Last Name: Weiner

Email Address: peterweiner@paulhastings.com

Affiliation:

Subject: Comments on CARB's September 2013 Proposed Regulation Order

Comment:

Please see attached comment letter.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/20-capandtrade13-AXFcMlIMVGQCZQZ2.pdf>'

Original File Name: PH Cap-and-Trade Comment Letter (10.14.13).pdf

Date and Time Comment Was Submitted: 2013-10-14 18:30:17

No Duplicates.

## **Comment 17 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Keith

Last Name: Adams

Email Address: [adamskb@airproducts.com](mailto:adamskb@airproducts.com)

Affiliation: Air Products and Chemicals, Inc.

Subject: Cap & Trade Program Amendment Comments

Comment:

Comments Regarding Proposed Amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms (Released 4 September 2013) and the Workshop Presentation of Proposed Amendments to the Refinery Allocation Under Cap and Trade (Presented 7 October 2013)

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/21-capandtrade13-UTBVOlMgVlpVI1Ig.pdf>'

Original File Name: Air Products Comments - 2013 Cap and Trade Amendments and Hydrogen Benchmark Revisions.pdf

Date and Time Comment Was Submitted: 2013-10-14 21:36:13

No Duplicates.

## **Comment 18 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Ross

Last Name: Nakasone

Email Address: RossN@bluegreenalliance.org

Affiliation: BlueGreen Alliance

Subject: Benchmarking California Refineries in the Cap-and-Trade Program

Comment:

Please find attached the joint comments of the United Steelworkers District 12, the Natural Resources Defense Council and the BlueGreen Alliance regarding benchmarking refineries in the Cap-and-Trade Program.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/22-capandtrade13-UWNRZ1RkWDgCNVJi.pdf>'

Original File Name: 20131014-FINAL DRAFT BGA Letter Benchmarking.pdf

Date and Time Comment Was Submitted: 2013-10-15 10:26:43

No Duplicates.

## **Comment 19 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Nancy

Last Name: Allred

Email Address: nancy.allred@sce.com

Affiliation: Southern California Edison Company

Subject: SCE Comments on Proposed 2013 Cap-and-Trade Amendments

Comment:

Please see attached document for SCE's comments on the proposed 2013 amendments to the cap-and-trade regulation.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/23-capandtrade13-VGZQZgQ0A2MCKQY3.pdf>'

Original File Name: 2013-10-15 Comments on Proposed 2013 Regulatory Changes to the Cap-and-Trade Regulation.pdf

Date and Time Comment Was Submitted: 2013-10-15 11:22:47

No Duplicates.

**Comment 20 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Greg

Last Name: Arnold

Email Address: greg@ce2capital.com

Affiliation: CE2 Carbon Capital

Subject: Support for Mine Methane Capture Protocol

Comment:

Please see attachment.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/24-capandtrade13-BWZQMwQ3V1tWM1U0.pdf>'

Original File Name: CE2 Capital ARB MMC Protocol Comment Letter.pdf

Date and Time Comment Was Submitted: 2013-10-15 13:19:26

No Duplicates.

## **Comment 21 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Mary

Last Name: Wiencke

Email Address: [mary.wiencke@pacificorp.com](mailto:mary.wiencke@pacificorp.com)

Affiliation:

Subject: PacifiCorp Comments on Sept. 4 Proposed Amendments

Comment:

Please accept PacifiCorp's attached comments on the proposed amendments to the Cap-and-Trade Program.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/25-capandtrade13-UiiHYFY0WGJQMAJr.pdf>'

Original File Name: PacifiCorp Comments\_ARB Sept 4 Proposed Amendments.pdf

Date and Time Comment Was Submitted: 2013-10-15 15:57:31

No Duplicates.

**Comment 22 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Ryan

Last Name: Young

Email Address: [ryany@greenlining.org](mailto:ryany@greenlining.org)

Affiliation: The Greenlining Institute

Subject: Comments on Transition Assistance and Natural Gas Allocations

Comment:

Please see the attached comments of The Greenlining Institute.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/26-capandtrade13-WzwAdAFlADYAAaARo.pdf>'

Original File Name: Greenlining Comments on Proposed Cap and Trade Amendments.Oct 15 2013 Final.pdf

Date and Time Comment Was Submitted: 2013-10-15 15:59:43

No Duplicates.

### **Comment 23 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

## **Comment 24 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Margaret

Last Name: Miller

Email Address: margaret.miller@brookfieldrenewable.com

Affiliation: Brookfield Energy Marketing

Subject: Brookfield's comment to proposed revisions to California Cap-and-Trade Regulation

Comment:

Please find attached Brookfield Energy Marketing's comments to proposed revisions to the California Cap-and-Trade Program.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/28-capandtrade13-UzEGcgFvAj4AbVQy.pdf>

Original File Name: Brookfield CARB GHG Final Comments.pdf

Date and Time Comment Was Submitted: 2013-10-16 13:52:29

No Duplicates.

## **Comment 25 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: John

Last Name: Nagle

Email Address: john.nagle@ejgallo.com

Affiliation: E&J Gallo Winery

Subject: Appendix C New and Modified Product-Based Benchmarks Table 2 correction

Comment:

The following changes need to be made to correct two definitions in Appendix C New and Modified Product-Based Benchmarks staff report.

On page 9 Table2: Proposed Product Definitions for Beverage Sector (NAICS 312120 and 312130)

Crystal is a brand and not an accurate description of the material. "Dry Color Concentrate" is a more accurate description of this product. Please change Crystal Color Concentrate "Dry Color Concentrate."

"Activin" is a brand name and not an accurate description of the material. The most accurate name of this product is "Grape Seed Extract." Please change Activin "Grape Seed Extract."

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2013-10-16 14:43:41

No Duplicates.

## **Comment 26 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Alex

Last Name: Jackson

Email Address: ajackson@nrdc.org

Affiliation: NRDC

Subject: NRDC and CCA Comments on 45-day Cap-and-Trade Amendments

Comment:

Please find attached comments from the Natural Resources Defense Council and Coalition for Clean Air on staff's proposed amendments to the cap-and-trade program for consideration at the October 25 Board hearing.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/30-capandtrade13-UT8AdFM2BzcBWARb.pdf>'

Original File Name: NRDC & CCA Comments on Proposed C&T Amendments\_FINAL.pdf

Date and Time Comment Was Submitted: 2013-10-16 15:12:45

No Duplicates.

**Comment 27 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Leonard

Last Name: Pettis

Email Address: lpettis@calstate.edu

Affiliation: California State University

Subject: capandtrade13

Comment:

CSU letter attached

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/31-capandtrade13-AmEFcAB0AAwAZwFz.pdf>'

Original File Name: CSU ARB Comments 10.24.2013.pdf

Date and Time Comment Was Submitted: 2013-10-16 15:50:00

No Duplicates.

## **Comment 28 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Clare

Last Name: Breidenich

Email Address: [cbreidenich@aciem.us](mailto:cbreidenich@aciem.us)

Affiliation: Western Power Trading Forum

Subject: Comments on Proposed Amendments to the Cap and Trade Program

Comment:

Please find attached comments of the Western Power Trading Forum.  
Thank you,  
Clare Breidenich  
WPTF GHG Committee Director

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/32-capandtrade13-W2pQZld7VjQHNwcq.pdf>'

Original File Name: 10-16-13 WPTF Comments on Proposed Amendments to the Cap and Trade Regulation.pdf

Date and Time Comment Was Submitted: 2013-10-16 16:17:40

No Duplicates.

## **Comment 29 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Lloyd

Last Name: Avram

Email Address: [LloydAvram@chevron.com](mailto:LloydAvram@chevron.com)

Affiliation: Chevron Corporation

Subject: Comments on the October 7 Workshop to Discuss Refineries and Related Industries

Comment:

Chevron is pleased to submit our comments on the October 7 workshop which include comments on proposed CWB benchmark for refineries and related industries.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/33-capandtrade13-B2RQPgRgWH0EcAJt.pdf>'

Original File Name: Chevron Comments October 7 Refinery Benchmark Workshop Final.pdf

Date and Time Comment Was Submitted: 2013-10-16 18:38:46

No Duplicates.

## **Comment 30 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Cathy  
Last Name: Reheis-Boyd  
Email Address: joey@wspa.org  
Affiliation: WSPA

Subject: Amendments To The California Cap On Greenhouse Gas Emissions And Market-Based Compliance M

Comment:

Please see attached WSPA Amendments To The California Cap On Greenhouse Gas Emissions And Market-Based Compliance Mechanisms, September 4, 2013.

Thank you.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/34-capandtrade13-BmAAGaVU6ADJXPQVa.pdf>'

Original File Name: Final WSPA Ammendments to the CA Cap.pdf

Date and Time Comment Was Submitted: 2013-10-16 21:30:33

No Duplicates.

**Comment 31 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Tony

Last Name: Brunello

Email Address: tbrunello@calstrat.com

Affiliation: CE2 Carbon Capital

Subject: CE2 Carbon Capital Support letter

Comment:

Please see attached comment.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/35-capandtrade13-VzRSMQc0Ag5RNAl0.pdf>

Original File Name: CE2 Carbon Capital.pdf

Date and Time Comment Was Submitted: 2013-10-17 09:57:55

No Duplicates.

## **Comment 32 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Lloyd

Last Name: Avram

Email Address: [LloydAvram@chevron.com](mailto:LloydAvram@chevron.com)

Affiliation: Chevron Corporation

Subject: Comments on Cap and Trade Amendments

Comment:

Chevron is pleased to submit our comments on the Proposed Regulation Order Amendments to the Cap and Trade Program.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/36-capandtrade13-UTJUOgZiByIEcAZp.pdf>'

Original File Name: Chevron Comments Cap and Trade October 17 2013 Final.pdf

Date and Time Comment Was Submitted: 2013-10-17 13:51:31

No Duplicates.

## **Comment 33 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Robert  
Last Name: Ehlers  
Email Address: robert.ehlers@valero.com  
Affiliation: Valero

Subject: Comment Period for Proposed Order for C&T Regulatory Amendments  
Comment:

Excerpted from page 2 of attached letter:

"The notice of public hearing for both the MRR and Cap & Trade proposed orders state that comments are due on October 23rd at noon (Pacific) and that the public hearing is scheduled for October 24th at 9 am. As a procedural issue, Valero does not feel that industry has sufficient time to comment on the proposed amendments in such a way that CARB can fully address the comments and incorporate appropriate changes to its regulatory language before the public hearing with the CARB Board. Further, the notice states "ARB requests that written and email statements on this item be filed at least 10 days prior to the hearing so that ARB staff and Board members have additional time to consider each comment." While this language is a request and not a requirement, the fact that the Board hearing is scheduled to occur the morning after the deadline for comments makes October 13th (Sunday) the de facto deadline for submitting comments. This, in effect, shortens the comment period to 35 days and also short circuits discussions within trade association and between trade associations and CARB, especially pertaining to entirely new sections of the regulation (i.e., pertaining to reporting of Toxic Air Pollutants and Criteria Pollutants under provisions of the Adaptive Management Plan). Valero suggests that CARB incorporate all appropriate comments into the regulatory language for the Board hearing, as long as the comments are submitted by the 23rd."

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/37-capandtrade13-AHZTNFQ5VGIAdAFu.pdf>

Original File Name: Valero MRR cmt ltr 10-17-13.pdf

Date and Time Comment Was Submitted: 2013-10-17 14:22:49

No Duplicates.

## **Comment 34 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Sarah

Last Name: Deslauriers

Email Address: SDeslauriers@carollo.com

Affiliation: CA Wastewater Climate Change Group

Subject: CWCCG Comments on the Amendments to the Cap and Trade Regulation

Comment:

The California Wastewater Climate Change Group appreciates the opportunity to comment on the Potential Amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms and we appreciate the leadership of the California Air Resources Board on climate change issues. The focus of this comment letter is the potential consequence of the amended language in § 95101(b)(2) of the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions.

Please contact me if you have any questions at (925)705-6404 or sdeslauriers@carollo.com. We welcome the opportunity to further discuss the wastewater community's position.

Regards,  
Sarah Deslauriers  
CWCCG Program Manager

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/40-capandtrade13-B2QBcFAyV2cGZwhX.pdf>'

Original File Name: CWCCG CT Comment Letter\_Final.pdf

Date and Time Comment Was Submitted: 2013-10-17 14:41:32

No Duplicates.

## **Comment 35 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Robert  
Last Name: Ehlers  
Email Address: robert.ehlers@valero.com  
Affiliation: Valero

Subject: Valero incorporation of WSPA comments

Comment:

Valero submitted a comment letter separately. Attached is the WSPA letter that Valero incorporates by reference.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/41-capandtrade13-UTdVOlQ7BzVSOAFe.pdf>'

Original File Name: Final WSPA Ammendments to the CA Cap.pdf

Date and Time Comment Was Submitted: 2013-10-17 15:25:36

No Duplicates.

**Comment 36 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

## **Comment 37 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Marcie

Last Name: Milner

Email Address: marcie.milner@shell.com

Affiliation: Shell Energy North America (US), L.P.

Subject: Comments of Shell Energy North America (US), L.P.

Comment:

Shell Energy North America (US), L.P. ("Shell Energy") provides its comments on the Staff's September 4, 2013 proposed amendments to the Air Resources Board ("ARB") Cap and Trade Regulations. Shell Energy submitted comments jointly with Shell Oil Products US ("SOPUS") on August 2, 2013, in response to the "Discussion Draft" of proposed amendments that was released by the ARB Staff on July 15, 2013. Unfortunately, upon review of the September 4 proposed amendments, it appears that most, if not all, of these comments were ignored. Shell Energy requests that the ARB consider the comments herein on specific proposed amendments to the Regulations in view of the importance of these issues to an efficient and effective regulatory structure. In particular, the ARB should strike or withdraw proposed amendments that would impose unreasonable and unnecessary burdens on covered entities, as well as proposed amendments that would interfere with existing contracts.

Shell Energy's comments, which track specific sections of the proposed amendments, are as follows:

1. Section 95830(c)(1)(H): The Staff's proposed amendment provides that a registered entity must identify every other entity with which the registered entity has a "corporate association," a "direct corporate association," or an "indirect corporate association," as defined in Section 95833(a), whether or not the entity is registered with or intends to register with the ARB. This proposed requirement is unreasonable and unduly burdensome. As Shell Energy noted in its August 2 comments, large multi-national corporations such as Royal Dutch Shell have hundreds, if not thousands, of affiliates that would meet the definition of either a "direct" or an "indirect" corporate association. It would serve no useful purpose for a large corporation to disclose all of these entities, unless the entities intend to register with the ARB. For purposes of compliance with the Cap and Trade Regulations, it should be enough for a registered entity to identify all related entities that are "registered" with the ARB, or registered with a "linked" External Greenhouse Gas Emissions Trading System. Inquiry into a direct or indirect corporate association with an entity that is not so registered is neither appropriate nor necessary.

The "Staff Report: Initial Statement of Reasons" ("Staff Report") states that the proposed language requiring disclosure of all "corporate associations," "direct corporate associations" and "indirect corporate associations" "is a clarification [of] an existing requirement and not a new requirement or change in policy." Staff Report at p. 112. Regardless of whether or not this is a "change" to an existing requirement, the proposed language should be stricken. As Shell Energy noted in its August 2

comments, the purpose of the "corporate association" rules is to place purchasing limits and holding limits on entities that are registered with the ARB (or a "linked" Trading System) and that have a "direct corporate association." No reasonable justification exists to disclose an entity's "corporate association" with an entity that is not participating in the Cap and Trade program. The Staff has not provided a reasonable basis for this requirement. This proposed amendment should be stricken or withdrawn.

2. Section 95830 (c)(1)(I), (J): The Staff Report states that new Section 95830(c)(1)(I), which would require registered entities to disclose the names of all persons employed by the entity in a capacity that would give them knowledge of the entity's decisions on compliance instrument transactions or holdings, is needed to identify individuals who gain knowledge of a registered entity's transaction strategy through their work as employees of a registered entity. See Staff Report at pp. 104-05. Similarly, the Staff Report states that Section 95830(c)(1)(J) is needed to disclose the identities of registered entities' auction bidding advisors or consultants for Cap and Trade activities. The Staff states that the new language would add disclosure requirements for individuals who gain knowledge of a registered entity's compliance and transaction strategy through their work as consultants. The Staff states that because these individuals may serve as consultants for multiple registered entities, disclosure is needed to enable the ARB to monitor for "collusive activity." Staff Report at p. 105.

The proposed language in these two sections is overbroad and unduly burdensome. In a large corporate organization such as Royal Dutch Shell, this proposed language, if adopted, could require disclosure of numerous individuals that are only tangentially involved in the Cap and Trade program, including individuals in foreign countries. Moreover, the Staff's failure to provide clear limits regarding the required disclosure would make it difficult to comply.

Shell Energy suggests that the ARB withdraw the proposed amendment and replace it with a provision that requires a registered entity to adopt a policy that prohibits its employees (and their family members) from trading products in personal accounts that the company trades or originates as part of its business.

Alternatively, Shell Energy recommends that the ARB narrow the proposed language to require disclosure of employees and consultants who have been delegated authority to commit the company to purchases and sales of compliance instruments, and who have access to the entity's CITSS account. The regulation could further require an attestation by any individual who seeks to register, that the individual's family members are not employees of a registered entity.

3. Section 95833(a)(2)(F): The Staff's proposed amendment includes a "limited liability corporation" within the meaning of a "direct corporate association," if one entity owns more than 50 percent of the other entity. Shell Energy does not object to including limited liability corporations ("LLC") within the meaning of the disclosure rules. However, it is not enough to establish a "direct corporate association" with an entity by showing that the entity owns more than 50 percent of the LLC. In order to establish the level of "control" that is required for a direct corporate association, the terms of the LLC's operating agreement must be considered. This consideration should be added to the amended language.

4. Section 95856(h): The Staff's proposed amendment establishes the "order" or "priority" in which a covered entity's compliance instruments will be retired. The Staff states that this provision is necessary "because it provides participants with details

regarding the order in which compliance instruments will be considered by the Executive Director for compliance with the annual surrender event." Staff Report at p. 138. The proposed amendment to order (prioritize) the retirement of compliance instruments should be modified to provide that the Executive Director will only dictate the order in which a covered entity's compliance instruments are retired if the covered entity has not otherwise designated the order in which the instruments are to be retired. The Staff Report states, for example, that "allowances from California and linked jurisdictions will be the third type of compliance instrument to be considered in the Compliance Account . . . based on earliest vintage first." Staff Report at p. 139. For a variety of reasons (including but not limited to corporate taxation and financial accounting), however, the covered entity may prefer to retire "offsets," or compliance instruments with a more recent vintage ahead of instruments with an older vintage. One reason for this is that most companies recognize their free allocations at \$0 on their balance sheet, but recognize purchased allowances at "cost." A company may wish to retire all of its freely allocated Vintage 2014 allowances before the company retires its purchased Vintage 2013 allowances, in order to optimize its balance sheet. The proposed Compliance Instrument Retirement Order would not permit this.

The order in which a covered entity's compliance instruments are retired should be within the discretion of the covered entity (both for its annual compliance obligation and its triennial compliance obligation), with the possible exception of "true-up" allowances, as provided in Section 95856(h)(3). The Executive Director should only prescribe the order of retirement as the "default."

5. Section 95912(d)(4)(C), (D): The proposed amendment would require a covered entity's auction participation application to include an allocation of the "purchase limit" and the "holding limit" among members of a "direct corporate association" as defined in Section 95833. The Staff states that the purpose of this provision is to require covered entities to report any change in the distribution of the purchase limit and/or the holding limit among corporate associates. Staff Report at p. 176. Whether or not this proposed amendment is adopted, each of the covered entities with a "direct corporate association" that is subject to the purchase limits and the holding limits should be permitted to establish its own subaccount for compliance and retirement in accordance with Section 95856(c), and should be allowed to transfer compliance instruments between and among the compliance accounts for each covered entity, subject to the overall holding limits. This approach provides entities that have a direct corporate association, and that are subject to the purchase and holding limits, greater flexibility in the timing and allocation of compliance instruments for retirement. The Regulation should be amended to include a provision that allows covered entities to establish their own subaccounts for compliance and retirement as discussed above.

6. Section 95912(d)(4)(E): The Staff's proposed amendment to the items that must be included in the "application" for auction participation would require an attestation that the entity participating in the auction, "and all other entities with whom the entity has a corporate association, direct corporate association, or indirect corporate association" (pursuant to Section 95833) has not been subject to "any previous or ongoing investigation with respect to any alleged violation of any rule, regulation or law associated with any commodity, securities, or financial market . . ." The Staff states that this new provision is needed "to improve ARB's ability to monitor investigation of alleged

violations in other financial markets . . . ." Staff Report at p. 176.

This proposed amendment is overreaching and unreasonable. Under Section 95833(a)(4), an "indirect" corporate association can be established with an ownership interest that is no more than 20 percent. It is unreasonably burdensome to require the applicant to undertake the research to ascertain whether an entity with an "indirect corporate association" is the subject of an allegation of wrongdoing under financial market rules. If such a disclosure requirement is to be imposed, the requirement should be limited to entities with which the applicant has a "direct corporate association." This proposed amendment should be modified or stricken.

7. Section 95920(a): As Shell Energy stated in its August 2 comments, the "holding limit" (for entities with a direct corporate association) referenced in this section of the Rules is unreasonably low. The holding limit fails to take into account the nature of a covered entity's business. Different holding limits should be established based on the type of business in which the entity is engaged. The current limits are punitive, especially for companies that have large compliance obligations and/or large purchase commitments by virtue of new or existing contractual arrangements. This latter point (new or existing contractual arrangements) is particularly important, because the limited exemption offered by the Compliance Account does not help an entity that has to transfer large volumes to a third party by virtue of some separate contractual arrangement. The holding limits should be re-examined.

8. Section 95921(b)(3)(C), (4)(E,F,G), (5)(E): The Staff's proposed amendment would require disclosure of the price term in a transfer request for the sale of compliance instruments, whether the transaction is over-the-counter or an exchange-based agreement.

The Staff's proposal would require disclosure of a "fixed price" or, in the alternative, a description of the pricing method in the secondary market transaction. The Staff attempts to justify a "price disclosure" requirement by stating that the "provision is needed to enable ARB market monitoring staff to understand the basis for pricing carbon instruments." Staff Report at p. 200. The Staff also asserts that the "provision is needed to allow ARB to interpret the price entered for the transfer request as part of market monitoring." Id. 199.

The Staff's reasoning does not justify a price disclosure requirement; disclosure of the price of a private transaction is not supported by law. The ARB does not approve or regulate the prices of compliance instruments that are sold in secondary market transactions. The ARB also does not regulate or limit the price that an entity may charge to sell, or pay to purchase compliance instruments in the secondary market. Secondary market price regulation is outside the scope of the ARB's authority under AB 32.

The ARB does not have the authority to require mandatory price disclosure as a part of a participating entity's "transfer request."

As Shell Energy stated in its August 2 comments, mandatory price disclosure to the ARB would risk the potential for public disclosure (inadvertent or through a Public Records Act request), which could in turn inhibit or distort competition in the secondary market. The secondary market for compliance instruments can and should be a robust and competitive market. Price disclosure could have a chilling effect on secondary market transactions.

In this connection, a "liquid" secondary market is dependent on a large volume of trades. Requiring price disclosure for secondary market transactions would reduce liquidity and create conditions

that would make price manipulation relatively more likely. The Staff seems to justify a price disclosure requirement for secondary market transactions based on a concern about price manipulation. In fact, a mandatory price disclosure requirement could lead to reduced liquidity, creating a greater potential for market manipulation.

In addition, some of the compliance instruments that will be purchased and sold in the secondary market represent "offsets," as well as allowances from jurisdictions (e.g., Quebec) with which the Cap and Trade program is "linked." There is a serious question whether the ARB can legally demand disclosure of prices agreed upon in transactions that occur outside California.

Finally, because the ARB does not regulate secondary market prices for compliance instruments, no legitimate purpose would be served by having the ARB demand price disclosure as a part of a transfer request. The ARB has a valid reason for requiring the disclosure of information regarding transaction dates, quantities and products transferred. Price, however, is not within the ARB's authority.

Price disclosure should not be required.

9. Section 95985(i): Under the current Regulation addressing the treatment of offset credits for U.S. forest projects, if a covered entity retires a forestry ARB offset credit and thereafter the project is invalidated, the Forest Owner is responsible and the covered entity is still considered to be in compliance, even if it does not have enough valid compliance instruments. The Staff proposes to amend the current Regulation. The Staff asserts that a change to the existing rule is needed to "clarify" that this section only applies to ARB offset credits issued to U.S. forest projects prior to the effective date of these amendments. Staff Report at pp. 277-78. The Staff states that, after the effective date of these amendments, the provisions in section 95985(h) will apply to ARB offset credits issued to U.S. forest projects, meaning that the risk of project invalidation will be shifted to the purchaser of the offset. *Id.*

As currently written, the subsection imposes the obligation to replace the ARB offset credits on the "Forest Owner" if the offset credit is determined to be invalid after retirement of the offset. Entities have relied upon this provision in the negotiation and execution of contracts for the purchase of offsets, and in the allocation of costs and risks under those contracts. The Staff's proposed change would shift responsibility for "replacement" of offset credits (credits issued prior to the effective date of these amendments) from the Forest Owner to the purchaser of the offset credit, thereby undermining the terms of existing contracts.

The Staff has not adequately explained why this subsection should be amended in this manner. The current language provides a clear, understandable assignment of responsibility in the event an offset credit from a forestry project is deemed to be invalid. Reversing direction with respect to the assignment of liability will create uncertainty and will be disruptive to entities with existing contracts.

If the ARB nevertheless decides to adopt the Staff's recommendation to amend this subsection, the ARB must afford "grandfathered" treatment to contracts that pre-date the effective date of the amended regulations. The Staff's proposal would only "grandfather" offset credits issued to U.S. forest projects prior to January 1, 2014. See Staff Report at pp. 277-78. Grandfathered treatment should apply to all pre-January 1, 2014 contracts, as well.

Parties that relied upon the pre-existing rules at the time they entered into an agreement for the purchase and sale of forest project offsets should continue to be able to rely upon these pre-existing rules for the duration of their contract.

10. Sections 95891(f), 95894: These sections address the "Transition Assistance" (direct allocation of allowances) that the Staff proposes for eligible "legacy contract" generators. As a general matter, the direct allocation of allowances should be available to all otherwise eligible legacy contracts. Staff's proposed Section 95894(a)(3)(C) would require an attestation that the operator of the legacy contract generator made a good faith effort, but was unable to renegotiate the legacy contract with the counterparty. The Staff states that the purpose of this new section is to ensure that the "operator has discussed the possibility of allocating these costs with the counterparty and has exhausted all other options to cover the cost of compliance."

Staff Report at p. 168.

Shell Energy supports the Staff's revised (October 16, 2013) proposal to provide free allowances as Transition Assistance to non-industrial legacy contract holders. ARB should clarify, however, that the Transition Assistance will continue to be provided through the second compliance period (2017) even if the parties are able to renegotiate the legacy contract. This assurance is necessary in order to support contract renegotiation efforts. Parties to an otherwise eligible legacy contract should not be discouraged from renegotiating their contract based on the potential loss of a direct allocation of allowances. For this reason, proposed Section 95894(a)(3)(C) should be clarified to confirm that non-industrial legacy contract holders will receive Transition Assistance whether or not the parties are able to renegotiate the legacy contract.

Shell Energy appreciates the opportunity to provide these comments on the Staff's proposed amendments to the Cap and Trade Regulations. If Staff has any questions regarding these comments, Shell Energy would be pleased to discuss the concerns raised in these comments in greater detail.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2013-10-17 16:15:07

No Duplicates.

## **Comment 38 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Katy

Last Name: Wilson

Email Address: [kmwilson@semprausgp.com](mailto:kmwilson@semprausgp.com)

Affiliation: Sempra Generation

Subject: Comments on the Proposed Amendments to the Cap & Trade Regulations

Comment:

Attached please find the comments of Sempra Generation regarding the proposed amendments to the CA Cap-and-Trade Regulations.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/46-capandtrade13-AXJdPgBsWHsBdQVk.pdf>'

Original File Name: Sempra Generation.pdf

Date and Time Comment Was Submitted: 2013-10-17 16:39:04

No Duplicates.

**Comment 39 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Ron

Last Name: Hughes

Email Address: ron.hughes@solvay.com

Affiliation:

Subject: Comments in support of ARB Mine Methane Protocol

Comment:

Attached comments in support of the ARB Mine Methane Protocol

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/47-capandtrade13-AnEBaAdqVnNRNgJ7.pdf>'

Original File Name: Solvay Chemicals comments in support of ARB MMC Protocol.pdf

Date and Time Comment Was Submitted: 2013-10-18 08:06:26

No Duplicates.

**Comment 40 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Mark

Last Name: Krausse

Email Address: mckd@pge.com

Affiliation: Pacific Gas & Electric Co.

Subject: Gas Utility Group Comments

Comment:

Gas Utility Group Comments

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/48-capandtrade13-WzxTNAR2BAgFdjcj.pdf>'

Original File Name: Gas Utility Comments ARB HearingOct 2425 Oct 17 Final Draft.pdf

Date and Time Comment Was Submitted: 2013-10-18 11:49:51

No Duplicates.

## **Comment 41 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Kara

Last Name: Roeder

Email Address: Roeder.kc@pg.com

Affiliation:

Subject: Amendments to The California CAP on GHG Emissions and Market-Based Compliance Mechanisms

Comment:

Please See attached Tissue Product-Based Benchmark comment.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/49-capandtrade13-UCBUDQNIAXMgVq.pdf>'

Original File Name: P&G Comment - Tissue Product-Based Benchmark.pdf

Date and Time Comment Was Submitted: 2013-10-18 12:00:04

No Duplicates.

**Comment 42 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Thomas

Last Name: Corr

Email Address: thomaspcorr@gmail.com

Affiliation:

Subject: Comments of Noble Americas Energy Solutions LLC

Comment:

Comments of Noble Americas Energy Solutions LLC attached

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/50-capandtrade13-UTdUO1U6UWNVPwdY.pdf>'

Original File Name: Final Noble Solutions Comments on RPS Adjustment 18Oct13 Final.pdf

Date and Time Comment Was Submitted: 2013-10-18 13:11:56

No Duplicates.

## **Comment 43 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Lily

Last Name: Mitchell

Email Address: lmitchell@hanmor.com

Affiliation: SCPPA

Subject: SCPPA comments on 45-day changes to Cap and Trade Regulation

Comment:

Please find attached the comments of the Southern California Public Power Authority on the proposed changes to the Cap and Trade Regulation released for 45-day public comment on September 4, 2013.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/51-capandtrade13-VWZVY1xtVDVYYQUz.pdf>'

Original File Name: 300226001lmm10181301 SCPPA comment to ARB on 090413 cap and trade changes.pdf

Date and Time Comment Was Submitted: 2013-10-18 14:07:49

No Duplicates.

## **Comment 44 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: William

Last Name: Westerfield

Email Address: [wwester@smud.org](mailto:wwester@smud.org)

Affiliation: Sacramento Municipal Utility District

Subject: SMUD Comments to Proposed Amendments to the Cap-and-Trade Regulation and MRR

Comment:

Attached please find the Sacramento Municipal Utility District's Comments to Proposed Amendments to the Cap-and-Trade Regulation and MRR. Because the comments are applicable to capandtrade13 and ghg2013, the attached document is uploaded to both comment logs.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/52-capandtrade13-VTkAY1UzVykCNgQ0.pdf>'

Original File Name: LEG-2013-0838-SMUD-Comments-Cap-and-Trade-MRR.pdf

Date and Time Comment Was Submitted: 2013-10-18 14:46:08

No Duplicates.

## **Comment 45 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Mark

Last Name: Krausse

Email Address: mckd@pge.com

Affiliation: Pacific Gas & Electric

Subject: PG&E's Comments on the 45-day Cap-and-Trade Amendments

Comment:

PG&E's Comments on the 45-day Cap-and-Trade Amendments

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/53-capandtrade13-B3cGZwRaUGYAWQNg.pdf>'

Original File Name: PG&E Comments on 45 day Amendments to Cap and Trade Regulation.pdf

Date and Time Comment Was Submitted: 2013-10-18 16:36:52

No Duplicates.

## **Comment 46 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Ann

Last Name: Trowbridge

Email Address: [atrowbridge@daycartermurphy.com](mailto:atrowbridge@daycartermurphy.com)

Affiliation: CCDC

Subject: Cap-in-Trade

Comment:

Attached are CCDC Comments on Proposed Amendments to the Cap-in-Trade Regulation

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/54-capandtrade13-UzAFYFM2WGgLUgZl.pdf>

Original File Name: CCDC Comments on Proposed Amendments to the Cap-and-Trade Regulation.pdf

Date and Time Comment Was Submitted: 2013-10-18 16:54:23

No Duplicates.

### **Comment 47 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

**Comment 48 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Karla

Last Name: Mendoza

Email Address: Karla.Mendoza@asm.ca.gov

Affiliation:

Subject: Letter from Assemblymember Skinner to Chair Nichols & ARB Board Members

Comment:

Attached please find a letter from Assemblymember Skinner.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/57-capandtrade13-UjMGc1YkAzUHbFU3.pdf>'

Original File Name: Assembly CA Legislature.pdf

Date and Time Comment Was Submitted: 2013-10-21 10:32:25

No Duplicates.

## **Comment 49 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Justin

Last Name: Thompson

Email Address: [justin.thompson@aps.com](mailto:justin.thompson@aps.com)

Affiliation:

Subject: Comments on Proposed Amendments to the Cap-and-Trade Regulation

Comment:

Please find detailed comments in the attached Word file.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/58-capandtrade13-WjkCZVMgBDVQCQBj.docx>'

Original File Name: CARB comments 102113.docx

Date and Time Comment Was Submitted: 2013-10-21 10:32:49

No Duplicates.

## **Comment 50 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Peter

Last Name: Weiner

Email Address: peterweiner@paulhastings.com

Affiliation:

Subject: CSP Alliance Comments Re Natural Gas Use at STF

Comment:

Please see the attached comment letter submitted on behalf of CSP Alliance.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/59-capandtrade13-UTJdKABxUFwCZVU5.pdf>'

Original File Name: CSP Alliance Cap-and-Trade Letter re De Minimis Gas at STF (PH Cmt. 10.18.13).pdf

Date and Time Comment Was Submitted: 2013-10-21 11:19:59

No Duplicates.

## **Comment 51 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Lily

Last Name: Mitchell

Email Address: lmitchell@hanmor.com

Affiliation: SCPPA Magnolia participants

Subject: SCPPA Magnolia comments on 45-day Cap and Trade changes

Comment:

Please find attached the comments of the Southern California Public Power Authority participants in the Magnolia Power Project on the proposed changes to the Cap and Trade Regulation that were released for 45-day public comment on September 4, 2013.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/60-capandtrade13-WmlcalFgVzYGMgg+.pdf>'

Original File Name: 300226008lmm10211301 Magnolia comments to ARB on 090413 Cap and Trade changes.pdf

Date and Time Comment Was Submitted: 2013-10-21 13:10:30

No Duplicates.

## **Comment 52 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Raphael  
Last Name: Bruneau  
Email Address: raphael.bruneau@biothermica.com  
Affiliation: Biothermica Technologies Inc.

Subject: Support for MMC Protocol

Comment:

Ms. Rajinder Sahota  
Chief  
Cap-and-Trade Program  
California Air Resources Board

Object: Support for Mine Methane Capture Protocol

Dear Ms. Sahota,

Biothermica Technologies Inc. ("Biothermica") would like to thank the California Air Resources Board (ARB) for this opportunity to support the approval of the proposed Mine Methane Capture (MMC) Protocol.

Our support is provided from the perspective of a ventilation air methane (VAM) project developer and technology owner, having developed and implemented the first VAM destruction project at an active mine in the U.S.

Methane abatement and Clean Technology Deployment

Mine ventilation air methane (VAM) emissions are one of the largest sources of non-regulated greenhouse gas emissions in the U.S. Based on the nature of these emissions -high volume but very low methane concentrations - carbon offsets are the most effective way to support the development of VAM abatement technologies.

Thanks to the carbon price signal finally provided by the Protocol's adoption, project developers will be able to deploy their innovative methane abatement projects at several U.S. mine sites. This price signal is a crucial factor, considering these projects rely on carbon offsets as a source of revenues.

Swift implementation

We understand the actual implementation of the Protocol will take place only after its approval by the Office of Administrative Law (OAL) and the training of accredited verifiers. While we understand and respect ARB's administrative constraints, we do wish to underline the importance of not delaying the implementation schedule in order to ensure MMC projects will start delivering offsets as soon as possible.

Sincerely,

Raphaël Bruneau  
Director – Carbon Markets  
Biothermica Technologies Inc.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/61-capandtrade13-Wmhcal1tUzMLIAc2.pdf>'

Original File Name: 2013-10-18\_Biothermica Support.pdf

Date and Time Comment Was Submitted: 2013-10-21 13:56:13

No Duplicates.

## **Comment 53 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Peter

Last Name: Weiner

Email Address: peterweiner@paulhastings.com

Affiliation:

Subject: PH Comments on CARB's October 16, 2013 Legacy Contract Proposal

Comment:

Please see the attached comment letter regarding CARB's October 16, 2013 proposal to address legacy contracts.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/62-capandtrade13-BXVUOgNdU2MGYQV1.pdf>'

Original File Name: PH Cap-and-Trade Comment Letter re CARB Legacy Contract Proposal (10.21.13).pdf

Date and Time Comment Was Submitted: 2013-10-21 14:47:40

No Duplicates.

**Comment 54 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Ellie

Last Name: Booth

Email Address: [ebooth@covantaenergy.com](mailto:ebooth@covantaenergy.com)

Affiliation:

Subject: Changes to the ISOR

Comment:

Please accept these comments on behalf of Covanta Energy.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/63-capandtrade13-AmsAdVU7VHUEXQlq.doc>'

Original File Name: ISOR Comments Octo14 2013 (3).doc

Date and Time Comment Was Submitted: 2013-10-21 21:18:53

No Duplicates.

## **Comment 55 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Catherine  
Last Name: Reheis Boyd  
Email Address: joey@wspa.org  
Affiliation: WSPA

Subject: WSPA Comments on October 7, 2013 Refiner Workshop

Comment:

Please see attached WSPA Comments on October 7, 2013 Refiner Workshop.

Thank you.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/67-capandtrade13-VyBcKVwtBTdVDABj.pdf>'

Original File Name: WSPA Comments on October 7th, 2013 Refiner Workshop.pdf

Date and Time Comment Was Submitted: 2013-10-22 09:59:43

No Duplicates.

**Comment 56 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Jodean  
Last Name: Giese  
Email Address: jodean.giese@ladwp.com  
Affiliation: LADWP

Subject: LADWP Comments on Cap & Trade Amendments

Comment:

Please see attached comments.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/68-capandtrade13-BmoCZVI3VnIBdwdY.pdf>'

Original File Name: LADWP Comments on ARB Cap & Trade Amendments of 9-4-13.pdf

Date and Time Comment Was Submitted: 2013-10-22 10:09:55

No Duplicates.

## **Comment 57 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Carl

Last Name: Fink

Email Address: cmfink@Blueplanetlaw.com

Affiliation: Capital Power

Subject: Comments of Capital Power Energy Marketing (US) Inc. on proposed amendments

Comment:

Comments of Capital Power Energy Marketing (US) Inc. on proposed amendments are included on the attached file.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/69-capandtrade13-VzRROFY6AjwGZVQ6.pdf>

Original File Name: Comments of CP Energy Marketing (US) Inc. on proposed ARB regulatory changes October 2013.pdf

Date and Time Comment Was Submitted: 2013-10-22 10:24:50

No Duplicates.

**Comment 58 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Frank

Last Name: Caponi

Email Address: [fcaponi@lacsd.org](mailto:fcaponi@lacsd.org)

Affiliation: LACSD

Subject: Comment Letter - Proposed Changes to the California GHG Cap and Trade Regulations

Comment:

From Frank Caponi of the Los Angeles County Sanitation Districts.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/70-capandtrade13-BWFTOIY0WTsGMAEz.pdf>'

Original File Name: DOC102213.pdf

Date and Time Comment Was Submitted: 2013-10-22 10:25:42

No Duplicates.

## **Comment 59 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Jackie  
Last Name: Ferlita  
Email Address: [jferlita@elementmarkets.com](mailto:jferlita@elementmarkets.com)  
Affiliation: Element Markets

Subject: Use of "True-Up" Allowances

Comment:

Dear ARB Staff:

There seems to be some ambiguity around which vintage compliance instruments may be retired for annual and triennial compliance in the draft regulations.

In the draft regulations section 95856(h)(1)(d) and (h)(2)(d), it appears to state that t-2 ("true-up") allowances [allocated to account for changes in production and not properly accounted] are allowed to be used for (the current year's) compliance obligation.

In the draft regulations, it is not clear whether "true-up" allowances provided in future years (post-2015) will also be usable in the same way for the current year's compliance obligation.

Could you please clarify whether the same will be true for t-2 allowances in future years? For example, are true-up allowances that are allocated in the form of vintage 2018s for a calendar year 2016 increase in production valid to be used for an entity's 2016 compliance obligation?

Sincerely,

Jackie Ferlita  
Director  
Element Markets

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2013-10-22 10:43:40

No Duplicates.

## **Comment 60 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Kyle

Last Name: Danish

Email Address: kwd@vnf.com

Affiliation: Van Ness Feldman, LLP, for AEPCO

Subject: AEPCO Comments on Resource Shuffling Amendments

Comment:

Attached are AEPCO's comments on the Proposed Amendments to California's Cap-and-Trade Regulation.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/72-capandtrade13-VzYFZgd2U2MDaghX.pdf>

Original File Name: AEPCO Comments on Cap-and-Trade Regulatory Amendments Oct 22 2013.pdf

Date and Time Comment Was Submitted: 2013-10-22 11:16:10

No Duplicates.

## **Comment 61 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Diana

Last Name: Golis

Email Address: dgolis@holycross.com

Affiliation: Holy Cross Energy

Subject: Mine Methane Capture Projects

Comment:

Please review attached letter regarding Public Comments to Board  
Item capandtrade13

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/73-capandtrade13-WjkCZVYIV2EHcQFg.pdf>

Original File Name: CA EPA support 2013-10-22.pdf

Date and Time Comment Was Submitted: 2013-10-22 12:22:00

No Duplicates.

## **Comment 62 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Elysia

Last Name: Treanor

Email Address: Elysia.Treanor@pgn.com

Affiliation: Portland General Electric Company

Subject: Comments of PGE on the Proposed Amendments to the Cap and Trade Regulation

Comment:

Portland General Electric Company appreciates the opportunity to provide comments to California Air Resources Board on the Proposed Amendments to the Cap and Trade Regulation. Our comments are attached and are directed at requirements specific to electric power entities.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/74-capandtrade13-BWYGb1U5U21XNFc5.pdf>

Original File Name: Comments on CARB 2013 Cap&Trade Regulatory Changes.pdf

Date and Time Comment Was Submitted: 2013-10-22 13:42:55

No Duplicates.

**Comment 63 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Ralph

Last Name: Moran

Email Address: moranrj1@bp.com

Affiliation:

Subject: BP Comments on Cap and Trade Reg Amendments

Comment:

BP America Comments

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/75-capandtrade13-WjhcklQKUmJROANu.pdf>'

Original File Name: BP comment ltr on CARB cap and trade reg amendments 10 13.pdf

Date and Time Comment Was Submitted: 2013-10-22 14:50:55

No Duplicates.

**Comment 64 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Charles

Last Name: White

Email Address: cwhite1@wm.com

Affiliation: Waste Management

Subject: Supplemental Comments - ARB Legacy Amendments

Comment:

Please see attached supplemental comments regarding legacy contract amendments.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/76-capandtrade13-UWABNFVIAGMEMAg6.pdf>'

Original File Name: 131022\_WM WTI Supplemental ARB Legacy Amendment Comments.pdf

Date and Time Comment Was Submitted: 2013-10-22 14:55:28

No Duplicates.

## **Comment 65 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Amber  
Last Name: Riesenhuber  
Email Address: amber@iepa.com  
Affiliation: IEP

Subject: IEP Comments on Amendments to Cap and Trade

Comment:

Attached Please find IEP's Comments on the Proposed Amendments to the Cap and Trade Program

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/77-capandtrade13-UzoHZFIjUFxVMAFu.pdf>

Original File Name: IEP Comments on CARB C&T Amendments FINAL.pdf

Date and Time Comment Was Submitted: 2013-10-22 15:23:31

No Duplicates.

## **Comment 66 for Cap and Trade 2013 (capandtrade13) - Non-Reg.**

First Name: Ken

Last Name: Bone

Email Address: fishbone1@earthlink.net

Affiliation: Sierra Club

Subject: Do not allow any leaks to occur in the carbon market regulations

Comment:

The Air Resources Board vote to amend the sucessful carbon market regulations may create adverse leakage problems.

Leakage solution: Allow any and all trading in the electricity sector -- but if a trade results in leakage, the party divesting from a high-emitting resource must retain the liability for the emissions that leak out of California's market.

Do not allow any leaks to occur in the carbon market regulations!

Ken Bone

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2013-10-22 14:14:16

No Duplicates.

## **Comment 67 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Bill

Last Name: Buchan

Email Address: buchan@mktpotential.com

Affiliation: Cardinal Cogen, Inc..

Subject: Legacy Contracts Under California Cap and Trade

Comment:

Members of Board,

Please accept the attached comments from Cardinal Cogen regarding legacy contract issues we face. The current regulation does not address legacy contract issues and the draft regulation does not adequately address the situation. We ask that the Board approve the new ARB staff proposal of October 16, 2013, so that we may work out a fair solution with ARB staff regarding the legacy contract issue we face. Please see our attached letter.

Bill Buchan

On Behalf of Cardinal Cogen, Inc.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/79-capandtrade13-AXFUJ1Q5UGoHYgBf.pdf>'

Original File Name: Public Review Comments for 2013 Amendments to GHG CT Regulation.pdf

Date and Time Comment Was Submitted: 2013-10-22 16:09:53

No Duplicates.

## **Comment 68 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Michael

Last Name: Huber

Email Address: michael.huber@navy.mil

Affiliation: U.S. Department of Defense

Subject: Amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance M

Comment:

Clerk of the Board,

Attached are the U.S. Department of Defense comments on the Amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms.

V/R,

Michael Huber

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/80-capandtrade13-Wz9WP1w5VFhWM1cI.pdf>

Original File Name: Dod C&T ltr 22Oct2013.PDF

Date and Time Comment Was Submitted: 2013-10-22 16:11:40

No Duplicates.

## **Comment 69 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Matthew

Last Name: Allen

Email Address: mallen@wga.com

Affiliation: Western Growers Association

Subject: Comments on Cap & Trade Program

Comment:

Clerk of the Board,

Please find attached comments from Western Growers Association regarding this agenda item.

Regards,

Matthew Allen

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/81-capandtrade13-VSYAbVI+WGIWJAF.pdf>

Original File Name: SKMBT\_C28013102215190.pdf

Date and Time Comment Was Submitted: 2013-10-22 16:25:28

No Duplicates.

## **Comment 70 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Todd

Last Name: Jones

Email Address: [todd@resource-solutions.org](mailto:todd@resource-solutions.org)

Affiliation: Center for Resource Solutions

Subject: Comments of Center for Resource Solutions on Proposed Amendments to the CA C&T regulation

Comment:

Thank you for the opportunity to comment. Please see our comments attached. Please contact me with any questions.

Todd Jones

Center for Resource Solutions

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/82-capandtrade13-AmFVIQR2BTVSowhl.pdf>

Original File Name: CRScommentstoARBproposedC&Treg\_10-23-2013.pdf

Date and Time Comment Was Submitted: 2013-10-22 16:48:31

No Duplicates.

## **Comment 71 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Jon

Last Name: Costantino

Email Address: jcostantino@manatt.com

Affiliation:

Subject: Coalition/WSPA Joint Letter on CWB Offsites

Comment:

Attached is the Coalition for Fair and Equitable Allocation and WSPA joint letter originally submitted to CARB on September 26, 2013.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/83-capandtrade13-WjlXPl09UG9VOlIm.pdf>'

Original File Name: Coalition-WSPA Offsites Comment Letter.pdf

Date and Time Comment Was Submitted: 2013-10-22 18:07:09

No Duplicates.

## **Comment 72 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Richard

Last Name: Rosenthal

Email Address: rrosenthal62@sbcglobal.net

Affiliation:

Subject: Notice of Public Hearing to Consider Amendments to the California Cap on Greenhouse Gas Em

Comment:

i oppose the proposed amendment. I refer to research work undertaken by Danny Cullenwood and David Weiskopf in a recent Stanford Law School working paper. The paper shows that the Board's exemptions will permit rampant resource shuffling, which could result in leakage that exceeds the cumulative mitigation required under the cap-and-trade market through 2020. Prior to consideration of proposed amendment, an EIR should be undertaken to assess the environmental impacts of the proposed amendment.

Thank you for consideration of this matter

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2013-10-23 01:52:51

1 Duplicates.

**Comment 73 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Angus

Last Name: Crane

Email Address: acrane@naima.org

Affiliation: NAIMA

Subject: CARB's Notice of Public Hearing to Consider Amendments to Cap and Trade Program  
Comment:

Please find attached comments from the North American Insulation Manufacturers Association ("NAIMA").

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/86-capandtrade13-BXcBZgFjWDgENwc3.docx>'

Original File Name: RAC3504.docx

Date and Time Comment Was Submitted: 2013-10-23 07:12:18

No Duplicates.

## **Comment 74 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Susie

Last Name: Berlin

Email Address: [berlin@susieberlinlaw.com](mailto:berlin@susieberlinlaw.com)

Affiliation: M-S-R Public Power Agency

Subject: Comments on Proposed Amendments

Comment:

Attached please find the M-S-R Public Power Agency (M-S-R) Comments on the Proposed Amendments to the Cap-and-Trade Regulations.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/87-capandtrade13-VjsFLIUnWCYHcwIW.pdf>

Original File Name: M-S-R comments re 2013 cap-and-trade amendments (final).pdf

Date and Time Comment Was Submitted: 2013-10-23 08:27:48

No Duplicates.

## **Comment 75 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Susie

Last Name: Berlin

Email Address: [berlin@susieberlinlaw.com](mailto:berlin@susieberlinlaw.com)

Affiliation: Northern California Power Agency (NCPA)

Subject: Comments on Proposed Amendments

Comment:

Attached please find the Northern California Power Agency (NCPA) Comments on the Proposed Amendments to the Cap-and-Trade Regulation.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/88-capandtrade13-BWtUMQFwV2UGX1Ix.pdf>

Original File Name: NCPA comments re proposed amendments (final).pdf

Date and Time Comment Was Submitted: 2013-10-23 08:32:01

No Duplicates.

## **Comment 76 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Clare

Last Name: Breidenich

Email Address: [cbreidenich@aciem.us](mailto:cbreidenich@aciem.us)

Affiliation: Western Power Trading Forum

Subject: Comments on Cap and Trade Amendments

Comment:

Please find attached supplemental comments of WPTF on the 45 day proposed amendments to the cap and trade regulation.

Thank you,  
Clare Breidenich  
WPTF GHG Committee Director

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/89-capandtrade13-W2oHMVV5VTQFMAgl.pdf>

Original File Name: 10-23-13 WPTF Supplemental on C&T- RPS Adjustment.pdf

Date and Time Comment Was Submitted: 2013-10-23 08:43:32

No Duplicates.

## **Comment 77 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Joseph  
Last Name: Seymour  
Email Address: jseymour@ttcorp.com  
Affiliation: Renewable Energy Markets Association

Subject: REMA Comments on ARB Proposed Amendments

Comment:

Dear ARB Board Members,

Please see attached for comments on the Cap and Trade program's Proposed Amendments from the Renewable Energy Markets Association (REMA).

For additional questions, please contact REMA General Manager Josh Lieberman, 202-640-6597 x322.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/90-capandtrade13-WigBYII+ADIGXwNg.pdf>'

Original File Name: REMA\_comments\_ARB\_CT\_amendments\_10.23.2013.pdf

Date and Time Comment Was Submitted: 2013-10-23 08:46:52

No Duplicates.

## **Comment 78 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Diana  
Last Name: Tang  
Email Address: diana.tang@longbeach.gov  
Affiliation: City of Long Beach

Subject: City of Long Beach Comment re: Proposed  
Comment:

October 23, 2013

The Honorable Mary D. Nichols, Chairman  
California Air Resources Board  
1001 "I" Street  
Sacramento, CA 95812

Re: City of Long Beach Comments to Proposed Cap and Trade  
Regulation Amendments

Dear Chairman Nichols:

On behalf of the City of Long Beach, I write to comment on Cap and Trade Program changes that have been proposed by California Air Resources Board (CARB) staff, and described in the Initial Statement of Reasons (ISOR), released September 4, 2013. The City is supportive of the document, particularly proposed regulatory changes that exempt Waste-to-Energy and natural gas suppliers from the first compliance period. However, Long Beach is concerned and is requesting clarification of Waste-to-Energy language on page 29 of the ISOR.

### **Waste to Energy Exemption**

The City appreciates the proposed exemption for Waste to Energy facilities from the first compliance period. This is consistent with CARB Board Resolutions 11-32 and 12-33. However, language on page 29 of the ISOR is inconsistent with the aforementioned resolutions, and inconsistent with proposed regulatory changes. This language would prevent a Waste to Energy facility's internal load, and potentially the entire Waste to Energy facility, from inclusion in the first compliance period exemption:

"In order to obtain the exemption, facilities must report and verify their emissions. In addition, the electricity must be placed on the California grid and not used to meet the facilities internal load."

The City does use a small amount of the energy generated at SERRF to power the facility, but the majority of electricity is placed on the California grid. Given this history, Long Beach requests an amendment to the language on page 29 to ensure consistency with proposed regulatory changes on page 96 of the ISOR. It is our preference that language read:

"In order to obtain the exemption, facilities must report and

verify the emissions."

Natural Gas Exemption

The City supports proposed amendments that would exempt natural gas suppliers from the first compliance period by providing new allowances to this industry. Such changes will allow Long Beach to ease its small natural gas customers into a price signal that will promote greater reductions in GHG emissions on a gradual and market basis.

Thank you for taking the city's earlier comments into consideration on the Cap and Trade Program with the establishment of CARB's ISOR.

Should you have any questions, please contact Tom Modica, Deputy City Manager at (562) 570-5091.

Sincerely,

Mayor Bob Foster  
City of Long Beach

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/91-capandtrade13-VTZWOQF0U3lRCAZp.pdf>

Original File Name: City of Long Beach Comments\_CapandTrade\_Proposed Regulatory Amendments\_10-23-13.pdf

Date and Time Comment Was Submitted: 2013-10-23 09:08:57

No Duplicates.

**Comment 79 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Barbara

Last Name: Haya

Email Address: bhaya@law.stanford.edu

Affiliation: Stanford Law School

Subject: Follow up to our meeting on the proposed MMC protocol

Comment:

Please find attached letter.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/92-capandtrade13-UyBTIVc3Um9QMAFu.pdf>'

Original File Name: Stanford.pdf

Date and Time Comment Was Submitted: 2013-10-23 09:19:44

No Duplicates.

## **Comment 80 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Jon

Last Name: Costantino

Email Address: jcostantino@manatt.com

Affiliation:

Subject: Coalition for Fair and Equitable Allocation Comments

Comment:

Please find attached the final comments from the Coalition for Fair and Equitable Allocation on the 2013 Cap and Trade amendments.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/93-capandtrade13-VDdSOwFhWGcDcVM6.pdf>'

Original File Name: Coaltion Cap and Trade Comments 10-22-13.pdf

Date and Time Comment Was Submitted: 2013-10-23 09:18:58

No Duplicates.

## **Comment 81 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Mikhael

Last Name: Skvarla

Email Address: mikhael.skvarla@calobby.com

Affiliation: Lucas Advocates/CCEEB

Subject: CCEEB's CnT Comments - October 2013

Comment:

Please find CCEEB's comments attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/94-capandtrade13-B2QHYl05UWdXM1cI.pdf>'

Original File Name: CCEEB CnT Revision Comments - October 2013.pdf

Date and Time Comment Was Submitted: 2013-10-23 09:31:35

No Duplicates.

## **Comment 82 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Janet

Last Name: Bell

Email Address: [jbell@mwdh2o.com](mailto:jbell@mwdh2o.com)

Affiliation: Metropolitan Water District

Subject: Metropolitan Water District Comments Letter on Proposed Amendments to C&T Regulations

Comment:

Attached is Metropolitan Water District's comments letter on the proposed amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms.

Mark Parsons of our staff will attend and speak at the Board hearing on Friday.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/95-capandtrade13-VDcAZ1IhAzIDWgVm.pdf>'

Original File Name: CARB C&T amends\_ Comment Letter 102313\_ final.Oct2013.pdf

Date and Time Comment Was Submitted: 2013-10-23 09:30:41

No Duplicates.

## **Comment 83 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Gerald

Last Name: Miller

Email Address: Gerald\_Miller@praxair.com

Affiliation:

Subject: Praxair Comments on Cap and Trade Regulation

Comment:

Attached are Praxair's Comments on the September 4, 2013 revisions to the Cap-and-Trade Regulation, as well as the ARB's recent October 7, 2013 Refineries and Related Industries Workshop.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/96-capandtrade13-WmtVYFVIB2QGMgEy.pdf>'

Original File Name: 131023\_Praxair Comments on 9 4 Cap and trade Regulation\_vfin (00193048) (00193122).pdf

Date and Time Comment Was Submitted: 2013-10-23 09:44:25

No Duplicates.

## **Comment 84 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Robin  
Last Name: Fraser  
Email Address: [fraser@ieta.org](mailto:fraser@ieta.org)  
Affiliation: International Emissions Trading Assoc.

Subject: IETA's Comments on ARB's Proposed Cap-and-Trade Amendments  
Comment:

To whom it may concern,

Please find attached IETA's comments relating to the California Air Resources Board's proposed cap-and-trade amendments and associated regulatory documentation.

Thank you for considering IETA's perspectives on the matter.

Best,

Robin Fraser

Senior Analyst,  
International Emissions Trading Association  
[fraser@ieta.org](mailto:fraser@ieta.org)  
+1.416.992.1540

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/97-capandtrade13-B25RMgRxV2VQCQhr.pdf>'

Original File Name: IETA Comments on ARB Proposed Cap-and-Trade Amendments\_23October2013.pdf

Date and Time Comment Was Submitted: 2013-10-23 10:03:56

No Duplicates.

**Comment 85 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: David

Last Name: Huard

Email Address: [dhuard@manatt.com](mailto:dhuard@manatt.com)

Affiliation:

Subject: PEC Comments on Legacy Contract Provisions

Comment:

Please find attached PEC's comments on the proposed Cap and Trade amendments related to Legacy Contracts.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/98-capandtrade13-AHBcP1MxAwEYVQ1.pdf>

Original File Name: PEC Cap and Trade Comments-Legacy Contracts 10-23-13.pdf

Date and Time Comment Was Submitted: 2013-10-23 10:38:16

No Duplicates.

**Comment 86 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Timothy

Last Name: Haines

Email Address: [thaines@swc.org](mailto:thaines@swc.org)

Affiliation: State Water Contractors

Subject: State Water Contractors' C-N-T Amendment Proposal

Comment:

Position is Neutral with Explanation WRT Agenda Item 13-9-9

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/99-capandtrade13-ATBcagcrUTBWYwEs.pdf>

Original File Name: 10-23-13 C-N-T Proposed Amendment Comments.pdf

Date and Time Comment Was Submitted: 2013-10-23 10:33:46

No Duplicates.

**Comment 87 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: William  
Last Name: Westerfield  
Email Address: [wwester@smud.org](mailto:wwester@smud.org)  
Affiliation: Sacramento Municipal Utility District

Subject: SMUD's Supplemental Comments on  
Comment:

Attached please find the Sacramento Municipal Utility District's  
Supplemental Comments on Proposed Regulation Order -- July 2013  
Amendments to California's Cap-and-Trade Program.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/100-capandtrade13-Uz9WNVcxV1tSZlBg.pdf>'

Original File Name: LEG 2013-0847-SMUD-Supp-Comments-Cap-and-Trade.pdf

Date and Time Comment Was Submitted: 2013-10-23 10:59:48

No Duplicates.

## **Comment 88 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Ann

Last Name: Trowbridge

Email Address: [atrowbridge@daycartermurphy.com](mailto:atrowbridge@daycartermurphy.com)

Affiliation: Day Carter & Murphy LLP

Subject: Comments on Proposed Revisions to Cap on GHG Emissions and Reporting of GHG Emissions

Comment:

Attached please find our Comments on Proposed Revisions to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms and the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions.

Thank you.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/101-capandtrade13-UjEAaQBsVGpRMgJs.pdf>'

Original File Name: Comments on Proposed Revisions to Cap-and-Trade and GHG.pdf

Date and Time Comment Was Submitted: 2013-10-23 11:07:33

No Duplicates.

## **Comment 89 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Melinda  
Last Name: Hicks  
Email Address: mhicks@kernoil.com  
Affiliation: Kern Oil & Refining Co.

Subject: Kern Oil Comments on 2013 Cap & Trade Amendments  
Comment:

See attached letter.  
Kern appreciates the opportunity to comment.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/102-capandtrade13-AmlUNwd0U24LUgdo.pdf>'

Original File Name: Kern Oil C&T Comments on 2013 Amendments 10-23-13.pdf

Date and Time Comment Was Submitted: 2013-10-23 11:18:01

No Duplicates.

**Comment 90 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Claire

Last Name: Halbrook

Email Address: [cehu@pge.com](mailto:cehu@pge.com)

Affiliation: Pacific Gas & Electric Co

Subject: Joint Utility Group Comments on 45-day Cap-and-Trade Amendments

Comment:

Joint Utility Group Comments on 45-day Cap-and-Trade Amendments

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/103-capandtrade13-UTsBaFM7VWhXJVAP.pdf>'

Original File Name: Joint Utility Group Comments on 45 Day Language.pdf

Date and Time Comment Was Submitted: 2013-10-23 11:22:04

No Duplicates.

## **Comment 91 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Thomas

Last Name: Vessels

Email Address: tvessels@vesselscoalgas.com

Affiliation: Vessels Coal Gas, Inc.

Subject: Mine Methane Capture Amendment to Cap and Trade system of Market Mechanisms

Comment:

I would like to make oral comments at Friday ARB Meeting. I attach herewith my written comments.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/104-capandtrade13-UjFcOwBzWWhRCFM+.docx>'

Original File Name: CARB MMC SUPPORT.docx

Date and Time Comment Was Submitted: 2013-10-23 11:32:17

No Duplicates.

## **Comment 92 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Daniel

Last Name: Riley

Email Address: Daniel.T.Riley@tsocorp.com

Affiliation: Tesoro

Subject: RE: Proposed Amendments to California Cap and Trade Regulation

Comment:

Dear Clerk of the Board:

Tesoro Corporation, a Fortune 100 company, is an independent refiner and marketer of petroleum products. Tesoro, through its subsidiaries, operates six refineries in the western United States with a combined capacity of over 845,000 barrels per day. Tesoro's retail-marketing system includes more than 2,200 retail stations, under the Tesoro®, Shell® ARCO® and USA Gasoline™ brands, of which more than 570 are company operated. Tesoro closed on the purchase of BP's southern California business in June 2013; we now supply approximately 25% of the state's transportation needs through our Martinez refinery in the Bay Area and our Los Angeles refinery in southern California. We employ 3900 Californians through our refineries, logistics assets and retail network.

Tesoro is also a member of the Western States Petroleum Association (WSPA) and has participated in the development of comments submitted to CARB regarding the Cap and Trade Regulation. Tesoro concurs with and hereby incorporates by reference comments submitted by WSPA.

Tesoro would like to comment on two specific areas. First, we commend the Air Resources Board (ARB) and the California Public Utility Commission (CPUC) for their well-coordinated efforts to develop ARB's methodologies for power allocation and CPUC's methodologies for auction revenue sharing to provide equity among EITE entities. We believe, however, that disparities exist between EITE entities serviced by the Publicly Owned Utilities (POU) depending on the extent of self-generation. We encourage ARB to work with the POU's towards equitable treatment of EITE entities within their service areas.

Second, we would like to request recognition of the early reduction projects such as the Tesoro Golden Eagle Coker Modification Project within the Complexity Weighted Barrel (CWB) benchmark method. In 2008 Tesoro implemented its Coker Modification Project (CMP) at the Golden Eagle Refinery near Martinez, California, that resulted in early reductions of greenhouse gases and other pollutants. GHG emission reductions from the project were 462,000 tonnes/yr based on the third party verified emission reports. The project was the largest single emission reduction measure reported for the refining sector in the Energy Efficiency and Co-Benefits Assessments and resulted in reductions of overall energy use, criteria pollutants and air toxic emissions. The project did not change production at the Golden Eagle Refinery. The emission reductions are real, permanent and verifiable.

Tesoro presented information to ARB staff demonstrating that as a result of project implementation, CWB, the proxy adopted for refinery sector output, is disproportionately reduced relative to refinery production. The Tesoro's CMP project replaced the existing fluid coking process with a delayed coking process which is a less carbon intensive process. Consequently, the CWB factor for delayed coking, which is lower than the factor for fluid coking, would be used in calculating allowance allocation for the second and third compliance period. This regulatory approach stifles innovation and reduces incentives to implement an alternate process to reduce multiple pollutants. Instead, the proposed regulation only serves to encourage an entity to continue to operate the same inefficient unit and to either purchase credits or install control equipment (if technology exists) for a single pollutant.

We recognize that the development of a refinery benchmarking method has been a difficult task. In many instances, changes in refinery operations may result in corresponding changes to refinery production. However, this is not the case for Tesoro's CMP project for which the refinery has continued to retain its capacity to produce clean California fuels. To ensure equitable treatment, we request that ARB allows the use of a CWB factor for fluid coking in determining allocation for Tesoro's Golden Eagle refinery coking process.

The current regulatory approach that results in a reduction in allocations to a facility because it adopts a less carbon intensive process resulting in multiple pollutant reductions is contrary to the objectives of AB32. In fact, ARB recognized the need to provide incentives in choosing an allocation methodology for the first compliance period by considering an allowance allocation based on the operation of the fluid coking process. Therefore, we are requesting that the same treatment continues into the second and third compliance period. To accomplish this, we suggest that ARB provide a mechanism for Executive Officer review of projects that adopt less carbon intensive operations and ensure that allocations are not inequitably reduced as a result of the proxy chosen to represent refinery output. We would expect such review to be supported by a thorough analysis of emissions, unit operations, and production. We believe this proposal is consistent with the objectives of AB-32.

Tesoro appreciates the opportunity to submit comments on the Cap and Trade Program Regulations.

Sincerely,

Daniel T. Riley  
Vice President  
State & Local Government Affairs

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/105-capandtrade13-VjVQN1AjWWhXDIU2.pdf>

Original File Name: CARB Cap and Trade Comments 10-23-2013.pdf

Date and Time Comment Was Submitted: 2013-10-23 11:35:29

No Duplicates.

## **Comment 93 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Eric

Last Name: Townsend

Email Address: etownsend@bluesource.com

Affiliation: Blue Source LLC

Subject: Support & Comments Regarding MMC Protocol

Comment:

October 23, 2013

Ms. Mary Nichols  
Chairman, California Air Resource Board  
1001 I Street  
Sacramento, CA 95814

Blue Source, LLC. Statement of Support and Comments to the  
"Proposed Compliance Offset Protocol - Mine Methane Capture  
Projects"

Dear Madam Chair:

Thank you for the opportunity to comment in support of ARB's adoption of the Proposed Compliance Offset Protocol for Mine Methane Capture (MMC) Projects. Blue Source, LLC has been a carbon offset developer and marketer in North America for the last 12 years, having developed and participated in over 200 offset projects, including forestry, coalmine methane, wastewater methane, landfill methane, ODS, transportation and many others. Blue Source fully supports the development of new compliance offset protocols that provide real, permanent and verifiable greenhouse gas emission reductions.

Blue Source urges ARB to adopt the Proposed Protocol for MMC Projects. Through its approval, ARB will enable voluntary participation in GHG emission reduction activities that, void of traditional economic viability and absent participation in California's Cap and Trade Program, would not otherwise occur. The protocol will establish a framework to allow companies to address the millions of tons of GHG emissions released from coal mining each year, without incentivizing additional mining activity. Adoption of this protocol will serve to encourage and promote the development and implementation of cleaner and more environmentally responsible practices in the industry, and will result in the ultimate goal: Reduced GHG emissions.

In addition to our support of the adoption of the MMC Projects Protocol, Blue Source respectfully submits the following comments:

### **§ 3.3 (d) Offset Project Operator**

As it is currently drafted, the express designation of the OPO as a Mine Operator (any owner, lessee or other person who operates, controls or supervises a coal or other mine or any independent contractor performing services or construction at such mine) may be

unnecessarily limiting and problematic in administering the project. Blue Source suggests that the definition be expanded to include the scope of parties likely to be directly and critically involved in the design, financing, construction and operation of the project, namely those entities responsible for the direct operation of the destruction equipment and/or the owners of the physical assets.

§ 6.2 (a) (1) Instrument QA/QC

While Blue Source understands and appreciates the motive for requesting "quarterly cleaning & inspections" to ensure valid and accurate recording of data, the simple inclusion of "cleaning" has proven to be overly cumbersome and in some cases impossible in practice in the field for existing offset projects. This is primarily due to equipment design and various requirements of equipment manufacturers. Many manufacturers warn that removal of the equipment for cleaning could cause inaccurate or improper readings, and in some cases the warranties for the devices are voided in the event of their removal. This is a challenge that has been encountered on a number of methane abatement projects. Therefore, it is recommended that the word "cleaning" be struck from the language entirely, as relying on a quarterly inspection alone meets ARB's requirement to ensure that the equipment is operating properly.

Thank you for your consideration of these issues. Blue Source reiterates its full support for the MMC protocol and looks forward to a prompt implementation.

Respectfully submitted,

Eric Townsend  
Chief Executive Officer  
Blue Source LLC

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/106-capandtrade13-AmBWPFYiV2EKUwh7.pdf>

Original File Name: Blue Source MMC Protocol Support Letter.pdf

Date and Time Comment Was Submitted: 2013-10-23 11:27:25

No Duplicates.

## **Comment 94 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Barbara

Last Name: Haya

Email Address: bhaya@law.stanford.edu

Affiliation: Stanford Law School

Subject: Comments on the draft Mine Methane Capture Offset Protocol

Comment:

Please find attached comments on the draft Mine Methane Capture Compliance Offset Protocol.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/107-capandtrade13-VzQCawNvUmwHZAFv.pdf>'

Original File Name: Comments from Stanford Law School on draft MMC Protocol for Oct 2013 Board meeting.pdf

Date and Time Comment Was Submitted: 2013-10-23 10:54:04

No Duplicates.

## **Comment 95 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Shellys  
Last Name: Sullivan  
Email Address: ssullivan@onemain.com  
Affiliation: AB 32 Implementation Group

Subject: AB 32 IG Comments Regarding CARB's Regulatory Amendments  
Comment:

Good Morning~

Attached please find comments from the AB 32 Implementation Group regarding ARB's regulatory amendments being considered at the October ARB meeting.

Should you have any questions or need anything further, please feel free to contact us.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/108-capandtrade13-AmMCZgNdVDQANAZZ.pdf>'

Original File Name: AB 32 IG Reg Amendments Comments\_10\_23\_2013-1.pdf

Date and Time Comment Was Submitted: 2013-10-23 11:39:02

No Duplicates.

## **Comment 96 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Kassandra

Last Name: Gough

Email Address: Kassandra.Gough@calpine.com

Affiliation: Calpine Corporation

Subject: Comments on Proposed Amendments to Cap-and-Trade Regulation

Comment:

Please find attached the comments of Calpine Corporation on the proposed amendments to the Cap-and-Trade Regulation. We greatly appreciate the work of Board staff on these amendments and look forward to working towards their implementation.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/109-capandtrade13-VjVWMVY7AyAKZQdp.pdf>'

Original File Name: Calpine Comments on Proposed Amendments to Cap-and-Trade Regulation.pdf

Date and Time Comment Was Submitted: 2013-10-23 11:44:45

No Duplicates.

## **Comment 97 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Mark

Last Name: Cowin

Email Address: mark.cowin@water.ca.gov

Affiliation: DWR

Subject: Cap & Trade Regulations; Proposed Amendments Oct 23 2013

Comment:

Attached please find the comments of Mark Cowin, Director of the Department of Water Resources, on the proposed amendments to the Cap and Trade Regulations.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/7-acc2013-UD1WNQNvVGgEXVIm.pdf>'

Original File Name: Memo to ARB re Cap n Trade Oct 2013.pdf

Date and Time Comment Was Submitted: 2013-10-23 11:39:51

No Duplicates.

## **Comment 98 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Dan

Last Name: Severson

Email Address: dbseverson@tid.org

Affiliation:

Subject: TID Comments on Cap-and-Trade Regulations

Comment:

Dear Clerk of the Board:

Turlock Irrigation District submits the attached Comments on the September 4, 2013 Proposed Amendments to the Cap-and-Trade Program.

Sincerely,

Dan B. Severson  
Turlock Irrigation District

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/112-capandtrade13-VWRRZFZmVTZSZgk6.pdf>'

Original File Name: 131023 TID Comments on 9.4 ARB CNT Regs (00193179).pdf

Date and Time Comment Was Submitted: 2013-10-23 11:45:32

No Duplicates.

**Comment 99 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: John

Last Name: Larrea

Email Address: john@clf.com

Affiliation: CA League of Food Processors

Subject: CLFP Comments on capandtrade

Comment:

Comments on Cap and Trade reg changes

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/113-capandtrade13-BmVXPV06V3QFXAlq.pdf>'

Original File Name: CLFP Cap and Trade Comments 2013.pdf

Date and Time Comment Was Submitted: 2013-10-23 11:52:25

No Duplicates.

## **Comment 100 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Paul

Last Name: Shepard

Email Address: p.shepard@dgc-us.com

Affiliation:

Subject: Wildflower Comments on Cap-and-Trade Amendments

Comment:

Dear Clerk of the Board:

Wildflower Energy submits the attached comments on the September 4, 2013 Cap-and-Trade Amendments.

Sincerely,

Paul Shepard  
Wildflower Energy

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/114-capandtrade13-UWBdaFBgWDtQZFRn.pdf>

Original File Name: 131023 Wildflower Comments on September 4, 2013 Cap-and-Trade Amendments (00193183).pdf

Date and Time Comment Was Submitted: 2013-10-23 11:55:19

No Duplicates.

**Comment 101 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Michael

Last Name: Cote

Email Address: mcote@rubycanyoneng.com

Affiliation: Ruby Canyon Engineering

Subject: Support of the MMC Protocol

Comment:

Please find our comment attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/115-capandtrade13-AHJcOVQwWFQKIQFe.pdf>'

Original File Name: RCE - Comments on proposed MMC protocol\_Final.pdf

Date and Time Comment Was Submitted: 2013-10-23 11:33:03

No Duplicates.

## **Comment 102 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Nico

Last Name: van Aelstyn

Email Address: nvanaelstyn@bdlaw.com

Affiliation: Beveridge & Diamond, PC

Subject: Poweerex's Comments on the Proposed CTR Amendments

Comment:

Please see the attached letter with Powerex's comments on the proposed amendments to the Cap-and-Trade Regulation.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/116-capandtrade13-BjRVY1BgAmIELwk4.pdf>

Original File Name: 2013-10-23 Powerex Comments Letter on Proposed CTR Amendments.PDF

Date and Time Comment Was Submitted: 2013-10-23 12:02:30

No Duplicates.

## **Comment 103 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Danny

Last Name: Cullenward

Email Address: dcullenward@berkeley.edu

Affiliation:

Subject: Resource Shuffling - § 95852(b)(2)

Comment:

Please find my comments in the attached PDF.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/4-acc2013-VDcAc1wxAzwBYgZo.pdf>'

Original File Name: Cullenward - Resource Shuffling - § 95852(b)(2).pdf

Date and Time Comment Was Submitted: 2013-10-23 10:47:06

No Duplicates.

## **Comment 104 for Cap and Trade 2013 (capandtrade13) - 45 Day.**

First Name: Gail

Last Name: Welch

Email Address: [gwelch@qualcomm.com](mailto:gwelch@qualcomm.com)

Affiliation: Qualcomm Incorporated

Subject: Qualcomm Comments on Amendments to the Regulation for the Mandatory  
Comment:

Qualcomm hereby submits comments in opposition to the Regulation  
for the Mandatory Reporting of Greenhouse Gas Emissions.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/20-ghg2013-VCVcL1Q0WWZWMwVq.pdf>'

Original File Name: QUALCOMM CARB Submission 10-24-13.pdf

Date and Time Comment Was Submitted: 2013-10-18 08:45:13

No Duplicates.

**Comment 1 for Cap and Trade 2013 (capandtrade13). (At Hearing)**

First Name: David

Last Name: Antonioli

Email Address: dantonioli@v-c-s.org

Affiliation:

Subject: Verified Carbon Standard Comments

Comment:

Please see attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/120-capandtrade13-BWEAZwRzU2kBYwBf.pdf>

Original File Name: David Antonioli.pdf

Date and Time Comment Was Submitted: 2013-10-29 10:34:28

No Duplicates.

**Comment 2 for Cap and Trade 2013 (capandtrade13). (At Hearing)**

First Name: Mari

Last Name: Rose Taruc

Email Address: marirose@apen4ej.org

Affiliation:

Subject: Cap & Trade Comments

Comment:

Please see attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/121-capandtrade13-VzpTNFIhU2lQCQBy.pdf>

Original File Name: Mari Rose Taruc.pdf

Date and Time Comment Was Submitted: 2013-10-29 10:34:28

No Duplicates.

**Comment 3 for Cap and Trade 2013 (capandtrade13). (At Hearing)**

First Name: Monica

Last Name: Wilson

Email Address: Non-web submitted comment

Affiliation: GAIA

Subject: Cap & Trade Comments

Comment:

Please see attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/123-capandtrade13-UD0Gb10yBT8LbgJj.pdf>

Original File Name: Monica Wilson.pdf

Date and Time Comment Was Submitted: 2013-10-29 10:34:28

No Duplicates.

**Comment 4 for Cap and Trade 2013 (capandtrade13). (At Hearing)**

First Name: F. Jackson  
Last Name: Stoddard  
Email Address: [jstoddard@manatt.com](mailto:jstoddard@manatt.com)  
Affiliation:

Subject: LA County Comments  
Comment:

Please see attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/124-capandtrade13-B2ECK1AOWWAHYFQ3.pdf>

Original File Name: F. Jackson Stoddard.pdf

Date and Time Comment Was Submitted: 2013-10-29 10:34:28

No Duplicates.

**Comment 5 for Cap and Trade 2013 (capandtrade13). (At Hearing)**

First Name: Tim

Last Name: Haines

Email Address: [thaines@swc.org](mailto:thaines@swc.org)

Affiliation: State Water Contractors

Subject: State Water Contractors' Comments

Comment:

Please see attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/125-capandtrade13-UycCbVwwBAhVOWlo.pdf>

Original File Name: Tim Haines.pdf

Date and Time Comment Was Submitted: 2013-10-29 10:34:28

No Duplicates.

**Comment 6 for Cap and Trade 2013 (capandtrade13). (At Hearing)**

First Name: Gary

Last Name: Gero

Email Address: gary@climateactionreserve.org

Affiliation: Climate Action Reserve

Subject: Cap and Trade Comments

Comment:

Please see attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/126-capandtrade13-VDNVMIIMgVX9WDwBn.pdf>

Original File Name: Gary Gero.pdf

Date and Time Comment Was Submitted: 2013-10-29 10:34:28

No Duplicates.

**Comment 7 for Cap and Trade 2013 (capandtrade13). (At Hearing)**

First Name: Stephanie  
Last Name: Williams  
Email Address: stephanie.r.williams@p66.com  
Affiliation: Phillips 66

Subject: Phillips 66 Cap and Trade Comments  
Comment:

Please see attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/127-capandtrade13-VCdRI1YyVHdRP1My.pdf>

Original File Name: Stephanie Williams.pdf

Date and Time Comment Was Submitted: 2013-10-29 10:34:28

No Duplicates.

**Comment 8 for Cap and Trade 2013 (capandtrade13). (At Hearing)**

First Name: Gary  
Last Name: Grimes  
Email Address: [ggrimes@ppcla.com](mailto:ggrimes@ppcla.com)  
Affiliation: Paramount Petroleum

Subject: Cap and Trade Comments  
Comment:

Please see attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/128-capandtrade13-B2ABZgZ1WHICWwFm.pdf>

Original File Name: Gary Grimes.pdf

Date and Time Comment Was Submitted: 2013-10-29 10:34:28

No Duplicates.

**Comment 9 for Cap and Trade 2013 (capandtrade13). (At Hearing)**

First Name: Alex

Last Name: Jackson

Email Address: ajackson@nrdc.org

Affiliation: NRDC

Subject: Cap and Trade Comments

Comment:

Please see attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/129-capandtrade13-BmdXPVI2VH9SCwRu.pdf>

Original File Name: Alex Jackson.pdf

Date and Time Comment Was Submitted: 2013-10-29 10:34:28

No Duplicates.

**Comment 10 for Cap and Trade 2013 (capandtrade13). (At Hearing)**

First Name: Tamara  
Last Name: Rasberry  
Email Address: [trasberry@semprautilities.com](mailto:trasberry@semprautilities.com)  
Affiliation: sempra utilities

Subject: Cap and Trade Comments

Comment:

Please see attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/130-capandtrade13-AnZQNwRoWWtSJgJj.pdf>

Original File Name: Tamara Rasberry 13-9-9.pdf

Date and Time Comment Was Submitted: 2013-10-29 10:34:28

No Duplicates.

## **Comment 11 for Cap and Trade 2013 (capandtrade13). (At Hearing)**

First Name: Michael

Last Name: Hertel

Email Address: michael.hertel@sce.com

Affiliation: Corporate Environmental Policy

Subject: Cap and Trade Comments

Comment:

Please see attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/131-capandtrade13-WjcGaQFjAzgLbFM2.pdf>

Original File Name: Michael Hertel.pdf

Date and Time Comment Was Submitted: 2013-10-29 10:34:28

No Duplicates.

## **Comment 1 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Randy

Last Name: Schmidt

Email Address: rschmidt@centralsan.org

Affiliation: Central Contra Costa Sanitary District

Subject: CCCSD's Comment Letter on ARB's Proposed Amendments to the Cap and Trade Regulations

Comment:

Attached please find Central Contra Costa Sanitary District's comments on the 15-day Notice of Public Availability of Modified Text for Amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms.

Please contact Senior Engineer Randy Schmidt at 925-229-7333 for any further discussions or questions.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/132-capandtrade13-UDEAdFIxUl5RCAhr.pdf>

Original File Name: ARB Cap and Trade Amendments Comment Letter 03-2014.pdf

Date and Time Comment Was Submitted: 2014-03-27 11:33:33

No Duplicates.

**Comment 2 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Kara

Last Name: Roeder

Email Address: Roeder.kc@pg.com

Affiliation:

Subject: Paper Mill Tissue Product-based Benchmark Table 9-1

Comment:

Please see attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/133-capandtrade13-WioCW1w6BAgLbII9.pdf>

Original File Name: P&G Comment - Paper Mill Table 9-1 Tissue Product-Based Benchmark 15 day comment.pdf

Date and Time Comment Was Submitted: 2014-03-30 09:59:23

No Duplicates.

### **Comment 3 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Sharon

Last Name: Garlena

Email Address: sharon.garlena@tatrc.org

Affiliation:

Subject: Flaring Methane

Comment:

We want clean, renewable, sustainable energy now--immediately  
cancel methane offsets.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-31 11:06:25

No Duplicates.

## **Comment 4 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Kenneth

Last Name: Ruby

Email Address: kennethgem@yahoo.com

Affiliation:

Subject: Methane Flaring

Comment:

California must immediately cancel methane offsets.

Climate change is an immediate threat to all of us.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-31 11:10:50

No Duplicates.

## **Comment 5 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Timothy

Last Name: Perkins

Email Address: timothy.perkins@laposte.net

Affiliation:

Subject: Mine Methane Capture Protocol

Comment:

Dear California Air Resources Board,

Please cancel the proposed Mine Methane Capture Protocol. Offsets and carbon trading are a false solution to climate change and must be excluded from California's Global Warming Solutions Act AB32.

Sincerely,  
Timothy Perkins

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-31 11:13:16

No Duplicates.

## **Comment 6 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Emily

Last Name: Glass

Email Address: emilyshirah@outlook.com

Affiliation:

Subject: Please cancel methane capture protocol

Comment:

To the California Air Resources Board;

Please cancel the proposed Mine Methane Capture Protocol. Offsets and carbon trading are a false solution to climate change and must be excluded from California's Global Warming Solutions Act AB32.

Coal is a major contributor to climate change, regardless of other sources of energy.

Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-31 11:16:18

No Duplicates.

## **Comment 7 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: John

Last Name: Waters

Email Address: [stormf5@riseup.net](mailto:stormf5@riseup.net)

Affiliation:

Subject: No Offsets for Flaring Methane!

Comment:

To the California Air Resources Board;

Please cancel the proposed Mine Methane Capture Protocol. Offsets and carbon trading are a false solution to climate change and must be excluded from California's Global Warming Solutions Act AB32.

Sincerely;  
John Waters

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-31 11:17:47

No Duplicates.

## **Comment 8 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Sonja

Last Name: Lourenco

Email Address: sonjasheine@yahoo.com

Affiliation:

Subject: Help I Need Clean Air!!

Comment:

To the California Air Resources Board;

Please cancel the proposed Mine Methane Capture Protocol. Offsets and carbon trading are a false solution to climate change and must be excluded from California's Global Warming Solutions Act AB32.

Sincerely,  
Sonja Lourenco  
Bakersfield, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-31 11:17:25

No Duplicates.

## **Comment 9 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Linda

Last Name: Hayes

Email Address: lindahayes92@yahoo.com

Affiliation:

Subject: Methane offsets

Comment:

To the Board:

I could hardly believe my eyes when I read that the State of California had gotten a mining executive to write a Mine Methane Protocol which does nothing but incentivize ongoing pollution from the coal mining industry.

To my mind this is nothing less than criminal behavior. Please back out of this bad move and end the nonsense.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-31 11:22:15

No Duplicates.

## **Comment 10 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Greg

Last Name: Sigler

Email Address: gregsglr@gmail.com

Affiliation:

Subject: Methane

Comment:

Cancel methane offsets immediately!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-31 11:27:01

No Duplicates.

## **Comment 11 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Julie

Last Name: Motl

Email Address: [juliemotl@yahoo.com](mailto:juliemotl@yahoo.com)

Affiliation:

Subject: Methane Offsets

Comment:

This proposal, if passed, would be very detrimental to the state of California. It would only lead to more mining and more environmental destruction. I am concerned about natural gas mining in an already seismically active state. This is a terrible idea and should be banned! The profit gained by a few companies is not worth the potential damage to the citizens of California!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-31 11:28:35

No Duplicates.

## **Comment 12 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Laura

Last Name: Marciak

Email Address: bopeace1999@yahoo.com

Affiliation:

Subject: Capture and Convert

Comment:

There is no reason to flare methane! It can be captured and converted for use! You plan to PAY to WASTE a resource?! Are you INSANE?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-31 11:30:52

No Duplicates.

## **Comment 13 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Lois

Last Name: Norrgard

Email Address: lnorrgard@lnmn10.com

Affiliation:

Subject: Oppose Mine Methane Capture Protocol

Comment:

To the California Air Resources Board;

Please cancel the proposed Mine Methane Capture Protocol. Offsets and carbon trading are a false solution to climate change and must be excluded from California's Global Warming Solutions Act AB32.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-31 11:31:52

No Duplicates.

## **Comment 14 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: marisa

Last Name: soliz

Email Address: misabot7@yahoo.com

Affiliation:

Subject: California's Global Warming Solutions Act AB32.

Comment:

To the California Air Resources Board;

Irresponsible solutions like offsets and carbon trading not realistic and will damage the environment further. Please cancel your the proposed Mine Methane Capture Protocol.

You all have a responsibility to the environment, animals and future generations. This is your chance to make a difference instead of making your pockets fat.

Sincerely,

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-31 11:28:04

No Duplicates.

## **Comment 15 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Jeanne

Last Name: Bulla

Email Address: [dammitspock@gmail.com](mailto:dammitspock@gmail.com)

Affiliation:

Subject: Mine Methane Capture Protocol

Comment:

The State of California's Global Warming Solutions Act's proposed Mine Methane Capture Protocol has extremely strong potential to become a major driver of national and international coal mining and fossil fuel extraction in Indigenous Peoples' and non-Indigenous lands, as well as profiteering and increased environmental degradation. The Protocol purports to be about the environmentally motivated capture and destruction of methane for offsets. However, it actually incentivizes and subsidizes the development of additional and potentially major coal mining and natural gas extraction operations, including flaring and burning, in existing and future coal and trona[2] mine areas. It represents not just business-as-usual for the fossil fuel industries, but a future increase in fossil fuel extraction, with expansions in extent, production, output, and infrastructure, including refineries and pipelines, together with permits to pollute even more.

Please cancel the proposed Mine Methane Capture Protocol. Offsets and carbon trading are a false solution to climate change and must be excluded from California's Global Warming Solutions Act AB32.

Sincerely,

Jeanne Bulla

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-31 11:28:54

No Duplicates.

## **Comment 16 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Gabrielle

Last Name: Barnard

Email Address: gabrielle@barnardlaw.us

Affiliation:

Subject: California's Global Warming Solutions Act AB32

Comment:

To the California Air Resources Board;

Please cancel the proposed Mine Methane Capture Protocol. Offsets and carbon trading are a false solution to climate change and must be excluded from California's Global Warming Solutions Act AB32.

Sincerely,  
Gabrielle Barnard

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-31 11:37:58

No Duplicates.

## **Comment 17 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Trina

Last Name: Cunningham

Email Address: maidudance@yahoo.com

Affiliation:

Subject: Offsets for flaring methane

Comment:

To the California Air Resources Board;

Please cancel the proposed Mine Methane Capture Protocol. Offsets and carbon trading are a false solution to climate change and must be excluded from California's Global Warming Solutions Act AB32.

Sincerely,

Trina Cunningham

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-31 11:43:31

No Duplicates.

## **Comment 18 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Dr.

Last Name: Zarro

Email Address: angelsoflovelight@gmail.com

Affiliation:

Subject: Stop mining fossil fuels

Comment:

Stop mining fossile fuels!!!

To continue to use them is Planetary & Social Suicide!!!

Thank You for your vital compliance!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-31 11:50:39

No Duplicates.

## **Comment 19 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Lori

Last Name: Morrison-Contreras

Email Address: tanchinashoba1@yahoo.com

Affiliation:

Subject: Global Warming Solutions Act AB32.

Comment:

To the California Air Resources Board;

Please cancel the proposed Mine Methane Capture Protocol. Offsets and carbon trading are a false solution to climate change and must be excluded from California's Global Warming Solutions Act AB32.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-31 11:58:16

No Duplicates.

## **Comment 20 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Helena

Last Name: Wong

Email Address: shialing@hotmail.com

Affiliation:

Subject: Cancel the proposed Mine Methane Capture Protocol

Comment:

To the California Air Resources Board,

Please cancel the proposed Mine Methane Capture Protocol. Offsets and carbon trading are a false solution to climate change and must be excluded from California's Global Warming Solutions Act AB32.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-31 12:00:04

28 Duplicates.

## **Comment 21 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Sarah

Last Name: Stock

Email Address: [bewarasarah@gmail.com](mailto:bewarasarah@gmail.com)

Affiliation:

Subject: Carbon Credits for Methane Flaring

Comment:

This concept is ridiculous. You have an obligation to your people to be true protectors of the humanity by protecting the environment. Get your act together.

Sarah Stock

Canyon Country Rising Tide

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-31 12:40:32

No Duplicates.

## **Comment 22 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Larry

Last Name: Lohmann

Email Address: larrylohmann@gn.apc.org

Affiliation:

Subject: Methane Offsets?

Comment:

Promoting coal mining through mine methane capture offset projects? How does subsidizing coal mining count against global warming? Much less count against global warming enough to be used to exempt mining in a SECOND location on the ground its emissions are being compensated for? This is lunacy.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/154-capandtrade13-AHUCdFclBDJWJAZy.pdf>

Original File Name: UpsettingtheOffset.pdf

Date and Time Comment Was Submitted: 2014-03-31 12:39:10

No Duplicates.

## **Comment 23 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Nick

Last Name: Buxton

Email Address: nicholasbuxton@gmail.com

Affiliation:

Subject: Please cancel mine methane capture and forest protocol

Comment:

The clear historical evidence from EU and elsewhere is that offsets reward polluters, fail to reduce emissions at source and frequently fail to be additional. Both the methane mine capture and forestry protocol are particularly ripe for abuse with mining and forestry executives pushing for them in order to expand their industries. California's Global Warming Solutions Act AB32 will turn from a flagship legislation to a laughing stock if these flaws are not addressed

Sincerely,

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-31 12:40:01

No Duplicates.

## **Comment 24 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Timothy

Last Name: DenHerder-Thomas

Email Address: timothydht@gmail.com

Affiliation:

Subject: Exclude Methane flaring from avoided carbon

Comment:

I'm writing to ask that flaring of methane emissions from coal extraction be excluded as a carbon abatement strategy considered in California's greenhouse gas regulations. Methane escaping from coal extraction is extra emissions that mining operations should have to count as part of their GHG burden. It's unfair to count the flaring of such gas, as a reduction in their impact, especially when it comes from an activity (coal mining) that is central to causing the problem in the first place.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-31 13:05:06

No Duplicates.

## **Comment 25 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Frank A  
Last Name: Ermineskin  
Email Address: bearwalker1@live.ca  
Affiliation: na

Subject: greenhouse gas emissions

Comment:

I come from Alberta and am very aware of Fracking and the damage it poses to Water tables. Look up Maskwacis AB. Used to be Hobbema AB. Economy will not save your sorry azzes. Oil and Gas kills all fresh water. What are your grandchildren going to drink in the near future. Hmm.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-31 13:15:54

No Duplicates.

## **Comment 26 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Donna

Last Name: Slade

Email Address: donnaslade3@gmail.com

Affiliation:

Subject: Complaint

Comment:

This is absolute craziness you bringing in laws to accommodate the likes of oil and mining and oil industries need for money over the well being of the planet as global warming is the number one thing that will change tip our climate beyond repair. I think that you should start making laws that will protect your citizens not the interests of the corporates people before profits.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-31 13:27:29

No Duplicates.

## **Comment 27 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Cynthia  
Last Name: Morrison  
Email Address: [cyn@eastlink.ca](mailto:cyn@eastlink.ca)  
Affiliation:

Subject: Offsets for flaring methane

Comment:

Please cancel the proposed Mine Methane Capture Protocol. Offsets and carbon trading are a false solution to climate change and must be excluded from California's Global Warming Solutions Act AB32.

Don't be fooled. Fossil fuels are not sustainable. Please do not even consider giving carbon credits to a company or corporation involved in fossil fuel extraction. There is no such thing as Ethical Oil. Please dont be fooled that there is such thing as ethical coal now too. Think for yourself. Ask a scientist. Oh, I mean a citizen scientist. Ask the people. Listen to the people. we want to go Solar! We want to use bio-fuel for vehicles, machines, etc. Carbon tax is the only way that you can help to get the mining companies and the word environmentally friendly on the same page, not the other way around. Please dont let them fool you. We the people that are awake are not that stupid.

Thank you for your time. You are a very important part of saving the planet...or not.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-31 13:23:52

No Duplicates.

## **Comment 28 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Ron

Last Name: Saeger

Email Address: rnsaeger@cableone.net

Affiliation:

Subject: Mine Methane Capture Protocol

Comment:

To the California Air Resources Board;

Please cancel the proposed Mine Methane Capture Protocol. Offsets and carbon trading are a false solution to climate change and must be excluded from California's Global Warming Solutions Act AB32.

Representatives of the mining and fossil fuel industries have contributed heavily to the protocol's drafting, dictating its terms. Carbon traders have also participated in its development. The Protocol represents the advent of a trading commodity - methane offsets.

Furthermore, the Protocol stands to be a dangerous prototype for the future development of other methane offsets from the full gamut of fossil fuels and even agriculture.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-31 14:01:04

No Duplicates.

## **Comment 29 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Linda

Last Name: Maes

Email Address: lindarmaes@yahoo.com

Affiliation:

Subject: Mine Methane Capture Protocol

Comment:

To the California Air Resources Board;

Please cancel the proposed Mine Methane Capture Protocol. Offsets and carbon trading are a false solution to climate change and must be excluded from California's Global Warming Solutions Act AB32.

This Mine Methane Capture Protocol will only encourage more fossil fuel extraction and burning, which exacerbates climate change, please don't do this!

Sincerely,  
Linda Maes

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-31 14:06:48

No Duplicates.

## **Comment 30 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Maggie

Last Name: Zhou

Email Address: mzhou\_us@yahoo.com

Affiliation:

Subject: Require Mine Methane Capture by law

Comment:

To the California Air Resources Board;

Mine Methane Capture should be REQUIRED BY LAW, and any violation severely penalized, instead of being optional and rewarded with incentives like offset credits. Methane is such a potent greenhouse gas that in fact the entire mining industry should face stringent regulations and strong DISINCENTIVES from mining for any fossil fuels at all, and for all emissions throughout the entire process.

Offsets and carbon trading are a false solution to climate change and must be excluded from California's Global Warming Solutions Act AB32.

Sincerely,

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-31 14:18:14

No Duplicates.

## **Comment 31 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Y.

Last Name: Yew

Email Address: yewyewyew2003@yahoo.com

Affiliation:

Subject: mine methane carbon credit offset

Comment:

The offset is moot. No allowances will be necessary. The offset will be in population transfers, and the demand for commodity will adjust.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-31 15:18:10

No Duplicates.

## **Comment 32 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Lynda

Last Name: Jarsocrak

Email Address: morningsky129@yahoo.com

Affiliation:

Subject: Offsets for flaring methane

Comment:

Why are you allowing the mining companies to write the regulations.  
Don't you work for the people not the coal industry. If we don't switch to green energy all the money in the world will not help us as we deal with climate change.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-31 15:44:49

No Duplicates.

## **Comment 33 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Saundra

Last Name: Simon

Email Address: redfishwichita@aol.com

Affiliation:

Subject: Stop Offsets for methane flaring

Comment:

I do not believe that Methane burn off is helping the environment and deserves rewards. I request that you stop rewarding burn off of Methane with Offsets.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-31 17:13:41

No Duplicates.

## **Comment 34 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Jake

Last Name: Edwards

Email Address: edwardsje@verizon.net

Affiliation:

Subject: stop carbon credits

Comment:

we all have a duty to the ground we walk on to the air we breath an to the water we all need, this goes for us humans too, its up to us how well we leave it for the next generations to come,, there's no room left on earth for "OFFSETS",, To all we should be gratefull tat the water, air, and the ground are still here for us all, stop methane offsets and any others that can damage mother earth.

Da-nay-to

Haiwagai:i

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-31 18:33:15

No Duplicates.

## **Comment 35 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Jeremy

Last Name: Taylorr

Email Address: jeremytaylor78@yahoo.com

Affiliation:

Subject: Positive Energy Transition

Comment:

Most of the Energy efficiency with Oil and coal degrades our environment and alternative sources need to be considered, otherwise our environments sustain ability will only continue to degrade. Please do you part to sustain a better living Environment!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-31 19:25:56

No Duplicates.

### **Comment 36 for Cap and Trade 2013 (capandtrade13) - 15-1.**

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

## **Comment 37 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Kristina

Last Name: DeSenze

Email Address: Kristinad86@gmail.com

Affiliation:

Subject: Stop carbon offsets for methane flaring

Comment:

Carbon credits and methane flaring are false solutions to the real problem of climate change. Do not let the coal industry continue to pollute the planet.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-31 19:37:17

No Duplicates.

## **Comment 38 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Dave

Last Name: Wheelock

Email Address: dawheelock@gmail.com

Affiliation: Indigenous citizen North America

Subject: "Mine Methane Capture Protocol"

Comment:

The Mine Methane Capture Protocol is actually a trojan horse designed to deceive the public and those legislators not already in on the scam. Kill it.

DW

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-31 19:49:16

No Duplicates.

## **Comment 39 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Chris

Last Name: Burley

Email Address: chris.burley@gmail.com

Affiliation:

Subject: Please stop California's Global Warming Solutions Act's (AB32) proposed Mine Methane Captu

Comment:

Please stop California's Global Warming Solutions Act's (AB32) proposed Mine Methane Capture Protocol (MMCP) . This is not the kind of environmental solution we need.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-31 21:49:19

No Duplicates.

## **Comment 40 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Duncan

Last Name: Bray

Email Address: dbray54@hotmail.com

Affiliation:

Subject: comment

Comment:

To call this nonsense spurious logic would be an understatement ... the ENTIRE 'carbon credits' program is spurious nonsense, and the PEOPLE are not fooled by it. Appealing to the ethics of a politician is an exercise in wasting breath, so instead I'll appeal to your vanity instead and ask, How do you want to be remembered? ... a champion ... or just another vile piece of flotsam?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-01 01:10:46

No Duplicates.

## **Comment 41 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Annie  
Last Name: Shattuck  
Email Address: annieshattuck@gmail.com  
Affiliation: UC Berkeley

Subject: Mine Methane Capture Protocol.

Comment:

To the California Air Resources Board;  
Please cancel the proposed Mine Methane Capture Protocol. This protocol undermines the intent and effectiveness of AB32. Incentivizing dirty fossil fuel extraction with subsidies for marginally better performance is not how we transition to a high tech clean energy economy. California is already a world leader in this space - resources and offsets from AB32 must go to building a clean energy economy, protecting and regenerating farmland and rangelands, and creating jobs and infrastructure in urban communities. This does none of the above.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-01 01:44:55

No Duplicates.

## **Comment 42 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Alnoor

Last Name: Ladha

Email Address: [alnoor@therules.org](mailto:alnoor@therules.org)

Affiliation:

Subject: Please cancel the proposed Mine Methane Capture Protocol

Comment:

To the California Air Resources Board;

Coal is the biggest contributor to climate change but nonetheless the mining industry wants to get carbon credits from "capturing and destroying methane." We know that the State of California asked a mining executive to write the Mine Methane Capture Protocol, which includes flaring offsets, and incentivizes more coal mining and fossil fuel extraction and infrastructure like pipelines.

We must stop this insanity and immediately cancel methane offsets. Please cancel the proposed Mine Methane Capture Protocol. Offsets and carbon trading are a false solution to climate change and must be excluded from California's Global Warming Solutions Act AB32.

Best regards,

Alnoor Ladha  
Executive Director  
The Rules

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-01 02:04:37

No Duplicates.

## **Comment 43 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Milena

Last Name: Nes

Email Address: melpop1@yahoo.com

Affiliation:

Subject: disgusting!!!!

Comment:

absolutely disgusting and abhorrent. these coal and oil tycoons will singlehandedly run the environment into the ground, leaving nothing but toxic wastelands to our future generations. i think theyve hoarded enough money to support themselves modestly for several lifetimes.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-01 06:48:21

No Duplicates.

## **Comment 44 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Emily

Last Name: Moore

Email Address: emilymooremn@yahoo.com

Affiliation:

Subject: Amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance M

Comment:

I can think of no more counterproductive and hypocritical regulatory measure than to allow offsets for flaring methane. Methane capture and use for fuel in a productive manner is what California should be requiring - NOT flaring. Please know that you have full support from the American people for strict regulation. The planet and we, its inhabitants, cannot afford to ignore any unproductive release of carbon to the atmosphere.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-01 12:53:53

No Duplicates.

## **Comment 45 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Victoria

Last Name: Evans

Email Address: [vevans@carbonvp.com](mailto:vevans@carbonvp.com)

Affiliation: Carbon Venture Partners

Subject: Comments on Compliance Offset Protocol - MMC

Comment:

Thank you for the opportunity to comment. Please see attached comments on behalf of Carbon Venture Partners in favor of adoption by the ARB of the Mine Methane Capture Protocol.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/200-capandtrade13-VTZTOIY6U20EZwBu.pdf>

Original File Name: Comments to ARB on MMC Adoption COP Apr2014.pdf

Date and Time Comment Was Submitted: 2014-04-01 15:00:30

No Duplicates.

## **Comment 46 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Sandra

Last Name: Kissam

Email Address: sandraks@frontiernet.net

Affiliation:

Subject: reject cap and trade

Comment:

Cap and trade is a terrible idea.  
Don't do it.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-01 19:46:08

No Duplicates.

## **Comment 47 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Cathy

Last Name: Buckley

Email Address: cabuck11@yahoo.com

Affiliation:

Subject: Cap and Trade 13

Comment:

If CO2 ppm were at 360, and we had a couple of decades to deal with our destruction of our possibilities on this planet, I would applaud these efforts.

Given where we are now - where even the careful IPCC is allowing itself to raise an anguished alarm - these proposed rules are sad. And criminal.

We cannot afford to continue using coal. We cannot afford to release one molecule of methane that we can stop. Otherwise, the permafrost giant up north (holding about 5 times as much carbon as humanity has released since 1750) will rouse itself with a roar.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-02 04:06:43

No Duplicates.

## **Comment 48 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Eric

Last Name: Dube

Email Address: erictdube@gmail.com

Affiliation:

Subject: Mine Methane Capture Protocol

Comment:

Converting methane to carbon dioxide does nothing to reduce the amount of carbon in the atmosphere. Please cut out the proposed Mine Methane Capture Protocol from California's Global Warming Solutions Act AB32. Thank you for your time.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-02 07:06:18

No Duplicates.

## **Comment 49 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Kathryn

Last Name: Barnes

Email Address: greenwoodsart@msn.com

Affiliation:

Subject: Methane waste

Comment:

Do not capture and burn off methane gas. It is wasteful and creates global warming. It is one thing to use a resource, another to waste it.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-02 07:09:10

No Duplicates.

## **Comment 50 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Charles

Last Name: White

Email Address: cwhite1@wm.com

Affiliation: Waste Management

Subject: ARB 15 Day Modification Language

Comment:

Please see the attached comments submitted by Chuck White on behalf of Waste Management and Wheelabrator Technologies.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/210-capandtrade13-UyRXPAZYBTUHbgVo.pdf>

Original File Name: WM Comments - 15 Day Modifications.pdf

Date and Time Comment Was Submitted: 2014-04-02 10:07:56

No Duplicates.

## **Comment 51 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Barbara

Last Name: Miller

Email Address: [bara.miller@verizon.net](mailto:bara.miller@verizon.net)

Affiliation:

Subject: Mine

Comment:

To the California Air Resources Board;

Please do not proceed with the proposed Mine Methane Capture Protocol (MMCP) in California's Global Warming Solutions Act AB32. The National Resources Defense Council has said it well:

"The environmental law clinic at Stanford Law School has pointed out problems with the analysis of how much methane will be captured from abandoned mines without the protocol as well as potential conflicts with future federal regulation under the Clean Air Act. In particular, the opportunity for coal mines to be paid to reduce emissions may make it more difficult to adopt regulations that require them to reduce emissions. And the Sierra Club has raised concerns about the potential that increased revenues for coal mine owners from offset sales could increase coal production, a point that was also raised by the Stanford clinic."

Adoption will help keep [Cap and Trade] allowance prices low by adding tens of millions of tons of potential emissions reductions to the carbon market. But there is no need right now for further cost containment. ARB has proposed an additional safeguard to ensure allowance prices stay within a reasonable range and recent forecasts suggest that, if anything, the concern may be in the other direction, as allowances are projected to stay near the floor price for the foreseeable future."

([http://switchboard.nrdc.org/blogs/pmiller/coal\\_mine\\_methane\\_offsets\\_a\\_ba.html](http://switchboard.nrdc.org/blogs/pmiller/coal_mine_methane_offsets_a_ba.html))

Sincerely,

Barbara Miller

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-02 09:56:56

No Duplicates.

## **Comment 52 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: j

Last Name: angell

Email Address: jangell@earthlink.net

Affiliation:

Subject: Proposed methane flaring offsets

Comment:

Proposed offsets for methane flaring are patently absurd, detrimental to effectively addressing climate change and to public health, especially for indigenous populations; thus do not approve this illogical insane proposal.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-02 12:45:29

No Duplicates.

## **Comment 53 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Mari Rose

Last Name: Taruc

Email Address: marirose@apen4ej.org

Affiliation: Asian Pacific Environmental Network

Subject: oppose offsets - mine methane capture

Comment:

The Asian Pacific Environmental Network (APEN) is a strong supporter of AB32, but oppose the offsets program being developed by California. We need direct emissions reductions from GHG pollution, not market schemes for polluters to avoid their responsibility to emissions reduction. We work with hundreds of families living next to oil refineries and other big polluters and want to see those emissions reduced to improve the ailing health of our communities and to combat climate change. We see no benefits for offsets. We are also raising this opposition to offsets under the AB32 Environmental Justice Advisory Committee.

Please cancel the proposed Mine Methane Capture Protocol. Offsets and carbon trading are a false solution to climate change and must be excluded from California's Global Warming Solutions Act AB32.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-02 17:41:13

No Duplicates.

## **Comment 54 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: john

Last Name: martinez

Email Address: aztlanmk@yahoo.com

Affiliation:

Subject: CA's Global Warming Solutions Act's (AB32) proposed Mine Methane

Comment:

DON'T DO THIS!

The State of California's Global Warming Solutions Act's (AB32) proposed Mine Methane Capture Protocol (MMCP) [1] has extremely strong potential to become a major driver of national and international coal mining and fossil fuel extraction in Indigenous Peoples' and non-Indigenous lands, as well as profiteering and increased environmental degradation. The Protocol purports to be about the environmentally motivated capture and destruction of methane for offsets. However, it actually incentivizes and subsidizes the development of additional and potentially major coal mining and natural gas extraction operations, including flaring and burning, in existing and future coal and trona[2] mine areas. It represents not just business-as-usual for the fossil fuel industries, but a future increase in fossil fuel extraction, with expansions in extent, production, output, and infrastructure, including refineries and pipelines, together with permits to pollute even more.

Representatives of the mining and fossil fuel industries have contributed heavily to the protocol's drafting, dictating its terms. Carbon traders have also participated in its development. The Protocol represents the advent of a trading commodity - methane offsets.

Furthermore, the Protocol stands to be a dangerous prototype for the future development of other methane offsets from the full gamut of fossil fuels and even agriculture. (A proposed rice methane capture protocol is also currently under development for future inclusion in AB32.)

NO TO A832!!!!!!!!!!!!!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-02 18:29:16

No Duplicates.

## **Comment 55 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Jack

Last Name: Thornburgh

Email Address: jvthorn@shaw.ca

Affiliation: Peninsula EcoVision

Subject: Mine Methane Capture Protocol

Comment:

The Mine Methane Capture Protocol will only encourage further coal extraction and burning, leading to more GHGs. Please reconsider.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-02 21:31:32

No Duplicates.

## **Comment 56 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Sherri  
Last Name: Gillespie  
Email Address: sagilsp@yahoo.com  
Affiliation:

Subject: AB32 MUST NOT PASS

Comment:

This legislation must be stopped. Representatives of the mining and fossil fuel industries have contributed heavily to the protocol's drafting, dictating its terms.

State of California's Global Warming Solutions Act's (AB32) has the very strong potent potential to become a major driver of national and international coal mining and fossil fuel extraction in Indigenous Peoples' and non-Indigenous lands, as well as profiteering and increased environmental degradation. The Protocol is said to be about environmentally motivated methane capture and destruction for methane offsets. However it actually incentivizes and subsidizes the development of additional and potentially major coal mining and natural gas extraction operations, including flaring and burning, in existing and future in coal and trona mine areas. It represents not just business-as-usual for fossil fuel industries, but a future increase in fossil fuel extraction, with expansions in extent, production, output, and infrastructure including refineries and pipelines, together with permits to pollute more.

This hydraulic fracturing on steroids and must NOT pass.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-03 01:34:20

No Duplicates.

**Comment 57 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Janice

Last Name: McMahon

Email Address: jmcmahon@esinc.cc

Affiliation:

Subject: Mine Methane

Comment:

Please see the attached letter of support.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/219-capandtrade13-UTQFcFM7Aw8LYANq.pdf>

Original File Name: ESI Mine Methane.pdf

Date and Time Comment Was Submitted: 2014-04-03 07:31:47

No Duplicates.

**Comment 58 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Diana  
Last Name: Golis  
Email Address: dgolis@holycross.com  
Affiliation: Holy Cross Energy

Subject: Support of Coal Mine Methane  
Comment:

Please read attached document

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/220-capandtrade13-B2RdOgdZV3cHdFIi.pdf>

Original File Name: CA Support 2014-04-03.pdf

Date and Time Comment Was Submitted: 2014-04-03 07:34:07

No Duplicates.

## Comment 59 for Cap and Trade 2013 (capandtrade13) - 15-1.

First Name: Sarah

Last Name: Sauter

Email Address: [sarah@theconservationcenter.org](mailto:sarah@theconservationcenter.org)

Affiliation: Western Slope Conservation Center

Subject: proposed offset protocol for mine methane capture

Comment:

The Western Slope Conservation Center is a grassroots non-profit conservation organization in western Colorado. We are dedicated to protecting and enhancing the environment and quality of life in Delta County and Colorado's Western Slope. The Conservation Center strongly supports the proposed California Air Resources Board (ARB) compliance offset protocol for mine methane capture (MMC) projects.

The Conservation Center is located in Colorado's North Fork Valley which is home to three coal mines. Each of our mines must vent methane gas as a safety precaution. We have always encouraged the mines to capture the methane because of its properties as a potent green house gas, which is up to 25 times more potent than carbon dioxide.

Methane also is an energy source that if used conserves energy from other sources and reduces green house gas emissions. The World Bank estimates that 7,500,000,000 metric tons of CO<sub>2</sub> equivalent per year of methane is emitted annually around the world. That methane if used for electricity generation for example could produce 250,000,000 Mega Watt Hours per year.

In 2012 a local partnership between Aspen Ski Company, Holy Cross Energy, Oxbow Carbon, Gunnison Energy Corporation, and Vessels Coal Gas enabled the first coal mine methane capture facility in Colorado to go online. While groundbreaking, the project in our valley was only possible because Aspen Ski Company was willing to pay higher rates for the energy generated from the coal mine methane. The Conservation Center envisions a future where all methane vented from mines can be converted to local electricity.

Unfortunately, mines in the USA typically are pressured to sign electricity agreements prohibiting them from self generating any electricity from their own waste methane. There is no incentive to avoid methane emissions and rules to reduce emissions are likely to take years and never be as effective as an economic incentive. We have no verifiable estimate of methane emissions over all from active or abandoned mines as the cost of performing detailed surveys is prohibitive. This protocol will encourage the generation of new and accurate data of methane emissions from mines. This could encourage more research and measurement of methane emissions from all sources.

The Conservation Center encourages the California Air Resources Board to approve and make effective the protocol as soon as possible.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-03 08:48:54

No Duplicates.

## **Comment 60 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Kit

Last Name: Ho

Email Address: mefafaso@live.com

Affiliation:

Subject: Green energy not extraction of fossil fuel & methane capture

Comment:

Extraction of fossil fuel like coal releases methane that requires the methane to be capture and burned. The methane is reduced to carbon dioxide. It causes environment degradation and is absolutely not a solution. Full force should be on the development of green energy like wind, solar, tidal wave, etc. giving the imminent ominous effect of global warning!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-03 10:06:44

No Duplicates.

## **Comment 61 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Eric

Last Name: Townsend

Email Address: etownsend@bluesource.com

Affiliation: Blue Source LLC

Subject: Support of MMC Protocol

Comment:

Blue Source strongly supports the proposed California Air Resources Board (ARB) compliance offset protocol for mine methane capture (MMC) projects, and commends ARB for its hard work in developing a protocol that will economically enable the destruction of waste mine methane previously vented to the atmosphere. ARB has constructed a protocol that is scientifically sound, technically robust and practical in its workability and application, which should all result in measurable, real and permanent reductions in greenhouse gas emissions. Furthermore, the offset credits to be generated from the MMC protocol will represent a material contribution to the California cap-and-trade program's ability to achieve GHG emission reductions in an economically efficient manner. Blue Source encourages ARB to approve and make effective the protocol as soon as possible.

Sincerely,  
Eric Townsend  
Chief Executive Officer  
Blue Source LLC

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-03 11:30:57

No Duplicates.

## **Comment 62 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Walter

Last Name: Wood

Email Address: permaculture@riseup.net

Affiliation:

Subject: Methane flaring and other acts of environmental suicide

Comment:

Hello,

As a father, this sort of lack of thinking scares me. I know that as someone who thinks about the future of my children I am in the minority, but for heaven's sake, lets be real! Burning off methane in no way contributes to our children's chance of survival.

Let's try and solve the problem of polluted water, polluted air, and polluted soil, instead of giving more ways for the rich to get richer. We need problem solving, not problem creation.

Offsets and carbon trading are a false solution to climate change and must be excluded from California's Global Warming Solutions Act AB32.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-03 13:48:01

No Duplicates.

## **Comment 63 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Gerald  
Last Name: Miller  
Email Address: Gerald\_Miller@praxair.com  
Affiliation: Praxair, Inc.

Subject: ARB 15 day Modified Language

Comment:

Dear Ms. Rajinder Sahota,

Please find attached Praxair, Inc.'s comments in support of the Air Resources Board's 15-Day Modified Language in recognition of the distinctions between gaseous and liquefied hydrogen and the development of an appropriate benchmark for liquefied hydrogen that is consistent with the Board's analysis for other products.

Sincerely,

Gerald Miller  
Vice President,  
West Region  
Praxair, Inc.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/225-capandtrade13-AnJWIgdnWXIAZwVs.pdf>

Original File Name: Praxair\_Cmts on 15-Day CNT Amendments (03Apr2014) (00224914).pdf

Date and Time Comment Was Submitted: 2014-04-03 14:18:01

No Duplicates.

## **Comment 64 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Scott

Last Name: Foster

Email Address: wreaincsf@gmail.com

Affiliation:

Subject: Mine Methane Capture

Comment:

Ms. Rajinder Sahota  
Chief  
Climate Change Program Evaluation Branch  
California Air Resources Board  
1001 "I" Street  
Sacramento, CA 95814

WREA Inc is a renewable energy analysts company.

WREA Inc strongly supports the proposed California Air Resources Board (ARB) compliance offset protocol for mine methane capture (MMC) projects. This will be the first protocol written entirely by ARB through the public protocol development process. Offset credits represent a crucial cost containment mechanism to help the California cap-and-trade program achieve GHG emission reductions in an economically efficient manner.

WREA Inc encourages officials to approve and make effective the protocol as soon as possible.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-03 15:16:04

No Duplicates.

## **Comment 65 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Gregory

Last Name: Meisinger

Email Address: gameisinger@aeraenergy.com

Affiliation:

Subject: California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Comments

Comment:

Dear Clerk of the Board:

Aera Energy LLC ("Aera") is a large oil and gas producer headquartered in Bakersfield, California. Aera appreciates the opportunity to comment on the March 21, 2014, California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms 15-day Package.

Aera would like to focus its comments on Section 95833(a)(2)(F)

Aera believes Section 95833(a)(2)(F) should be revised to read:

"In the case of a limited liability corporation company, owns more than 50% of the other entity regardless of how the interest is held., unless that entity provides documentation demonstrating to the reasonable satisfaction of the Executive Officer that it neither controls nor is controlled by the other entity."

### Rationale

Some LLCs have member companies that are totally unassociated market participants but with one of the members (or a group of members, collectively, a "member group") having an ownership interest in the LLC of greater than 50%. Normally, control follows from ownership. However, in some situations, the LLC's governance documents dictate that no member or member group has control over the LLC's activities, despite holding a majority ownership interest in the LLC. In these cases, the LLC acts as an independent entity, and the majority member or member group should be found to have a corporate association with the LLC under section 95833(a)(1), but not a "direct corporate association" under section 95833(a)(2).

As proposed, section 95833(a)(2)(F) creates legal dilemmas for the LLC, its majority ownership member, and any minority members or member groups. The LLC can be put in the untenable situation of having to choose to take actions that could violate the provisions of its LLC governance documents, violate the non-disclosure provisions of section 95914(c), and/or potentially run contrary to state and federal antitrust laws.

Depending on the LLC's governance documents, the minority ownership members would likely have the right to understand the LLC's joint, coordinated strategy that it develops with the majority member because it directly impacts the operational and financial viability of the LLC. Further, the LLC could be required to obtain the unanimous approval of all members in order to implement the joint

strategy after disclosure.

In this case, although the minority members would not have a direct corporate association with the LLC, the LLC would be obligated to share with the minority member the details of the purchase strategies it has developed with the majority member, including plans for auction and secondary market participation, as well as bidding and pricing strategy. Holding limits/strategies would also be implicated, including any strategies related to the timing of transfers of compliance instruments to/from third parties or into compliance accounts.

Any sharing of such information by the LLC with its minority members would be a direct violation of section 95914(c). Even if minority members are not directly participating in the cap-and-trade program, they could have corporate associations with other registered and non-registered entities, further multiplying the potential for violations of the non-disclosure provisions of section 95914. If the minority members are covered entities or opt-in covered entities registered and participating in the cap-and-trade program, the end result is that there will be three or more market participants having knowledge of the majority owner's and the LLC's market position, participation, and transfer strategies. The only way the LLC can avoid putting its members in this untenable situation created by section 95833(a)(2)(F) is to violate the provisions of its corporate governance documents. This result is not only patently unfair to the entities involved, it also gives rise to potential antitrust issues.

Section 95833(a)(2)(F) creates serious antitrust implications because it creates the appearance that the LLC and its majority and minority members could be colluding to manipulate one or more carbon markets. There are potential international law implications as well, now that California's cap-and-trade program is linked with Quebec's.

The best solution to avoid the undesirable and unjust outcomes described above is to vest the Executive Officer with the power to review the corporate governance documents of LLCs where ownership does not equate to control over the LLC's actions. Such review could be augmented with objective indicia of non-control, such as the inability of the majority member or member group to obtain any of the following:

1. Appointment or removal of more than 50% of the directors of the LLC;
2. Unilateral appointment or removal of officers of the LLC; or
3. Ability to act unilaterally on behalf of the LLC or commit it to any obligation.

It would not be unreasonable for the Executive Officer to require some form of attestation from the LLC that it will not share market-sensitive information relating to its participation in the cap-and-trade program with the majority member. Because not all information related to the LLC's program participation is market-sensitive, some limited exceptions to the blanket "gag order" could be made to facilitate proper governance of the LLC by its members. Exceptions could include the following:

1. Forecasted aggregate annual cost of purchasing compliance instruments;
2. Actual aggregate annual cost incurred to purchase compliance instruments;
3. Volume and total cost of compliance instruments associated with

any untimely surrender obligation or excess emissions (section 95857);  
4. Volume, source and cost of offset credits invalidated by CARB and remedies pursued;  
5. Penalties imposed by CARB (section 96013)  
6. Violations noticed by CARB (sections 95856, 95857 and 96104)  
7. Any other actions taken by CARB that directly affect the LLC's ability to participate in the cap-and-trade program and the reasons therefore (e.g. auction registration rejected by the Auction Administrator).

There are undoubtedly other solutions that can be considered to the situation where LLC ownership does not equate to LLC control. However, the revisions proposed above strike a rational balance between the need for certain LLCs to conduct business and the need to protect the integrity of the cap-and-trade program and related markets. The added language gives the Executive Officer the authority to require that the LLC make its case for being exempted from the finding of a direct corporate association with its majority member. It also vests the Executive Officer with the power to demand enforceable assurances from the LLC that ownership does not equate to control, and that its information sharing with the majority owner will be limited to a closely circumscribed subset of information that is not market-sensitive.

Aera appreciates your consideration of its comments.

Sincerely,

Gregory A. Meisinger  
Government Affairs Manager

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-03 15:05:12

No Duplicates.

## **Comment 66 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Joe

Last Name: Gershen

Email Address: joegershen@EncoreBioRenewables.com

Affiliation:

Subject: proposed California Air Resources Board (ARB) compliance offset protocol for mine methane

Comment:

Ms. Rajinder Sahota  
Chief - Climate Change Program Evaluation Branch  
California Air Resources Board#8232;1001 I Street#8232;  
Sacramento, CA 95814

Encore BioRenewables is a marketing and business development company based in California, specializing in sustainable, recyclable and renewable bio-based products.

Encore BioRenewables strongly supports the proposed California Air Resources Board (ARB) compliance offset protocol for mine methane capture (MMC) projects. This will be the first protocol written entirely by ARB through the public protocol development process. Offset credits represent a crucial cost containment mechanism to help the California cap-and-trade program achieve GHG emission reductions in an economically efficient manner.

Experts are now reporting that Methane is a green house gas with a Global Warming Potential twenty five times that of Carbon Dioxide. Methane also is an energy source that, if used, conserves energy from other sources and reduces green house gas emissions. The World Bank estimates that 7,500,000,000 Metric Tons of CO2 equivalent of methane is emitted annually around the world. That methane, if used for electricity generation for example, could produce 250,000,000 Mega Watt Hours per year.

Mines in the United States typically are pressured to sign electricity agreements prohibiting them from self-generating any electricity from their own waste methane. There is no incentive to avoid methane emissions and rules to reduce emissions are likely to take years and never be as effective as an economic incentive. We have no verifiable estimate of methane emissions overall from active or abandoned mines as the cost of performing detailed surveys is prohibitive. This protocol will encourage the generation of new and accurate data of methane emissions from mines. This could also encourage more research and measurement of methane emissions from all sources.

Encore BioRenewables encourages officials to approve and make effective the protocol as soon as possible.

Thank you for your consideration,

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/228-capandtrade13-VDEAaFc1Az9WIgVg.pdf>

Original File Name: Encore MMC CARB support.pdf

Date and Time Comment Was Submitted: 2014-04-03 17:29:03

No Duplicates.

## **Comment 67 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Miles

Last Name: Heller

Email Address: miles.t.heller@tsocorp.com

Affiliation: Tesoro

Subject: C&T 15-day package clarifications

Comment:

Tesoro appreciates the opportunity to comment on the regulatory package and seeks clarification on three provisions:

1. 95812(f)(3): Please clarify that the phrase "within 30 days of fulfilling its compliance obligation" refers to the final allowance retirement that may occur up to three years after the year in which the facility was shutdown.
2. 95812(f)(3): Please confirm that the "formerly covered entity" referenced in this provision is considered the same entity that is converted to a voluntary associated entity pursuant to 95812(f)(2).
3. 95830(f)(1): Please confirm whether the phrase "within 30 days of the changes becoming effective" in the first sentence of provision (f)(1) refers to 30 days after the board adoption date for the ammendments in 95830(c) or 30 days after OAL approval of the ammdement package.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-04 06:52:15

No Duplicates.

**Comment 68 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Ralph

Last Name: Moran

Email Address: moranrj1@bp.com

Affiliation:

Subject: BP Comments to Cap and Trade Reg 15-Day Package

Comment:

BP Comments

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/231-capandtrade13-VjRdKwFfUGABaAhl.pdf>

Original File Name: BP comment ltr on CARB cap and trade reg amendments 4 14.pdf

Date and Time Comment Was Submitted: 2014-04-04 07:36:00

No Duplicates.

## **Comment 69 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: William  
Last Name: Flederbach  
Email Address: wflederbach@climeco.com  
Affiliation: ClimeCo Corporation

Subject: Support for Mine Methane Capture Protocol

Comment:

ClimeCo Corporation strongly supports the proposed California Air Resources Board (ARB) compliance offset protocol for mine methane capture (MMC) projects.

Offset credits represent a crucial cost containment mechanism to help the California cap-and-trade program achieve GHG emission reductions in an economically efficient manner.

As a respected advisor and trader of environmental commodity market products, ClimeCo has specialized expertise in California cap-and-trade, voluntary market advisory and project financing of internal CO<sub>2</sub> abatement systems. ClimeCo managed projects generate in excess of 3 million credits per year, including a diverse commodity portfolio which includes CRTs generated under the Nitric Acid Production protocol and California Air Resources Board (CARB) Forestry, Ozone Depleting Substance and Agricultural Methane protocols.

Anticipated to be the first protocol written entirely by ARB through the public protocol development process, ClimeCo encourages officials to approve and make effective the compliance offset protocol for mine methane capture (MMC) projects as soon as possible.

Sincerely,  
ClimeCo Corporation  
William E. Flederbach, Jr.  
President

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/232-capandtrade13-WzhVPABsBzkDYFc5.pdf>

Original File Name: Comments to support ARB mine methane protocol.pdf

Date and Time Comment Was Submitted: 2014-04-04 07:54:06

No Duplicates.

## **Comment 70 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Dell

Last Name: Majure

Email Address: dell.majure@kcc.com

Affiliation:

Subject: Comments For Proposed Changes To Benchmark For Tissue Sector

Comment:

Please see comments to the proposed changes to the benchmark for the Tissue Sector.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/233-capandtrade13-VT5cOVMNWWIWPwRp.pdf>

Original File Name: KC Comments To Proposed Change To Benchmark.pdf

Date and Time Comment Was Submitted: 2014-04-04 07:35:23

No Duplicates.

## **Comment 71 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Amber  
Last Name: Riesenhuber  
Email Address: amber@iepa.com  
Affiliation: IEP

Subject: IEP Comments On Cap and Trade Amendments

Comment:

Attached Please find IEP's Comments on the Cap and Trade Amendments, released March 21, 2014

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/234-capandtrade13-Vj9XNABxUFxWMwFu.pdf>

Original File Name: IEP Comments to CARB on Cap and Trade FINAL.pdf

Date and Time Comment Was Submitted: 2014-04-04 09:14:54

No Duplicates.

## **Comment 72 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Ron

Last Name: Hughes

Email Address: ron.hughes@solvay.com

Affiliation:

Subject: Comments in support of Mine Methane Capture protocol

Comment:

SCI supports ARB's efforts to reduce global greenhouse gas emissions through a healthy and proactive cap and trade system. SCI further believes that methane is a potent greenhouse gas and the MMC protocol will reduce these emissions from US mines.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/235-capandtrade13-UiFcOVM7WFQDZglm.pdf>

Original File Name: SCI comments in support of ARB MMC Protocol - April 2014.pdf

Date and Time Comment Was Submitted: 2014-04-04 09:41:51

No Duplicates.

## **Comment 73 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: ANGLIQUE

Last Name: SOPHINA

Email Address: asophina@liberty.edu

Affiliation:

Subject: NO CONSENT for Mine Methane Capture Protocol

Comment:

To the California Air Resources Board;

The people of CALIFORNIA and the UNITED STATES DO NOT CONSENT to the proposed Mine Methane Capture Protocol. Offsets and carbon trading are a false solution to climate change and must be excluded from California's Global Warming Solutions Act AB32.

NO CONSENT TO CONTINUED SUPPORT OR EXPANSION FOR FOSSIL FUELS. WE WANT WIND AND SOLAR POWER EMPOWERED AT THE INDIVIDUAL LEVEL TO SUPPORT THE GRID WITH DISTRIBUTED GENERATION WITH A FAIR PRICE PAID TO CONSUMER WHO ALSO ACT AS SUPPLIERS. California and its people have endured enough damage from the fossil-fuel paradigm. We as agent and principal withdraw our consent.

Agent Anglique Sophina

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-04 09:31:33

No Duplicates.

## **Comment 74 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Thomas J.

Last Name: Vessels

Email Address: tvessels@vesselscoalgas.com

Affiliation: Vessels

Subject: Support of Mine Methane Capture Protocol

Comment:

Vessels strongly supports the proposed California Air Resources Board (ARB) compliance offset protocol for mine methane capture (MMC) projects. This will be the first protocol written entirely by ARB through the public protocol development process. Offset credits represent a crucial cost containment mechanism to help the California cap-and-trade program achieve GHG emission reductions in an economically efficient manner. There are currently no incentives to avoid methane emissions and regulations to reduce emissions are not likely in the near term. Regulations will never be as effective as an economic incentive and not implemented as quickly.

Experts are now reporting that methane emissions are the most important greenhouse gas emissions to reduce. Methane is now considered to have a Global Warming Potential twenty five times that of carbon dioxide (CO<sub>2</sub>). Methane also is an energy source that if used conserves energy from other sources while reducing greenhouse gas emissions.

The World Bank estimates that 7,500,000,000 metric tons of CO<sub>2</sub> equivalent per year of methane is emitted annually around the world from human related activity. That methane if used for electricity generation for example could produce 250,000,000 Mega Watt Hours per year. Mines in the US typically are pressured to sign electricity agreements prohibiting them from generating any electricity from the naturally occurring methane in their mines.

Projects based on this protocol could incentivize mines to use a valuable resource and not purchase electricity at additional expense. In locations where such energy conversion is not economical or practical the MMC protocol will encourage feasibility studies to reduce the emissions by combustion.

Vessels encourages the Board to approve the Mine Methane Capture Protocol and make effective date of the protocol as soon as possible

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-04 11:01:30

No Duplicates.

## **Comment 75 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Peter

Last Name: Weiner

Email Address: peterweiner@paulhastings.com

Affiliation:

Subject: CARB March 2014 Cap-and-Trade Proposed Modified Regulation Order Re Legacy Contracts

Comment:

Please find attached our comments to CARB's March 21, 2014 proposed Modified Regulation Order regarding the Cap-and-Trade Regulation, as it applies to legacy contracts.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/238-capandtrade13-BnYHaVQKBzcEbwdz.pdf>

Original File Name: PH Cmt. Ltr. to CARB re March 2014 Modified Regulation Order (4.4.14).pdf

Date and Time Comment Was Submitted: 2014-04-04 11:04:34

No Duplicates.

## **Comment 76 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: John

Last Name: Leslie

Email Address: [jleslie@mckennalong.com](mailto:jleslie@mckennalong.com)

Affiliation: Attorney for Shell Oil

Subject: Shell Martinez Refinery Comments to March 21, 2014 Proposed Revisions to the Cap and Trade

Comment:

Attached are Shell Martinez Refinery's Comments to the March 21, 2014 Proposed Revisions to the Cap and Trade Regulations.

If you have any questions regarding this document, please do not hesitate to contact the undersigned.

John W. Leslie  
Attorney for Shell Oil

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/239-capandtrade13-BnUFa1czVGsFbwdY.pdf>

Original File Name: Shell Martinez Refinery Comments to March 21, 2014 Proposed Revisions to the Cap and Trade Regulations.pdf

Date and Time Comment Was Submitted: 2014-04-04 11:07:38

No Duplicates.

## **Comment 77 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Ben

Last Name: Apple

Email Address: ben.apple@envcomcorp.com

Affiliation: Environmental Commodities Corporation

Subject: Comment in Support of MMC Protocol

Comment:

I commend the ARB staff for producing a well-designed and effective MMC protocol. The quality and relevance of the work indicates that the staff successfully learned critical intricacies of mining operations and understands the economics of the industry to ensure incentives created by the Protocol are fairly applied and distributed.

This MMC protocol will enable and encourage mines to voluntarily reduce GHG emissions that would otherwise be vented, a requirement by law to ensure miner safety, to the atmosphere. Mitigating these emissions is expensive and would not be achieved without financial compensation.

The "Mine Methane Capture Protocol and Mining Economics" analysis is very conservative and yet still demonstrates that MMC projects will not impact the financial standing of coal mines. It will not encourage development of new mines, nor will it prolong the life of operating mines. Coal mining will continue as it did before the MMC protocol, however mines that would otherwise vent methane will now have a means to recover some of the costs of reducing their GHG emissions.

MMC projects require large capital expenditures that are difficult to securitize and are risky, both operationally and economically. Recognizing the full crediting period of a project is necessary to attract investments and achieve the goals of the Program.

Project developers recognize the value of energy in mine methane and endeavor to utilize this resource where possible. Unfortunately, the extreme terrain and remote and often isolated locations of many mines prohibit the utilization of this energy. Recognizing flares as qualifying destruction devices is essential to maximize GHG emission reductions driven by this protocol as the alternative would be to vent this gas.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-04 12:07:38

No Duplicates.



**Comment 78 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Keith

Last Name: Adams

Email Address: adamskb@airproducts.com

Affiliation: Air Products and Chemicals

Subject: Comments on 15-Day Cap & Trade Regulatory Package

Comment:

Comments on 15-Day Cap & Trade Regulatory Package

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/241-capandtrade13-WjtRPgFyAAwDdVIg.pdf>

Original File Name: Air Products Comments - 2014 15-Day Rulemaking Package - Final.pdf

Date and Time Comment Was Submitted: 2014-04-04 12:09:30

No Duplicates.

**Comment 79 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: John

Last Name: Bolden

Email Address: [jbolden@usg.com](mailto:jbolden@usg.com)

Affiliation: United States Gypsum Company

Subject: Cap and Trade Regulation, Proposed 15-Day Modifications

Comment:

Please find attached comments from United States Gypsum Company.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/242-capandtrade13-BzUGMFBgVjEDKFdn.pdf>

Original File Name: 2014-03-27 CARB Cap and Trade 15-day Notice.pdf

Date and Time Comment Was Submitted: 2014-04-04 12:19:26

No Duplicates.

## **Comment 80 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Raphael  
Last Name: Bruneau  
Email Address: raphael.bruneau@biothermica.com  
Affiliation: Biothermica Technologies Inc.

Subject: Support for MMC Protocol Adoption

Comment:

Dear Ms. Sahota,

Biothermica Technologies Inc. ("Biothermica") would like to thank the California Air Resources Board (ARB) for this opportunity to support the approval of the proposed Mine Methane Capture (MMC) Protocol.

Our support is provided from the perspective of a ventilation air methane (VAM) project developer and technology owner, having developed and implemented the first VAM destruction project at an active mine in the U.S.

Thanks to the carbon price signal finally provided by the Protocol's adoption, project developers will be able to deploy their innovative methane abatement projects and technologies at several U.S. mine sites. This price signal is a crucial factor, considering these projects rely on carbon offsets as a source of revenues.

Sincerely,

Raphaël Bruneau  
Director – Carbon Markets  
Biothermica Technologies Inc.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/243-capandtrade13-V2UGMFVIVzABKgQ0.pdf>

Original File Name: 2014-04-03\_Biothermica Letter of Support.pdf

Date and Time Comment Was Submitted: 2014-04-04 12:42:06

No Duplicates.

**Comment 81 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Braydon

Last Name: Boulanger

Email Address: braydon\_boulanger@transalta.com

Affiliation:

Subject: TransAlta Comments on 15 day Cap-and-Trade Package

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/244-capandtrade13-BnJVIVAwVWgKf1c2.pdf>

Original File Name: TransAlta Comments on 2014 15 day package for cap and trade.pdf

Date and Time Comment Was Submitted: 2014-04-04 13:13:11

No Duplicates.

**Comment 82 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Jodean

Last Name: Giese

Email Address: jodean.giese@ladwp.com

Affiliation:

Subject: LADWP Comments-Cap & Trade Reg 15-Day Changes

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/246-capandtrade13-VDhQN1cyBSEAdIN.pdf>

Original File Name: LADWP Comments C&T Reg 15-Day Changes.pdf

Date and Time Comment Was Submitted: 2014-04-04 14:00:05

No Duplicates.

## **Comment 83 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Luan

Last Name: Marks

Email Address: luanmakesmarks@yahoo.com

Affiliation:

Subject: Comments on the Mine Methane Capture Protocol Portion of the Cap and Trade Document

Comment:

I am attaching my comments. Thank you for the opportunity to speak to this. I hope you will reconsider and not pass the MMCP under the Cap and Trade Program.

Sincerely,  
Luan Marks, PhD

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/247-capandtrade13-AmEHbgFwAigBWFM+.doc>

Original File Name: Copy MMCP Information Summary.doc

Date and Time Comment Was Submitted: 2014-04-04 14:08:51

No Duplicates.

## **Comment 84 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: John  
Last Name: Leslie  
Email Address: [jleslie@mckennalong.com](mailto:jleslie@mckennalong.com)  
Affiliation: Attorney for Shell Energy

Subject: Shell Energy Comments to March 21, 2014 Proposed Revisions to the Cap and Trade Regulation

Comment:

Attached are Shell Energy's Comments to the March 21, 2014 Proposed Revisions to the Cap and Trade Regulations.

If you have any questions regarding this document, please do not hesitate to contact the undersigned.

John W. Leslie  
Attorney for Shell Energy North America (US), L.P.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/248-capandtrade13-USICbFYyAzwLYQNc.pdf>

Original File Name: Shell Energy Comments to March 21, 2014 Proposed Revisions to the Cap and Trade Regulations.pdf

Date and Time Comment Was Submitted: 2014-04-04 14:21:50

No Duplicates.

## **Comment 85 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Suguru  
Last Name: Ide  
Email Address: tide@koveva.com  
Affiliation: Koveva Ltd.

Subject: CMM

Comment:

My name is Taku Ide and I strongly support implementing protocols to reduce methane from abandoned and active coal mines. I had the opportunity to study about methane flow within coal seams under the guidance of Professor Lynn Orr (nominated by President Obama to be the next Under Secretary of Science at the DOE) at Stanford University as a Ph.D. student in Petroleum Engineering.

During my career at Stanford, we conclusively measured methane seepage through coal seams to the atmosphere as a result of anthropogenic activities. We suspected at the time that such seepage was prevalent all throughout the U.S.

Since graduating from my program, I have made several high-order measurements of methane seeps from coal seams in Colorado, New Mexico, and on Indian Reservations. Our results confirmed that methane seepages from coal seams occur in many states, and at many active and abandoned coal mines. Reducing such emissions would be a positive step towards preventing further increases in GHG concentrations in the atmosphere.

The California Air Resource Board's compliance offset protocol for mine methane projects provides key economic driver that allows methane to be destroyed from leaky coal mines. I fully support the mine methane protocol.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-04 14:26:42

No Duplicates.

## **Comment 86 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Paul

Last Name: Shepard

Email Address: p.shepard@dgc-us.com

Affiliation:

Subject: ARB 15-Day Modified Language

Comment:

Dear Ms. Rajinder Sahota,

Please find attached the comments of Wildflower Energy, LP in support of the Air Resources Board's 15-Day Cap-and-Trade Modified Language and that seeks clarification on the use of the term "Legacy Contracts" in the Final Statement of Reasons. Thank you.

Sincerely,

Paul Shepard  
Asset Manager,  
Wildflower Energy, LP

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/250-capandtrade13-UmNQYgc2B2AFM1Vh.pdf>

Original File Name: 140404\_Wildflower Energy Comments on 15-Day CNT Modified Language (00225060).pdf

Date and Time Comment Was Submitted: 2014-04-04 14:36:35

No Duplicates.

## **Comment 87 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Jon

Last Name: Lambeck

Email Address: [jlambeck@mwdh2o.com](mailto:jlambeck@mwdh2o.com)

Affiliation: Metropolitan Water District of S. CA

Subject: Metropolitan Water District of Southern California 15-Day Modifications Comments

Comment:

Attached are the comments of the Metropolitan Water District of Southern California to the ARB's Notice on greenhouse gas emissions and market-based compliance mechanisms.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/251-capandtrade13-Uz5cLVI3UFxSN1c4.pdf>

Original File Name: MWD Comments on CARB 15 Day Modifications 040514.pdf

Date and Time Comment Was Submitted: 2014-04-04 14:37:12

No Duplicates.

## **Comment 88 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Katy

Last Name: Wilson

Email Address: [kmwilson@semprausgp.com](mailto:kmwilson@semprausgp.com)

Affiliation: Sempra Generation

Subject: Comments of SGEN re: the Cap-and-Trade 15-Day Notice

Comment:

Attached please find a copy of the comments prepared and submitted by Sempra Generation.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/252-capandtrade13-B2RSOwFtUW9VNngVr.pdf>

Original File Name: Comment Letter - SGEN - 15-day Comment Period 04042014.pdf

Date and Time Comment Was Submitted: 2014-04-04 14:48:22

No Duplicates.

**Comment 89 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Danny

Last Name: Cullenward

Email Address: dcullenward@berkeley.edu

Affiliation:

Subject: Resource Shuffling Safe Harbors - § 95852(b)

Comment:

Please see the attached file for my comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/253-capandtrade13-VjVcNVY6UW9WNQln.pdf>

Original File Name: Comment letter - Cullenward.pdf

Date and Time Comment Was Submitted: 2014-04-04 14:50:29

No Duplicates.

## **Comment 90 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Nancy

Last Name: Allred

Email Address: nancy.allred@sce.com

Affiliation: Southern California Edison Company

Subject: SCE Comments on 15-Day Modifications to Cap-and-Trade Regulation

Comment:

See attached for Southern California Edison Company's comments on the proposed 15-day amendments to the cap-and-trade regulation.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/254-capandtrade13-BTdSZFJiWT5SeQIy.pdf>

Original File Name: 2014-04-04 Comments on 15-Day Modifications.pdf

Date and Time Comment Was Submitted: 2014-04-04 14:54:40

No Duplicates.

**Comment 91 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Raymond  
Last Name: Pilcher  
Email Address: pilcher@ravenridge.com  
Affiliation: UNECE Group of Experts CMM

Subject: MMC Protocol

Comment:

Please see attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/255-capandtrade13-AncBaVA0BDQAY1IN.pdf>

Original File Name: UNECE GOECMM comments CARB\_MMC .pdf

Date and Time Comment Was Submitted: 2014-04-04 15:02:11

No Duplicates.

## **Comment 92 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Robert

Last Name: Lucas

Email Address: bob.lucas@calobby.com

Affiliation: CCEEB

Subject: Amendments to the CA Cap on Greenhouse Gas emissions and Market-Based Compliance Mechanis

Comment:

Attached is CCEEB comment letter. If you have any questions, please do not hesitate to contact Bob Lucas. Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/256-capandtrade13-UDNdOFA0UmQKblcI.pdf>

Original File Name: CCEEB Cap-and-Trade 15-Day Language - April 4, 2014.pdf

Date and Time Comment Was Submitted: 2014-04-04 15:29:02

No Duplicates.

## **Comment 93 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Barbara

Last Name: Toole O'Neil

Email Address: barbara.tooleoneil@redhorsecorp.com

Affiliation:

Subject: Support of the Mine Methane Capture Protocol

Comment:

Where there is coal there is methane. Methane seeps from coal deposits whether the coal is mined or not. Methane from coal is a natural resource that can be hard to capture too. Historically, methane was viewed as a waste product of mining valuable coal. Of the known methane emissions, EPA estimates that less than 25% are being captured and beneficially used.

The proposed California Air Resources Board (ARB) compliance offset protocol for mine methane capture (MMC) projects encourages use of a natural resource that is being wasted. We have no rigorous verifiable estimate of overall methane emissions including emissions from active or abandoned mines as the cost of performing detailed surveys is prohibitive. This protocol will encourage the generation of new and accurate data of methane emissions from mines because the potential value of using and eliminating those emissions. This could encourage more research and measurement of methane emissions from all sources.

Please approve the Mine Methane Capture Protocol and the make effective date of the protocol as soon as possible.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-04 15:38:53

No Duplicates.

## **Comment 94 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Miles

Last Name: Heller

Email Address: miles.t.heller@tsocorp.com

Affiliation: Tesoro

Subject: C&T 15-day package comment

Comment:

Tesoro is concerned with the overly broad requirement for identifying corporate associations in 95833 and believes that these associations should be limited to those located in CA or those that participate in the CA GHG program - consistent with the WSPA comments.

Alternatively, if CARB is not willing to focus the language as suggested above, the language should at least be made consistent with 95912(d)(4)(E) regarding attestations and corporate associations where the associations are limited to those who "participate in a carbon, fuel, or electricity market". Changes should be made to sections 95833 (a)(1), (a)(2), (a)(3), and (a)(4)

"An entity has a corporate association with another entity that participates in a carbon, fuel, or electricity market, regardless of whether the second entity is subject to the requirements of this article,..."

The excerpt above with the proposed change is taken directly from provision (a)(1), but the proposed change would be similar for the other three provisions listed.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-04 15:27:28

No Duplicates.

## **Comment 95 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Ken

Last Name: Nold

Email Address: [krnold@TID.org](mailto:krnold@TID.org)

Affiliation: Turlock Irrigation District ("TID")

Subject: ARB 15-Day Cap-and-Trade Modifications

Comment:

Dear Air Resources Board,

On behalf of Turlock Irrigation District ("TID"), please find attached our comments in response to the 15-Day proposed modified language to the Cap-and-Trade regulation. Thank you.

Sincerely,

Ken Nold  
Turlock Irrigation District

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/259-capandtrade13-UmNVZ1VkJUDdQZgg8.pdf>

Original File Name: 140404\_TID Comments on 3-21 ARB 15-Day Amendments (00225239).pdf

Date and Time Comment Was Submitted: 2014-04-04 15:59:11

No Duplicates.

**Comment 96 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Todd

Last Name: English

Email Address: tenglish@eosclimate.com

Affiliation:

Subject: EOS Climate comments /15-day proposed Regulation Order

Comment:

Please see attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/260-capandtrade13-AWQBaFEjUFwKbVIg.pdf>

Original File Name: EOS ARB Regulation Comments 140404.pdf

Date and Time Comment Was Submitted: 2014-04-04 16:03:47

No Duplicates.

## **Comment 97 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Tamara

Last Name: Rasberry

Email Address: dxjones@semprautilities.com

Affiliation: Sempra Energy utilities

Subject: Proposed Amendments to CA Cap on GHG Emissions & Market-Based Compliance  
Mechs

Comment:

Attached comments from the Sempra Energy utilities, SoCalGas and SDG&E on the Proposed Amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/261-capandtrade13-AnHZFQ4AiEBdVMy.docx>

Original File Name: SempraEgyutils Suggstd Cap-and-Trade Reg Revisns 4.4.14.docx

Date and Time Comment Was Submitted: 2014-04-04 16:16:38

No Duplicates.

**Comment 98 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Dwayne  
Last Name: Phillips  
Email Address: Dwayne.Phillips@AirLiquide.com  
Affiliation: Air Liquide Large Industries U.S. LP

Subject: Proposed Amendments to Cap-and-Trade Regulation  
Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/262-capandtrade13-UWMCNAAwUzRSeQg4.pdf>

Original File Name: 2014-04-04 Air Liquide Comment Letter.pdf

Date and Time Comment Was Submitted: 2014-04-04 16:29:31

No Duplicates.

## **Comment 99 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Clare

Last Name: Breidenich

Email Address: [cbreidenich@aciem.us](mailto:cbreidenich@aciem.us)

Affiliation: Western Power Trading Forum

Subject: Comments on 45 day version of cap and trade regulation

Comment:

Attached please find comments of the Western Power Trading Forum on 45 day proposed changes to the cap and trade regulation.

Thank you,  
Clare Breidenich  
WPTF GHG Committee Director  
1.206.697.4946

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/263-capandtrade13-U2cFLlFkWCYEM1Vh.pdf>

Original File Name: 4-4-14 WPTF on 45-day CT.pdf

Date and Time Comment Was Submitted: 2014-04-04 16:24:53

No Duplicates.

## **Comment 100 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Thomas

Last Name: Corr

Email Address: thomaspcorr@gmail.com

Affiliation: Noble Americas Energy Solutions LLC

Subject: Comments of Noble Solutions on the RPS Adjustment

Comment:

Comments of Noble Solutions on the RPS Adjustment

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/264-capandtrade13-UjFQOVwwBDpVNgdp.pdf>

Original File Name: Comments of Noble Solutions on the RPS Adjustment FINAL  
4apr2014.pdf

Date and Time Comment Was Submitted: 2014-04-04 16:35:00

No Duplicates.

## **Comment 101 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Alex

Last Name: Pennock

Email Address: alex@resource-solutions.org

Affiliation: Center for Resource Solutions

Subject: Cap and Trade Reg Comments from CRS

Comment:

Please find attached Center for Resource Solutions' comments on the March 21 draft of the cap and trade regulations.

Thank you,  
Alex

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/265-capandtrade13-AWJRJQR2VVIVMFQ7.pdf>

Original File Name: CRS comments on ARB cap and trade 4-4-14.pdf

Date and Time Comment Was Submitted: 2014-04-04 16:04:35

No Duplicates.

## **Comment 102 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Keith

Last Name: Adams

Email Address: adamskb@airproducts.com

Affiliation: Air Products and Chemicals

Subject: AMENDED - Comments on Cap & Trade 15-day Rulemaking Package

Comment:

AMENDED - Comments on Cap & Trade 15-day Rulemaking Package

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/266-capandtrade13-BmdWOVAjAg5VI1Ai.pdf>

Original File Name: Air Products Comments - 2014 15-Day Rulemaking Package - Amended.pdf

Date and Time Comment Was Submitted: 2014-04-04 16:53:31

No Duplicates.

## **Comment 103 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Christie

Last Name: Pollet-Young

Email Address: cpollet-young@scsglobalservices.com

Affiliation:

Subject: Cap and Trade13 Comments to Increase Verification Efficiency

Comment:

Please see the attached document for SCS' comments about the Cap and Trade Regulation.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/267-capandtrade13-BnVQNVEjBAgLbAZ0.pdf>

Original File Name: SCS\_ARB\_RegulationComments\_040414.pdf

Date and Time Comment Was Submitted: 2014-04-04 16:45:04

No Duplicates.

**Comment 104 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Claire

Last Name: Halbrook

Email Address: [cehu@pge.com](mailto:cehu@pge.com)

Affiliation: Pacific Gas and Electric Company

Subject: PG&E Comments on 15-day Amendments to the Cap-and-Trade Regulation

Comment:

PG&E Comments on 15-day Amendments to the Cap-and-Trade Regulation

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/268-capandtrade13-VSVVNFCJAzUEXQdk.pdf>

Original File Name: PG&E Comments on 15-day amendments to cap-and-trade regulation.pdf

Date and Time Comment Was Submitted: 2014-04-04 17:06:27

No Duplicates.

## **Comment 105 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Nicholas  
Last Name: van Aelstyn  
Email Address: nvanaelstyn@bdlaw.com  
Affiliation: Beveridge & Diamond, PC

Subject: Powerex Corp.'s Comments on Proposed CTR Amendments  
Comment:

Dear Madam Clerk,

Please see Powerex's attached comments.

Sincerely,

Nicholas van Aelstyn

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/270-capandtrade13-UmBRZwExUDdSeQk5.pdf>

Original File Name: 2014-04-04 Powerex Comments on Proposed 15-Day CTR Amendments.DOCX.PDF

Date and Time Comment Was Submitted: 2014-04-04 17:18:51

No Duplicates.

## **Comment 106 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Kassandra  
Last Name: Gough  
Email Address: Kassandra.Gough@calpine.com  
Affiliation: Calpine Corporation

Subject: Calpine Comments on 15-Day Changes to Proposed Amendments  
Comment:

Please find attached the comments of Calpine Corporation on the California Air Resources Board's notice of 15-day modifications to the Proposed Amendments to the Cap-and-Trade Regulation and related regulatory text.

Thank you for the opportunity to submit these comments.

Please contact me with any questions regarding these comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/271-capandtrade13-UTIAZwNuVXYGaQNt.pdf>

Original File Name: Calpine Comments on 15-Day Changes.pdf

Date and Time Comment Was Submitted: 2014-04-04 17:23:07

No Duplicates.

## **Comment 107 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Michael

Last Name: Rubio

Email Address: MichaelRubio@chevron.com

Affiliation: Chevron Corporation

Subject: Chevron Comments on Proposed 15 Day Amendments

Comment:

Chevron submits these comments on the Proposed 15 day Amendments to the Cap and Trade Regulation dated March 21, 2014.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/272-capandtrade13-UTJVO1QwAyYAdAhn.pdf>

Original File Name: Chevron Comments on Proposed 15 Day Amendments 4\_4\_2014.pdf

Date and Time Comment Was Submitted: 2014-04-04 17:29:32

No Duplicates.

## **Comment 108 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Stephanie  
Last Name: Williams  
Email Address: Stephanie.R.Williams@p66.com  
Affiliation: Phillips 66

Subject: Phillips 66 comments on ARB's March 21, 2014 Proposed 15 day amendment  
Comment:

Please accept our comments

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/273-capandtrade13-AnJVZVZhWFQGZIU8.pdf>

Original File Name: P66 Final comments March 212014 Proposed 15 day amends cap and trade.pdf

Date and Time Comment Was Submitted: 2014-04-04 17:34:13

No Duplicates.

## **Comment 109 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Robin

Last Name: Fraser

Email Address: [fraser@ieta.org](mailto:fraser@ieta.org)

Affiliation: International Emissions Trading Assoc.

Subject: IETA Comments on ARB 15-day modifications to C&T Regs and MMC Protocol

Comment:

Thank you for considering IETA's perspective. Please do not hesitate to be in touch with any questions.

Robin Fraser

Analyst, IETA

+1.416.992.1540

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/274-capandtrade13-Vj9SMVAIVmQEXQlq.pdf>

Original File Name: IETA Comments on ARB Cap-and-Trade Proposed Amendments\_4April2014.pdf

Date and Time Comment Was Submitted: 2014-04-04 17:46:59

No Duplicates.

## **Comment 110 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Catherine  
Last Name: Reheis Boyd  
Email Address: joey@wspa.org  
Affiliation: WSPA

Subject: WSPA Comments on Proposed 15-day Amendments to the California Cap on Greenhouse Gas Emissi

Comment:

Please see attached Western States Petroleum Association Comments on Proposed 15-day Amendments to the California Cap on Greenhouse Gas Emissions and Market - Based Compliance Mechanisms.

Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/275-capandtrade13-UiVRJFwtU2EBWANg.pdf>

Original File Name: WSPA Cap and Trade 15 day comments April 4, 2014.pdf

Date and Time Comment Was Submitted: 2014-04-04 18:56:05

No Duplicates.

## **Comment 111 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Susie

Last Name: Berlin

Email Address: [berlin@susieberlinlaw.com](mailto:berlin@susieberlinlaw.com)

Affiliation: Northern California Power Agency (NCPA)

Subject: NCPA Comments on 15-Day Changes

Comment:

Attached please find the comments of the Northern California Power Agency on the 15-Day Changes to the Cap-and-Trade Program Regulation.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/276-capandtrade13-B2kCZwFwADJWDwdk.pdf>

Original File Name: NCPA comments re 15-day changes to cap-and-trade amendments (final 4-4-14).pdf

Date and Time Comment Was Submitted: 2014-04-04 19:48:21

No Duplicates.

## **Comment 112 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Susie

Last Name: Berlin

Email Address: [berlin@susieberlinlaw.com](mailto:berlin@susieberlinlaw.com)

Affiliation: M-S-R Public Power Agency

Subject: M-S-R Comments on 15-Day Changes

Comment:

Attached please find the M-S-R Public Power Agency comments on the 15-Day Changes to the Cap-and-Trade Program Regulation.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/277-capandtrade13-BmsHLMhA30HcwRb.pdf>

Original File Name: M-S-R comments re 3-21-14 15-day changes (final 4-4-14).pdf

Date and Time Comment Was Submitted: 2014-04-04 19:58:48

No Duplicates.

**Comment 113 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Ellie

Last Name: Booth

Email Address: [ebooth@covantaenergy.com](mailto:ebooth@covantaenergy.com)

Affiliation:

Subject: 15 day comments

Comment:

Comments for the 15 day language

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/278-capandtrade13-V2UBN11tVjEAKwIy.pdf>

Original File Name: 2014-04 CVA Comments on ARB CT Proposal.pdf

Date and Time Comment Was Submitted: 2014-04-04 21:03:57

No Duplicates.

**Comment 114 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Dave

Last Name: Huard

Email Address: [dhuard@manatt.com](mailto:dhuard@manatt.com)

Affiliation:

Subject: PEC Comments

Comment:

Attached are the comments of Panoche Energy Center

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/279-capandtrade13-USFQM1EzBAgFYANs.pdf>

Original File Name: PEC Comment Letter.pdf

Date and Time Comment Was Submitted: 2014-04-04 22:13:24

No Duplicates.

## **Comment 115 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Jon

Last Name: Costantino

Email Address: jcostantino@manatt.com

Affiliation: Small Refinery Coalition

Subject: Coalition Comments

Comment:

Find attached the comments fo the Coalition for Fair and Equitable Allocation

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/280-capandtrade13-AWIGbwBgV2gHdQVs.pdf>

Original File Name: Coaltion Comment Letter.pdf

Date and Time Comment Was Submitted: 2014-04-04 22:33:57

No Duplicates.

## **Comment 116 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Margaret

Last Name: Miller

Email Address: margaret.miller@brookfieldrenewable.com

Affiliation: Brookfield Energy Marketing LP

Subject: 15-day Comments to Proposed Changes to Cap-and-Trade Regulation

Comment:

Attached are Brookfield Energy Marketing LP's 15-day comments to proposed changes to Cap-and-Trade Regulation.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/281-capandtrade13-AGIHcwRqWWVVOABm.pdf>

Original File Name: Brookfield CARB GHG Formal 15-day comments Final.pdf

Date and Time Comment Was Submitted: 2014-04-05 01:28:42

No Duplicates.

## **Comment 117 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Brian  
Last Name: Shillinglaw  
Email Address: bshillinglaw@newforests-us.com  
Affiliation: New Forests

Subject: COMMENT TO CAPANDTRADE13

Comment:

Thank you for the opportunity to comment; we have attached our comments in PDF format.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/282-capandtrade13-WzUFZlEnVloHZwlm.pdf>

Original File Name: New Forests comments ARB 15-day changes 040414.pdf

Date and Time Comment Was Submitted: 2014-04-05 01:37:14

No Duplicates.

## **Comment 118 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Americans against Of  
Last Name: Americans against Of  
Email Address: baad\_eyes@yahoo.com  
Affiliation:

Subject: Cancel the Mine Methane Capture Protocol

Comment:

To Jerry Brown;  
To Chair and members of the California Air Resources Board;  
On behalf on Americans against Offsets, I cordially request that  
you immediately cancel the proposed Mine Methane Capture Protocol.  
We are particularly concerned that offsets will fuel further mining  
and fossil fuel expansion, which are completely contrary to  
addressing climate change.  
Furthermore, the fact that a mining executive drafted the protocol  
smacks of a conflict of interest and does not reflect well on  
CARB.  
Offsets and carbon trading are a false solution to climate change  
and must be excluded from California's Global Warming Solutions Act  
AB32.  
Sincerely,  
Americans against Offsets

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-05 09:35:37

No Duplicates.

## **Comment 119 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Carl

Last Name: Fink

Email Address: cmfink@Blueplanetlaw.com

Affiliation: CP Energy Marketing (US) Inc.

Subject: Comments of CP Energy Marketing (US) Inc. on Proposed Amendments

Comment:

Attached please find the comments of CP Energy Marketing (US) Inc. on proposed Cap-and-Trade regulatory amendments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/285-capandtrade13-BmUHbgRoAz0AY1A+.pdf>

Original File Name: Comments of CP Energy Marketing (US) Inc. on Proposed Amendments to Cap and Trade Regulations.pdf

Date and Time Comment Was Submitted: 2014-04-05 10:17:13

No Duplicates.

## **Comment 120 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Jennifer

Last Name: Haley

Email Address: [jhaley@caseyoil.com](mailto:jhaley@caseyoil.com)

Affiliation: Kern Oil & Refining Co.

Subject: Kern Oil & Refining Co. Comments on Proposed Amendments

Comment:

Kern Oil & Refining Co. hereby submits its comments on the Proposed Amendments to the Cap and Trade Regulation.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/286-capandtrade13-AmlSO1MgWVUAZVQg.pdf>

Original File Name: KOR CT Proposed Amendments Comment Letter 4\_5\_14.pdf

Date and Time Comment Was Submitted: 2014-04-05 12:24:16

No Duplicates.

## **Comment 121 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Catherine  
Last Name: Houston  
Email Address: chouston@usw.org  
Affiliation: United Steelworkers

Subject: Refinery Benchmarking comments

Comment:

Dear Chairwoman Nichols and CARB board members,

Please be advised that the United Steelworkers (USW) remain opposed to the currently drafted benchmarking proposals. Our comments are attached.

Sincerely,  
Catherine Houston  
Policy and Legislation  
United Steelworkers

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/287-capandtrade13-BzMFLlRhAH4CNVdj.pdf>

Original File Name: 4-4-14 CARB Letter.pdf

Date and Time Comment Was Submitted: 2014-04-05 13:05:11

No Duplicates.

## **Comment 122 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Kate

Last Name: Chung

Email Address: katechung17@gmail.com

Affiliation:

Subject: Stop carbon trading & offsets

Comment:

To the California Air Resources Board:

I urge you to cancel the proposed Mine Methane Capture Protocol.

Offsets and carbon trading are a false solution to climate change and must be excluded from California's Global Warming Solutions Act AB32.

The only thing that can save this planet is conservation

K Chung

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-05 13:32:02

No Duplicates.

**Comment 123 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Gary

Last Name: Grimes

Email Address: [ggrimes@ppcla.com](mailto:ggrimes@ppcla.com)

Affiliation:

Subject: Amendment Comments

Comment:

Attached is the comment letter for Paramount Petroleum

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/289-capandtrade13-VSNTNFUUmVGZXPAZp.doc>

Original File Name: Paramount 15 Day Benchmark Comments.doc

Date and Time Comment Was Submitted: 2014-04-05 13:41:38

No Duplicates.

**Comment 124 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Grant

Last Name: Aguinaldo

Email Address: gaguinaldo@worldoil.net

Affiliation: Lunday-Thagard Company

Subject: Public Comments Re: Cap-and-Trade and Refinery Benchmarking

Comment:

Lunday-Thagard Company appreciates the opportunity to submit the attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/290-capandtrade13-BmoCcAZ1WFRWYlBg.pdf>

Original File Name: LTR 2014-04-05 CARB LTR Comments on March 21 2014 15-Day Notice.pdf

Date and Time Comment Was Submitted: 2014-04-05 14:34:55

No Duplicates.

## **Comment 125 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: John

Last Name: Larrea

Email Address: john@clfp.com

Affiliation: California League of Food Processors

Subject: Comments on Amendments to the California Cap on Greenhouse Gas Emissions and Market-Based

Comment:

Attached are the comments from the California League of Food Processors on the Proposed Amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/291-capandtrade13-BmUBa1M0BCcKUwBj.pdf>

Original File Name: CLFP Comments on 15-Day Notice Amendments to Regulation Apr 5 2014.pdf

Date and Time Comment Was Submitted: 2014-04-05 14:52:30

No Duplicates.

## **Comment 126 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Andrew  
Last Name: Westgate  
Email Address: andrew.westgate@lw.com  
Affiliation: Latham & Watkins LLP

Subject: Latham & Watkins Letter to ARB 4.4.2014

Comment:

Ladies and Gentlemen,

Attached please find Latham & Watkins LLP's comment letter to the Air Resources Board.

Best regards,

Andrew Westgate  
Law Clerk,  
Latham & Watkins LLP

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/292-capandtrade13-AW1VJFMNV2gCYQB0.pdf>

Original File Name: LW Letter to ARB - 4 4 2014.pdf

Date and Time Comment Was Submitted: 2014-04-05 16:51:50

No Duplicates.

**Comment 127 for Cap and Trade 2013 (capandtrade13) - 15-1.**

First Name: Barbara

Last Name: Haya

Email Address: bhaya@law.stanford.edu

Affiliation: Stanford Law School

Subject: Comments from Stanford Law School on the Board's proposed MMC protocol

Comment:

Please find comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/293-capandtrade13-VyRRIwBgUG1WNlc4.pdf>

Original File Name: Stanford Law School comments on MMC Protocol released 21-Mar-2014.pdf

Date and Time Comment Was Submitted: 2014-04-05 16:24:30

No Duplicates.