

## **Comment 1 for Mandatory Reporting of GHG Emissions (ghg2016) - 45 Day.**

First Name: chuck

Last Name: Tamagni

Email Address: chuck@tamagni.org

Affiliation: Retired senior engineer Lockheed

Subject: california production of CO2 as a result of forest fires

Comment:

I see that AB 32 was passed without considering the impact of forest fires on CO2 emissions. Why this was ignored I just can't understand. Consider the following data gathered from very reliable sources.

Just looking at the Chimney and Soberanes fires alone this year 30 tons/acre were lost by the missing CO2 absorption by the living forest. Another 200 tons/acre of CO2 were produced by the burning and subsequent decay of the burned forest. So far the two fires have consumed 150,000 acres of forest. This conservatively totals 34,000,000 tons of CO2 production. Just maybe this isn't an insignificant number? If 1/2 of your yearly budget were spent on paying more attention to fire suppression tools and personnel this number could be significantly reduced. Remember, this was just 2 of the fires this year and neither is controlled by this date!!! If you don't believe these numbers please spend a little time to verify them...

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2016-08-29 08:48:13

No Duplicates.

## **Comment 2 for Mandatory Reporting of GHG Emissions (ghg2016) - 45 Day.**

First Name: Nico

Last Name: van Aelstyn

Email Address: nvanaelstyn@bdlaw.com

Affiliation: Beveridge & Diamond, PC

Subject: Powerex Corp. Comments on Proposed Amendments to the MRR

Comment:

Please see attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/3-ghg2016-VTZVPFc7UW9XNAVr.pdf>'

Original File Name: Comments of Powerex Corp on Proposed Amendments to the Mandatory Reporti....pdf

Date and Time Comment Was Submitted: 2016-09-09 15:28:14

No Duplicates.

## **Comment 3 for Mandatory Reporting of GHG Emissions (ghg2016) - 45 Day.**

First Name: Erin  
Last Name: Quinn  
Email Address: equinn@analyticalcorp.com  
Affiliation: AES

Subject: GHG Mandatory Reporting Regulation, change of verification deadline  
Comment:

To whom it may concern,

I am a GHG verifier with CARB. If the verification submittal data were changed from September 1 to August 1 this year, I would have had at least 5 reporters with an adverse or qualified verification statement. Often times it take a reporter, even a seasoned report, time to accurately report its GHG emissions or product data. The reason provided by CARB for this change is flawed at best. There seems to be no analysis provided for the impacts on the reporter (who ultimately support the MRR program) and the VB who assist CARB in the efforts to reduce GHG emissions throughout CA. Please provide a discussion of the impacts to the reporters and VB. Implementation of this change in Regulation without this analysis could be a violation of CEQA. To change the verification submittal date based solely on CARB's inability to do its job is unreasonable. Verifier's and reporters have put in long hours to conform to the requirement of the MMR and I would expect CARB to understand and respect their commitment.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2016-09-12 13:23:34

No Duplicates.

## **Comment 4 for Mandatory Reporting of GHG Emissions (ghg2016) - 45 Day.**

First Name: Brian

Last Name: Pickard

Email Address: Brian.Pickard@dbr.com

Affiliation:

Subject: Comments of AmeriGas Propane, L.P. to Proposed Amendments to the MRR of GHG Emissions

Comment:

On behalf of AmeriGas Propane, L.P., Drinker Biddle & Reath LLP submits the attached comments to the Proposed Amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions in advance of the September 22, 2016, Public Hearing.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/5-ghg2016-VDVSJIQ3WVUGZwRs.pdf>'

Original File Name: ARB GHG Comments.pdf

Date and Time Comment Was Submitted: 2016-09-12 14:07:55

No Duplicates.

## **Comment 5 for Mandatory Reporting of GHG Emissions (ghg2016) - 45 Day.**

First Name: Derek  
Last Name: Markolf  
Email Address: derek.markolf@lrqa.com  
Affiliation: LRQA, Inc.

Subject: Changing the verification deadline from September 1 to August 1

Comment:

Dear ARB staff,

LRQA is concerned with the proposed change in the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions which would move the verification deadline from September 1st to August 1st. Much of the scheduling for our business outside of ARB work has been structured around the ARB September 1st deadline. A change to August 1st would have a significant impact on the number of verification projects (both ARB and other voluntary and mandatory programs) that LRQA would be able to perform in a given year with adverse effects on our bottom line.

Your analysis results stating verification bodies can more effectively use their time leading up to the verification deadline is likely not taking into consideration work verification bodies perform under programs not related to California initiatives. For instance, LRQA's team of verifiers are booked on verifications under a number of voluntary programs from early spring through the entire month of June. If ARB's analysis has not taken into consideration non-California related verification activities, the analysis has not adequately address LRQA's business situation and that of many of the other ARB accredited verification bodies. With the balance of schedules for various programs we work in, your suggestion that a more effective use of time with a shift to starting the verification cycle earlier would not alleviate the adverse effects on our business.

Taking into consideration the adverse effect this will have on the business of many of the ARB accredited verification bodies, if there is an adequate internal need for ARB schedule adjustments, we strongly encourage you to consider either a one or two week change rather than an entire month.

Sincerely,  
Derek Markolf  
Americas Technical Manager Climate Change

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/6-ghg2016-UDxSJlwsU2EDWIIk.pdf>'

Original File Name: LRQA Verification Deadline Comment-Sep16.pdf

Date and Time Comment Was Submitted: 2016-09-16 09:26:53

No Duplicates.

## **Comment 6 for Mandatory Reporting of GHG Emissions (ghg2016) - 45 Day.**

First Name: Harrison

Last Name: Clay

Email Address: hclay@cleanenergyfuels.com

Affiliation:

Subject: Clean Energy Cap and Trade Comments

Comment:

Please see the attached comments from Clean Energy.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/7-ghg2016-VjVSOFczBTcEbFUK.pdf>'

Original File Name: Clean Energy Cap and Trade Comments\_091616.pdf

Date and Time Comment Was Submitted: 2016-09-19 11:26:25

No Duplicates.

## **Comment 7 for Mandatory Reporting of GHG Emissions (ghg2016) - 45 Day.**

First Name: Adrianna

Last Name: Kripke

Email Address: [akripke@semprautilities.com](mailto:akripke@semprautilities.com)

Affiliation:

Subject: Comments on Mandatory Reporting Regulation Changes

Comment:

Attached are comments from San Diego Gas & Electric on the 45-Day Mandatory Reporting Regulation Changes.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/8-ghg2016-UiFTMVE3VWMFXFAz.pdf>'

Original File Name: SDGE Cmts Mandatory Reportg GHG 9.19.16.1.pdf

Date and Time Comment Was Submitted: 2016-09-19 11:46:24

No Duplicates.

## **Comment 8 for Mandatory Reporting of GHG Emissions (ghg2016) - 45 Day.**

First Name: Andrew  
Last Name: Ulmer  
Email Address: aulmer@caiso.com  
Affiliation: California ISO

Subject: Comments on Proposed Amendments to the Regulation for the Mandatory Reporting of Greenhous

Comment:

Please find the California ISO's comments on Proposed Amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions.

Respectfully submitted,

Andrew Ulmer  
Director, Federal Regulatory Affairs  
California Independent System Operator Corp.  
Tel. 916.608.7209  
Cell. 916.673.7797

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/9-ghg2016-UjFVMgBzAzJSCwNx.pdf>

Original File Name: CARB\_Regulations\_Comments\_20160919\_Final.pdf

Date and Time Comment Was Submitted: 2016-09-19 12:02:59

No Duplicates.

## **Comment 9 for Mandatory Reporting of GHG Emissions (ghg2016) - 45 Day.**

First Name: Steve

Last Name: Zuretti

Email Address: steven.zuretti@brookfieldrenewable.com

Affiliation: Brookfield Energy Marketing LP

Subject: Comments of Brookfield Energy Marketing LP on Proposed Amendments to the Regulation for th

Comment:

PDF comments attached on behalf of Brookfield Energy Marketing LP.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/10-ghg2016-UTNXNANvUG9XIQBf.pdf>

Original File Name: BEMPLP\_ARB MRR Draft Comments\_final.pdf

Date and Time Comment Was Submitted: 2016-09-19 12:24:31

No Duplicates.

## **Comment 10 for Mandatory Reporting of GHG Emissions (ghg2016) - 45 Day.**

First Name: Frank

Last Name: Sheets

Email Address: laura@houstonmagnani.com

Affiliation: CCMEC

Subject: CCMEC Comments on Proposed Amendments to Regulations for Mandatory Reporting

Comment:

Please accept the attached comments on behalf of the California Cement Manufacturers Environmental Coalition (CCMEC) in regards to 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/11-ghg2016-WjlcOVU5BDIGY1QL.pdf>'

Original File Name: CCMEC Comments on Mandatory Reporting Final Sept 19 2016.pdf

Date and Time Comment Was Submitted: 2016-09-19 12:25:35

No Duplicates.

## **Comment 11 for Mandatory Reporting of GHG Emissions (ghg2016) - 45 Day.**

First Name: Nicholas

Last Name: Martin

Email Address: nicholas.martin@saputo.com

Affiliation: Saputo Cheese USA Inc.

Subject: Comments of Saputo Cheese USA Inc. to Proposed Amendments to the MRR

Comment:

Please see attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/12-ghg2016-AXJRNI EgVnAAcgNs.pdf>

Original File Name: Saputo-Comments MRR (Sept 19 2016).pdf

Date and Time Comment Was Submitted: 2016-09-19 12:10:46

No Duplicates.

## **Comment 12 for Mandatory Reporting of GHG Emissions (ghg2016) - 45 Day.**

First Name: David

Last Name: Huck

Email Address: [david.huck@simplot.com](mailto:david.huck@simplot.com)

Affiliation: JR Simplot Company

Subject: Public Comments to CARB

Comment:

Please find attached public comments to the California Air Resources Board regarding the proposed amendments to the regulation for the mandatory reporting of greenhouse gas emissions. Please note a duplicate of these comments has also been submitted to CARB regarding the proposed changes to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulation.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/13-ghg2016-AmhTJwdZU3MAb1Q5.pdf>'

Original File Name: JR Simplot\_Public Comments\_MRR Ammendments.pdf

Date and Time Comment Was Submitted: 2016-09-19 13:24:36

No Duplicates.

## **Comment 13 for Mandatory Reporting of GHG Emissions (ghg2016) - 45 Day.**

First Name: Samantha  
Last Name: Engelage  
Email Address: Samantha.Engelage@CityofPaloAlto.org  
Affiliation: City of Palo Alto

Subject: Comments on the Proposed Amendments to the Regulation for the Mandatory Reporting of GHGs

Comment:

Dear California Air Resources Board,

The City of Palo Alto Regional Water Quality Control Plant (City of Palo Alto) appreciates the opportunity to comment on the proposed amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (17 CCR §95100 et seq.). In particular, the City of Palo Alto supports the effort in the proposed amendments to align this regulation with that of other jurisdictions with greenhouse gas (GHG) reporting programs. The City of Palo Alto recommends further action be taken within the proposed amendments to better align the California Air Resources Board's (CARB) GHG reporting regulation with that of the United States Environmental Protection Agency's (USEPA).

The City of Palo Alto treats wastewater collected from 220,000 residents of Palo Alto, Stanford University, Mountain View, Los Altos, Los Altos Hills, and the East Palo Alto Sanitary District. The City of Palo Alto treatment plant utilizes several stationary combustion sources that require facility reporting of GHG emissions under the existing Regulation for the Mandatory Reporting of Greenhouse Gas Emissions as well as reporting under the USEPA's Mandatory Greenhouse Gas Reporting regulation (40 CFR §98). Currently, the CARB GHG regulation utilizes global warming potentials and emission factors from 2009-2011 versions of the USEPA regulation; however, USEPA has since amended these values resulting in significantly different emission inventories for the same facility being reported to the two regulatory agencies. This discrepancy results in increased staff time for inventory compilation as well as confusion for those not directly involved in emission compilation and reporting such as elected officials, upper management, and interested public stakeholders.

&#8195;  
The proposed amendments to the CARB regulation seek to align global warming potential multipliers with that of the USEPA regulation by incorporating as reference Table A-1 to Subpart A of the Title 40 Code of Federal Regulations Part 98, as published to the CFR on 12/11/14. However, the proposed amendments do not currently seek to adopt the most recent USEPA emission factors resulting in facilities, such as the City of Palo Alto, still having significantly different emission inventories reported to the two different regulatory agencies. City of Palo Alto recommends that CARB also align emission factor multipliers with that of the USEPA regulation by incorporating as reference Tables C-1 and C-2 to Subpart C of the Title 40 Code of Federal Regulations Part 98, as

published to the CFR on 12/11/14.

Please do not hesitate to contact Samantha Engelage (Associate Engineer) at 650-329-2123, or by email (Samantha.Engelage@CityofPaloAlto.org) if you have any questions or require additional information concerning City of Palo Alto's comments.

Respectfully,  
Jamie S. Allen  
Regional Water Quality Control Plant  
City of Palo Alto

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/14-ghg2016-B3dUM1IMADAGb1A9.pdf>'

Original File Name: PA Comment Letter\_CARB MRR\_19SEP16.pdf

Date and Time Comment Was Submitted: 2016-09-19 14:25:59

No Duplicates.

**Comment 14 for Mandatory Reporting of GHG Emissions (ghg2016) - 45 Day.**

First Name: Nathan

Last Name: Bengtsson

Email Address: Nathan.Bengtsson@pge.com

Affiliation:

Subject: PG&E Comments on the 2016 Proposed MRR Amendments

Comment:

Comments attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/16-ghg2016-B3dUNV0DWW8CW1Mw.pdf>'

Original File Name: PG&E Comments - 2016 MRR Amendments.pdf

Date and Time Comment Was Submitted: 2016-09-19 14:54:50

No Duplicates.

## **Comment 15 for Mandatory Reporting of GHG Emissions (ghg2016) - 45 Day.**

First Name: Barbara  
Last Name: McBride  
Email Address: barbara.mcbride@calpine.com  
Affiliation: Calpine Corporation

Subject: Calpine's Comments on Proposed Amendments to Regulation for Mandatory Reporting  
Comment:

Please find attached Calpine's comments on the proposed amendments to the Regulation for the Mandatory Reporting of GHG Emissions, along with its comments on the proposed amendments to the Cap-and-Trade Regulation and proposed Clean Power Plan compliance plan. Thank you for the opportunity to submit these comments. Please contact me if you should have any questions regarding these comments.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/17-ghg2016-AGMHYFA9WHsLZAln.pdf>'

Original File Name: Calpine Comments on 2016 Cap-and-Trade Amendments, MRR Amendments and Proposed CPP Compliance Plan.pdf

Date and Time Comment Was Submitted: 2016-09-19 15:04:24

No Duplicates.

## **Comment 16 for Mandatory Reporting of GHG Emissions (ghg2016) - 45 Day.**

First Name: Janet

Last Name: Bell

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

Affiliation: Metropolitan Water District

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

Comment:

Per ARB staff's request, I am also submitting our comment letter to the MRR comments. One of the comments pertains to the verification deadline which is in the MRR regulation.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/18-ghg2016-WjxUOwBvBzUFbwJd.pdf>

Original File Name: Final\_CARB Letter dated 9-19-16 Proposed Amendments CA Greenhouse (2).pdf

Date and Time Comment Was Submitted: 2016-09-19 15:14:25

No Duplicates.

## **Comment 17 for Mandatory Reporting of GHG Emissions (ghg2016) - 45 Day.**

First Name: James

Last Name: Wintergreen

Email Address: jtw@firstenvironment.com

Affiliation: First Environment, Inc.

Subject: Comments regarding proposed revisions to the Mandatory Reporting Regulation

Comment:

First Environment offers the following comments regarding proposed revisions to the Mandatory Reporting Regulation.

Consistent with our previous comments on this issue, First Environment does not support revision of the verification deadline from September 1 to August 1 without further revisions to the regulation to facilitate meeting this earlier deadline. Changing the deadline without making appropriate changes to the MRR to facilitate meeting the deadline will potentially result in a less impartial and/or rigorous verification process, less accurate GHG reports submitted to ARB, and a higher risk of missing the verification deadline for reporters which could result in enforcement action.

If ARB changes the verification deadline from September 1 to August 1, First Environment proposes the following additional revisions to the regulation to facilitate successful verifications by the earlier date:

1. Relative to 95105, establish requirements for uploading specified supporting documentation to Cal eGGRT at the time the GHG report is submitted. We propose, at a minimum, that this documentation should include but not be limited to:
  - a. Statement on operational control and related entities
  - b. Electricity purchases/acquisition records
  - c. Natural gas purchases/acquisition records
  - d. Evidence of unit nameplate capacities
  - e. Air district permits
  - f. Internal meter calibration records
  - g. Gross and net generation data
  - h. Thermal energy generation data
  - i. Product data evidence
  - j. Records associated with any issue ARB defines as a high risk issue (e.g. contracts for biomass derived fuel)
  - k. Specified source contracts for EPEs
  - l. Specified source generation meter data for EPEs

The verification body should be provided access to these uploaded documents through Cal eGGRT when the reporter selects the verification body in Cal eGGRT to provide verification services.

2. Relative to 95105(c) and 95105(d), establish requirements for uploading these documents to Cal eGGRT, which will encourage reporters to prepare for and begin verification activities earlier.

We propose establishing a February 30 deadline for uploading these documents to Cal eGGRT.

3. Relative to 95131(a), establish a regulatory deadline for reporters for submission of the NOVS, which will encourage reporters to prepare for and begin verification activities earlier.

We propose a May 30 deadline for submission of NOVS.

4. Relative to 95131(b)(3), establish a regulatory deadline for

reporters for completion of verification site visits, which will encourage reporters to prepare for and begin verification activities earlier. We propose a June 30 deadline for completion of verification site visits.

5. Relative to 95131(c)(4), recognizing the proposed shortened verification period, reduce the notification and report correction period to five days.

6. Relative to 95133(e), establish a regulatory deadline for reporters for submission of the COI, which will encourage reporters to prepare for and begin verification activities earlier. We propose a May 1 deadline for submission of COI.

Without these revisions to the MRR, First Environment requests that the verification deadline remain September 1.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2016-09-19 15:23:01

No Duplicates.

## **Comment 18 for Mandatory Reporting of GHG Emissions (ghg2016) - 45 Day.**

First Name: Travis

Last Name: Ritchie

Email Address: travis.ritchie@sierraclub.org

Affiliation: Sierra Club

Subject: Sierra Club Comments on Greenhouse Gas Accounting in an Integrated Market  
Comment:

See attached comments.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/20-ghg2016-VSZUO1M3AiMKfgFg.pdf>'

Original File Name: Sierra Club Comments on GHG in Regional Market\_9-19-16.pdf

Date and Time Comment Was Submitted: 2016-09-19 15:27:46

No Duplicates.

**Comment 19 for Mandatory Reporting of GHG Emissions (ghg2016) - 45 Day.**

First Name: Clare

Last Name: Breidenich

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

Affiliation: Western Power Trading Forum

Subject: WPTF Comments on Proposed MRR Changes

Comment:

Attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/21-ghg2016-AThUf1ZmBG4LIFNi.pdf>'

Original File Name: 9-19-16 WPTF Comments on MRR.pdf

Date and Time Comment Was Submitted: 2016-09-19 15:41:49

No Duplicates.

## **Comment 20 for Mandatory Reporting of GHG Emissions (ghg2016) - 45 Day.**

First Name: Amy

Last Name: Mmagu

Email Address: amy.mmagu@calchamber.com

Affiliation:

Subject: Comments for the Mandatory Reporting of Greenhouse Gas Emissions

Comment:

Please see attached comments.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/22-ghg2016-AGNSNVc6WWkLZQZn.pdf>'

Original File Name: CalChamber MMR Comments 9-19-16 MS.pdf

Date and Time Comment Was Submitted: 2016-09-19 15:42:35

No Duplicates.

## **Comment 21 for Mandatory Reporting of GHG Emissions (ghg2016) - 45 Day.**

First Name: Ken

Last Name: Nold

Email Address: [krnold@tid.org](mailto:krnold@tid.org)

Affiliation:

Subject: TID Comments on the 2016 Proposed MRR Amendments

Comment:

Comments attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/23-ghg2016-USUBblA1UV0GbQFz.pdf>'

Original File Name: TID MRR Comments Final 9-19-16.pdf

Date and Time Comment Was Submitted: 2016-09-19 15:50:25

No Duplicates.

## **Comment 22 for Mandatory Reporting of GHG Emissions (ghg2016) - 45 Day.**

First Name: C.C.

Last Name: Song

Email Address: [csong@mccleanenergy.org](mailto:csong@mccleanenergy.org)

Affiliation: Marin Clean Energy

Subject: Comments of Community Choice Aggregators on RPS Adjustment

Comment:

The Community Choice Aggregators respectfully submit their comments in the attached PDF. Please don't hesitate to contact us if you have any questions.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/24-ghg2016-BjZdYl1xUTMGOVd6.pdf>'

Original File Name: 09-19-2016 CCA Comments on RPS Adjustment Elimination.pdf

Date and Time Comment Was Submitted: 2016-09-19 15:03:41

No Duplicates.

## **Comment 23 for Mandatory Reporting of GHG Emissions (ghg2016) - 45 Day.**

First Name: Rebecca

Last Name: Claassen

Email Address: rclaassen@fwwatch.org

Affiliation:

Subject: Comment on Proposed Amendments

Comment:

I respectfully submit the following comment to the Air Resources Board.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/25-ghg2016-AGYBbl0yV2UEblMM.pdf>'

Original File Name: Final Comment CA C&T Amendments ghg2016.pdf

Date and Time Comment Was Submitted: 2016-09-19 15:57:22

No Duplicates.

## **Comment 24 for Mandatory Reporting of GHG Emissions (ghg2016) - 45 Day.**

First Name: Adam

Last Name: Smith

Email Address: adam.smith@sce.com

Affiliation: SCE

Subject: Southern California Edison Comments

Comment:

Please find attached Southern California Edison's comments on the proposed changes to the Mandatory Reporting Rule.

Sincerely,

Adam R. Smith

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/26-ghg2016-BnUBaFUhBCMAblA1.pdf>'

Original File Name: Southern California Edison MRR comments.pdf

Date and Time Comment Was Submitted: 2016-09-19 16:22:02

No Duplicates.

## **Comment 25 for Mandatory Reporting of GHG Emissions (ghg2016) - 45 Day.**

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

Subject: CCEEB Comments RE: Potential 2016 Amendments to Mandatory Reporting  
Comment:

Attached is a comment letter from the California Council for Environmental and Economic Balance ("CCEEB") regarding Potential 2016 Amendments to Mandatory Reporting.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/27-ghg2016-WjlWM1A0WG4GYgRb.pdf>'

Original File Name: CCEEB Comment Letter RE Potential 2016 Amendments to Mandatory Reporting\_9-19.pdf

Date and Time Comment Was Submitted: 2016-09-19 15:44:24

No Duplicates.

## **Comment 26 for Mandatory Reporting of GHG Emissions (ghg2016) - 45 Day.**

First Name: Sarah

Last Name: Deslauriers

Email Address: sdeslauriers@carollo.com

Affiliation: CASA Climate Change Program

Subject: Comments on the Potential Amendments to the Regulation for the Mandatory Reporting of GHGs

Comment:

The California Association of Sanitation Agencies (CASA) appreciates the opportunity to comment on the Potential Amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions. CASA is an association of California wastewater agencies engaged in advancing the recycling of wastewater into usable water, maximizing beneficial use of biosolids, generating renewable energy, and producing other valuable resources.

We have three comments for your consideration related to:

- The potential consequence of changing the deadline for completing third party verification services from September 1 to August 1, 2018 for the 2017 reporting year and each year following (as noted in §95103(f) and (h));
- The alignment of the Reporting Regulation with Title 40 of the Code of Federal Regulations Part 98 (40 CFR Part 98); and
- Annual verification requirements under §95130(a).

Please see the attached comment letter providing the full set of comments for your review and consideration. Feel free to contact me if you have any questions at (925) 705-6404 or sdeslauriers@carollo.com.

Sincerely,  
Sarah A. Deslauriers  
Climate Change Program Manager, CASA

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/28-ghg2016-VjVSNQByUGIKbwJu.pdf>

Original File Name: CASAClimateChange\_FINAL MRR Comment Letter\_091916.pdf

Date and Time Comment Was Submitted: 2016-09-19 16:16:51

No Duplicates.

## **Comment 27 for Mandatory Reporting of GHG Emissions (ghg2016) - 45 Day.**

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

## **Comment 28 for Mandatory Reporting of GHG Emissions (ghg2016) - 45 Day.**

First Name: William

Last Name: Westerfield

Email Address: william.westerfield@smud.org

Affiliation: Sacramento Municipal Utility District

Subject: SMUD's Comments Regarding Proposed Amendments to Mandatory Reporting Regulations

Comment:

Attached are SMUD's comments Regarding Proposed Amendments to Mandatory Reporting Regulations.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/30-ghg2016-WjZTMFQyAg4FMgI0.pdf>

Original File Name: LEG 16-0593 SMUD MRR comments 9192016.pdf

Date and Time Comment Was Submitted: 2016-09-19 16:35:52

No Duplicates.

## **Comment 29 for Mandatory Reporting of GHG Emissions (ghg2016) - 45 Day.**

First Name: Diana

Last Name: Lee

Email Address: diana.lee@cpuc.ca.gov

Affiliation: Office of Ratepayer Advocates

Subject: ORA Comments on Proposed Amendments to GHG Regulation

Comment:

Please see the attached comments of the Office of Ratepayer Advocates on the Proposed Amendments to the California Cap on GHG Emissions and Market-based Compliance Mechanisms.

Thanks,  
Diana Lee

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/31-ghg2016-WzQBdVc3WVVQNQVq.pdf>'

Original File Name: ORA Comments CARB ProposedAmendRegulation 9.19.16.pdf

Date and Time Comment Was Submitted: 2016-09-19 16:31:07

No Duplicates.

## **Comment 30 for Mandatory Reporting of GHG Emissions (ghg2016) - 45 Day.**

First Name: Keith

Last Name: Adams

Email Address: adamskb@airproducts.com

Affiliation: Air Products and Chemicals

Subject: Comments on Proposed MRR Amendments

Comment:

Comments on Proposed MRR Amendments

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/32-ghg2016-WjsAbwBzBAgFcwFz.pdf>'

Original File Name: Air Products Comments - Proposed MRR amendments.pdf

Date and Time Comment Was Submitted: 2016-09-19 16:56:14

No Duplicates.

## **Comment 31 for Mandatory Reporting of GHG Emissions (ghg2016) - 45 Day.**

First Name: Cindy

Last Name: Parsons

Email Address: Cindy.Parsons@ladwp.com

Affiliation: LADWP

Subject: Comments on proposed amendments to the Mandatory Reporting Regulation

Comment:

Please see attached comments.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/33-ghg2016-WzdXMABIUHRSJFUK.pdf>'

Original File Name: LADWP comments on 2016 amendments to the MRR (submitted 09-19-16).pdf

Date and Time Comment Was Submitted: 2016-09-19 16:54:44

No Duplicates.

## **Comment 32 for Mandatory Reporting of GHG Emissions (ghg2016) - 45 Day.**

First Name: Joey

Last Name: Martinelli

Email Address: Non-web submitted comment

Affiliation: Western States Petroleum Association

Subject: WSPA comments AB 32 MRR Regulation Amendments

Comment:

See Attached

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/35-ghg2016-BnEBdFUkUWMDWgFi.pdf>'

Original File Name: WSPA comments AB 32 MRR Regulation Amendments.pdf

Date and Time Comment Was Submitted: 2016-09-20 14:35:37

No Duplicates.

## **Comment 33 for Mandatory Reporting of GHG Emissions (ghg2016) - 45 Day.**

First Name: Gary

Last Name: Soiseth

Email Address: kelsey.gowans@mid.org

Affiliation: Modesto Irrigation District

Subject: Modesto Irrigation District's Comments on the Cap-and-Trade and MRR

Comment:

Please see attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/82-capandtrade16-BmtRPlM2WFQGYwVk.zip>'

Original File Name: MID Cap-and-Trade Comments.zip

Date and Time Comment Was Submitted: 2016-09-19 16:12:10

No Duplicates.

## **Comment 34 for Mandatory Reporting of GHG Emissions (ghg2016) - 45 Day.**

First Name: Ellen

Last Name: Wolfe

Email Address: [ewolfe@resero.com](mailto:ewolfe@resero.com)

Affiliation: Resero Consulting

Subject: Valley Electric Association MRR Comments

Comment:

Please find attached Valley Electric Association's MRR comments.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/86-capandtrade16-AHZTMFY2UFwGbQBy.pdf>

Original File Name: VEA MRR Comments-Final.pdf

Date and Time Comment Was Submitted: 2016-09-19 16:40:29

No Duplicates.

## **Comment 35 for Mandatory Reporting of GHG Emissions (ghg2016) - 45 Day.**

First Name: Todd

Last Name: Jones

Email Address: Non-web submitted comment

Affiliation:

Subject: Proposed Amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas

Comment:

Late Comment. See Attached

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/88-ghg2016-UTIAdAd1U2NSOwlk.pdf>'

Original File Name: CRSCommentMRR\_4-28-2017.pdf

Date and Time Comment Was Submitted: 2017-05-05 16:21:54

No Duplicates.

**Comment 1 for Mandatory Reporting of GHG Emissions (ghg2016). (At Hearing)**

First Name: Tim

Last Name: Carmichael

Email Address: Non-web submitted comment

Affiliation: SoCal Gas

Subject: Comments on Proposed Amendments to the Reg for the Mandatory Reporting of GHG

Comment:

See Attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/39-ghg2016-UGECMIZ6VzwLIAg7.pdf>

Original File Name: 16-8-3 Tim Carmichael.pdf

Date and Time Comment Was Submitted: 2016-09-28 14:12:16

No Duplicates.

**Comment 2 for Mandatory Reporting of GHG Emissions (ghg2016). (At Hearing)**

First Name: Shelly  
Last Name: Sullivan  
Email Address: Non-web submitted comment  
Affiliation: CCPC

Subject: CARB's Proposed Amendments to the Mandatory Reporting of GHG  
Comment:

See Attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/42-ghg2016-WmsGNIZ6VT4KIQQ3.pdf>

Original File Name: 16-8-3 Shelly Sullivan.pdf

Date and Time Comment Was Submitted: 2016-09-28 14:12:16

No Duplicates.

**Comment 3 for Mandatory Reporting of GHG Emissions (ghg2016). (At Hearing)**

First Name: Susie

Last Name: Berlin

Email Address: Non-web submitted comment

Affiliation: MSR Public Power Agency

Subject: Comments on Proposed Amendments to Mandatory Reporting Reg

Comment:

See Attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/43-ghg2016-BjdTYwEtUDsBKldk.pdf>

Original File Name: 16-8-3 Susie Berlin.pdf

Date and Time Comment Was Submitted: 2016-09-28 14:12:16

No Duplicates.

**Comment 4 for Mandatory Reporting of GHG Emissions (ghg2016). (At Hearing)**

First Name: WSPA

Last Name: Western States Petro

Email Address: Non-web submitted comment

Affiliation:

Subject: Enclosure A

Comment:

See Attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/107-capandtrade16-VWRRYVR4VzxQewMw.pdf>

Original File Name: 16-8-3 WSPA.pdf

Date and Time Comment Was Submitted: 2016-09-28 14:49:41

No Duplicates.

## **Comment 1 for Mandatory Reporting of GHG Emissions (ghg2016) - 15-1.**

First Name: JOHN

Last Name: SAVAGE

Email Address: johntsavage@gmail.com

Affiliation:

Subject: GWP of Short-Lived Pollutants

Comment:

Despite its long-standing leadership on climate, one important area where ARB's climate policies have lagged behind both US federal and global standards is in regard to its use of outdated GWP's for short-lived pollutants.

Now, despite its proposed changes to update some of these GWP's, ARB will continue to be a laggard in this area, which is disappointing given the increasing importance scientists are placing on short-lived pollutants in the overall climate change picture.

By the time ARB implements its proposed changes, the EPA and UNFCCC may well have moved to, at minimum, the AR5. It seems like ARB will always be out of lockstep with national and international reporting when that really shouldn't be the case. California should continue to lead, not lag.

Please consider using the most current GWPs going forward rather than continuing to lag behind the rest of the world in this important area.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2017-01-04 13:36:21

No Duplicates.

## **Comment 2 for Mandatory Reporting of GHG Emissions (ghg2016) - 15-1.**

First Name: Badia

Last Name: Harrell

Email Address: bharrell@cityofpasadena.net

Affiliation: Pasadena Water and Power

Subject: Pasadena Comments on 2016 15 day Proposed Amendment to the MRR

Comment:

Please see attached document.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/48-ghg2016-UiJTNFQmUmBSMANm.pdf>

Original File Name: Pasadena Water and Power Comments on 15day proposed Cap and Trade\_Mandatory Reporting Regulation Amendments.pdf

Date and Time Comment Was Submitted: 2017-01-19 14:33:43

No Duplicates.

### **Comment 3 for Mandatory Reporting of GHG Emissions (ghg2016) - 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 15 day MRR amendments

Comment:

Thank you,  
Clare Breidenich

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/49-ghg2016-W2oAK1NgAGMLIAQ1.pdf>

Original File Name: 1-20-17 WPTF on 15 day MRR.pdf

Date and Time Comment Was Submitted: 2017-01-20 03:52:02

No Duplicates.

## **Comment 4 for Mandatory Reporting of GHG Emissions (ghg2016) - 15-1.**

First Name: Adrianna

Last Name: Kripke

Email Address: AKripke@semprautilities.com

Affiliation:

Subject: Utility Recommendations-Implementation RPS-Cap and Trade

Comment:

Attached are Joint Utility Recommendations to Improve Implementation of the Renewable Portfolio Standard Adjustment Under the Cap-and-Trade Program.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/50-ghg2016-UzkCZQNsUnQKbVMh.pdf>

Original File Name: January 2017 Utility Comments re RPS Adjustment.pdf

Date and Time Comment Was Submitted: 2017-01-20 07:34:30

No Duplicates.

## **Comment 5 for Mandatory Reporting of GHG Emissions (ghg2016) - 15-1.**

First Name: Brian

Last Name: Pickard

Email Address: Brian.Pickard@dbr.com

Affiliation: Drinker, Biddle, & Reath LLP

Subject: Further Comments of AmeriGas Propane, L.P. to Proposed Amendments to the MRR  
Comment:

On behalf of AmeriGas Propane, L.P., Drinker, Biddle & Reath LLP submits the attached comments to the modifications to 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/51-ghg2016-B2FcL1UmUHcBbwdi.pdf>

Original File Name: Further Comments of AmeriGas to Proposed MRR Amendments.pdf

Date and Time Comment Was Submitted: 2017-01-20 10:19:18

No Duplicates.

## **Comment 6 for Mandatory Reporting of GHG Emissions (ghg2016) - 15-1.**

First Name: Ellen

Last Name: Wolfe

Email Address: [ewolfe@resero.com](mailto:ewolfe@resero.com)

Affiliation: Resero Consulting

Subject: Valley Electric Association MRR 15-day comments

Comment:

Please find VEA's MRR comments in the attached file.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/52-ghg2016-UScAY1U1UV1QO1Qm.pdf>

Original File Name: VEA MRR 15-day comments 01 20 17.pdf

Date and Time Comment Was Submitted: 2017-01-20 10:32:49

No Duplicates.

## **Comment 7 for Mandatory Reporting of GHG Emissions (ghg2016) - 15-1.**

First Name: Shelly

Last Name: Sullivan

Email Address: ssullivan@onemain.com

Affiliation: Climate Change Policy Coalition

Subject: CCPC Comments on the Proposed MRR Amendments

Comment:

Attached please find comments submitted on behalf of the Climate Change Policy Coalition regarding the ARB staff report on the Mandatory Reporting Regulation amendments released on December 21, 2016.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/53-ghg2016-Am9TJwFyBwtXYAVa.pdf>

Original File Name: MRR\_1\_20\_17.pdf

Date and Time Comment Was Submitted: 2017-01-20 11:36:38

No Duplicates.

## Comment 8 for Mandatory Reporting of GHG Emissions (ghg2016) - 15-1.

First Name: Jay

Last Name: Wintergreen

Email Address: jtw@firstenvironment.com

Affiliation: First Environment, Inc.

Subject: Comments on proposed MRR revisions

Comment:

First Environment offers the following comments regarding proposed revisions to Mandatory Reporting Regulation.

Consistent with our previous comments on this issue, First Environment does not support revision of the verification deadline from September 1 to August 1 without further revisions to the regulation to facilitate meeting this earlier deadline. Changing the deadline without making appropriate changes to the MRR to facilitate meeting the deadline will potentially result in a less impartial and/or rigorous verification process, less accurate GHG reports submitted to ARB, and a higher risk of missing the verification deadline for reporters which could result in enforcement action.

If ARB changes the verification deadline from September 1 to August 1, First Environment proposes the following additional revisions to the regulation to facilitate successful verifications by the earlier date:

1. Relative to 95105, establish requirements for uploading specified supporting documentation to Cal eGGRT at the time the GHG report is submitted. We propose, at a minimum, that this documentation should include but not be limited to:
  - a. Statement on operational control and related entities
  - b. Electricity purchases/acquisition records
  - c. Natural gas purchases/acquisition records
  - d. Evidence of unit nameplate capacities
  - e. Air district permits
  - f. Internal meter calibration records
  - g. Gross and net generation data
  - h. Thermal energy generation data
  - i. Product data evidence
  - j. Records associated with any issue ARB defines as a high risk issue (e.g. contracts for biomass derived fuel)
  - k. Specified source contracts for EPEs
  - l. Specified source generation meter data for EPEs

The verification body should be provided access to these uploaded documents through Cal eGGRT when the reporter selects the verification body in Cal eGGRT to provide verification services.

2. Relative to 95105(c) and 95105(d), establish requirements for uploading these documents to Cal eGGRT, which will encourage reporters to prepare for and begin verification activities earlier.

We propose establishing a February 30 deadline for uploading these documents to Cal eGGRT.

3. Relative to 95131(a), establish a regulatory deadline for reporters for submission of the NOVS, which will encourage reporters to prepare for and begin verification activities earlier.

We propose a May 30 deadline for submission of NOVS.

4. Relative to 95131(b)(3), establish a regulatory deadline for

reporters for completion of verification site visits, which will encourage reporters to prepare for and begin verification activities earlier. We propose a June 30 deadline for completion of verification site visits.

5. Relative to 95131(c)(4), recognizing the proposed shortened verification period, reduce the notification and report correction period to five days.

6. Relative to 95133(e), establish a regulatory deadline for reporters for submission of the COI, which will encourage reporters to prepare for and begin verification activities earlier. We propose a May 1 deadline for submission of COI.

Without these revisions to the MRR, First Environment requests that the verification deadline remain September 1.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2017-01-20 13:32:23

No Duplicates.

## **Comment 9 for Mandatory Reporting of GHG Emissions (ghg2016) - 15-1.**

First Name: Barbara

Last Name: McBride

Email Address: [barbara.mcbride@calpine.com](mailto:barbara.mcbride@calpine.com)

Affiliation: Calpine Corporation

Subject: Calpine's Comments on 15-Day Changes to MRR

Comment:

Please see the attached comments of Calpine Corporation on the 15-day changes to the proposed amendments to the Mandatory Reporting Regulation. Thank you for the opportunity to submit this comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/55-ghg2016-VjVWMVU4UHNQP1M9.pdf>

Original File Name: Calpine Comments on 15-Day Changes to CT and MRR.pdf

Date and Time Comment Was Submitted: 2017-01-20 13:36:18

No Duplicates.

## **Comment 10 for Mandatory Reporting of GHG Emissions (ghg2016) - 15-1.**

First Name: Mary

Last Name: Wiencke

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

Affiliation: PacifiCorp

Subject: PacifiCorp Comments

Comment:

Please find attached PacifiCorp comments on proposed amendments to the cap-and-trade program and MRR.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/56-ghg2016-AHBVMIiwU2kBYYA5.pdf>

Original File Name: PacifiCorp\_ARB\_December 21 Amendments Comments\_012017.pdf

Date and Time Comment Was Submitted: 2017-01-20 13:50:42

No Duplicates.

## **Comment 11 for Mandatory Reporting of GHG Emissions (ghg2016) - 15-1.**

First Name: Mary

Last Name: Wiencke

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

Affiliation:

Subject: Joint Comments of the EIM Entities

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/57-ghg2016-AWQCbVQ4VFhVNII8.pdf>

Original File Name: EIM Entity Comments\_ARB December 21 Amendments\_012017.pdf

Date and Time Comment Was Submitted: 2017-01-20 14:48:12

No Duplicates.

## **Comment 12 for Mandatory Reporting of GHG Emissions (ghg2016) - 15-1.**

First Name: Andrew  
Last Name: Ulmer  
Email Address: aulmer@caiso.com  
Affiliation: California ISO

Subject: ISO Comments on ARB's 15 Day Notices

Comment:

Attached please find the California ISO's comment son ARB's 15 Day Notices.

Andrew Ulmer  
Director, Federal Regulatory Affairs  
California Independent System Operator Corp.  
Tel. 916.608.7209  
Cell. 916.673.7797

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/58-ghg2016-UjtRJAzoUV0DZIM8.pdf>

Original File Name: ISO Comments on ARB 15 Day Notices\_20170120.pdf

Date and Time Comment Was Submitted: 2017-01-20 14:48:34

No Duplicates.

## **Comment 13 for Mandatory Reporting of GHG Emissions (ghg2016) - 15-1.**

First Name: Sarah

Last Name: Taheri

Email Address: [staheri@scppa.org](mailto:staheri@scppa.org)

Affiliation: Southern Calif. Public Power Authority

Subject: SCPPA Comments on Mandatory Reporting Regulation 15-Day Language

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/59-ghg2016-BzdQZwYqBGUHMQUo.pdf>

Original File Name: 01-20-2017 SCPPA Comments on Cap-and-Trade Proposed Regulation final.pdf

Date and Time Comment Was Submitted: 2017-01-20 15:08:32

No Duplicates.

## **Comment 14 for Mandatory Reporting of GHG Emissions (ghg2016) - 15-1.**

First Name: Adrianna

Last Name: Kripke

Email Address: AKripke@semprautilities.com

Affiliation:

Subject: Utility Recommendations-Implementation RPS-MRR

Comment:

Attached are Utility Recommendations to Improve Implementation of the Renewable Portfolio Standard Adjustment Under the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions and Cap-and-Trade Program.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/60-ghg2016-UWMBNwAwVTELPVVk.pdf>

Original File Name: 20170120-MRR Utility Comments re RPS Adjustment.pdf

Date and Time Comment Was Submitted: 2017-01-20 15:31:29

No Duplicates.

## **Comment 15 for Mandatory Reporting of GHG Emissions (ghg2016) - 15-1.**

First Name: Tim

Last Name: Carmichael

Email Address: TCarmichael@semprautilities.com

Affiliation:

Subject: SDG&E CARB MRR Comments

Comment:

Attached are comments from San Diego Gas & Electric Company on the 15-Day Mandatory Reporting Regulation Changes to the Cap-and-Trade Regulation.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/61-ghg2016-USIFZ1YwBAhSMVIN.pdf>

Original File Name: SDG&E CARB MRR-comments-1-20-17.pdf

Date and Time Comment Was Submitted: 2017-01-20 15:40:22

No Duplicates.

## **Comment 16 for Mandatory Reporting of GHG Emissions (ghg2016) - 15-1.**

First Name: Amy

Last Name: Mmagu

Email Address: amy.mmagu@calchamber.com

Affiliation:

Subject: Comments on the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions

Comment:

Please see attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/62-ghg2016-WzgCZVM+UmJRPwZn.pdf>

Original File Name: CalChamber Mandatory Reporting Comments 1-20-17 MS.pdf

Date and Time Comment Was Submitted: 2017-01-20 15:51:18

No Duplicates.

## **Comment 17 for Mandatory Reporting of GHG Emissions (ghg2016) - 15-1.**

First Name: Ken

Last Name: Nold

Email Address: [krnold@tid.org](mailto:krnold@tid.org)

Affiliation:

Subject: TID Comments on the 2016 Proposed MRR Amendments

Comment:

TID Comments on the 2016 Proposed MRR Amendments

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/63-ghg2016-VmdSY1xtWDpWYVBn.docx>

Original File Name: 170117\_TID MRR Comments.docx

Date and Time Comment Was Submitted: 2017-01-20 15:54:55

No Duplicates.

## **Comment 18 for Mandatory Reporting of GHG Emissions (ghg2016) - 15-1.**

First Name: Nathan

Last Name: Bengtsson

Email Address: NXBZ@pge.com

Affiliation:

Subject: PG&E Comments on MRR Amendment 15-Day Revisions

Comment:

Please find PG&E's comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/64-ghg2016-BnZSMwNnAAwDZgRr.pdf>

Original File Name: PGE Comments on MRR Amendment 15 Day Revisions.pdf

Date and Time Comment Was Submitted: 2017-01-20 16:03:28

No Duplicates.

## **Comment 19 for Mandatory Reporting of GHG Emissions (ghg2016) - 15-1.**

First Name: William  
Last Name: Westerfield  
Email Address: william.westerfield@smud.org  
Affiliation: Sacramento Municipal Utility District

Subject: SMUD's Comments Re: Proposed Amendments to the Mandatory Reporting of GHG Emissions (MRR)

Comment:

SMUD's Comments Re: Proposed Amendments to the Mandatory Reporting of GHG Emissions (MRR).

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/65-ghg2016-VjpSMQNIWFRRZQAw.pdf>

Original File Name: LEG 2017-0027 SMUD Comments Re Proposed Amendments to the Mandatory GHG Emissions.pdf

Date and Time Comment Was Submitted: 2017-01-20 16:17:50

No Duplicates.

## **Comment 20 for Mandatory Reporting of GHG Emissions (ghg2016) - 15-1.**

First Name: Nico

Last Name: van Aelstyn

Email Address: nvanaelstyn@bdlaw.com

Affiliation:

Subject: Powerex Comments on 15-Day Proposed Amendments

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/66-ghg2016-VWdQZgc3UjZWfVJi.pdf>

Original File Name: 2017-01-20 Powerex Comments on CARB Proposed 15-Day Amendments.PDF

Date and Time Comment Was Submitted: 2017-01-20 16:29:31

No Duplicates.

## **Comment 21 for Mandatory Reporting of GHG Emissions (ghg2016) - 15-1.**

First Name: Justin

Last Name: Wynne

Email Address: [wynne@braunlegal.com](mailto:wynne@braunlegal.com)

Affiliation: California Muni. Utilities Association

Subject: CMUA Comments on Proposed 15-Day Modifications

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/67-ghg2016-VzRVPlQgADJWDwBj.pdf>

Original File Name: CMUA Comments on Cap and Trade and MRR 15 Day Language 1\_20\_17.pdf

Date and Time Comment Was Submitted: 2017-01-20 16:42:59

No Duplicates.

## **Comment 22 for Mandatory Reporting of GHG Emissions (ghg2016) - 15-1.**

First Name: Diana

Last Name: Lee

Email Address: diana.lee@cpuc.ca.gov

Affiliation: CPUC/ORA

Subject: ORA Comments on Proposed Amendments re Mandatory Reporting of GHG Emissions  
Comment:

Please see that attached comments of ORA on mandatory reporting of GHG emissions

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/68-ghg2016-VTpRJQFhUGAHbgBt.pdf>

Original File Name: ORAComments CARBProposed Amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions 1.20.17 FINAL.pdf

Date and Time Comment Was Submitted: 2017-01-20 16:48:48

No Duplicates.

## **Comment 23 for Mandatory Reporting of GHG Emissions (ghg2016) - 15-1.**

First Name: Cindy

Last Name: Parsons

Email Address: cindy.parsons@ladwp.com

Affiliation: LADWP

Subject: Comments on MRR amendments

Comment:

See attached comments

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/69-ghg2016-BmpQNwRhWHwAdlcI.pdf>

Original File Name: LADWP Comments on MRR amendments (01-20-2017).pdf

Date and Time Comment Was Submitted: 2017-01-20 16:50:22

No Duplicates.

## **Comment 24 for Mandatory Reporting of GHG Emissions (ghg2016) - 15-1.**

First Name: Catherine  
Last Name: Reheis-Boyd  
Email Address: Non-web submitted comment  
Affiliation: WSPA

Subject: WSPA comments ARB's 15-day AB 32 MRR Regulation Amendments Modification  
Comment:

Late Comment.  
See Attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/70-ghg2016-AnUFcFIjWWtQCQJh.pdf>

Original File Name: WSPA Comment Letter\_ AB 32 MRR\_01\_20\_2016\_final.pdf

Date and Time Comment Was Submitted: 2017-02-01 08:46:14

No Duplicates.

## **Comment 1 for Mandatory Reporting of GHG Emissions (ghg2016) - 15-2.**

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

Subject: WSPA comments ARB's 2nd 15-day AB 32 MRR Regulation Amendment Modifications

Comment:

Please see attached WSPA comments ARB's 2nd 15-day AB 32 MRR Regulation Amendment Modifications. Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/72-ghg2016-BXJQJQZ3BzUFXFMw.pdf>

Original File Name: WSPA Comment Letter\_ AB 32 MRR\_04\_27\_2017\_posted.pdf

Date and Time Comment Was Submitted: 2017-04-27 14:44:43

No Duplicates.

## **Comment 2 for Mandatory Reporting of GHG Emissions (ghg2016) - 15-2.**

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

### **Comment 3 for Mandatory Reporting of GHG Emissions (ghg2016) - 15-2.**

First Name: Sarah

Last Name: Taheri

Email Address: [staheri@scppa.org](mailto:staheri@scppa.org)

Affiliation: Southern Calif. Public Power Authority

Subject: SCPPA Comments on the Second 15-Day Modifications to Mandatory GHG Reporting Regulations

Comment:

Please see the attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/74-ghg2016-UCMGY1UkAiFQNwZZ.pdf>

Original File Name: SCPPA Comments on MRR Second 15-Day Amendments 04-28-2017\_Final.pdf

Date and Time Comment Was Submitted: 2017-04-27 17:19:30

No Duplicates.

## **Comment 4 for Mandatory Reporting of GHG Emissions (ghg2016) - 15-2.**

First Name: Melissa

Last Name: Poole

Email Address: melissa.poole@wonderful.com

Affiliation: The Wonderful Company

Subject: Wonderful Company Comments on April 2017 Proposed Amendments to MRR

Comment:

Please see attached comments on the proposed amendments to the regulatory text for the Mandatory Reporting of Greenhouse Gas Emissions.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/75-ghg2016-Wy9TIgBiWFQHbANx.pdf>

Original File Name: TWC MRR Comments 4\_28\_17.pdf

Date and Time Comment Was Submitted: 2017-04-28 08:59:39

No Duplicates.

## **Comment 5 for Mandatory Reporting of GHG Emissions (ghg2016) - 15-2.**

First Name: Andrew  
Last Name: Ulmer  
Email Address: aulmer@caiso.com  
Affiliation: California ISO

Subject: California ISO comments on 15 Day Notice Mandatory Reporting Regulation  
Comment:

Please find attached comments of the California ISO on ARB's 15 day notice of changes. This version replaces the version submitted yesterday that had an incorrect date. Kindly discard that submission.

Thank you in advance for your consideration.

Andrew

Andrew Ulmer  
Director, Federal Regulatory Affairs  
California Independent System Operator Corp.  
Tel. 916.608.7209  
Cell. 916.673.7797

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/76-ghg2016-UTJRNgNwADFXDlcl.pdf>

Original File Name: CARB\_Regulations\_Comments\_20170428.pdf

Date and Time Comment Was Submitted: 2017-04-28 09:07:00

No Duplicates.

## **Comment 6 for Mandatory Reporting of GHG Emissions (ghg2016) - 15-2.**

First Name: Brian

Last Name: Pickard

Email Address: Brian.Pickard@dbr.com

Affiliation: Drinker, Biddle, & Reath LLP

Subject: Additional Comments of AmeriGas Propane, L.P. to Proposed Amendments to the MRR

Comment:

On behalf of AmeriGas Propane, L.P., Drinker, Biddle & Reath LLP submits the attached comments to the Proposed Second 15-Day Modifications to 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/77-ghg2016-VDVNV104WWMEdlc+.pdf>

Original File Name: Additional Comments of AmeriGas to Proposed MRR Amendments.pdf

Date and Time Comment Was Submitted: 2017-04-28 11:41:14

No Duplicates.

## **Comment 7 for Mandatory Reporting of GHG Emissions (ghg2016) - 15-2.**

First Name: Douglas  
Last Name: Findley  
Email Address: dwfindley@landolakes.com  
Affiliation: LOL Environment Engineer

Subject: Land O'Lakes-ARB MRR 2nd 15-Day Comment Letter v1.0

Comment:

RE: PROPOSED AMENDMENTS TO THE REGULATION FOR THE MANDATORY REPORTING OF GREENHOUSE GAS EMISSIONS (Second 15-day Modifications)

Land O'Lakes, Inc ("Land O'Lakes"), on behalf of its dairy production facility in Tulare, California, appreciates the opportunity to provide comments to the California Air Resources Board ("ARB") in regards to the proposed second 15-day modifications to proposed amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions ("Proposed Modification"), which is posted on April 13, 2017 on ARB's website.

In general, Land O'Lakes would like to express genuine gratitude and appreciation to ARB staff for taking the comment of industry into consideration during this rule-making process. Although Land O'Lakes agrees with most of proposed modifications related to Dairy Product industry, we have a serious concern regarding the proposed changes to move the deadline to complete verification of the annual greenhouse (GHG) emission data reports earlier by approximately 22 calendar days from September 1 to August 10 each year.

Land O'Lakes is opposed to the proposed modification to the verification deadline because it will result in less amount of time available for reporting and verification entities to work together to complete the verification process. We sense that ARB is likely not taking into consideration other day-to-day compliance and other regulatory work activities that the reporting industry staff and verifiers perform while handling the verification project each year. The proposed earlier deadline will cause additional pressure and burden to both parties and may lead to a compromise in the data and verification work quality. As such, Land O'Lakes respectfully request that ARB leave the September 1 verification date, as stated in the current versions of the regulation.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/78-ghg2016-UmMAMVVkUzRWYgY+.pdf>

Original File Name: 170428 LOL-ARB MRR 2nd 15-Day Comment Letter v1.0.pdf

Date and Time Comment Was Submitted: 2017-04-28 12:40:31

No Duplicates.

## **Comment 8 for Mandatory Reporting of GHG Emissions (ghg2016) - 15-2.**

First Name: Keith

Last Name: Adams

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

Affiliation: Air Products and Chemicals, Inc.

Subject: Comments regarding Second Proposed 15-Day Modifications to the MRR

Comment:

Air Products comments regarding Second Proposed 15-Day Modifications to the MRR

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/79-ghg2016-UjMABwZ1BwtWIFQm.pdf>

Original File Name: Air Products Comments - Proposed MRR amendments - April 28 2017.pdf

Date and Time Comment Was Submitted: 2017-04-28 13:37:14

No Duplicates.

## **Comment 9 for Mandatory Reporting of GHG Emissions (ghg2016) - 15-2.**

First Name: Amy

Last Name: Mmagu

Email Address: amy.mmagu@calchamber.com

Affiliation:

Subject: Comments on the amendments to the Regulation for the Mandatory Reporting of GHG  
Comment:

Please see attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/80-ghg2016-AjZQeFRnUzgKIgc2.pdf>

Original File Name: 4.28.17 MRR Comments.pdf

Date and Time Comment Was Submitted: 2017-04-28 14:28:13

No Duplicates.

## **Comment 10 for Mandatory Reporting of GHG Emissions (ghg2016) - 15-2.**

First Name: John

Last Name: Larrea

Email Address: john@clfp.com

Affiliation: CA League of Food Processors

Subject: CLFP Comments on 15-day proposed amends to MRR

Comment:

CLFP MRR Comments

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/81-ghg2016-VjVWPFcwU3ABWFc0.pdf>

Original File Name: CLFP Comments on Proposed Amends to MRR Regulation.pdf

Date and Time Comment Was Submitted: 2017-04-28 14:28:00

No Duplicates.

## **Comment 11 for Mandatory Reporting of GHG Emissions (ghg2016) - 15-2.**

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

Subject: CCEEB MRR April 15-Day Comments

Comment:

Attached is a comment letter from the California Council for Environmental and Economic Balance.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/82-ghg2016-UzBRNFE1BMLbwdY.pdf>

Original File Name: CCEEB MRR April 15-Day Comments\_4-28.pdf

Date and Time Comment Was Submitted: 2017-04-28 14:27:28

No Duplicates.

## **Comment 12 for Mandatory Reporting of GHG Emissions (ghg2016) - 15-2.**

First Name: Cindy

Last Name: Parsons

Email Address: cindy.parsons@ladwp.com

Affiliation: LADWP

Subject: LADWP comments on 2nd 15-day changes to MRR

Comment:

see attached comments

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/83-ghg2016-WjZRNII3AiYCdAdY.pdf>

Original File Name: LADWP comments on 2nd 15-day changes to the MRR (04-28-17).pdf

Date and Time Comment Was Submitted: 2017-04-28 14:54:46

No Duplicates.

## **Comment 13 for Mandatory Reporting of GHG Emissions (ghg2016) - 15-2.**

First Name: Nathan

Last Name: Bengtsson

Email Address: NXBZ@pge.com

Affiliation:

Subject: PG&E Comments on the April 2017 MRR 15-Day Text

Comment:

PG&E's comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/84-ghg2016- VTNXOARrBDZROwVa.pdf>

Original File Name: FINAL - PGE Comments on April 2017 15-Day MRR 4.28.17.pdf

Date and Time Comment Was Submitted: 2017-04-28 15:30:54

No Duplicates.

## **Comment 14 for Mandatory Reporting of GHG Emissions (ghg2016) - 15-2.**

First Name: William

Last Name: Westerfield

Email Address: william.westerfield@smud.org

Affiliation:

Subject: SMUD Comments Regarding Proposed Amendments to the Mandatory Reporting of GHG Emissions

Comment:

SMUD Comments Regarding Proposed Amendments to the Mandatory Reporting of GHG Emissions.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/85-ghg2016-Uz8GZQRiUl4DNwAw.pdf>

Original File Name: LEG 2017-0213 SMUD Comments Re Proposed Amendments to the Mandatory Reporting of GHG Emissions.pdf

Date and Time Comment Was Submitted: 2017-04-28 16:19:38

No Duplicates.

## **Comment 15 for Mandatory Reporting of GHG Emissions (ghg2016) - 15-2.**

First Name: Charles

Last Name: Lee

Email Address: [clee@trinityconsultants.com](mailto:clee@trinityconsultants.com)

Affiliation: Trinity Consultants, Inc.

Subject: Trinity Comments on Mandatory Reporting Regulation Second 15-Day Modification

Language

Comment:

Please see attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/86-ghg2016-AnYGcl01BTgFagh8.pdf>

Original File Name: Trinity Comments to 2nd 15-Day Modification Language\_04.28.17.pdf

Date and Time Comment Was Submitted: 2017-04-28 16:30:55

No Duplicates.

## **Comment 16 for Mandatory Reporting of GHG Emissions (ghg2016) - 15-2.**

First Name: Martin

Last Name: Hopper

Email Address: admin@susieberlinlaw.com

Affiliation: M-S-R Public Power Agency

Subject: M-S-R Comments re second 15-Day Changes

Comment:

M-S-R Public Power Agency comments on second 15-day changes.  
thank you

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/87-ghg2016-Uz5SeVwuUS8KfgFe.pdf>

Original File Name: M-S-R comments re MRR 2d 15-day changes (final 4-28-17).pdf

Date and Time Comment Was Submitted: 2017-04-28 16:43:12

No Duplicates.