

**Comment 1 for Climate Change Recommendations from the Market  
Advisory Committee (ccmac06) - Non-Reg.**

First Name: Jeffrey

Last Name: Hahn

Email Address: Non-web submitted comment

Affiliation: Covanta Energy

Subject: Comments on Market Advisory Committee's "Recommendations for Designing a  
Greenhouse Gas

Comment:

Please see the attached comment.

Attachment: 'www.arb.ca.gov/lists/ccmac06/1-ccmac06-1.pdf'

Original File Name: ccmac06-1.pdf

Date and Time Comment Was Submitted: 2007-07-16 13:31:22

No Duplicates.

**Comment 2 for Climate Change Recommendations from the Market  
Advisory Committee (ccmac06) - Non-Reg.**

First Name: Andrew

Last Name: O'Hare

Email Address: Non-web submitted comment

Affiliation: Portland Cement Assoc.

Subject: Comments Submitted to the ARB Concerning Implementation of CA Global Warming  
Solutions Act

Comment:

Please see the attached comment.

Attachment: 'www.arb.ca.gov/lists/ccmac06/2-ccmac06-2.pdf'

Original File Name: ccmac06-2.pdf

Date and Time Comment Was Submitted: 2007-07-16 13:33:00

No Duplicates.

**Comment 3 for Climate Change Recommendations from the Market  
Advisory Committee (ccmac06) - Non-Reg.**

First Name: Kimball

Last Name: McCloud

Email Address: Non-web submitted comment

Affiliation: Mitsubishi Cement Corp.

Subject: Initial Comments for the CARB Mandatory Reporting and Emission Inventory Sections  
Comment:

Please see the attached comment.

Attachment: 'www.arb.ca.gov/lists/ccmac06/3-ccmac06-3.pdf'

Original File Name: ccmac06-3.pdf

Date and Time Comment Was Submitted: 2007-07-16 13:34:26

No Duplicates.

**Comment 4 for Climate Change Recommendations from the Market  
Advisory Committee (ccmac06) - Non-Reg.**

First Name: Larry

Last Name: Allen

Email Address: Non-web submitted comment

Affiliation: CAPCOA

Subject: CAPCOA Comments on the June 30, 2007 MAC Report: Recommendations  
Comment:

Please see the attached comment.

Attachment: 'www.arb.ca.gov/lists/ccmac06/4-ccmac06-4.pdf'

Original File Name: ccmac06-4.pdf

Date and Time Comment Was Submitted: 2007-07-20 07:21:12

No Duplicates.

## **Comment 5 for Climate Change Recommendations from the Market Advisory Committee (ccmac06) - Non-Reg.**

First Name: FIJI

Last Name: GEORGE

Email Address: FIJI.GEORGE@ELPASO.COM

Affiliation: EL PASO CORP-PIPELINE GROUP

Subject: COMMENTS ON MAC RECOMMENDATIONS

Comment:

On behalf of El Paso Corporation Pipeline Group, I would like to thank the Market Advisory Committee (MAC) on their diligent work in developing the recommendations on "Designing a Greenhouse Gas Cap-and-Trade System for California".

Based on the review of the final recommendations, El Paso would like to highlight the issues we raised in our comments to the MAC, especially related to regulatory concerns with respect to designing cap-and-trade programs for interstate natural gas pipelines. Our comments are summarized below and I am re-attaching our June 15, 2007 comments for the Board's consideration:

Summary of El Paso's comments with respect to the Program Scope:

- There are major regulatory and commercial hurdles that have not been considered by the MAC, under Option B, that outweigh any perceived administrative efficacy derived from fewer regulated entities.
- El Paso recommends not including both fugitive and vented methane emissions in any cap-and-trade programs due to substantial uncertainty surrounding emission estimates from these categories.
- Vented emissions should not be considered as process emissions. Instead, this category should be considered as a separate source category and not be included in the overall cap-and-trade program.

Summary of El Paso's comments with respect to Early Action Credits:

- El Paso recommends issuance of allowances for early action credits for the natural gas transmission and distribution sectors.
- Fugitive and vented emissions of natural gas transmission companies represent a small fraction of California's overall 2004 GHG emissions.
- El Paso and other natural gas transmission companies have already deployed technologies over the past several years to mitigate and reduce fugitive and vented emissions.
- Not providing allowances for early actions will create inconsistencies with programs such as RGGI.

Summary of El Paso's comments with respect to Emission Offsets:

- El Paso recommends incorporation of both case-by-case and performance-based standards emission offsets.

- El Paso supports development of performance-based offset standards and has led industry and stakeholder efforts in this area.
- The quality of the GHG offsets must be the primary criterion for deciding between performance-based and case-by-case offset standards.
- The CDM board has approved AM0023 to quantify GHG offsets from natural gas facilities. El Paso has developed a policy-neutral technical protocol that incorporates the technical attributes of AM0023.
- Inclusion of El Paso's case-by-case offset protocol for natural gas transmission and distribution facilities will ensure the availability of high quality GHG offsets to California's cap-and-trade program.
- Experience gained through case-by-case offset development will form the cornerstone for future performance-based offset standards.

Thank you for your consideration of our comments and if you have any further questions, please do not hesitate to contact me.

Sincerely,  
Fiji George

Attachment: 'www.arb.ca.gov/lists/ccmac06/5-mac\_cap\_and\_trade\_el\_paso\_comments\_061507\_\_final\_ecopy\_.pdf'

Original File Name: MAC Cap and trade El Paso Comments\_061507\_\_FINAL\_Ecopy\_.pdf

Date and Time Comment Was Submitted: 2007-07-20 08:31:28

No Duplicates.

**Comment 6 for Climate Change Recommendations from the Market  
Advisory Committee (ccmac06) - Non-Reg.**

First Name: Ken

Last Name: Johnson

Email Address: [kjinnovation@earthlink.net](mailto:kjinnovation@earthlink.net)

Affiliation:

Subject: MAC recommendations for cap-and-trade

Comment:

Please see the attached pdf file.

Attachment: '[www.arb.ca.gov/lists/ccmac06/8-comments\\_2007\\_07\\_23.pdf](http://www.arb.ca.gov/lists/ccmac06/8-comments_2007_07_23.pdf)'

Original File Name: Comments\_2007\_07\_23.pdf

Date and Time Comment Was Submitted: 2007-07-22 22:23:19

No Duplicates.

**Comment 7 for Climate Change Recommendations from the Market  
Advisory Committee (ccmac06) - Non-Reg.**

First Name: John  
Last Name: Busterud  
Email Address: JWBb@pge.com  
Affiliation: Pacific Gas and Electric Company

Subject: PG&E's Comments on the Final Report of the MAC  
Comment:

July 24, 2007

Attached please find for filing Pacific Gas and Electric Company's ("PG&E") Comments on the Market Advisory Committee's ("MAC") Recommendations for Designing a Greenhouse Gas Cap-and-Trade System for California ("MAC Report") regarding the design of a market-based program for achieving greenhouse gas ("GHG") emission reductions in California. If you have any questions, please do not hesitate to contact me at (415) 973-6617.

John W. Busterud  
PG&E Law Department  
77 Beale Street, B30A-2491  
San Francisco, CA 94105  
Telephone: (415) 973-6617  
Facsimile: (415) 972-5952  
E-Mail: JWBb@pge.com

Attachment: 'www.arb.ca.gov/lists/ccmac06/10-07-23-  
07\_pg\_es\_comments\_on\_mac\_final\_report.pdf'

Original File Name: 07-23-07 PG&Es Comments on MAC Final Report.pdf

Date and Time Comment Was Submitted: 2007-07-24 09:26:26

No Duplicates.



**Comment 8 for Climate Change Recommendations from the Market  
Advisory Committee (ccmac06) - Non-Reg.**

First Name: Kimball

Last Name: McCloud

Email Address: Non-web submitted comment

Affiliation: Mitsubishi Cement Corp.

Subject: Detailed Comments & Recommendations for the MAC in response to the June 1, 2007  
MAC Report

Comment:

Please see the attached comment.

Attachment: 'www.arb.ca.gov/lists/ccmac06/11-ccmac06-8.pdf'

Original File Name: ccmac06-8.pdf

Date and Time Comment Was Submitted: 2007-07-24 11:09:51

No Duplicates.

**Comment 9 for Climate Change Recommendations from the Market  
Advisory Committee (ccmac06) - Non-Reg.**

First Name: Robert  
Last Name: Callahan  
Email Address: info@ab32ig.com  
Affiliation:

Subject: AB 32 Implementation Group Comments to the ARB  
Comment:

Hello,

Attached are the AB 32 Implementation Group's comments to the Air Resources Board in reference to the Market Advisory Committee report. Our coalition represents companies employing millions of California workers. More information about the AB 32 IG, as well as a list of members, can be found at [www.ab32ig.com](http://www.ab32ig.com).

Thank you,

Robert Callahan  
AB 32 Implementation Group  
[info@ab32ig.com](mailto:info@ab32ig.com)

Attachment: 'www.arb.ca.gov/lists/ccmac06/12-ab32ig\_comments\_to\_arb\_on\_mac\_report\_07.27.07.pdf'

Original File Name: AB32IG Comments to ARB on MAC report 07.27.07.pdf

Date and Time Comment Was Submitted: 2007-07-24 13:11:41

No Duplicates.

**Comment 10 for Climate Change Recommendations from the Market  
Advisory Committee (ccmac06) - Non-Reg.**

First Name: Amisha

Last Name: Patel

Email Address: amisha.patel@calchamber.com

Affiliation: California Chamber of Commerce

Subject: CalChamber Comments on CMAC Report

Comment:

Comments are attached.

Attachment: 'www.arb.ca.gov/lists/ccmac06/13-comments\_to\_carb\_on\_mac\_report.doc'

Original File Name: Comments to CARB on MAC report.doc

Date and Time Comment Was Submitted: 2007-07-24 15:09:44

No Duplicates.

**Comment 11 for Climate Change Recommendations from the Market  
Advisory Committee (ccmac06) - Non-Reg.**

First Name: Ian

Last Name: Carter

Email Address: carter@ieta.org

Affiliation: IETA

Subject: Comments on MAC Report

Comment:

Please find attached the comments prepared by IETA's US Working  
Group.

Attachment: 'www.arb.ca.gov/lists/ccmac06/14-ieta-uswg-mac-commentsarb-jul25-07.pdf'

Original File Name: IETA-USWG-MAC-CommentsARB-Jul25-07.pdf

Date and Time Comment Was Submitted: 2007-07-25 09:36:33

No Duplicates.

**Comment 12 for Climate Change Recommendations from the Market  
Advisory Committee (ccmac06) - Non-Reg.**

First Name: Michael  
Last Name: Sandler  
Email Address: [mike@climateprotectioncampaign.org](mailto:mike@climateprotectioncampaign.org)  
Affiliation: Climate Protection Campaign

Subject: Market Advisory Committee Report Comments  
Comment:

Please accept the attached comments on the Market Advisory  
Committee Final Report. If you have any questions, please feel  
free to contact me.

Sincerely,

Mike Sandler  
Carbon Share Project Manager  
Climate Protection Campaign  
4731 La Villa Marina, Unit B  
Marina del Rey, California 90292  
Phone: 707-529-4620  
E-mail: [mike@climateprotectioncampaign.org](mailto:mike@climateprotectioncampaign.org)  
Web: [www.carbonshare.org](http://www.carbonshare.org)

Attachment: '[www.arb.ca.gov/lists/ccmac06/15-cpccommenttocarb7-27-07.doc](http://www.arb.ca.gov/lists/ccmac06/15-cpccommenttocarb7-27-07.doc)'

Original File Name: CPCcommenttoCARB7-27-07.doc

Date and Time Comment Was Submitted: 2007-07-25 10:33:37

No Duplicates.

**Comment 13 for Climate Change Recommendations from the Market  
Advisory Committee (ccmac06) - Non-Reg.**

First Name: Laura

Last Name: Genao

Email Address: laura.genao@sce.com

Affiliation: Southern California Edison Company

Subject: SCE's Comments on Final MAC Report

Comment:

Attached please find SCE's comments on final MAC Report

Attachment: 'www.arb.ca.gov/lists/ccmac06/16-scecommentsonmacfinalreport.pdf'

Original File Name: scecommentsonmacfinalreport.pdf

Date and Time Comment Was Submitted: 2007-07-25 11:57:59

No Duplicates.

**Comment 14 for Climate Change Recommendations from the Market  
Advisory Committee (ccmac06) - Non-Reg.**

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

Subject: WSPA Comments Submittal re. Climate Change Item  
Comment:

Attached are WSPA's comments on the July 27 agenda item marked  
07-8-2 - Climate Change- Recommendations from the MAC.

Attachment: 'www.arb.ca.gov/lists/ccmac06/17-  
wspa\_comments\_on\_mac\_recommendations.pdf'

Original File Name: WSPA Comments on MAC Recommendations.pdf

Date and Time Comment Was Submitted: 2007-07-25 13:02:22

No Duplicates.

**Comment 1 for Climate Change Recommendations from the Market  
Advisory Committee (ccmac06). (At Hearing)**

First Name: Bill

Last Name: Dombrosa

Email Address: Non-web submitted comment

Affiliation: CA Retailers Assoc.

Subject: Recommendations for Designing a Greenhouse Gas Cap-and-Trade System in CA  
Comment:

Please see the attached comment.

Attachment: [www.arb.ca.gov/lists/ccmac06/18-ccmac06-ws-1.pdf](http://www.arb.ca.gov/lists/ccmac06/18-ccmac06-ws-1.pdf)

Original File Name: ccmac06-ws-1.pdf

Date and Time Comment Was Submitted: 2007-07-30 11:40:11

No Duplicates.



**Comment 2 for Climate Change Recommendations from the Market  
Advisory Committee (ccmac06). (At Hearing)**

First Name: Barbara

Last Name: Baird

Email Address: Non-web submitted comment

Affiliation: SCAQMD

Subject: Recommendations for Designing a Greenhouse Gas Cap-and-Trade System in CA  
Comment:

Please see the attached comment.

Attachment: [www.arb.ca.gov/lists/ccmac06/19-ccmac06-ws-2.zip](http://www.arb.ca.gov/lists/ccmac06/19-ccmac06-ws-2.zip)

Original File Name: ccmac06-ws-2.zip

Date and Time Comment Was Submitted: 2007-07-30 11:44:03

No Duplicates.

**Comment 3 for Climate Change Recommendations from the Market  
Advisory Committee (ccmac06). (At Hearing)**

First Name: Evan

Last Name: Edgar

Email Address: Non-web submitted comment

Affiliation: CA Refuse Removal Council

Subject: Climate Change: Presentation of Recommendations from MAC-Cap and Trade  
Recycling Offsets

Comment:

Please see the attached comment.

Attachment: [www.arb.ca.gov/lists/ccmac06/20-ccmac06-ws-4.pdf](http://www.arb.ca.gov/lists/ccmac06/20-ccmac06-ws-4.pdf)

Original File Name: ccmac06-ws-4.pdf

Date and Time Comment Was Submitted: 2007-07-30 12:04:05

No Duplicates.

**Comment 4 for Climate Change Recommendations from the Market  
Advisory Committee (ccmac06). (At Hearing)**

First Name: Andrew

Last Name: Hoerner

Email Address: Non-web submitted comment

Affiliation:

Subject: Why Not the Best? Designing a Greenhouse Cap-and-Auction System for CA  
Comment:

Please see the attached comment.

Attachment: [www.arb.ca.gov/lists/ccmac06/21-ccmac06-ws-5.pdf](http://www.arb.ca.gov/lists/ccmac06/21-ccmac06-ws-5.pdf)

Original File Name: ccmac06-ws-5.pdf

Date and Time Comment Was Submitted: 2007-07-30 12:05:37

No Duplicates.

**Comment 5 for Climate Change Recommendations from the Market  
Advisory Committee (ccmac06). (At Hearing)**

First Name: Kevin

Last Name: Fay

Email Address: Non-web submitted comment

Affiliation: International Climate Change Partnership

Subject: AB 32 MAC

Comment:

Please see the attached comment.

Attachment: [www.arb.ca.gov/lists/ccmac06/22-ccmac06-ws-6.pdf](http://www.arb.ca.gov/lists/ccmac06/22-ccmac06-ws-6.pdf)

Original File Name: ccmac06-ws-6.pdf

Date and Time Comment Was Submitted: 2007-07-30 12:06:46

No Duplicates.

**Comment 6 for Climate Change Recommendations from the Market  
Advisory Committee (ccmac06). (At Hearing)**

First Name: Chris

Last Name: Busch

Email Address: Non-web submitted comment

Affiliation: Union of Concerned Scientists

Subject: UCS Statement to ARB on MAC Report

Comment:

Please see the attached comment.

Attachment: [www.arb.ca.gov/lists/ccmac06/23-ccmac06-ws-7.pdf](http://www.arb.ca.gov/lists/ccmac06/23-ccmac06-ws-7.pdf)

Original File Name: ccmac06-ws-7.pdf

Date and Time Comment Was Submitted: 2007-07-30 12:07:56

No Duplicates.

**Comment 7 for Climate Change Recommendations from the Market  
Advisory Committee (ccmac06). (At Hearing)**

First Name: Devra

Last Name: Wang

Email Address: Non-web submitted comment

Affiliation: NRDC

Subject: Cal EPA MAC Draft Report

Comment:

Please see the attached comment.

Attachment: [www.arb.ca.gov/lists/ccmac06/24-ccmac06-ws-8.pdf](http://www.arb.ca.gov/lists/ccmac06/24-ccmac06-ws-8.pdf)

Original File Name: ccmac06-ws-8.pdf

Date and Time Comment Was Submitted: 2007-07-30 12:08:53

No Duplicates.

**Comment 8 for Climate Change Recommendations from the Market  
Advisory Committee (ccmac06). (At Hearing)**

First Name: Mark

Last Name: Hite

Email Address: Non-web submitted comment

Affiliation: CCEEB

Subject: Report of the CA MAC

Comment:

Please see the attached comment.

Attachment: [www.arb.ca.gov/lists/ccmac06/25-ccmac06-ws-9.pdf](http://www.arb.ca.gov/lists/ccmac06/25-ccmac06-ws-9.pdf)

Original File Name: ccmac06-ws-9.pdf

Date and Time Comment Was Submitted: 2007-07-30 12:09:42

No Duplicates.

**Comment 9 for Climate Change Recommendations from the Market  
Advisory Committee (ccmac06). (At Hearing)**

First Name: Nicholas W.

Last Name: van Aelstyn

Email Address: Non-web submitted comment

Affiliation: Beveridge & Diamond

Subject: Comments on the Final Cal/EPA MAC Report

Comment:

Please see the attached comments.

Attachment: [www.arb.ca.gov/lists/ccmac06/26-ccmac06-ws-10.zip](http://www.arb.ca.gov/lists/ccmac06/26-ccmac06-ws-10.zip)

Original File Name: ccmac06-ws-10.zip

Date and Time Comment Was Submitted: 2007-07-30 14:09:37

No Duplicates.