# **Comment 1 for 2016 Amendments to the Clean Power Plan Compliance Effort (111dcompliance-ws) - 1st Workshop.**

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

# **Comment 2 for 2016 Amendments to the Clean Power Plan Compliance Effort (111dcompliance-ws) - 1st Workshop.**

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

# **Comment 3 for 2016 Amendments to the Clean Power Plan Compliance Effort (111dcompliance-ws) - 1st Workshop.**

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

Subject: Public Workshop on Potential 2016 Amendments to the Cap-and-Trade Regulation and Californi Comment:

Attached are the comments of the California ISO.

Attachment: www.arb.ca.gov/lists/com-attach/3-111dcompliance-ws-UzACZVY7BD5SMgVq.pdf

Original File Name: California ISO Comments\_Public Workshop on Cap and Trade and CPP.pdf

Date and Time Comment Was Submitted: 2015-10-19 13:13:09

#### **Comment 4 for 2016 Amendments to the Clean Power Plan Compliance Effort (111dcompliance-ws) - 1st Workshop.**

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

Subject: SCPPA Comments on EPA Clean Power Plan Implementation Comment:

Attached are comments of the Southern California Public Power Authority on implementation of the federal Clean Power Plan.

Attachment: www.arb.ca.gov/lists/com-attach/4-111dcompliance-ws-UiEAZVAhVnVVMlcI.pdf

Original File Name: SCPPA Comments for ARB Clean Power Plan Design.pdf

Date and Time Comment Was Submitted: 2015-10-19 14:28:51

## **Comment 5 for 2016 Amendments to the Clean Power Plan Compliance Effort (111dcompliance-ws) - 1st Workshop.**

First Name: Tamara Last Name: Rasberry Email Address: trasberry@semprautilities.com Affiliation:

Subject: Oct 2 Workshop on EPA Clean Power Plan Comment:

Attached are comments filed on behalf of San Diego Gas and Electric.

Attachment: www.arb.ca.gov/lists/com-attach/6-111dcompliance-ws-UiEBY1UzUWcEXQVm.pdf

Original File Name: SDGE Comments\_ARB Oct 2 Workshop on EPA Clean Power Plan.pdf

Date and Time Comment Was Submitted: 2015-10-19 16:31:25

#### **Comment 6 for 2016 Amendments to the Clean Power Plan Compliance Effort (111dcompliance-ws) - 1st Workshop.**

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

Subject: Calpine Comments on Section 111(d) Compliance and Cap-and-Trade Regulation Comment:

Please find attached the comments of Calpine Corporation on the California Air Resources Board's workshop regarding the Clean Power Plan compliance and accompanying discussion paper.

Attachment: www.arb.ca.gov/lists/com-attach/7-111dcompliance-ws-UTJUMwBtUnFQPwRq.pdf

Original File Name: Calpine Comments on Section 111(d) Compliance and Cap-and-Trade Amendments.pdf

Date and Time Comment Was Submitted: 2015-10-19 16:34:01

#### **Comment 7 for 2016 Amendments to the Clean Power Plan Compliance Effort (111dcompliance-ws) - 1st Workshop.**

First Name: Cindy Last Name: Parsons Email Address: cindy.parsons@ladwp.com Affiliation: LADWP

Subject: LADWP's Comments on CARB CPP Discussion Paper Comment:

Attached are LADWP's comments on CARB's Clean Power Plan Compliance Discussion Paper.

Attachment: www.arb.ca.gov/lists/com-attach/8-111dcompliance-ws-AGxXMANmWHwKfAhX.pdf

Original File Name: LADWP Comments to CARB on CPP Discussion Paper.pdf

Date and Time Comment Was Submitted: 2015-10-19 16:39:14

## **Comment 8 for 2016 Amendments to the Clean Power Plan Compliance Effort (111dcompliance-ws) - 1st Workshop.**

First Name: Clare Last Name: Breidenich Email Address: cbreidenich@aciem.us Affiliation: WPTF

Subject: WPTF Comments on 2016 Cap and Trade Amendments and Clean Power Plan Compliance Comment:

See attached.

 $\label{eq:lists} Attachment: www.arb.ca.gov/lists/com-attach/9-111dcompliance-ws-ATBRZwcrUTBXYVN+.pdf$ 

Original File Name: 10-20-15 WPTF Comments to CARB on possible Cap and Trade Amendments and ....pdf

Date and Time Comment Was Submitted: 2015-10-21 09:11:45

## **Comment 9 for 2016 Amendments to the Clean Power Plan Compliance Effort (111dcompliance-ws) - 1st Workshop.**

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

Subject: Comments re CARB Clean Power Plan Compliance Discussion Paper Comment:

See attached.

Attachment: www.arb.ca.gov/lists/com-attach/10-111dcompliance-ws-VTsHYgd2VGZXDlAz.pdf

Original File Name: NCPA commentsClean Power Plan White Paper.pdf

Date and Time Comment Was Submitted: 2015-10-27 08:11:25

## **Comment 10 for 2016 Amendments to the Clean Power Plan Compliance Effort (111dcompliance-ws) - 1st Workshop.**

First Name: Amber Last Name: Blixt Email Address: Amber@iepa.com Affiliation: Independent Energy Producers Association

Subject: IEP Comments on CARB's Clean Power Plan Compliance Discussion Paper Comment:

See attached.

Attachment: www.arb.ca.gov/lists/com-attach/11-111dcompliance-ws-BWxQM1MiV1sCZwJt.pdf

Original File Name: IEP comments on CARB Clean Power Plan Discussion Paper.pdf

Date and Time Comment Was Submitted: 2015-10-27 08:14:57

## **Comment 11 for 2016 Amendments to the Clean Power Plan Compliance Effort (111dcompliance-ws) - 1st Workshop.**

First Name: Adam Last Name: Smith Email Address: Adam.Smith@sce.com Affiliation:

Subject: JUG Guiding Principles on Clean Power Plan Implementation Comment:

See attached.

Attachment: www.arb.ca.gov/lists/com-attach/12-111dcompliance-ws-VT9XJFUzVFgEYQBw.pdf

Original File Name: JUG CPP Guiding Principles.pdf

Date and Time Comment Was Submitted: 2015-10-27 08:21:31

## **Comment 12 for 2016 Amendments to the Clean Power Plan Compliance Effort (111dcompliance-ws) - 1st Workshop.**

First Name: Mark C. Last Name: Krausse Email Address: mark.krausse@pge.com Affiliation: PG&E

Subject: Re: PG&E's Comments on the Clean Power Plan Compliance Discussion Paper Comment:

See attached.

Attachment: www.arb.ca.gov/lists/com-attach/13-111dcompliance-ws-VycBYAFIAAxSNwBv.pdf

Original File Name: PGE Comments on ARB CPP Discussion Paper.pdf

Date and Time Comment Was Submitted: 2015-10-27 10:00:44

## **Comment 13 for 2016 Amendments to the Clean Power Plan Compliance Effort (111dcompliance-ws) - 1st Workshop.**

First Name: Karen Last Name: Terranova Email Address: kt@a-klaw.com Affiliation: EPUC

Subject: Clean Power Plan Discussion Paper - EPUC Comments Comment:

See attached.

Attachment: www.arb.ca.gov/lists/com-attach/14-111dcompliance-ws-AmdcKgF1WGgEXQVm.pdf

Original File Name: EPUC Comments EPA Proposed Rule 11 13 15.pdf

Date and Time Comment Was Submitted: 2015-11-20 09:28:56

#### **Comment 14 for 2016 Amendments to the Clean Power Plan Compliance Effort (111dcompliance-ws) - 1st Workshop.**

First Name: David Last Name: Schonbrunn Email Address: David@Schonbrunn.org Affiliation: TRANSDEF

Subject: Comments on the Clean Power Plan Discussion Paper Comment:

After reviewing the Clean Power Plan Compliance Discussion Paper, we offer the following comments:

While our organization has long been involved in ARB climate change processes and generally supports ARB's efforts to reduce GHGs, we have never been supporters of Cap and Trade. We continue to be concerned about the abstruseness of the regulatory structure--no one besides the lawyers involved really understands it--as well as its potential to be gamed. We were strong advocates of a carbon tax in our comments on the first Scoping Plan, and continue to see its superiority, especially after its real-world success in British Columbia.

We suggest that a carbon tax be adopted as the backstop mechanism for the Clean Power Plan. It would not be triggered unless a massive policy failure, such as widespread gaming, occurred or there is a failure of nerve by either the Legislature or the Board. A carbon tax in the backstop position would act as a strong deterrent to gaming or backsliding, because of its unquestioned effectiveness.

BTW, we found the following sentence impossible to understand: "For California, U.S. EPA calculated a final statewide mass goal in the 2030-31 period of 96.8 million short tons of CO2 (e.g., 48.4 million short tons, approximately, in 2030)." It is entirely non-obvious why half the mass goal is stated in parentheses. Please either clarify or correct the text.

To further inform stakeholders, it would be useful to calculate the actual emissions reduction percentage for CA EGUs, using the EPA mass goals.

Thank you,

David Schonbrunn

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-12-03 14:54:03

There are no comments posted to 2016 Amendments to the Clean Power Plan Compliance Effort (111dcompliance-ws) that were presented during the Workshop at this time.