

## **Comment 1 for Public Workshop on Cap-and-Trade Regulation Amendments: Post-2020 Cap Setting and Allowance Allocation (caps-allocation-ws) - 1st Workshop.**

First Name: Jim

Last Name: Roeder

Email Address: jroeder@kcc.com

Affiliation: Kimberly-Clark

Subject: Comments on Proposed Update to Tissue Benchmark

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1-caps-allocation-ws-BzVVY1JiBGEFLINn.pdf>

Original File Name: 2016-4-1 Kimberly-Clark Comments Ltr on CARB March 29 Puublic Workshop& Tissue Benchmark.PDF

Date and Time Comment Was Submitted: 2016-04-01 14:31:38

No Duplicates.

## **Comment 2 for Public Workshop on Cap-and-Trade Regulation Amendments: Post-2020 Cap Setting and Allowance Allocation (caps-allocation-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 the March 29, 2016 Workshop  
Comment:

Please find the comments of Center for Resource Solutions (CRS) in response to the March 29, 2016 Workshop on Cap-and-Trade Regulation Post-2020 Emissions Caps and Allowance Allocation attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/3-caps-allocation-ws-VzQHcwNxUmIAaVQ5.pdf>

Original File Name: CRScomment\_3-29Workshop\_4-12-2016.pdf

Date and Time Comment Was Submitted: 2016-04-12 11:21:29

No Duplicates.

### **Comment 3 for Public Workshop on Cap-and-Trade Regulation Amendments: Post-2020 Cap Setting and Allowance Allocation (caps-allocation-ws) - 1st Workshop.**

First Name: Sarah

Last Name: Taheri

Email Address: staheri@scppa.org

Affiliation: Southern CA Public Power Authority

Subject: Southern CA Public Power Authority Comments on Post-2020 C&T Allowance Allocation  
Comment:

Please see attachment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/4-caps-allocation-ws-B3RVMFYnWHtXMFMM.pdf>

Original File Name: SCPPA Comments on ARB workshop - Allowance Allocations\_Final.pdf

Date and Time Comment Was Submitted: 2016-04-15 09:39:57

No Duplicates.

## **Comment 4 for Public Workshop on Cap-and-Trade Regulation Amendments: Post-2020 Cap Setting and Allowance Allocation (caps-allocation-ws) - 1st Workshop.**

First Name: Elvyra F.  
Last Name: San Juan  
Email Address: esanjuan@calstate.edu  
Affiliation: CSU, Office of the Chancellor

Subject: California State University's comments regarding Cap-and-Trade Regulation 2016 Amendments:  
Comment:

Good morning,

On behalf of Assistant Vice Chancellor Elvyra F. San Juan, please find attached letter dated April 15, 2016 in reference to California State University's comments regarding Cap-and-Trade Regulation 2016 Amendments: Setting Post 2020 Emissions Caps.

Thank you,

HEATHER KING  
Administrative Analyst for Architecture & Engineering

Capital Planning, Design & Construction  
401 Golden Shore, 2nd Floor Long Beach, CA 90802-4210  
Office: 562.951.4132 | Fax: 562.951.4921 | hking@calstate.edu  
Please consider the environment before printing this email.

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

Original File Name: ARB Comment letter allowances post 2000.pdf

Date and Time Comment Was Submitted: 2016-04-15 10:38:43

No Duplicates.

## **Comment 5 for Public Workshop on Cap-and-Trade Regulation Amendments: Post-2020 Cap Setting and Allowance Allocation (caps-allocation-ws) - 1st Workshop.**

First Name: David  
Last Name: Siao  
Email Address: dsiao@roseville.ca.us  
Affiliation: Roseville Electric

Subject: Roseville Electric Comments on March 29 CARB Post 2020 Cap and Allocation Workshop  
Comment:

Thank you for considering Roseville Electric's comments on the 1st Workshop.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/6-caps-allocation-ws-AXNVPAR2BDIBcQhh.pdf>

Original File Name: Roseville Comments, March 29 CARB Post 2020 Cap and Allocation Workshop.pdf

Date and Time Comment Was Submitted: 2016-04-15 10:56:13

No Duplicates.

## **Comment 6 for Public Workshop on Cap-and-Trade Regulation Amendments: Post-2020 Cap Setting and Allowance Allocation (caps-allocation-ws) - 1st Workshop.**

First Name: Martin

Last Name: Caballero

Email Address: martin.caballero@mid.org

Affiliation: Modesto Irrigation District

Subject: March 29, 2016 CARB Workshop MID Comments

Comment:

MID respectfully submits the attached comments in response to the March 29, 2016 CARB workshop on proposed changes to the cap & trade program.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/7-caps-allocation-ws-VDIQN1MgU19XYwU8.pdf>

Original File Name: Mar 29 2016 CARB Workshop MID Comments.pdf

Date and Time Comment Was Submitted: 2016-04-15 12:42:14

No Duplicates.

**Comment 7 for Public Workshop on Cap-and-Trade Regulation Amendments: Post-2020  
Cap Setting and Allowance Allocation (caps-allocation-ws) - 1st Workshop.**

First Name: Susie  
Last Name: Berlin  
Email Address: berlin@susieberlinlaw.com  
Affiliation: Law Offices of Susie Berlin

Subject: NCPA Comments on March 29 Cap-Setting and Allowance Allocation Workshop  
Comment:

Attached please find the Northern California Power Agency Comments  
on the March 29 Cap-Setting and Allowance Allocation Workshop.

thank you

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/8-caps-allocation-ws-AW9RNFwtAjABWABj.pdf>

Original File Name: NCPA comments re March 29 Workshop (final 4-15-16).pdf

Date and Time Comment Was Submitted: 2016-04-15 14:09:52

No Duplicates.

**Comment 8 for Public Workshop on Cap-and-Trade Regulation Amendments: Post-2020 Cap Setting and Allowance Allocation (caps-allocation-ws) - 1st Workshop.**

First Name: Katie  
Last Name: Sullivan  
Email Address: sullivan@ieta.org  
Affiliation: IETA

Subject: IETA Comments on Post-2020 Caps & Allocation Workshop  
Comment:

Dear Staff,

Attached, find IETA's comments on the 29 March Workshop on potential amendments to California's Cap-and-Trade Regulation related to post-2020 emissions caps and allowance allocation.

We appreciate this opportunity to share input.

Regards,

Katie

Director  
International Emissions Trading Association (IETA)

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/9-caps-allocation-ws-VTwGZQRxUmBSC1c0.pdf>

Original File Name: IETA Comments\_ARB Post-2020 Cap-Allocation\_15Apr2016.pdf

Date and Time Comment Was Submitted: 2016-04-15 15:11:48

No Duplicates.



**Comment 9 for Public Workshop on Cap-and-Trade Regulation Amendments: Post-2020 Cap Setting and Allowance Allocation (caps-allocation-ws) - 1st Workshop.**

First Name: Jerilyn Lopez

Last Name: Mendoza

Email Address: jmendoza5@semprautilities.com

Affiliation: SoCalGas and SDG&E

Subject: SoCalGas and SDG&E Comments on Cap Setting and Allowance Allocation  
Comment:

Attached please find written comments submitted on behalf of SoCalGas and SDG&E on the materials shared by the California Air Resources Board at the March 29, 2016, workshop on Cap and Trade Regulation Amendments: Post-2020 Cap Setting and Allowance Allocation. Please contact me with any questions or concerns. Thank you.

Jerilyn López Mendoza  
SoCalGas  
Environmental Affairs Program Manager - CARB  
Energy and Environmental Affairs  
and on behalf of SDG&E  
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/10-caps-allocation-ws-WilVPFIwBzVSOFI1.pdf>

Original File Name: SoCalGas-SDG&E Comments on C&T Cap&Allowances 4-15-16.pdf

Date and Time Comment Was Submitted: 2016-04-15 15:32:50

No Duplicates.

## **Comment 10 for Public Workshop on Cap-and-Trade Regulation Amendments: Post-2020 Cap Setting and Allowance Allocation (caps-allocation-ws) - 1st Workshop.**

First Name: Warren  
Last Name: MacGillivray  
Email Address: wmacgillivray@aresmgmt.com  
Affiliation: Panoche Energy Center

Subject: PEC Comments  
Comment:

Attached are PEC's comments to the March 29, 2016 workshop.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/11-caps-allocation-ws-WytSMQFjUl5XMgdm.pdf>

Original File Name: PEC CARB Comments 4 15 16.pdf

Date and Time Comment Was Submitted: 2016-04-15 15:57:17

No Duplicates.

## **Comment 11 for Public Workshop on Cap-and-Trade Regulation Amendments: Post-2020 Cap Setting and Allowance Allocation (caps-allocation-ws) - 1st Workshop.**

First Name: Bruce  
Last Name: Ray  
Email Address: bruce.ray@jm.com  
Affiliation: Johns Manville

Subject: Comments of Johns Manville on CARB Post-2020 cap/allocation workshop on March 29, 2016  
Comment:

Johns Manville (JM) operates a fiber glass insulation manufacturing plant in Willows in Glenn County about an hour north of Sacramento.

The JM Willows plant is designated ARB ID No. 104122 and falls within NAICS Code 327993 (mineral wool).

We attended the March 29, 2016 workshop on "Cap-and-Trade Regulation Post-2020 Emissions Caps and Allowance Allocation" and offer the following comments:

- The JM Willows plant participates in the current cap and trade program. At the end of the current program in 2020 we expect to be in allowance surplus. At the workshop I requested that staff confirm that JM can carry over our pre-2020 surplus into the post-2020 program for use in meeting our post-2020 compliance/surrender obligations. This was in fact confirmed by staff response and will guide our compliance strategy going forward.

- Clarification is needed on whether net electricity will be accounted for at the state-wide emission factor or at the individual provider's portfolio's numbers. It should be noted that those latter numbers may not be available in time for submittal to CITTS. CARB should also clarify if the statewide numbers will be adjusted year over year.

- For strategic planning purposes, the numbers CARB will use as electricity emission factors should be published well in advance.

- CARB should clarify how including direct allocation for purchased electricity will affect the current mandatory participation threshold of 25,000 MT CO<sub>2</sub>e per year as well as the mandatory reporting threshold of 10,000 MT CO<sub>2</sub>e per year.

At the March 29, 2016 workshop, staff announced that there will soon be scheduled a workshop on leakage risk. Industrial allowance allocations and leakage are closely related. Accordingly, we look forward to the leakage workshop and will be submitting additional comments on both leakage and industrial allocations.

Thank you,  
Bruce D. Ray, Director of Governmental and Regulatory Affairs,  
Associate General Counsel  
Johns Manville  
717 17th Street (80202) | Denver, Colorado 80217-5108  
P: 303 810 9723

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-04-15 16:08:53

No Duplicates.

## **Comment 12 for Public Workshop on Cap-and-Trade Regulation Amendments: Post-2020 Cap Setting and Allowance Allocation (caps-allocation-ws) - 1st Workshop.**

First Name: William

Last Name: Westerfield

Email Address: William.Westerfield@smud.org

Affiliation: SMUD

Subject: SMUD Comments On Post-2020 Cap-Setting and Allocation  
Comment:

Please see attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/13-caps-allocation-ws-AXJROlwoBTJSeVAz.pdf>

Original File Name: SMUD-comments-capsettingallocation-LEG-16-0298.pdf

Date and Time Comment Was Submitted: 2016-04-15 16:21:16

No Duplicates.

## **Comment 13 for Public Workshop on Cap-and-Trade Regulation Amendments: Post-2020 Cap Setting and Allowance Allocation (caps-allocation-ws) - 1st Workshop.**

First Name: Erica

Last Name: Morehouse

Email Address: emorehouse@edf.org

Affiliation: Environmental Defense Fund

Subject: Comments on Cap Setting and Allocation Post-2020

Comment:

Please accept EDF's comments on the March 29 Workshop.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/14-caps-allocation-ws-UjFWfQN2Aw8BZANi.pdf>

Original File Name: C-T Cap Setting and Allocation.pdf

Date and Time Comment Was Submitted: 2016-04-15 16:21:50

No Duplicates.

## **Comment 14 for Public Workshop on Cap-and-Trade Regulation Amendments: Post-2020 Cap Setting and Allowance Allocation (caps-allocation-ws) - 1st Workshop.**

First Name: Claire  
Last Name: Halbrook  
Email Address: cehu@pge.com  
Affiliation: Pacific Gas and Electric Company

Subject: PG&E Comments on 3/29 Cap Setting and Allocation Workshop  
Comment:

PG&E Comments on 3/29 Cap Setting and Allocation Workshop

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/15-caps-allocation-ws-VydUNVQwVloAZVQ7.pdf>

Original File Name: PGE Comments on allocation and cap setting workshop 4\_15\_16.pdf

Date and Time Comment Was Submitted: 2016-04-15 16:23:59

No Duplicates.

## **Comment 15 for Public Workshop on Cap-and-Trade Regulation Amendments: Post-2020 Cap Setting and Allowance Allocation (caps-allocation-ws) - 1st Workshop.**

First Name: James  
Last Name: Hendry  
Email Address: [jhendry@sfgwater.org](mailto:jhendry@sfgwater.org)  
Affiliation: San Francisco PUC

Subject: Comments on post-2020 allowance allocation  
Comment:

Attached are comments of the San Francisco PUC on the March 29th CARB workshop on post-2020 allowance allocation issues. Thanks for the opportunity to comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/16-caps-allocation-ws-VDcAZ1AjVWQAWQFi.doc>

Original File Name: carb cap and trade post 2020 comment 041516.doc

Date and Time Comment Was Submitted: 2016-04-15 16:26:44

No Duplicates.



## **Comment 16 for Public Workshop on Cap-and-Trade Regulation Amendments: Post-2020 Cap Setting and Allowance Allocation (caps-allocation-ws) - 1st Workshop.**

First Name: Shelly  
Last Name: Sullivan  
Email Address: ssullivan@onemain.com  
Affiliation: Climate Change Policy Coalition

Subject: CCPC Comments Post-2020 Cap Setting  
Comment:

Attached please find comments submitted on behalf CCPC regarding ARB's Post-2020 Cap Setting workshop.

If you have any questions or need anything further please feel free to contact me.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/17-caps-allocation-ws-VjVVMF0sBzdQCQd3.pdf>

Original File Name: CCPC Post 2020 Cap Setting Comments\_2\_15\_16.pdf

Date and Time Comment Was Submitted: 2016-04-15 16:38:10

No Duplicates.

**Comment 17 for Public Workshop on Cap-and-Trade Regulation Amendments: Post-2020  
Cap Setting and Allowance Allocation (caps-allocation-ws) - 1st Workshop.**

First Name: Jerilyn

Last Name: Lopez Mendoza

Email Address: JMendoza5@semprautilities.com

Affiliation: SoCalGas Co

Subject: CA Joint NG Utility Group C&T Comment Letter

Comment:

These comments are respectfully submitted jointly on behalf of investor owned, natural-gas distribution utilities (IOUs): Southern California Gas Company (SoCalGas), Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric (SDG&E), Southwest Gas Corporation, and publicly-owned natural gas distribution utilities (POUs): serving the Cities of Palo Alto, Long Beach, and Vernon.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/18-caps-allocation-ws-UWVXfFRkUDYLIAMy.pdf>

Original File Name: 4-15-16 Final Comment letter-Gas Utilities Group\_CARB\_CT 3-29-16 wrkshp.pdf

Date and Time Comment Was Submitted: 2016-04-15 16:54:37

No Duplicates.

## **Comment 18 for Public Workshop on Cap-and-Trade Regulation Amendments: Post-2020 Cap Setting and Allowance Allocation (caps-allocation-ws) - 1st Workshop.**

First Name: John

Last Name: Larrea

Email Address: john@clfp.com

Affiliation: CA League of Food Processors

Subject: Comments on C&T Regulation Amends for Post-202 Cap setting

Comment:

CLFP Comments on Post-202 cap set and allocation

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/19-caps-allocation-ws-WzhTOVQzAiEKUwZl.pdf>

Original File Name: CLFP comments April 15, 2016.pdf

Date and Time Comment Was Submitted: 2016-04-15 17:05:56

No Duplicates.

## **Comment 19 for Public Workshop on Cap-and-Trade Regulation Amendments: Post-2020 Cap Setting and Allowance Allocation (caps-allocation-ws) - 1st Workshop.**

First Name: Alex  
Last Name: Jackson  
Email Address: [ajackson@nrdc.org](mailto:ajackson@nrdc.org)  
Affiliation: NRDC

Subject: NRDC initial comments on cap setting & allocation post 2020  
Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/20-caps-allocation-ws-VzkFcVYzBzdRCFMw.pdf>

Original File Name: NRDC Comments on Post 2020 Cap Setting Allocation.pdf

Date and Time Comment Was Submitted: 2016-04-19 13:23:36

No Duplicates.

**Comment 20 for Public Workshop on Cap-and-Trade Regulation Amendments: Post-2020  
Cap Setting and Allowance Allocation (caps-allocation-ws) - 1st Workshop.**

First Name: Deric  
Last Name: Wittenborn  
Email Address: djw@eslawfirm.com  
Affiliation: TID

Subject: TID Comments on the March 29th Cap-and-Trade Public Workshop  
Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/23-caps-allocation-ws-USVRPgBlBwsDZFU5.pdf>

Original File Name: TID Allowance Allocation March 29 2016 Workshop.pdf

Date and Time Comment Was Submitted: 2016-04-19 13:23:36

No Duplicates.

**Comment 21 for Public Workshop on Cap-and-Trade Regulation Amendments: Post-2020  
Cap Setting and Allowance Allocation (caps-allocation-ws) - 1st Workshop.**

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

Subject: CCEEB Cap-and-Trade March 29 Workshop Comment Letter  
Comment:

See attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/24-caps-allocation-ws-UjECZ1YyV2FQNABf.pdf>

Original File Name: CCEEB Cap-and-Trade March 29 Workshop Comments\_4-22.pdf

Date and Time Comment Was Submitted: 2016-04-26 12:47:36

No Duplicates.

**Comment 22 for Public Workshop on Cap-and-Trade Regulation Amendments: Post-2020  
Cap Setting and Allowance Allocation (caps-allocation-ws) - 1st Workshop.**

First Name: Katy  
Last Name: Morsony  
Email Address: [klr@a-klaw.com](mailto:klr@a-klaw.com)  
Affiliation: EPUC

Subject: EPUC Comments on March 29 Workshop  
Comment:

See attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/25-caps-allocation-ws-AWRRJ1cjUWEDWIIx.pdf>

Original File Name: EPUC Comments March 29 Workshop.pdf

Date and Time Comment Was Submitted: 2016-04-26 12:47:36

No Duplicates.

**Comment 23 for Public Workshop on Cap-and-Trade Regulation Amendments: Post-2020  
Cap Setting and Allowance Allocation (caps-allocation-ws) - 1st Workshop.**

First Name: Tamara  
Last Name: Raspberry  
Email Address: TRaspberry@semprautilities.com  
Affiliation: SDGE

Subject: SDGE Comments to March 29 Workshop  
Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/26-caps-allocation-ws-UGIHMQExAGVXDgAw.pdf>

Original File Name: 2016\_04\_13-SDGE-Comment-Cap-and-Trade-Post2020Workshop.pdf

Date and Time Comment Was Submitted: 2016-04-26 12:47:36

No Duplicates.



## **Comment 24 for Public Workshop on Cap-and-Trade Regulation Amendments: Post-2020 Cap Setting and Allowance Allocation (caps-allocation-ws) - 1st Workshop.**

First Name: Mark

Last Name: Sedlacek

Email Address: ombcomm@arb.ca.gov

Affiliation: LADWP

Subject: LADWP Comments on 3-29-16 Workshop - Post 2020 Emissions Caps/Allowance Allocation I  
Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/27-caps-allocation-ws-AGxRNIUwUXUGcANc.pdf>

Original File Name: LADWP Comments on Post 2020 Cap Setting Allowance Allocation April 2016.pdf

Date and Time Comment Was Submitted: 2016-05-04 10:37:46

No Duplicates.

## **Comment 25 for Public Workshop on Cap-and-Trade Regulation Amendments: Post-2020 Cap Setting and Allowance Allocation (caps-allocation-ws) - 1st Workshop.**

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

Subject: WSPA comments on Cap & Trade Cost Containment  
Comment:

See Attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/28-caps-allocation-ws-UyRSJ1cmADIEXQlq.zip>

Original File Name: WSPA comment letter AB 32 Offsets Workshops\_05\_13\_2016\_final.zip

Date and Time Comment Was Submitted: 2016-05-16 13:31:03

No Duplicates.

**There are no comments posted to Public Workshop on Cap-and-Trade Regulation Amendments: Post-2020 Cap Setting and Allowance Allocation (caps-allocation-ws) that were presented during the Workshop at this time.**