

## **Comment 1 for Mandatory Reporting 2014 (ghg2014) - 45 Day.**

First Name: Amber

Last Name: Blixt

Email Address: amber@iepa.com

Affiliation: IEP

Subject: IEP Comments on MRR Amendments

Comment:

Attached Please find IEP's Comments on CARB's Amendments to the  
Mandatory Reporting Regulation.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1-ghg2014-  
AWgBYlYnAw8DZIM8.pdf'

Original File Name: IEP Comments to CARB Re MRR Amendments Filed August 8 2014.pdf

Date and Time Comment Was Submitted: 2014-08-08 10:43:36

No Duplicates.

## **Comment 2 for Mandatory Reporting 2014 (ghg2014) - 45 Day.**

First Name: Clare

Last Name: Breidenich

Email Address: cbreidenich@aciem.us

Affiliation: Western Power Trading Forum

Subject: WPTF Comments on 45 day MRR changes

Comment:

Please find attached comments of the Western Power Trading Forum on 2014 45 day proposed amendments to the Mandatory Reporting Regulation.

Thank you,

Clare Breidenich

Western Power Trading Forum

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/2-ghg2014-UGIQewAyUC4GMQYy.pdf'

Original File Name: 9-3-14 WPTF on 45 day MRR.pdf

Date and Time Comment Was Submitted: 2014-09-03 09:52:34

No Duplicates.

### **Comment 3 for Mandatory Reporting 2014 (ghg2014) - 45 Day.**

First Name: Tanya  
Last Name: DeRivi  
Email Address: tderivi@scppa.org  
Affiliation: SCPPA

Subject: SCPPA Comments on Potential Amendments to the Mandatory Reporting Regulation  
Comment:

Please find attached SCPPA's recommended revisions to ARB's proposed MRR amendments.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/3-ghg2014-UyAGY1YnAiEHYARb.pdf'

Original File Name: SCPPA MRR Proposed Amendment Language.pdf

Date and Time Comment Was Submitted: 2014-09-08 12:21:00

No Duplicates.

## **Comment 4 for Mandatory Reporting 2014 (ghg2014) - 45 Day.**

First Name: Kelle

Last Name: Vigeland

Email Address: kvigelan@wm.com

Affiliation:

Subject: Comments on GHG MRR Rule Revisions

Comment:

Please see attached Wheelabrator Technologies, Inc. comments

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/4-ghg2014-BXJXOVI2UGYKYAlo.pdf'

Original File Name: Wheelabrator GHG MRR Comments.pdf

Date and Time Comment Was Submitted: 2014-09-11 15:41:26

No Duplicates.

## **Comment 5 for Mandatory Reporting 2014 (ghg2014) - 45 Day.**

First Name: Matthew

Last Name: Plummer

Email Address: m3pu@pge.com

Affiliation: Pacific Gas and Electric Company

Subject: PG&E Comments on 45-Day Amendments to MRR and COI Fee

Comment:

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to comment on the Air Resources Board's (ARB) proposed amendments to its Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (MRR) and the Cost of Implementation (COI) Fee Regulation.

Please to not hesitate to contact me if you have any questions.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/5-ghg2014-VycAYQZYBzEHXgJh.pdf'

Original File Name: PG&E Comments on 45-Day Amendments to MRR and COI.pdf

Date and Time Comment Was Submitted: 2014-09-12 15:42:34

No Duplicates.

## **Comment 6 for Mandatory Reporting 2014 (ghg2014) - 45 Day.**

First Name: Charles

Last Name: White

Email Address: cwhite1@wm.com

Affiliation:

Subject: WM Comments: Proposed Amendments (MMR)

Comment:

Please see the attached letter submitted on behalf of Waste Management by Charles White.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/7-ghg2014-B3AAawZYAzNWPwNu.pdf'

Original File Name: WM Comments - Prososed Amendments (MMR).pdf

Date and Time Comment Was Submitted: 2014-09-15 10:11:52

No Duplicates.

## **Comment 7 for Mandatory Reporting 2014 (ghg2014) - 45 Day.**

First Name: Martin

Last Name: Hopper

Email Address: berlin@susieberlinlaw.com

Affiliation: M-S-R Public Power

Subject: Comments on MRR Amendments

Comment:

attached please find the M-S-R Public Power Agency comments on the proposed revisions to the Mandatory Reporting Regulation.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/8-ghg2014-Am9QewNxAH4EcABf.pdf'

Original File Name: M-S-R comments 2014 MRR amendments (final 9-15-14).pdf

Date and Time Comment Was Submitted: 2014-09-15 11:20:21

No Duplicates.

## **Comment 8 for Mandatory Reporting 2014 (ghg2014) - 45 Day.**

First Name: Mary

Last Name: Wiencke

Email Address: mary.wiencke@pacificorp.com

Affiliation:

Subject: PacifiCorp Comments on July 29 Proposed Amendments

Comment:

Please see attached PacifiCorp comments on July 29 Proposed Amendments

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/9-ghg2014-WjtWIIY1BAGAdQNm.pdf'

Original File Name: ARB\_Sept 15 Amendments Comments\_FINAL.pdf

Date and Time Comment Was Submitted: 2014-09-15 13:03:29

No Duplicates.



## **Comment 9 for Mandatory Reporting 2014 (ghg2014) - 45 Day.**

First Name: David

Last Name: Cox

Email Address: info@rngcoalition.com

Affiliation: Coalition For Renewable Natural Gas

Subject: Comments re: Proposed Regulatory Amendments to the Mandatory Reporting of Greenhouse Gas E

Comment:

Dear Clerk and Members of the California Air Resources Board:

Please find attached comments submitted by the Coalition For Renewable Natural Gas on the Proposed Amendments (Amendments) to the Regulations for the Mandatory Reporting of Greenhouse Gas Emissions (MRR) issued by the ARB on July 28, 2014.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/10-ghg2014-VSdXP1w6BQkEYQhn.pdf'

Original File Name: RNG Coalition Comments on the MRR Sept 15 2014.pdf

Date and Time Comment Was Submitted: 2014-09-15 13:06:15

No Duplicates.

## **Comment 10 for Mandatory Reporting 2014 (ghg2014) - 45 Day.**

First Name: Tamara

Last Name: Raspberry

Email Address: dxjones@semprautilities.com

Affiliation: Sempra Energy utilities

Subject: Mandatory GHG Reporting Regulation

Comment:

Attached are comments from the Sempra Energy utilities, SoCalGas and San Diego Gas & Electric on the Proposed Amendments to the Regulation for the Mandatory Reporting of GHG Emissions.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/11-ghg2014-WilQMwRwV1sKflcy.pdf'

Original File Name: SEu Regulation.MRR comments 9-15-14.pdf

Date and Time Comment Was Submitted: 2014-09-15 13:17:20

No Duplicates.

## **Comment 11 for Mandatory Reporting 2014 (ghg2014) - 45 Day.**

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

Subject: WSPA COI MMR Comments  
Comment:

Please see attached Western States Petroleum Association Comments on Proposed Changes to ARB Regulations: Mandatory Reporting Rule (MRR), Cost of Implementation Rule (COI), and Cap and Trade (C/T).

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/12-ghg2014-Wi1UIVIjBTdWDwRn.pdf'

Original File Name: WSPA Comments on COI MMR.pdf

Date and Time Comment Was Submitted: 2014-09-15 14:17:36

No Duplicates.

## **Comment 12 for Mandatory Reporting 2014 (ghg2014) - 45 Day.**

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

## **Comment 13 for Mandatory Reporting 2014 (ghg2014) - 45 Day.**

First Name: Barbara

Last Name: McBride

Email Address: Barbara.McBride@calpine.com

Affiliation: Calpine Corporation

Subject: Comments on Proposed Amendments to the Mandatory Reporting Rule

Comment:

Please find attached the comments of Calpine Corporation on the Proposed Amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/14-ghg2014-UTJdOgBtAyAHaAFv.pdf'

Original File Name: Calpine Comments on Proposed MRR Amendments.pdf

Date and Time Comment Was Submitted: 2014-09-15 14:41:42

No Duplicates.

## **Comment 14 for Mandatory Reporting 2014 (ghg2014) - 45 Day.**

First Name: Melinda

Last Name: Hicks

Email Address: mhicks@kernoil.com

Affiliation: Kern Oil & Refining Co.

Subject: Comments on MRR 2014 Revisions

Comment:

Please see attached comment letter from Kern Oil & Refining Co.  
Thank you for the opportunity to comment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/15-ghg2014-B2xTMFwvAj8FXANs.pdf'

Original File Name: Kern Oil MRR Comments 2014 Amendments 9-15-14.PDF

Date and Time Comment Was Submitted: 2014-09-15 15:38:37

No Duplicates.

## **Comment 15 for Mandatory Reporting 2014 (ghg2014) - 45 Day.**

First Name: William  
Last Name: Westerfield  
Email Address: [william.westerfield@smud.org](mailto:william.westerfield@smud.org)  
Affiliation: SMUD

Subject: SMUD's Comments on July 29, 2014 Proposed Amendments to the Mandatory Reporting Regulation  
Comment:

SMUD's Comments are attached for your consideration.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/16-ghg2014-UT1SMQFnAAxVYIVh.pdf>'

Original File Name: LEG 14-0818 SMUD Comments on July 29 Proposed Amendments to the Mandatory Reporting Regulation.pdf

Date and Time Comment Was Submitted: 2014-09-15 15:56:06

No Duplicates.

## **Comment 16 for Mandatory Reporting 2014 (ghg2014) - 45 Day.**

First Name: Susie  
Last Name: Berlin  
Email Address: berlin@susieberlinlaw.com  
Affiliation: NCPA

Subject: Comments on MRR Amendments  
Comment:

Northern California Power Agency Comments on MRR Proposed  
Amendments.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/17-ghg2014-VzlcOQR1WGpRCARn.pdf'

Original File Name: NCPA comments re 2014 MRR amendments (final).pdf

Date and Time Comment Was Submitted: 2014-09-15 16:39:03

No Duplicates.



## **Comment 17 for Mandatory Reporting 2014 (ghg2014) - 45 Day.**

First Name: Cindy

Last Name: Parsons

Email Address: cindy.parsons@ladwp.com

Affiliation: LADWP

Subject: LADWP Comments on Proposed Amendments to the Mandatory Reporting Regulation  
Comment:

See attached comments.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/18-ghg2014-Uz8HYAZjAycKfFIN.pdf'

Original File Name: LADWP Comments on July 29, 2014 Proposed Amendments to MRR.pdf

Date and Time Comment Was Submitted: 2014-09-15 16:44:49

No Duplicates.

## **Comment 18 for Mandatory Reporting 2014 (ghg2014) - 45 Day.**

First Name: Janet

Last Name: Bell

Email Address: jbell@mwdh2o.com

Affiliation: Metropolitan Water District

Subject: Comments on Proposed Amendments to Regulations for C&T, MRR, and COI Fee  
Comment:

Attached is Metropolitan's comment letter.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/15-capandtrade14-AGMBZgNwVmcAZVI9.pdf'

Original File Name: CARBcommentsltr\_C&T\_final\_Jksign\_Sept152014.pdf

Date and Time Comment Was Submitted: 2014-09-15 09:21:56

No Duplicates.

**There are no comments posted to Mandatory Reporting 2014 (ghg2014) that were presented during the Board Hearing at this time.**

## **Comment 1 for Mandatory Reporting 2014 (ghg2014) - 15-1.**

First Name: Tanya  
Last Name: DeRivi  
Email Address: tderivi@scppa.org  
Affiliation: SCPPA

Subject: SCPPA Comments on Modified Text to the Mandatory Reporting Regulation  
Comment:

Please find attached SCPPA's comment letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/19-ghg2014-VCddOAFwWHsDZFQL.pdf>

Original File Name: SCPPA MRR 15-Day Support Letter.pdf

Date and Time Comment Was Submitted: 2014-10-15 15:35:10

No Duplicates.

## **Comment 2 for Mandatory Reporting 2014 (ghg2014) - 15-1.**

First Name: Braydon

Last Name: Boulanger

Email Address: braydon\_boulanger@transalta.com

Affiliation: TransAlta

Subject: Amendments to the Regulation for Mandatory Reporting Of Greenhouse Gas Emissions  
Comment:

Please see the uploaded attachment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/20-ghg2014-UT5dOAF0UGwCZgdi.pdf>

Original File Name: October 16 2014 - TransAlta 15 day MRR changes.pdf

Date and Time Comment Was Submitted: 2014-10-16 07:32:59

No Duplicates.

### **Comment 3 for Mandatory Reporting 2014 (ghg2014) - 15-1.**

First Name: Martin

Last Name: Hopper

Email Address: susie@susieberlinlaw.com

Affiliation: M-S-R Public Power

Subject: Comments on 15-day changes to MRR Amendments

Comment:

Attached please find the M-S-R Public Power Agency comments on the 15-day changes to the MRR amendments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/21-ghg2014-Uz4AK1AiAH4Hc1AP.pdf>

Original File Name: M-S-R comments 2014 MRR amendments 15-day changes (final 10-16-14).pdf

Date and Time Comment Was Submitted: 2014-10-16 19:35:15

No Duplicates.

## **Comment 4 for Mandatory Reporting 2014 (ghg2014) - 15-1.**

First Name: Miles

Last Name: Heller

Email Address: miles.t.heller@tsocorp.com

Affiliation: Tesoro

Subject: MRR comments on 15-day package

Comment:

Tesoro appreciates the work CARB has done in clarifying certain provisions in the proposed regulation. Tesoro has two substantive issues remaining - one new one based on the 15-day changes and one that we wish to reiterate.

1. The new issue related to reporting of CWB for ISOM units. This corrects an inconsistency with how the reactor feed is reported with Solomon surveys. Tesoro recommends the following language:

95113 (1) (5) (A) Should read:

Reporting of CWB Throughputs Functions. The operator must report the annual throughput for each CWB unit listed in Table 1 of this section, using the appropriate units listed in column 3 of Table 1 of this section. With the exception of C4 Isomer Production and C5/C6 Isomer production, reported throughputs based on feed must include only fresh feed and exclude recycled streams. Throughputs for C4 Isomer Production and C5/C6 Isomer production should be based on reactor feed including recycle.

2. 95103 (h)(4): Tesoro does not agree with the elimination of best available methods for measuring by-product hydrogen. The by-product hydrogen is not currently incorporated into the CWB calculation and resultant allocations so it should not be subjected to the more stringent accuracy requirements; and therefore, subject to increased enforcement risk. Please retain the flexibility to comply with BAM for these meters consistent with this provision in the current regulation.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-10-17 07:19:31

No Duplicates.

## **Comment 5 for Mandatory Reporting 2014 (ghg2014) - 15-1.**

First Name: Susie

Last Name: Berlin

Email Address: berlin@susieberlinlaw.com

Affiliation: NCPA

Subject: NCPA Comments on MRR 15-Day Changes

Comment:

Attached please find the Northern California Power Agency (NCPA) comments on the 15-day changes to the MRR amendments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/23-ghg2014-UjxWM1QIBzUFXFc0.pdf>

Original File Name: NCPA comments re 2014 MRR amendments 15-day changes (final 10-17-14).pdf

Date and Time Comment Was Submitted: 2014-10-17 11:12:36

No Duplicates.



## **Comment 6 for Mandatory Reporting 2014 (ghg2014) - 15-1.**

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

## **Comment 7 for Mandatory Reporting 2014 (ghg2014) - 15-1.**

First Name: Clare

Last Name: Breidenich

Email Address: cbreidenich@aciem.us

Affiliation: Western Power Trading Forum

Subject: WPTF Comments on 15 day MRR changes

Comment:

Thank you,

Clare Breidenich

WPTF GHG Committee Director 1.206.697.4946

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/25-ghg2014-U2IFM1d7B2UDMgQp.pdf>

Original File Name: 10-17-14 WPTF on 15 day MRR amendments.pdf

Date and Time Comment Was Submitted: 2014-10-17 11:50:19

No Duplicates.

## **Comment 8 for Mandatory Reporting 2014 (ghg2014) - 15-1.**

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

Subject: IEP Comments on MRR  
Comment:

IEP comments on MRR

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/26-ghg2014-UDIXNFQIV1sKb1Q7.pdf>

Original File Name: IEP Comments on MRR 15 Day Language Oct 2014 FINAL.pdf

Date and Time Comment Was Submitted: 2014-10-17 12:14:59

No Duplicates.

## **Comment 9 for Mandatory Reporting 2014 (ghg2014) - 15-1.**

First Name: Nico

Last Name: van Aelstyn

Email Address: nvanaelstyn@bdlaw.com

Affiliation: Beveridge & Diamond

Subject: Powerex Corp. Comments on 15-Day MRR Changes

Comment:

Please see attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/27-ghg2014-BzVWYFBgAGcAKwU0.pdf>

Original File Name: 2014-10-17 Powerex Comments on ARB Proposed 15-Day Changes to MRR.pdf

Date and Time Comment Was Submitted: 2014-10-17 14:28:29

No Duplicates.

## **Comment 10 for Mandatory Reporting 2014 (ghg2014) - 15-1.**

First Name: Gerald  
Last Name: Secundy  
Email Address: jerrys@cceeb.org  
Affiliation:

Subject: CCEEB Comments  
Comment:

Please see attachment for comments from California Council for  
Environmental and Economic Balance ("CCEEB").

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/28-ghg2014-AmFWM1I2VWMAZABf.pdf>

Original File Name: CCEEB 15 Day Comments\_10-17.pdf

Date and Time Comment Was Submitted: 2014-10-17 16:00:15

No Duplicates.

## **Comment 11 for Mandatory Reporting 2014 (ghg2014) - 15-1.**

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

Subject: WSPA Cap and Trade Letter  
Comment:

Please see attached WSPA Comments on Proposed 15-day changes to ARB Cap and Trade, MRR and COI Fee Regulations, and Ozone Depleting Offset Protocol. Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/29-ghg2014-UyQCd1wtBTcKUwh4.zip>

Original File Name: WSPA Proposed 15 day Cap and Trade Letter.zip

Date and Time Comment Was Submitted: 2014-10-17 16:23:06

No Duplicates.

## **Comment 12 for Mandatory Reporting 2014 (ghg2014) - 15-1.**

First Name: Frank

Last Name: Harris

Email Address: frank.harris@sce.com

Affiliation: Southern California Edison

Subject: SCE Comments on the 15 Day Changes to the MRR

Comment:

Clerk of the Board,

Please find the attached comments of Southern California Edison to the changes on the Mandatory Reporting Regulation.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/30-ghg2014-AnFQNVA0WGYCdV3.pdf>

Original File Name: SCEMRRComments14-10-17.pdf

Date and Time Comment Was Submitted: 2014-10-17 16:28:51

No Duplicates.