

## **Comment 1 for South Coast Air Basin Electric Reliability and Offset Assessment (ab1318-ws) - 1st Workshop.**

First Name: Kassandra

Last Name: Gough

Email Address: Kassandra.Gough@calpine.com

Affiliation: Calpine Corporation

Subject: Calpine Comments on Draft Final AB 1318 Report

Comment:

Please find attached the comments of Calpine Corporation on the Draft Final Report entitled "Assembly Bill 1318: Assessment of Electrical Grid Reliability Needs and Offset Requirements in the South Coast Air Basin". We greatly appreciate the opportunity to submit these comments. Thank you for your consideration.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1-ab1318-ws-AGNSNVU4UnEEawVr.pdf>

Original File Name: Calpine Comments on Draft Final AB 1318 Report.pdf

Date and Time Comment Was Submitted: 2013-10-31 17:11:36

No Duplicates.

**Comment 2 for South Coast Air Basin Electric Reliability and Offset Assessment (ab1318-ws) - 1st Workshop.**

First Name: Robert

Last Name: Lucas

Email Address: bob.lucas@calobby.com

Affiliation: ClearEdge Power

Subject: Comments re AB 1318 Report

Comment:

Attached is ClearEdge Power comment letter re AB 1318 Report. If you have any questions, please do not hesitate to contact me at 916-444-7337. Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/2-ab1318-ws-UzAGbAFIV2UGclQx.pdf>

Original File Name: ClearEdge Power Comments re AB 1318 Report.pdf

Date and Time Comment Was Submitted: 2013-11-04 12:56:50

No Duplicates.

## **Comment 3 for South Coast Air Basin Electric Reliability and Offset Assessment (ab1318-ws) - 1st Workshop.**

First Name: Sharon

Last Name: Rubalcava

Email Address: sharon.rubalcava@alston.com

Affiliation: Alston & Bird

Subject: Comments on the Draft Final Report: Assembly Bill 1318: Assessment of Electrical Grid Reli

Comment:

These comments are submitted on behalf of Plains All American Pipeline LLP. We are writing to comment on the draft report titled Assembly Bill 1318: Assessment of Electrical Grid Reliability Needs and Offset Requirements in the South Coast Air Basin (Draft Report) and specifically on the discussion of the availability of Emission Reduction Credits (ERCs) for new greenfield power generating capacity in the South Coast Air Basin (Basin).

As the Draft Report explains, while there are exemptions for existing power plants that repower using advanced generating technologies, for new generation not directly linked to the retirement of existing steam boiler facilities offsets must be provided. The Draft Report estimates that under the high bookend scenario, the Basin would need an additional 615 megawatts of new, greenfield generation. Such new generation capacity would not be eligible for the offset exemption in Rule 1304(a)(2) but would have to supply offsets by purchasing ERCs or finding other means to generate surplus emission reductions.

Over the last ten years, Plains has purchased a significant amount of ERCs for a project that is no longer proceeding, and it now has ERCs available for sale. Table III-4 of the Draft Report shows the estimated amount of credits required in the form of ERCs for new greenfield projects, assuming a 1.2:1 offset ratio. Using that information, the following table compares the estimated amount of ERCs needed for such projects in tons/day (pounds/day) to Plains current ERC holdings:

Pollutant	Tons/Day (lbs/day)	Needed Plains' ERC Holdings (lbs/day)
NOx	0.76 (1520)	658
CO	0.93 (1860)	0
VOC	0.45 (900)	630
PM10	0.32 (640)	22
SOx	0.12 (240)	203

As you can see, Plains' ERCs could provide offsets for a significant percentage of the additional 615 megawatts of power needed in the Basin under the high bookmark scenario. Also, since NOx and SOx are precursors to PM 10, the use of the NOx and/or SOx ERCs as interpollutant offsets, set an appropriate offset ratio, could provide an additional source of PM 10 offsets. (A new power plant would be in NOx RECLAIM and would not need the NOx ERCs.) Since Plains' ERCs are available for sale and represent a

significant commitment of resources on behalf of the company, Plains believes it is premature to claim that sufficient PM 10 offsets are not available at this time to satisfy the need for offsets from new generation, and would object to legislation to address this situation that might adversely affect the value of its credits.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-11-06 10:25:21

No Duplicates.

## **Comment 4 for South Coast Air Basin Electric Reliability and Offset Assessment (ab1318-ws) - 1st Workshop.**

First Name: Kevin  
Last Name: Woodruff  
Email Address: [kdw@woodruff-expert-services.com](mailto:kdw@woodruff-expert-services.com)  
Affiliation: Consultant to TURN

Subject: Comments on Draft AB 1318 Report

Comment:

Dear ARB,

Footnotes 1, 3 and 4 on pages i and ii of the Summary make the key point that the CPUC will determine in its LTPP processes reliability needs for the CPUC-jurisdictional portions of the grid.

These points should be strengthened by (a) including specific reference in footnote 4 that the CPUC will also determine any "renewable integration" needs, and (b) elevating these footnotes to a separate paragraph in the text of the Summary on pages i to v and in the opening of the Executive Summary on pages 1 to 3.

Please call or email if you have any questions.

Kevin Woodruff  
Woodruff Expert Services  
Consultant to TURN  
916-442-4877  
[kdw@woodruff-expert-services.com](mailto:kdw@woodruff-expert-services.com)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-11-06 16:49:51

No Duplicates.

**Comment 5 for South Coast Air Basin Electric Reliability and Offset Assessment (ab1318-ws) - 1st Workshop.**

First Name: Dorothy

Last Name: Rothrock

Email Address: drothrock@cmta.net

Affiliation:

Subject: CMTA comments on Draft Final AB 1318 Report

Comment:

Attached please find comments from California Manufacturers & Technology Association on Draft Final AB 1318 Report.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/5-ab1318-ws-AWJTNAR3AzICW1Ax.pdf>

Original File Name: CARB AB 1318 CMTA Comments.pdf

Date and Time Comment Was Submitted: 2013-11-07 14:44:27

No Duplicates.

**Comment 6 for South Coast Air Basin Electric Reliability and Offset Assessment (ab1318-ws) - 1st Workshop.**

First Name: John

Last Name: Foster

Email Address: [jfoster@cpv.com](mailto:jfoster@cpv.com)

Affiliation:

Subject: Comments on the Draft South Coast Air Basin Electric Reliability and Offset

Assessment

Comment:

Please see attached comments. Thanks.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/6-ab1318-ws-W2pdagEtUjFXZgYr.pdf>

Original File Name: 11-07-13 CPV comments.pdf

Date and Time Comment Was Submitted: 2013-11-07 15:07:05

No Duplicates.

**Comment 7 for South Coast Air Basin Electric Reliability and Offset Assessment (ab1318-ws) - 1st Workshop.**

First Name: Erin

Last Name: Grizard

Email Address: erin.grizard@bloomenergy.com

Affiliation: Bloom Energy

Subject: Bloom Energy Comments on Draft AB 1318 Report

Comment:

Please find attached Bloom Energy Corporation's comments on the draft AB 1318 report.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/7-ab1318-ws-UjBQOgNtUW0GbQFe.pdf>

Original File Name: Bloom Energy Comments on AB 1318 report.pdf

Date and Time Comment Was Submitted: 2013-11-07 16:15:09

No Duplicates.

**Comment 8 for South Coast Air Basin Electric Reliability and Offset Assessment (ab1318-ws) - 1st Workshop.**

First Name: Adrian

Last Name: Martinez

Email Address: amartinez@earthjustice.org

Affiliation:

Subject: Coalition Comments on the draft AB 1318 Report

Comment:

Please see attached comments on the draft AB 1318 Report.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/8-ab1318-ws-AGEGYIAOB2UKPwk4.pdf>

Original File Name: AB 1318 Report Comments 11-7-2013 final.pdf

Date and Time Comment Was Submitted: 2013-11-07 16:24:59

No Duplicates.

**Comment 9 for South Coast Air Basin Electric Reliability and Offset Assessment (ab1318-ws) - 1st Workshop.**

First Name: Michael

Last Name: Webb

Email Address: [ombcomm@arb.ca.gov](mailto:ombcomm@arb.ca.gov)

Affiliation: City of Redondo Beach

Subject: Comments on Draft Final AB1318 Report

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/9-ab1318-ws-AWJVPANvUmwKaQBu.pdf>

Original File Name: Comments on AB 1318 Report.pdf

Date and Time Comment Was Submitted: 2013-11-12 11:25:13

No Duplicates.

**There are no comments posted to South Coast Air Basin Electric Reliability and Offset Assessment (ab1318-ws) that were presented during the Workshop at this time.**