

## **Comment 1 for Workshop on Potential Amendments to MRR and Cap-and-Trade Regulation (mrr-cpp-ct-amend-ws) - 1st Workshop.**

First Name: Erica

Last Name: Alvarado

Email Address: erica.alvarado@tetrtech.com

Affiliation: Tetra Tech

Subject: Concern over proposed verification deadline

Comment:

Dear ARB,

We appreciate the opportunity to provide comments on the "Amendments to Mandatory Reporting and Cap-and-Trade Regulations." We would like to bring to your attention of our serious concern over ARB's proposal to change the verification deadline from September 1 to August 1. While we understand the need to have this change of deadline to better support cap-and-trade regulation allocation and compliance, it would critically shorten the time to an already very tight verification season. Our verifiers have conducted many verifications over the years, we strive to provide the best and high quality service to our clients. However, losing a month of time to complete such verifications would make it very challenging to provide the full attention to each and every verification we complete. Should you go forward with shortening an already very tight verification season, we will still absolutely provide the highest quality service possible but please keep in mind this deadline change will significantly impact every verification body and their clients work.

In the webinar, it stated that reporters and verifiers can more effectively use time leading up to the verification deadline, however, in our experience reporters need all the time given to meet the reporting deadline, particularly for a complex facility such as an oil and gas producer. The verifier must wait to officially begin work until the contract is signed, report is in the system, the COI has been submitted and processed. Currently, we do use the time leading up to the verification season as effectively as possible but when you have no control over time of another entity's work or critical path, it is extremely difficult to be at the end of the process that have to catch up with a season cut short.

We sincerely ask you to reconsider changing the verification deadline from September 1 to August 1.

Thank you,  
Erica Alvarado

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-02-25 12:35:58

No Duplicates.

**Comment 2 for Workshop on Potential Amendments to MRR and Cap-and-Trade Regulation (mrr-cpp-ct-amend-ws) - 1st Workshop.**

First Name: Todd

Last Name: Jones

Email Address: todd.jones@resource-solutions.org

Affiliation: Center for Resource Solutions (CRS)

Subject: Comments of Center for Resource Solutions (CRS) in response to February 24, 2016

Workshop

Comment:

Please find the comments of Center for Resource Solutions (CRS) in response to February 24, 2016 Workshop on potential amendments to the Greenhouse Gas Mandatory Reporting and Cap-and-Trade Regulations attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/2-mrr-cpp-ct-amend-ws-VDdcKFYkAzMGb1c6.pdf>

Original File Name: CRScommentstoARB\_3-4-2016.pdf

Date and Time Comment Was Submitted: 2016-03-04 09:17:47

No Duplicates.

## **Comment 3 for Workshop on Potential Amendments to MRR and Cap-and-Trade Regulation (mrr-cpp-ct-amend-ws) - 1st Workshop.**

First Name: Neil

Last Name: Mahony

Email Address: anziani14@dc.rr.com

Affiliation:

Subject: the CO2 hoax

Comment:

Willie Soon, David R. Legates, & Christopher Monckton of Brenchley12 Feb 2016394

How much will the doubling of CO2 in the air warm the global temperature? How do scientists take an accurate measurement of the temperature of the Earth's atmosphere? Why can scientists better measure atmospheric temperatures from satellites than surface temperatures from ground thermometers?

Despite large uncertainties and many unknowns in Earth Science, scientists have a reasonable understanding of the answers to these questions.

Atmospheric CO2 is a "greenhouse gas," and therefore, an increase of its concentration in the atmosphere will tend to warm the air. But the latest scientific research by William Happer of Princeton University has shown that the belief that a doubling of atmospheric CO2 will cause directly a 1°C warming of the globe may be incorrect. Indeed, the more likely answer is that a doubling of CO2 will cause only a 0.6°C warming, or about 40% less than previously thought. This makes it even more important to take with caution the excessive impact of CO2 on global air temperatures.

Complicating our understanding is that many processes involving the atmosphere, the ocean, and the land surface which affect the warming effect of CO2 are highly complex and largely incompletely understood. Those rushing to transition from a fossil fuel-based world economy to the wickedly named "decarbonized" future tout a relationship between a doubling of CO2 and global temperatures as large as 4 to 5°C. But how can such a calculation have any basis in scientific fact when the processes that form clouds, rainfall, snow, and ice – as well as the flow of air and ocean currents – are so imprecisely understood? How is it possible to create an accurate climate model given such uncertainties?

So, how well can we measure the consequences of CO2 on global air temperatures? Even this simple question is marred with half-truths and distortions arising from the politics of global climate change.

It is universally accepted that the most direct impact of atmospheric CO2 will be the warming of the lowest six miles of air. This is the layer that is best measured by satellites and balloon-borne instruments rather than surface-based thermometers which under-represent the poles, the tropics, the high altitudes, and the oceans. In short, thermometers are biased to where people

live and confined to measure only the air within six feet of the ground. Satellites, by contrast, are not limited spatially and can estimate global temperatures in the lowest six miles, not six feet, of air.

But of late, anthropogenic climate change "believers" are pushing thermometer-based analyses and dismissing satellite observations. Why? For nearly the last two decades, satellite- and balloon-borne instruments have not detected any significant warming which does not support the climate change "disaster" scenarios the believers wish to promote. Besides, the bias associated with surface thermometers can easily be manipulated with subjective "bias adjustments" which allows the data to support the global warming hype.

A recent paper published in *Earth Science Reviews* (by W. Soon, R. Connolly and M. Connolly) discusses and demonstrates that the post-1970 warming, as measured by surface-based thermometers, was highly exaggerated by non-climate related factors such as changes in location, the time-of-observation bias, urbanization effects, and changes in land use as well as by changes in the measurement of sea-surface temperature and the fair-weather bias (ships tend to avoid storms) to estimate air temperature over the oceans.

However, the most important problem with thermometer/surface-based assessments is that the most important signal arising from CO2 impacts lies higher in troposphere – at about six miles – rather than at the surface. Satellite observations have provided a nearly complete global coverage since about 1979, providing us with an excellent record extending more than 35 years. These observations indicate that the atmosphere warmed slightly since 1979 but its temperature has remained relatively constant over the past fifteen years or so – despite the dramatic increase in CO2 concentrations. This makes it hard to argue that global temperature changes are largely driven by changes in atmospheric CO2 concentrations.

Scientists from the National Oceanic and Atmospheric Administration (NOAA) cling to their bias-adjusted surface temperature record because it yields a far more continuous and rapid rate of warming than what was deduced from satellites and weather balloons records. This is consistent with the exaggerated "CO2 disastrously warms the planet" meme that, in part, keeps their funding levels high. Recently, they released a newer version that exaggerates the warming even further. Detailed explanations for their revisions – published in *Science* in June of 2015 – are not convincing but it is clear that their main effort was focused on making sure that the pause in air temperature increases over the past two decades vanished. The editor-in-chief of *Science* magazine, Dr. Marcia McNutt, proclaimed at a climate symposium in January that the revision "eliminates the [global warming] hiatus." Scientists from NOAA and Lawrence Berkeley National Laboratory also wrote in *Science* that "whether or not the early 21st century global warming hiatus existed is not important".

It is appropriate for us to offer a reminder from our colleague, the late Professor Bob Carter, who as early as 2006 warned that "There IS [sic.] a problem with global warming... it stopped in 1998... In truth, however, the biggest part of the problem is neither environmental nor scientific, but a self-created political fiasco."

From a physics standpoint, the impact of increasing CO2 causes a

relatively and disproportionately larger warming in the atmosphere than near the ground. Is there a problem, therefore, with the satellite record or the way in which it measures air temperature?

As previously mentioned and usually ignored by the believers, thermometers provide a poor spatial coverage of the Earth's surface. By contrast, satellites carry instruments that accurately measure the amount of energy in thermal infrared and microwave wavelengths which directly relates to the temperature of the lower atmosphere (where most of the air resides and where the CO<sub>2</sub> signal should be strongest) with nearly complete spatial coverage.

Global estimates of air temperature by satellites are independently produced by scientists from Remote Sensing Systems (RSS) and the University of Alabama-Huntsville (UAH), and their methods have been well-discussed and compared in the scientific literature. Both groups show that global temperatures in the lowest six miles show no warming trend since 2002 (we start in 2002 mainly because the new global atmospheric temperature data record [labeled ROM SAF in the top panel] is available only starting September 2001 and partly to avoid the effect of the strong El Nino and La Nina between 1997 and 2001 - see graph below).

chart

The big complaint leveled against the satellite record is that their estimates are contaminated by the decay of satellite orbits, changes in the satellite orientation over time, and the piecing together of several satellites to complete the record since 1979. While these issues allow for more physically-based adjustments than with the thermometer record (note that new satellites overlap with older ones and that satellite orbital decay is well-documented), the balloon data corroborate the satellite record.

In addition, a third method of measuring global temperature over the lower atmosphere – using the series of GPS (Global Positioning System) satellites – can be obtained by accurately measuring the propagation of radio waves through the atmosphere. The importance of this new method is that a near-complete coverage of the Earth is afforded and that global atmospheric temperature can be determined without requiring any complex satellite inter-calibration. Only the precise atomic clock is needed to measure the relative delay in propagation of radio waves through the atmosphere which, in turn, allows for a direct assessment of the atmospheric temperature over the lower portion of the atmosphere.

Unsurprisingly, the GPS-based method confirms what was measured by the thermal infrared/microwave radiometers aboard other satellites; that the nearly-two-decade-long temperature hiatus is real and the thermometer-based record is the oddball. More specifically, global atmospheric temperatures are not warming in the way predicted by the CO<sub>2</sub>-driven climate models, which serves to argue that CO<sub>2</sub> does not act as the thermostat for global atmospheric temperatures.

An objectively science-based decision is clear: The preponderance of the evidence suggests that a discernable CO<sub>2</sub>-influence on the climate has been grossly overstated. So will you choose the scientific decision or rely on the politically-driven thermometer adjustments? Our future rides on the answer to this question.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-03-07 08:51:14

No Duplicates.

**Comment 4 for Workshop on Potential Amendments to MRR and Cap-and-Trade Regulation (mrr-cpp-ct-amend-ws) - 1st Workshop.**

First Name: Erin

Last Name: Quinn

Email Address: equinn@analyticalcorp.com

Affiliation:

Subject: Change of verification due date

Comment:

It is already difficult to submit verification by September 1 of a verification year. It could be a liability to the reporters and the verification bodies if the date for submittal of verifications were to be moved to August 1 of the verification year.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-03-07 10:40:37

No Duplicates.

**Comment 5 for Workshop on Potential Amendments to MRR and Cap-and-Trade Regulation (mrr-cpp-ct-amend-ws) - 1st Workshop.**

First Name: Patrick

Last Name: Wood

Email Address: patrick@agmethaneadvisors.com

Affiliation: Ag Methane Advisors

Subject: C&T Amendment Comments

Comment:

Attached please find comments related to potential regulatory amendments from Ag Methane Advisors. Thank you for the opportunity.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/5-mrr-cpp-ct-amend-ws-UDFSMwRoUGYFd1A4.pdf>

Original File Name: AgMethane\_Comments Re\_2016 C&T Regulation Amendments 3.8.16.pdf

Date and Time Comment Was Submitted: 2016-03-08 19:12:32

No Duplicates.

**Comment 6 for Workshop on Potential Amendments to MRR and Cap-and-Trade Regulation (mrr-cpp-ct-amend-ws) - 1st Workshop.**

First Name: Derek

Last Name: Six

Email Address: [dsix@climeco.com](mailto:dsix@climeco.com)

Affiliation: ClimeCo Corporation

Subject: Cap and Trade Regulation Comments

Comment:

Thank you for the opportunity to submit the attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/9-mrr-cpp-ct-amend-ws-UzIFcQdkVFgDZlc4.pdf>

Original File Name: ARB Comments 03102016.pdf

Date and Time Comment Was Submitted: 2016-03-10 15:45:31

No Duplicates.

**Comment 7 for Workshop on Potential Amendments to MRR and Cap-and-Trade Regulation (mrr-cpp-ct-amend-ws) - 1st Workshop.**

First Name: Dan

Last Name: Tillman

Email Address: dant@vea.coop

Affiliation: Valley Electric Association, Inc.

Subject: VEA Comments on 2/24 Workshop

Comment:

Please find VEA's comments on the ARB's 2/24 Cap and Trade workshop attached. Thanks!

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/10-mrr-cpp-ct-amend-ws-V2dWYwFfUTNQZwdY.docx>

Original File Name: 03 11 16 VEA ARB Feb 26 16 workshop comments.docx

Date and Time Comment Was Submitted: 2016-03-11 08:10:52

No Duplicates.

**Comment 8 for Workshop on Potential Amendments to MRR and Cap-and-Trade Regulation (mrr-cpp-ct-amend-ws) - 1st Workshop.**

First Name: Charles

Last Name: Purshouse

Email Address: charles.purhouse@camcocleanenergy.com

Affiliation: Camco

Subject: Camco Comments to ARB C&T Protocol Revision 2016

Comment:

Thank you for the opportunity to provide comments towards the revision of ARB's Cap-and-Trade Regulation.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/11-mrr-cpp-ct-amend-ws-UjFWMVA8WGgLYgBf.doc>

Original File Name: Camco Comments ARB Reg Rev 2016.doc

Date and Time Comment Was Submitted: 2016-03-11 09:13:46

No Duplicates.

**Comment 9 for Workshop on Potential Amendments to MRR and Cap-and-Trade Regulation (mrr-cpp-ct-amend-ws) - 1st Workshop.**

First Name: Daryl

Last Name: Maas

Email Address: daryl@maasenergy.com

Affiliation:

Subject: Comments Regarding Cap and Trade Regulation Amendments

Comment:

Attached are the comments from Maas Energy Works Inc on the potential Cap-and-Trade regulation amendments. Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/12-mrr-cpp-ct-amend-ws-Uz5UM1U1WXkEXQBl.pdf>

Original File Name: Maas Energy Works - Comments Re 2016 Cap and Trade Regulation Amendments.pdf

Date and Time Comment Was Submitted: 2016-03-11 09:24:24

No Duplicates.

**Comment 10 for Workshop on Potential Amendments to MRR and Cap-and-Trade Regulation (mrr-cpp-ct-amend-ws) - 1st Workshop.**

First Name: Peter

Last Name: Weisberg

Email Address: [pweisberg@climatetrust.org](mailto:pweisberg@climatetrust.org)

Affiliation: The Climate Trust

Subject: Cap and trade regulation comments

Comment:

Attached are The Climate Trust's recommendations for 2016 cap and trade regulation amendments to change the application of "regulatory compliance" and procedures for invalidation for offset projects. Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/13-mrr-cpp-ct-amend-ws-VDcBa1Q8V2kDZFUh.pdf>

Original File Name: Climate Trust Comments Re 2016 Cap and Trade Regulation Amendments - 151019-CAM.pdf

Date and Time Comment Was Submitted: 2016-03-11 10:29:03

No Duplicates.

## **Comment 11 for Workshop on Potential Amendments to MRR and Cap-and-Trade Regulation (mrr-cpp-ct-amend-ws) - 1st Workshop.**

First Name: Kevin

Last Name: Townsend

Email Address: ktownsend@bluesource.com

Affiliation: Blue Source, LLC

Subject: Proposed Changes to the Cap and Trade Program

Comment:

Thank you for the opportunity to comment. Blue Source would like to express its support for the points raised in the letter submitted by ClimeCo Corporation pertaining to the following:

- The utility and necessity of the invalidation provisions, as well as alternative approaches to offset integrity adopted by other jurisdictions.
- All points related to regulatory compliance, its extra-jurisdictional nature, its need to be defined and interpreted narrowly and appropriately, and the need for violations to affect only the offsets attributable to the timing of the violation rather than the entire reporting during which the violation occurred.
- Recommendations for improvements to general processes, including "wet signatures," materiality and timing of verification work.

Thank you very much for your consideration.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-03-11 10:30:17

No Duplicates.

**Comment 12 for Workshop on Potential Amendments to MRR and Cap-and-Trade Regulation (mrr-cpp-ct-amend-ws) - 1st Workshop.**

First Name: Joyce

Last Name: Dillard

Email Address: dillardjoyce@yahoo.com

Affiliation:

Subject: Comments ARB MRR and Cap-and-Trade Regulation due 3.11.2016

Comment:

Attached.

Joyce Dillard  
P.O. Box 31377  
Los Angeles, CA 90031

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/15-mrr-cpp-ct-amend-ws-UDNVPFwwU20KaVU7.pdf>

Original File Name: Comments ARB MRR and Cap-and-Trade Regulation due 3.11.2016.pdf

Date and Time Comment Was Submitted: 2016-03-11 11:56:35

No Duplicates.

## **Comment 13 for Workshop on Potential Amendments to MRR and Cap-and-Trade Regulation (mrr-cpp-ct-amend-ws) - 1st Workshop.**

First Name: Jay

Last Name: Wintergreen

Email Address: jtw@firstenvironment.com

Affiliation: First Environment, Inc.

Subject: Proposed August 1st MRR verification deadline

Comment:

At the February 24th workshop, the California Air Resources Board proposed changing the MRR verification deadline from September 1 to August 1 (Slide 8).

First Environment is very concerned and does not support the changing of the verification deadline, especially for EPEs, without additional changes that will clearly facilitate meeting an earlier deadline. Our experience during previous verification years have demonstrated that the verification process has taken until at least mid-August. 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. Furthermore, it should be acknowledged that an earlier verification deadline reduces the performance period for our services and could produce a negative effect on our California-based business.

At the February 24th workshop, other changes to the MRR were proposed as method of facilitating meeting the August 1 deadline (slide 16). It is unclear how the proposed changes would facilitate meeting an earlier deadline and therefore do not support implementing an earlier verification deadline.

To meet an earlier deadline, changes to the MRR must encourage the verification process to begin sooner, either before or very shortly after the reporting deadlines. First Environment has several suggestions regarding revisions that would facilitate this earlier start.

First Environment proposes revising the MRR to introduce additional interim deadlines for the reporter between the existing report submission and the report verification deadlines. These interim deadlines could include, but are not limited to, a deadline for the submission of a reporter's COI form, conducting the verification kickoff meeting, and/or performance of the site visit. First Environment believes this would encourage reporters and VBs to begin the verification process earlier after report submission and thereby facilitate verification completion by an earlier verification deadline.

First Environment also proposes revising the MRR to specify reporters to upload key documents and records to the Cal e-GGRT tool at the time of GHG report submission. The documents and

records could include, but are not limited to, the monitoring plan, fuel and energy purchase records, meter calibration records, and other documents and records that are relevant to GHG report verification. Having these documents uploaded to Cal e-GGRT for download by the reporter's verification body will allow core verification activities to start more quickly.

Without these revisions to the MRR, or other revisions to the MRR that can clearly demonstrate to facilitate meeting an earlier verification deadline, First Environment requests that the verification deadline remain September 1.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-03-11 12:35:25

No Duplicates.

**Comment 14 for Workshop on Potential Amendments to MRR and Cap-and-Trade Regulation (mrr-cpp-ct-amend-ws) - 1st Workshop.**

First Name: Susie  
Last Name: Berlin  
Email Address: [berlin@susieberlinlaw.com](mailto:berlin@susieberlinlaw.com)  
Affiliation: Northern California Power Agency (NCPA)

Subject: Comments on Feb 24 Workshop

Comment:

Northern California Power Agency Comments on February 24 Workshop

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/17-mrr-cpp-ct-amend-ws-VTYGb1A8WGZVNghm.pdf>

Original File Name: comments re Feb 24 Workshop (final 3-11-16).pdf

Date and Time Comment Was Submitted: 2016-03-11 15:16:18

No Duplicates.

**Comment 15 for Workshop on Potential Amendments to MRR and Cap-and-Trade Regulation (mrr-cpp-ct-amend-ws) - 1st Workshop.**

First Name: Tanya

Last Name: DeRivi

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

Affiliation: Southern CA Public Power Authority

Subject: SCPPA's Comments on 2/24 Workshop on MRR and C&T Alignment with CPP

Comment:

Please see attachment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/18-mrr-cpp-ct-amend-ws-UiFSNwNyWXoFYgVa.pdf>

Original File Name: SCPPA Comments on CT-MRR-CPP 2-24-16 Workshop.pdf

Date and Time Comment Was Submitted: 2016-03-11 14:47:42

No Duplicates.

## **Comment 16 for Workshop on Potential Amendments to MRR and Cap-and-Trade Regulation (mrr-cpp-ct-amend-ws) - 1st Workshop.**

First Name: Jerilyn Lopez

Last Name: Mendoza

Email Address: jmendoza5@semprautilities.com

Affiliation: SoCalGas and SDG&E

Subject: Comments on Proposed Changes to GHG Mandatory Reporting Program

Comment:

Thank you for the opportunity to submit these comments on behalf of SoCalGas and SDG&E. Please advise if you have any questions or concerns.

Jerilyn López Mendoza  
SoCalGas  
and on behalf of SDG&E  
Environmental Affairs Program Manager - CARB  
Energy and Environmental Affairs  
555 W 5th St., GCT 17E5  
Los Angeles, CA 90013  
Jmendoza5@semprautilities.com  
(desk) 213-244-5235  
(cell) 213-700-0095  
(fax) 213-244-8257

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/19-mrr-cpp-ct-amend-ws-UjRRPgdoAjAFbwNc.pdf>

Original File Name: FINAL SoCalGas SDG&E Comments re Changes to GHG Mandatory Reporting Program 3-11-16.pdf

Date and Time Comment Was Submitted: 2016-03-11 15:47:36

No Duplicates.

**Comment 17 for Workshop on Potential Amendments to MRR and Cap-and-Trade Regulation (mrr-cpp-ct-amend-ws) - 1st Workshop.**

First Name: John

Last Name: Larrea

Email Address: john@clf.com

Affiliation: CA League of Food Processors

Subject: Regulation Revision

Comment:

CLFP comments on proposed regulation revisions of the MRR and Cap-and-Trade

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/20-mrr-cpp-ct-amend-ws-UjEFb106UHMLUgRn.pdf>

Original File Name: CLFP comments March 11-2016.pdf

Date and Time Comment Was Submitted: 2016-03-11 15:51:01

No Duplicates.

**Comment 18 for Workshop on Potential Amendments to MRR and Cap-and-Trade Regulation (mrr-cpp-ct-amend-ws) - 1st Workshop.**

First Name: Kevin

Last Name: Townsend

Email Address: ktownsend@bluesource.com

Affiliation: Compliance Offset Developers Association

Subject: Amendments to the Cap and Trade Program

Comment:

Thank you for the opportunity to submit the attached comments on behalf of CODA.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/21-mrr-cpp-ct-amend-ws-UTIBaFI3AjBWD1Q3.pdf>

Original File Name: CODA Comments Amendments to Cap and Trade Reg 03112016.pdf

Date and Time Comment Was Submitted: 2016-03-11 15:59:46

No Duplicates.

**Comment 19 for Workshop on Potential Amendments to MRR and Cap-and-Trade Regulation (mrr-cpp-ct-amend-ws) - 1st Workshop.**

First Name: Nick

Last Name: Facciola

Email Address: nick@OriginClimate.com

Affiliation: Origin Climate

Subject: Amendments to the Cap and Trade Program

Comment:

Thank you for the opportunity to provide the attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/22-mrr-cpp-ct-amend-ws-VWdVY1xsUjcLiwQ0.pdf>

Original File Name: 2016.03.11 Comments on 2016 amendments.pdf

Date and Time Comment Was Submitted: 2016-03-11 16:01:44

No Duplicates.

**Comment 20 for Workshop on Potential Amendments to MRR and Cap-and-Trade Regulation (mrr-cpp-ct-amend-ws) - 1st Workshop.**

First Name: Katie  
Last Name: Sullivan  
Email Address: [sullivan@ieta.org](mailto:sullivan@ieta.org)  
Affiliation: IETA

Subject: IETA Comments on Potential C&T Regulation Amendments

Comment:

Dear ARB Staff

Attached, please find IETA's comments on potential revisions of California's MRR and cap-and-trade regulation.

If you have questions or require further information, please contact me.

We appreciate your efforts and welcome this opportunity to provide input.

Best,

Katie Sullivan  
Director - The Americas & Climate Finance, IETA

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/23-mrr-cpp-ct-amend-ws-UThVNNgN2UWMLUlIh.pdf>

Original File Name: IETA Submission to ARB\_Proposed 2016 CT Reg Amendments\_11Mar2016.pdf

Date and Time Comment Was Submitted: 2016-03-11 16:00:47

No Duplicates.

**Comment 21 for Workshop on Potential Amendments to MRR and Cap-and-Trade Regulation (mrr-cpp-ct-amend-ws) - 1st Workshop.**

First Name: Jodean

Last Name: Giese

Email Address: [jodean.giese@ladwp.com](mailto:jodean.giese@ladwp.com)

Affiliation: LADWP

Subject: LADWP Comments on Cap-and-Trade, MRR, Clean Power Plan

Comment:

Please see attached letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/24-mrr-cpp-ct-amend-ws-Uz9QN1cyVHAGcABf.pdf>

Original File Name: LADWP Comments - Feb 24 2016 Workshop.pdf

Date and Time Comment Was Submitted: 2016-03-11 16:03:58

No Duplicates.

**Comment 22 for Workshop on Potential Amendments to MRR and Cap-and-Trade Regulation (mrr-cpp-ct-amend-ws) - 1st Workshop.**

First Name: Alex

Last Name: Jackson

Email Address: ajackson@nrdc.org

Affiliation: NRDC

Subject: NRDC comments on Feb 24 workshop

Comment:

Please find attached NRDC's comments on the Feb. 24th workshop

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/25-mrr-cpp-ct-amend-ws-UT9dKQFkVGRXDIAz.pdf>

Original File Name: NRDC Comments on Feb 24 CA CPP Workshop.pdf

Date and Time Comment Was Submitted: 2016-03-11 16:13:22

No Duplicates.

**Comment 23 for Workshop on Potential Amendments to MRR and Cap-and-Trade Regulation (mrr-cpp-ct-amend-ws) - 1st Workshop.**

First Name: Kelsey

Last Name: Gowans

Email Address: [kelsey.gowans@mid.org](mailto:kelsey.gowans@mid.org)

Affiliation: Modesto Irrigation District

Subject: MID Comments on Amendments to Mandatory Reporting and Cap & Trade Regulations

Comment:

Please find attached Modesto Irrigation District's comments on the potential amendments to the Mandatory Reporting and Cap & Trade Regulations.

Please let me know if you have any questions, and thank you for your consideration. We look forward to working with you throughout this process.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/26-mrr-cpp-ct-amend-ws-AG0CbQZjAw8EYQFu.pdf>

Original File Name: MID Comments on CARB Amendments to Mandatory Reporting 3-11-16.pdf

Date and Time Comment Was Submitted: 2016-03-11 16:18:39

No Duplicates.

**Comment 24 for Workshop on Potential Amendments to MRR and Cap-and-Trade Regulation (mrr-cpp-ct-amend-ws) - 1st Workshop.**

First Name: Claire

Last Name: Halbrook

Email Address: [cehu@pge.com](mailto:cehu@pge.com)

Affiliation: Pacific Gas and Electric Company

Subject: PG&E Comments on February 24 MRR and Cap-and-Trade Workshop

Comment:

PG&E Comments on February 24 MRR and Cap-and-Trade Workshop

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/27-mrr-cpp-ct-amend-ws-UiJWN1A0AAxVMFM8.pdf>

Original File Name: PGE Comments on 2\_24 ARB Workshop on MRR and CandT\_3\_11\_16.pdf

Date and Time Comment Was Submitted: 2016-03-11 16:20:31

No Duplicates.

**Comment 25 for Workshop on Potential Amendments to MRR and Cap-and-Trade Regulation (mrr-cpp-ct-amend-ws) - 1st Workshop.**

First Name: Curt

Last Name: Kaminer

Email Address: ckaminer@ckeclm.com

Affiliation:

Subject: Comments MRR-CPP-CT-Amend-WS

Comment:

Attached find our comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/28-mrr-cpp-ct-amend-ws-UjEAaVc7BzlVNgln.docx>

Original File Name: Comments of CHAPEL STREET ENVIRONMENTAL\_031116.docx

Date and Time Comment Was Submitted: 2016-03-11 16:23:41

No Duplicates.

**Comment 26 for Workshop on Potential Amendments to MRR and Cap-and-Trade Regulation (mrr-cpp-ct-amend-ws) - 1st Workshop.**

First Name: Shelly

Last Name: Sullivan

Email Address: ssullivan@onemain.com

Affiliation: Climate Change Policy Coalition

Subject: MRR Cap-and-Trade Alignment with CPP Alignment Workshop

Comment:

Attached please find comments submitted on behalf of the Climate Change Policy Coalition (formerly the AB 32 Implementation Group) regarding the ARB workshop on changes to the MRR/Cap-and-Trade program and alignment with the U.S. EPA's Clean Power Plan.

Should you have any questions please feel free to contact Shelly Sullivan at (916) 858-8686.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/29-mrr-cpp-ct-amend-ws-VDdSNwd2WGgHXgBm.pdf>

Original File Name: CCPC FINAL CPP Comments\_3\_11\_16.pdf

Date and Time Comment Was Submitted: 2016-03-11 16:28:38

No Duplicates.

**Comment 27 for Workshop on Potential Amendments to MRR and Cap-and-Trade Regulation (mrr-cpp-ct-amend-ws) - 1st Workshop.**

First Name: N Ross

Last Name: Buckenham

Email Address: rbuckenham@calbioenergy.com

Affiliation:

Subject: Comments Re: 2016 Cap and Trade Regulation Amendments "regulatory compliance"

Comment:

See attached comments re. 2106 Cap and Trade Regulation Amendments regarding Regulatory Compliance

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/30-mrr-cpp-ct-amend-ws-VjUHYARpUGFRPgFu.pdf>

Original File Name: CalBio Comments on Regulatory Compliance Submitted to ARB 3-11-2016 Submitted.pdf

Date and Time Comment Was Submitted: 2016-03-11 16:22:43

No Duplicates.

## **Comment 28 for Workshop on Potential Amendments to MRR and Cap-and-Trade Regulation (mrr-cpp-ct-amend-ws) - 1st Workshop.**

First Name: Erik  
Last Name: Feldman  
Email Address: [efeldman@rinconconsultants.com](mailto:efeldman@rinconconsultants.com)  
Affiliation: Rincon Consultants, Inc

Subject: Amendments to mandatory Reporting Regulation

Comment:

General Revisions(2)

Require schematics for refineries and oil and gas production facilities

Schematics, in general, provide important information and lead to a better understanding the complex operations at refineries and oil and gas production facilities. Requiring schematics can significantly improve a verifiers understanding of a facilities operation and would assist in the development of appropriate Verification and Sampling Plans.

Verification (1)

Change verification deadline from September 1 to August 1  
We believe the verification deadline of September 1 is important to give the verifier sufficient time to conduct the analysis necessary develop appropriate verification and sampling plans and complete thorough facility evaluations and data checks. While we believe the suggested verification streamlining processes are positive suggestions that will help the overall verification process, we do not believe they provide sufficient streamlining to the verification process to justify shortening of the verification deadline by an entire month. The areas that represent the largest time sinks in the verification process are generally related to expanded data sampling, additional data collection, and revisions to reports based on identified non conformances. In our experience many facilities have large teams responsible for the facility operations, data collection, and reporting and significant time is necessary for the scheduling and collaboration necessary complete the site visits, data gathering and report revisions. Shortening the season and changing the deadline from September 1 to August 1 may limit the verification process by affecting the quality of the service and accuracy of data.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-03-11 16:39:45

No Duplicates.

**Comment 29 for Workshop on Potential Amendments to MRR and Cap-and-Trade Regulation (mrr-cpp-ct-amend-ws) - 1st Workshop.**

First Name: Derek

Last Name: Markolf

Email Address: [derek.markolf@lrqa.com](mailto:derek.markolf@lrqa.com)

Affiliation:

Subject: LRQA Verification Deadline Comment

Comment:

This comment is to express LRQA's concern with the proposed change to the verification deadline under the MRR.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/32-mrr-cpp-ct-amend-ws-VjpQJAFxUWNSC1Uj.pdf>

Original File Name: LRQA Verification Deadline Comment.pdf

Date and Time Comment Was Submitted: 2016-03-11 16:36:59

No Duplicates.

## **Comment 30 for Workshop on Potential Amendments to MRR and Cap-and-Trade Regulation (mrr-cpp-ct-amend-ws) - 1st Workshop.**

First Name: Lara

Last Name: Gertler

Email Address: lgertler@algcorp.com

Affiliation: Ashworth Leininger Group

Subject: Concern about Proposed Verification Deadline

Comment:

Thank you for the opportunity to submit comments on the recent workshop regarding proposed amendments to the MRR and cap-and-trade rules. In short, under the the proposed deadline, it would be very challenging to provide quality verification services.

First, regarding the June 1 reporting deadline for EPEs, I do not feel that there is enough time between June 1 and the proposed August 1 verification deadline to adequately verify Electric Power Entities (EPEs) reports. Rajinder indicated that EPEs could always submit earlier and start the verification earlier. While that is true, presumably there is a reason why the EPE reports were due so late, e.g., data not being available earlier in the year. I recall that many do not have RECs retired until sometime in July. I imagine you are working on this aspect of things. I am simply concerned that while some will submit early, perhaps many EPEs cannot or will not, and that would not leave an adequate amount of time to do a good verification, and in fact may make it difficult for a reporter to find a verifier willing to take on the verification on that schedule.

On a practical level, one thing that CARB should be aware of is that it is often very difficult to get quick turnaround from reporters on answering questions in June and July. Extremely difficult. Invariably, several key staff members are on vacation for a week or two at a time each. I realize the hope is that this would change if the regulatory deadline were moved, but the practical realities should be taken into account, to foresee and avoid the potential problems with a rule change.

Following up on Rajinder's discussion of the procedure on CARB's end after verifications are submitted, CARB might consider running its QA/QC routines on the reports as soon as they are submitted, rather than waiting until after the verification. That would be helpful to all parties, and that way any "red flags" can be passed along to the verifiers at the beginning of the process to investigate, rather than waiting to catch problems afterward.

I would recommend staggering the site visit requirement in the regulation so that not every facility is required to have a site visit in the first year of the compliance period. That adds yet another time pressure to the system, which would make it difficult to handle an August 1 deadline in those years. Perhaps you could allow the site visit to be delayed by a year or two if the reporter is using the same VB as previous years, and that VB has already performed a site visit. Or allow site visits before the report is

submitted.

You may want to add a provision to allow exemptions from the site visit requirement with approval from CARB. While the site visit is valuable, or even essential, for some facilities, for others it is pretty pointless. Most notably, for some electricity importers/exporters and transportation fuel suppliers, the critical verification activity is reviewing databases and contracts, and there is nothing that is done onsite that could not be done just as effectively via phone or computer conference (for example, using GoToMeeting to allow the reporter to demonstrate the data system). Often these entities are based out of state as well, which needlessly inflates the expense of the verification to the reporter.

If you'd like to streamline the verification timeline, I would strongly suggest that CARB carefully consider and prioritize the reported data to focus and limit the scope of the verifications to certain types of data that are absolutely critical. The scope and work load has grown quite a bit over the course of the program, from basically just checking the accuracy and precision of data directly associated with the emissions at first, to now checking essentially every data point submitted. Is all of that really necessary? If so, that's fine, but recognize that it takes time and effort. To achieve a quicker schedule, a more limited verification scope would seem to be a reasonable trade-off.

Also, I would note that the single most frustrating element of the verification process in our experience, both for the verifiers and the reporters, is the requirement that every correctable error be corrected. Because of that, our Issues Logs are often littered with lots of very minor errors that have absolutely no consequences with respect to the report. And these both frustrate (and frankly, sometimes infuriate) the reporters and divert the focus from the important issues that need to be addressed. Follow-up on these super-minor issues eat up an disproportionate time of the verification. It kind of goes to the comment that one gentleman made in the meeting that 1% of the verification takes a large portion of the time. I understand that CARB desires error-free reports, but there should be a reasonable threshold for requiring action, below which correction is not required. Where should that threshold be set? I don't know, but any threshold would be better than the absolute that is now in place. Again, I think prioritization is in order, if the schedule is to be compressed.

Thanks as always for your hard work and consideration. I look forward to future workshops on the matter.

Regards,  
Lara

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-03-11 16:53:35

No Duplicates.



**Comment 31 for Workshop on Potential Amendments to MRR and Cap-and-Trade Regulation (mrr-cpp-ct-amend-ws) - 1st Workshop.**

First Name: Clare

Last Name: Breidenich

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

Affiliation: Western Power Trading Forum

Subject: WPTF Comments to CARB on Potential Cap and Trade Changes

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/34-mrr-cpp-ct-amend-ws-UWJXfAQ0VDBWfQk4.pdf>

Original File Name: 3-17-16 WPTF Comments to CARB on Potential Cap and Trade Changes.pdf

Date and Time Comment Was Submitted: 2016-03-18 07:58:23

No Duplicates.

**Comment 32 for Workshop on Potential Amendments to MRR and Cap-and-Trade Regulation (mrr-cpp-ct-amend-ws) - 1st Workshop.**

First Name: Catherine  
Last Name: Reheis-Boyd  
Email Address: [creheis@wspa.org](mailto:creheis@wspa.org)  
Affiliation: WSPA

Subject: WSPA Comment Letter on pre-regulatory MRR amendments

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/35-mrr-cpp-ct-amend-ws-WyxQJVQIU2EFXAZl.pdf>

Original File Name: WSPA Comments on Pre-Regulatory MRR Ammendments.pdf

Date and Time Comment Was Submitted: 2016-03-18 07:58:23

No Duplicates.

**Comment 33 for Workshop on Potential Amendments to MRR and Cap-and-Trade Regulation (mrr-cpp-ct-amend-ws) - 1st Workshop.**

First Name: Gerald  
Last Name: Secundy  
Email Address: [ombcomm@arb.ca.gov](mailto:ombcomm@arb.ca.gov)  
Affiliation: CCEEB

Subject: CCEEB Comment Letter RE: Potential 2016 Amendments to Cap-and-Trade Regulation  
Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/36-mrr-cpp-ct-amend-ws-WjlXP1EkV1tXPAZ0.pdf>

Original File Name: CnT MRR CPP Feb24 Workshop Comments\_3-18.pdf

Date and Time Comment Was Submitted: 2016-03-21 13:18:18

No Duplicates.

**Comment 34 for Workshop on Potential Amendments to MRR and Cap-and-Trade Regulation (mrr-cpp-ct-amend-ws) - 1st Workshop.**

First Name: Catherine  
Last Name: Reheis-Boyd  
Email Address: [creheis@wspa.org](mailto:creheis@wspa.org)  
Affiliation: WSPA

Subject: Comments on ARB-Proposed Cap & Trade Regulation Amendments to Align With Clean Power  
Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/37-mrr-cpp-ct-amend-ws-UjNQJFc0VVISMgNm.pdf>

Original File Name: ARB February 2016 CapTrade Workshop WSPA Comment Letter.pdf

Date and Time Comment Was Submitted: 2016-03-21 13:18:18

No Duplicates.

**Comment 35 for Workshop on Potential Amendments to MRR and Cap-and-Trade Regulation (mrr-cpp-ct-amend-ws) - 1st Workshop.**

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

**Comment 36 for Workshop on Potential Amendments to MRR and Cap-and-Trade Regulation (mrr-cpp-ct-amend-ws) - 1st Workshop.**

First Name: Rock

Last Name: Zierman

Email Address: rock@cipa.org

Affiliation:

Subject: CIPA Comments on MRR Feb 24 Workshop

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/39-mrr-cpp-ct-amend-ws-VTZcM1UkWGoDWgBt.pdf>

Original File Name: CIPA MRR Comments 3-16-16.pdf

Date and Time Comment Was Submitted: 2016-03-29 12:48:49

No Duplicates.

**Comment 37 for Workshop on Potential Amendments to MRR and Cap-and-Trade Regulation (mrr-cpp-ct-amend-ws) - 1st Workshop.**

First Name: Clare

Last Name: Breidenich

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

Affiliation:

Subject: Joint Letter on a Trading-Ready Program

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/40-mrr-cpp-ct-amend-ws-U2BXfFRnUzlQewU0.pdf>

Original File Name: 3-29-15 Joint Letter to CARB on a Trading-Ready Program.pdf

Date and Time Comment Was Submitted: 2016-03-30 09:07:07

No Duplicates.

**Comment 38 for Workshop on Potential Amendments to MRR and Cap-and-Trade Regulation (mrr-cpp-ct-amend-ws) - 1st Workshop.**

First Name: Therese  
Last Name: Hampton  
Email Address: [thampton@publicgeneratingpool.com](mailto:thampton@publicgeneratingpool.com)  
Affiliation: Public Generating Pool

Subject: Consideration of 'Trading-Ready' Requirements

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/41-mrr-cpp-ct-amend-ws-UiJQMVmVFgAZVI9.pdf>

Original File Name: PGP Comments to CA Air Resources Board\_4-5-16.pdf

Date and Time Comment Was Submitted: 2016-04-06 15:10:55

No Duplicates.

**Comment 39 for Workshop on Potential Amendments to MRR and Cap-and-Trade Regulation (mrr-cpp-ct-amend-ws) - 1st Workshop.**

First Name: Nicole  
Last Name: Looney  
Email Address: Nicole.Looney@smud.org  
Affiliation: SMUD

Subject: SMUD Comments Re: February 24, 2016 Workshop on Mandatory Reporting and C&T  
Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/42-mrr-cpp-ct-amend-ws-VTIXNFI0UI4LPwc3.pdf>

Original File Name: LEG 2016-0272 SMUD Comments to ARB Re Workshop 2-24-16 Cap-and-Trade.pdf

Date and Time Comment Was Submitted: 2016-04-06 15:10:55

No Duplicates.

**There are no comments posted to Workshop on Potential Amendments to MRR and Cap-and-Trade Regulation (mrr-cpp-ct-amend-ws) that were presented during the Workshop at this time.**