

**Comment 1 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Larry  
Last Name: Trowsdale  
Email Address: [wepco@mchsi.com](mailto:wepco@mchsi.com)  
Affiliation: PVL Limestone, Inc.

Subject: Requested Revision of Cap and Trade for Lime  
Comment:

Please see uploaded message.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/2-ct-3-2-18-wkshp-ws-USFSIIU4VlpSNwJj.docx>

Original File Name: PVL Cap&Trade Revision .docx

Date and Time Comment Was Submitted: 2018-03-07 11:32:30

No Duplicates.

## **Comment 2 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Andrew  
Last Name: Craig  
Email Address: [acraig@calbioenergy.com](mailto:acraig@calbioenergy.com)  
Affiliation: California Bioenergy LLC

Subject: GWP of Methane

Comment:

CalBio proposes that the definition of Global Warming Potential be updated to be consistent with the updated definition provided in the Mandatory Reporting Regulation:

The language from the MRR is:

"Global warming potential" or "GWP" means the ratio of the time-integrated radiative forcing from the instantaneous release of one kilogram of a trace substance relative to that of one kilogram of a reference gas, i.e., CO<sub>2</sub>. For 2011 through 2020 data years, the GWP values used for emissions estimation and reporting are as specified in Table A-1 to Subpart A of Title 40, Code of Federal Regulations (CFR) Part 98 as published to the Federal Register on 10/30/2009. For data years 2021 and onward, the GWP values are as specified in the Table A-1 to Subpart A of Title 40 Code of Federal Regulations Part 98 as published to the CFR on 12/11/2014, which is hereby incorporated by reference.

Thanks,  
Andrew Craig

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2018-03-12 14:30:59

No Duplicates.

**Comment 3 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Nicol

Last Name: Gagstetter

Email Address: [nicol.gagstetter@riotinto.com](mailto:nicol.gagstetter@riotinto.com)

Affiliation:

Subject: Comments on possible revisions to the Cap and Trade Regulation

Comment:

Please see the attached comments on the possible revisions to the cap and trade regulation.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/5-ct-3-2-18-wkshp-ws-WihcLIIxBAgEYQRl.pdf>

Original File Name: RTB CARB Cap & Trade Reg Comments March 2018 FINAL.pdf

Date and Time Comment Was Submitted: 2018-03-13 10:16:42

No Duplicates.

**Comment 4 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) -  
1st Workshop.**

First Name: Jim

Last Name: Halloran

Email Address: JPH@CAT.COM

Affiliation:

Subject: Solar Turbines March 2nd Workshop Comments

Comment:

Please find our attached comments....

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/6-ct-3-2-18-wkshp-ws-VTZVDFwtUV0GY1I9.pdf>

Original File Name: C&P Comments 3-16.pdf

Date and Time Comment Was Submitted: 2018-03-14 12:02:04

No Duplicates.

**Comment 5 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Nigel

Last Name: Ravenscroft

Email Address: nigel.ravenscroft@owenscorning.com

Affiliation: Owens Corning

Subject: foam methodology for carbon offset credit creation

Comment:

Comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/7-ct-3-2-18-wkshp-ws-AGNQOVc7AD5VNgdp.docx>

Original File Name: Comments to CalEPA-ARB on ACR carbon offset credit - foam methodology (2018.3.14) Ravenscroft.docx

Date and Time Comment Was Submitted: 2018-03-14 12:06:33

No Duplicates.

**Comment 6 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Ramsey

Last Name: Haddad

Email Address: ramsey.haddad@californiasteel.com

Affiliation: California Steel Industries

Subject: CSI Comments on Amendments to the Cap-and-Trade Regulation 03142018

Comment:

Please see attached comments to ARB from California Steel Industries, Inc.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/8-ct-3-2-18-wkshp-ws- VTYBdAFpWFQCZwlm.pdf>

Original File Name: CSI Comments on Amendments to the Cap-and-Trade Regulation 03142018.pdf

Date and Time Comment Was Submitted: 2018-03-14 12:57:16

No Duplicates.

**Comment 7 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Jeffrey

Last Name: Fort

Email Address: jeffrey.fort@dentons.com

Affiliation: Dentons US LLP

Subject: Possible Revisions to the Cap-and-Trade Regulation

Comment:

See Comments regarding Possible Revisions to the Cap-and-Trade Regulation

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/9-ct-3-2-18-wkshp-ws-BmVRNgR1VCpXMABu.pdf>

Original File Name: Cap-and-Trade.pdf

Date and Time Comment Was Submitted: 2018-03-15 12:54:59

No Duplicates.

**Comment 8 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Nick

Last Name: Facciola

Email Address: nick@3Degreesinc.com

Affiliation: 3Degrees Group, Inc.

Subject: Removal of days out of Regulatory Compliance, Process Improvements, & Protocol Errata

Comment:

Please see the attached comment letter.

Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/10-ct-3-2-18-wkshp-ws-UWIBYwRgUWVRJVM2.pdf>

Original File Name: 3Degrees CT-3-2-19-WKSHP Comments.pdf

Date and Time Comment Was Submitted: 2018-03-15 13:37:42

No Duplicates.

**Comment 9 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Badia

Last Name: Harrell

Email Address: BHarrell@cityofpasadena.net

Affiliation: City of Pasadena Water and Power

Subject: PWP Comments re 03/02/18 Cap-and-Trade Prelim Discussion Draft

Comment:

Thank you for the opportunity to provide comments on the Cap and Trade Preliminary Discussion Draft and Cost Containment Concept Paper.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/12-ct-3-2-18-wkshp-ws-AnIHYAR2AzEDYQBl.pdf>

Original File Name: Pasadena Water and Power C & T PDD and Cost Containment Comments 03\_15\_18.pdf

Date and Time Comment Was Submitted: 2018-03-15 17:02:41

No Duplicates.

**Comment 10 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Tanya

Last Name: DeRivi

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

Affiliation: Joint State POUs

Subject: California Public Power "Forced Consignment" Comments

Comment:

Please see attached letter/paper.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/13-ct-3-2-18-wkshp-ws-AnJROFQgAg4Lawhn.pdf>

Original File Name: POU Forced Consignment Comment Letter.pdf

Date and Time Comment Was Submitted: 2018-03-16 07:51:15

No Duplicates.

**Comment 11 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Tanya

Last Name: DeRivi

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

Affiliation: SCPPA

Subject: SCPPA Comments on March 2018 CnT Workshop

Comment:

Please see SCPPA's attached comment letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/14-ct-3-2-18-wkshp-ws-VyRWM10sVHdVMgdY.pdf>

Original File Name: SCPPA Comments on PDD of CnT amendments 3-16-2018.pdf

Date and Time Comment Was Submitted: 2018-03-16 10:40:43

No Duplicates.

**Comment 12 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Jessica

Last Name: Olson

Email Address: [jessica.olson2@honeywell.com](mailto:jessica.olson2@honeywell.com)

Affiliation:

Subject: Comments from Honeywell International Inc.

Comment:

Please see attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/16-ct-3-2-18-wkshp-ws-VmdcYgYqVDcHMgkk.pdf>

Original File Name: 18-03-16 Honeywell comments.pdf

Date and Time Comment Was Submitted: 2018-03-16 10:56:07

No Duplicates.

**Comment 13 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: sean  
Last Name: carney  
Email Address: scarney@finitecarbon.com  
Affiliation: Finite Carbon

Subject: Finite Carbon Public Comments

Comment:

Dear Chair Nichols and Members of the Board:

On behalf of Finite Carbon, I am pleased to submit our public comments.

Sincerely,

Sean Carney

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/18-ct-3-2-18-wkshp-ws-AGYFYABeVmYCawBt.pdf>

Original File Name: FC comment letter\_3-16-18.pdf

Date and Time Comment Was Submitted: 2018-03-16 12:21:42

No Duplicates.

**Comment 14 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Shelly

Last Name: Sullivan

Email Address: ssullivan@onemain.com

Affiliation: Climate Change Policy Coalition

Subject: CCPC Comments Amendments to the Cap-and-Trade Regulation - March 2018 Workshop

Comment:

Attached please find comments submitted on behalf of the Climate Change Policy Coalition (CCPC) regarding ARB's Cap-and-Trade Regulatory Amendments Workshop in March 2018.

If you have any questions or need anything further, please feel free to contact Shelly Sullivan at (916) 213-3700.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/19-ct-3-2-18-wkshp-ws-B2RWMwR1WGhSC1Az.pdf>

Original File Name: CCPC C\_T Comments 3\_16\_18.pdf

Date and Time Comment Was Submitted: 2018-03-16 12:20:37

No Duplicates.

**Comment 15 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Sarah  
Last Name: Wescott  
Email Address: [swescott@climateactionreserve.org](mailto:swescott@climateactionreserve.org)  
Affiliation: Climate Action Reserve

Subject: Climate Action Reserve comments on PDD  
Comment:

Please see attachment

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/20-ct-3-2-18-wkshp-ws-WmgANgAwAGtQCQBw.pdf>

Original File Name: 2018 PDD Reserve Public Comments - with Attachment.pdf

Date and Time Comment Was Submitted: 2018-03-16 12:25:47

No Duplicates.

## **Comment 16 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Tara

Last Name: Kaushik

Email Address: [tara.kaushik@hklaw.com](mailto:tara.kaushik@hklaw.com)

Affiliation:

Subject: Workshop to Discuss Possible Revisions to the Cap-and-Trade Regulation

Comment:

Please find attached Native American Venture Fund's Comments on February 16, 2018 Staff Preliminary Discussion Draft of Proposed Amendments to the Offsets Provisions of the California Cap-and-Trade Regulation.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/21-ct-3-2-18-wkshp-ws-Uz0AZwdwU2ZWDwNg.pdf>

Original File Name: NAVF Comments on PDD of Proposed Amendments to Cap and Trade Program.pdf

Date and Time Comment Was Submitted: 2018-03-16 12:12:48

No Duplicates.

**Comment 17 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Jodean

Last Name: Giese

Email Address: jodean.giese@ladwp.com

Affiliation: LADWP

Subject: LADWP Comments on Possible Revisions to Cap and Trade Regulation

Comment:

Please see attached letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/22-ct-3-2-18-wkshp-ws-VDhdOlcyBSEFc1MM.pdf>

Original File Name: LADWP Comments on Cap and Trade Regulation March 2018 Workshop.pdf

Date and Time Comment Was Submitted: 2018-03-16 12:34:55

No Duplicates.

**Comment 18 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Charles  
Last Name: Kolstad  
Email Address: [ckolstad@stanford.edu](mailto:ckolstad@stanford.edu)  
Affiliation: Stanford University

Subject: Comment on Scoping Plan  
Comment:

Attached is a document prepared several years ago but never put in the public domain officially. The issue is how to evaluate the success or failure of the cap and trade program.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/23-ct-3-2-18-wkshp-ws-B2wHbl0wUXFXJVc2.pdf>

Original File Name: Kolstad.Wimberger.AB32Symposium.2012.pdf

Date and Time Comment Was Submitted: 2018-03-16 12:40:12

No Duplicates.

**Comment 19 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Katelyn  
Last Name: Roedner Sutter  
Email Address: [kroedner@edf.org](mailto:kroedner@edf.org)  
Affiliation: Environmental Defense Fund

Subject: Comments re: Possible Revisions to the Cap-and-Trade Regulation  
Comment:

Attached please find comments on behalf of Environmental Defense Fund regarding possible revisions to the cap-and-trade regulation.

Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/24-ct-3-2-18-wkshp-ws-WzoBZVZkBG4APgdY.pdf>

Original File Name: AB398 Update Reg Workshop Comments final.pdf

Date and Time Comment Was Submitted: 2018-03-16 12:29:58

No Duplicates.

**Comment 20 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

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

Subject: C&T Reg Amendment Comments - IETA  
Comment:

Here are IETA comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/26-ct-3-2-18-wkshp-ws-UDIUNwN2U2EHXgFi.pdf>

Original File Name: IETA\_CARB\_Post\_2020\_Cap\_and\_Trade\_Proposed\_Amendments\_FINAL.pdf

Date and Time Comment Was Submitted: 2018-03-16 13:43:44

No Duplicates.

**Comment 21 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Alisa

Last Name: Kaseweter

Email Address: [alkaseweter@bpa.gov](mailto:alkaseweter@bpa.gov)

Affiliation: Bonneville Power Administration

Subject: BPA Comments to March 2 workshop

Comment:

Please find attached BPA's comments in response to the ARB's March 2 workshop and solicitation for comments pertaining to the CAISO's regional integration and EIM GHG compliance initiative.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/27-ct-3-2-18-wkshp-ws-UzVRPgfUVmQHbVIN.pdf>

Original File Name: FINAL\_CARB comments-CAISO GHG initiative\_03162018.pdf

Date and Time Comment Was Submitted: 2018-03-16 13:55:39

No Duplicates.

**Comment 22 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Daniel

Last Name: Lashof

Email Address: dan.lashof@nextgenpolicy.org

Affiliation: NextGen Policy Center

Subject: NextGen California Comments on 3-16-2018 Cap and Trade Workshop

Comment:

Please see attached comment with 4 attachments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/28-ct-3-2-18-wkshp-ws-BWsHZAd+ByBSM1M2.zip>

Original File Name: NextGen Cap and Trade Reg Revision Discussion Draft Comment 3-16-2018.zip

Date and Time Comment Was Submitted: 2018-03-16 13:54:28

No Duplicates.

**Comment 23 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Alex

Last Name: Jackson

Email Address: ajackson@nrdc.org

Affiliation: NRDC

Subject: NRDC Comments on March 2 Workshop

Comment:

Please find attached NRDC's comments on the March 2, 2018  
cap-and-trade workshop

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/29-ct-3-2-18-wkshp-ws-VjhSJI3AzMLUlc0.pdf>

Original File Name: NRDC Comments on March 2 Workshop.pdf

Date and Time Comment Was Submitted: 2018-03-16 14:04:40

No Duplicates.

**Comment 24 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Robin  
Last Name: Shropshire  
Email Address: rshropshire@ppmsllc.com  
Affiliation: Panoche Energy Center

Subject: PEC Comments on PDD C&T Regulation  
Comment:

See Attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/30-ct-3-2-18-wkshp-ws-AnJQM1MxBAgCZwFu.pdf>

Original File Name: PEC Comments \_ 021618 PDD of the Cap and Trade Regulation.pdf

Date and Time Comment Was Submitted: 2018-03-16 14:29:25

No Duplicates.

**Comment 25 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: John  
Last Name: Leslie  
Email Address: john.leslie@dentons.com  
Affiliation: Attorney for Shell Energy

Subject: Comments of Shell Energy

Comment:

Attached are the Comments of Shell Energy North America (US), L.P. on Preliminary Discussion Draft of Potential Changes to the Cap and Trade Regulations.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/31-ct-3-2-18-wkshp-ws-UiEFa1M3VmkBawZZ.pdf>

Original File Name: Shell Energy Comments on Preliminary Discussion Draft (Cap and Trade Regulations).pdf

Date and Time Comment Was Submitted: 2018-03-16 14:42:33

No Duplicates.

**Comment 26 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Peter  
Last Name: Weiner  
Email Address: peterweiner@paulhastings.com  
Affiliation: Crockett Cogeneration

Subject: Comments of Crockett Cogeneration  
Comment:

Please see attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/32-ct-3-2-18-wkshp-ws-UzABdVQ6UGBQPQRh.pdf>

Original File Name: Crockett Comments (Workshop 2018 Amendments).pdf

Date and Time Comment Was Submitted: 2018-03-16 14:55:01

No Duplicates.

**Comment 27 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Melinda

Last Name: Hicks

Email Address: mhicks@kernoil.com

Affiliation: Kern Oil & Refining Co.

Subject: Workshop Comments - Kern Oil & Refining Co.

Comment:

Kern Oil & Refining Co. appreciates the opportunity to comment.  
Please see attached letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/33-ct-3-2-18-wkshp-ws-UDsAYwZ1VWgAWQFu.pdf>

Original File Name: Kern Oil C&T 03-02-18 Workshop Comments March 16 2018.pdf

Date and Time Comment Was Submitted: 2018-03-16 15:03:42

No Duplicates.

**Comment 28 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Clare

Last Name: Breidenich

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

Affiliation:

Subject: Comments of the Western Power Trading Forum

Comment:

Please find attached WPTF comments on the March 2nd workshop.  
Thank you, Clare Breidenich

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/34-ct-3-2-18-wkshp-ws-UWIBKIVLAGUELwg5.pdf>

Original File Name: 3-16-18 WPTF comments on cap and trade changes.pdf

Date and Time Comment Was Submitted: 2018-03-16 15:11:33

No Duplicates.

**Comment 29 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Jon

Last Name: Costantino

Email Address: [jon@tradesmanadvisors.com](mailto:jon@tradesmanadvisors.com)

Affiliation: VERA

Subject: VERA Comments on Offset Provisions

Comment:

Please find attached comment letter

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/35-ct-3-2-18-wkshp-ws-UWIGLVJiA2YLIAMy.pdf>

Original File Name: 3-16-18 VERA Comments on CT PDD-final.pdf

Date and Time Comment Was Submitted: 2018-03-16 15:08:33

No Duplicates.

## **Comment 30 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Arjun  
Last Name: Patney  
Email Address: arjun.patney@winrock.org  
Affiliation: American Carbon Registry

Subject: Comments on Potential C&T Regulation Changes  
Comment:

Dear Ms. Sahota:

Attached are ACR's comments on the Preliminary Discussion Draft of Potential Changes to the Regulation for the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms.  
Thank you for the opportunity to provide input.

Kind regards,  
Arjun Patney  
Policy Director  
American Carbon Registry

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/36-ct-3-2-18-wkshp-ws-UjMCZ1YIUI5VMAhn.pdf>

Original File Name: ACR comments on Preliminary Discussion Draft of Potential Changes to CT reg FINAL.pdf

Date and Time Comment Was Submitted: 2018-03-16 15:19:11

No Duplicates.

**Comment 31 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Steven

Last Name: Smith

Email Address: steven.d.smith@p66.com

Affiliation: Phillips 66

Subject: ARB's March 2, 2018 Cap and Trade program workshop

Comment:

Phillips 66 submits the attached written comments on information presented in the ARB's March 2, 2018 workshop on potential Cap and Trade amendments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/37-ct-3-2-18-wkshp-ws-B3dWOAdvUG8GbFI7.pdf>

Original File Name: Phillips 66 Comments on ARB March 2 2018 workshop.pdf

Date and Time Comment Was Submitted: 2018-03-16 15:37:00

No Duplicates.

**Comment 32 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Michelle

Last Name: Passero

Email Address: [mpassero@tnc.org](mailto:mpassero@tnc.org)

Affiliation:

Subject: Comments from TNC in response to March 2nd cap and trade workshop

Comment:

Please accept the attached comments from The Nature Conservancy regarding potential amendments to the cap and trade regulations

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/38-ct-3-2-18-wkshp-ws-BnJROQBiV1sAZVU0.pdf>

Original File Name: TNC Cap and trade comments\_03 15 18.pdf

Date and Time Comment Was Submitted: 2018-03-16 15:57:53

No Duplicates.

**Comment 33 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Danny

Last Name: Cullenward

Email Address: dcullenward@nearzero.org

Affiliation: Near Zero

Subject: Near Zero comments on ARB workshop documents

Comment:

Please see the attached PDF for our comments. Thanks!

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/39-ct-3-2-18-wkshp-ws-VzkCYVAwByYHXIIo.pdf>

Original File Name: Near Zero comment letter with attachments.pdf

Date and Time Comment Was Submitted: 2018-03-16 15:53:21

No Duplicates.

**Comment 34 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Brian

Last Name: Biering

Email Address: bsb@eslawfirm.com

Affiliation: American Wind Energy Assoc. CA Caucus

Subject: Comments on the 2018 Cap-and-Trade Rulemaking Scope

Comment:

Dear Ms. Sahota:

On behalf of the American Wind Energy Association (AWEA) California Caucus, please see the attached comments on the 2018 Cap-and-Trade Rulemaking Scope. Thank you.

Kind regards,  
Brian S. Biering  
Ellison Schneider Harris & Donlan LLP

Attorneys for the AWEA California Caucus

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/40-ct-3-2-18-wkshp-ws-UWBcYlRIVjYCNQQy.pdf>

Original File Name: 180316\_ACC\_ARB Cap-and-Trade Workshop Comments (00434647xBA8E1).pdf

Date and Time Comment Was Submitted: 2018-03-16 15:53:28

No Duplicates.

**Comment 35 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Tim

Last Name: Carmichael

Email Address: TCarmichael@semprautilities.com

Affiliation: Gas Utility Group

Subject: March 2018 Cap-and-Trade Workshop

Comment:

Attached are comments from the Gas Utility Group regarding the March 2018 Cap-and-Trade Workshop issues.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/41-ct-3-2-18-wkshp-ws-B2AAcwFnVFgLbgFu.pdf>

Original File Name: GUG Comments March 2-2018 Cap-and-Trade Workshop 3.16.18.pdf

Date and Time Comment Was Submitted: 2018-03-16 16:09:20

No Duplicates.

**Comment 36 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Galen

Last Name: Ross

Email Address: galenross547@gmail.com

Affiliation:

Subject: DEBS Language

Comment:

See attachment

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/42-ct-3-2-18-wkshp-ws-AWJWMQNyUFwAZwln.pdf>

Original File Name: Cap and Trade Regulation Changes Public Comments.pdf

Date and Time Comment Was Submitted: 2018-03-16 16:09:16

No Duplicates.

**Comment 37 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Mikhael

Last Name: Skvarla

Email Address: Mikhael\_Skvarla@gualcogroup.com

Affiliation: CCEEB

Subject: CCEEB's Comments on the PDD

Comment:

Please see attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/43-ct-3-2-18-wkshp-ws-AmEHYlE1UGYCZlcI.pdf>

Original File Name: CCEEB CnT PDD Comments\_3-16-2018.pdf

Date and Time Comment Was Submitted: 2018-03-16 16:13:35

No Duplicates.

**Comment 38 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Emily  
Last Name: Warms  
Email Address: [ewarms@newforests-us.com](mailto:ewarms@newforests-us.com)  
Affiliation: New Forests

Subject: New Forests' Comments on Possible Revisions to the Cap-and-Trade Regulation  
Comment:

Thank you for the opportunity to comment on the proposed revisions to the cap and trade regulation. Please find our comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/44-ct-3-2-18-wkshp-ws-UT9QM1chUFxVNVI9.pdf>

Original File Name: New Forests public comments cap and trade changes March 2018 Final.pdf

Date and Time Comment Was Submitted: 2018-03-16 16:11:45

No Duplicates.

**Comment 39 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Denise

Last Name: Grab

Email Address: denise.grab@nyu.edu

Affiliation: Institute for Policy Integrity

Subject: Comments of the Institute for Policy Integrity

Comment:

Please see attached file for the comments of the Institute for Policy Integrity.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/45-ct-3-2-18-wkshp-ws-ViYCa1A9AjgLbIcu.pdf>

Original File Name: Policy Integrity\_2018-03-16\_CA Cap-and-Trade comments\_FINAL.pdf

Date and Time Comment Was Submitted: 2018-03-16 16:16:18

No Duplicates.

**Comment 40 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: John

Last Name: Larrea

Email Address: john@clfp.com

Affiliation: California League of Food Producers

Subject: Possible Revisions to C&T Regulation

Comment:

CLFP Comments on Possible Revisions to C&T Regulation

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/46-ct-3-2-18-wkshp-ws-AmFUPIcwUXIGX1Mw.pdf>

Original File Name: CLFP Comments on Potential C&T Revisions.pdf

Date and Time Comment Was Submitted: 2018-03-16 16:25:02

No Duplicates.

**Comment 41 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Fariya

Last Name: Ali

Email Address: fariya.ali@pge.com

Affiliation: PG&E

Subject: PG&E Comments on March Cap-and-Trade Amendments Workshop

Comment:

See attached files.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/47-ct-3-2-18-wkshp-ws-VWUBNFRkVzIFMgQ8.zip>

Original File Name: 031618\_PGE C-T Workshop Comments.zip

Date and Time Comment Was Submitted: 2018-03-16 16:25:50

No Duplicates.

**Comment 42 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Kevin  
Last Name: Townsend  
Email Address: ktownsend@bluesource.com  
Affiliation: Bluesource

Subject: Comments on PDD of Potential Changes to Cap and Trade  
Comment:

Thank you for the opportunity to comment.

Sincerely,

Kevin Townsend  
Bluesource

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/48-ct-3-2-18-wkshp-ws- VTYBZIIjBQkGYVU7.pdf>

Original File Name: Cap and Trade Amendment Comments\_Blue Source\_031618.pdf

Date and Time Comment Was Submitted: 2018-03-16 16:21:11

No Duplicates.

**Comment 43 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Barbara

Last Name: Haya

Email Address: bhaya@berkeley.edu

Affiliation: University of California, Berkeley

Subject: comments on proposed amendments to cap-and-trade regulations

Comment:

Please find comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/49-ct-3-2-18-wkshp-ws-ADFcYgEtAGMFMAQp.pdf>

Original File Name: 18-03-16 Comments from Barbara Haya on proposed amendments to the cap-and-trade regulations.pdf

Date and Time Comment Was Submitted: 2018-03-16 15:46:27

No Duplicates.

**Comment 44 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Amy

Last Name: Mmagu

Email Address: amy.mmagu@calchamber.com

Affiliation:

Subject: Workshop to Discuss Possible Revisions to the Cap-and-Trade Regulation

Comment:

Please see attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/50-ct-3-2-18-wkshp-ws-VDcGbWFtAD4HZARq.pdf>

Original File Name: Comments on Cap and Trade workshop 3.2.18.pdf

Date and Time Comment Was Submitted: 2018-03-16 15:39:49

No Duplicates.

**Comment 45 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Zane

Last Name: Haxtema

Email Address: zhaxtema@scsglobalservices.com

Affiliation: SCS Global Services

Subject: Comments regarding potential changes to Cap and Trade Regulation

Comment:

SCS Global Services appreciates the opportunity to submit comments.  
Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/51-ct-3-2-18-wkshp-ws-WzwGaABmAg5SI1M8.pdf>

Original File Name: GHG\_WorkshopComments\_V1-1\_031618.pdf

Date and Time Comment Was Submitted: 2018-03-16 16:40:09

No Duplicates.

## **Comment 46 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Laurie

Last Name: Wayburn

Email Address: lwayburn@pacificforest.org

Affiliation: Pacific Forest Trust

Subject: Comments on Discussion Draft of Cap and Trade Regulation Changes

Comment:

March 16, 2018

Re: Preliminary Discussion Draft of Potential Changes to the Regulation for the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms

Dear Chair Nichols, Board Members, and Staff:

Thank you for this opportunity to comment on the preliminary discussion draft of potential changes to the cap-and-trade regulations. We urge that the new requirements for Direct Environmental Benefits of offset projects to California are applied fairly and do not change the viability of offsets that have already been issued or of projects that were already under development when as guidance is finalized. We suggest that the new criteria around direct environmental benefits be applied only to offset credits generated by new projects going forward from the new requirements as they are adopted, not retroactively to the credits that have already been generated, or to projects currently under development under the existing rules.

Family forest owners, tribal groups, community forests, and many others around the nation have developed offset projects in good faith-requiring years of time and significant investments-under the existing offset protocols. The millions of acres of forest carbon offsets in 30 states is a mark of California's leadership across the nation in the fight against climate change. Requiring the credits that have already been generated or projects which have already incurred significant costs to meet the new legislative requirement represents a "moving of the goalposts" that is unfair to those who have already committed significant personal and financial resources in the offset program.

The repercussions of changing the playing field for existing offset projects could have implications far beyond California's boarders. As neighboring states and regional partners such as Oregon and potentially Washington seek to develop their own cap-and-trade or cap and invest programs, it will likely be much harder to build support if landowners with projects already under development for California's system are left with stranded assets and negative perceptions of cap-and-trade. If other states don't follow California's example in regulating emissions then the impact on our air and waters will be much worse than with this new policy.

We support ARB's proposal to stipulate that forest offset projects in watersheds that flow into California meet the DEB requirement. We would also suggest that benefits to migratory wildlife be considered. As other project types and locations are evaluated, we encourage ARB to recognize that improved forest management and other offset actions do benefit California by reducing the levels of this global gas, even if those actions are not undertaken in areas directly adjacent to the state.

We appreciate your taking these comments under consideration. If you would like to discuss them further, I can be reached at 415-561-0700 ext. 14 or lwayburn@pacificforest.org.

Sincerely,

Laurie Wayburn  
President, Pacific Forest Trust

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/52-ct-3-2-18-wkshp-ws-UiJWNlAlAAxVMFM8.pdf>

Original File Name: PFT Comments on Cap and Trade Reg Changes.pdf

Date and Time Comment Was Submitted: 2018-03-16 16:40:03

No Duplicates.

**Comment 47 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Brock

Last Name: Costalupes

Email Address: [brock.costalupes@mid.org](mailto:brock.costalupes@mid.org)

Affiliation:

Subject: MID Comments on the Workshop to Discuss Possible Revisions to the Cap-and-Trade Regulation

Comment:

MID Comments on the Workshop to Discuss Possible Revisions to the Cap-and-Trade Regulation

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/53-ct-3-2-18-wkshp-ws-BmsFali3Ul4HYgBv.pdf>

Original File Name: MID Comments on the Workshop to Discuss Possible Revisions to the Cap-and-Trade Regulation.pdf

Date and Time Comment Was Submitted: 2018-03-16 16:56:12

No Duplicates.

**Comment 48 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Brian

Last Name: Nowicki

Email Address: bnowicki@biologicaldiversity.org

Affiliation: Center for Biological Diversity

Subject: Proposed changes to the cap-and-trade rule

Comment:

These comments are submitted on behalf of the Center for Biological Diversity regarding the Preliminary Discussion Draft of Potential Changes to the Regulation for the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms and the associated public workshop held on March 2, 2018.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/54-ct-3-2-18-wkshp-ws-WmsGOFEPUDAKUwMy.pdf>

Original File Name: 18 3 16 Center comments 2018 capandtrade draft reg.pdf

Date and Time Comment Was Submitted: 2018-03-16 16:57:22

No Duplicates.

**Comment 49 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Chris  
Last Name: Jones  
Email Address: cmjones@berkeley.edu  
Affiliation: UC Berkeley

Subject: More regulatory measures are needed to reduce risk of hitting ceiling price  
Comment:

See comments attached. A working paper will be mailed to ARB directly.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/55-ct-3-2-18-wkshp-ws-UjECaVw3AAxSNQV3.docx>

Original File Name: CMJ ARB comments - no attachment.docx

Date and Time Comment Was Submitted: 2018-03-16 16:57:10

No Duplicates.

**Comment 50 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Michael  
Last Name: Shaw  
Email Address: [ombcomm@arb.ca.gov](mailto:ombcomm@arb.ca.gov)  
Affiliation: CMTA

Subject: CMTA comments  
Comment:

see attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/56-ct-3-2-18-wkshp-ws-UjFROgZzUWMDWlNg.pdf>

Original File Name: cmta 3-2-2018 c-t workshop comments (003).pdf

Date and Time Comment Was Submitted: 2018-03-19 09:24:42

No Duplicates.

**Comment 51 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Robert  
Last Name: Wyman  
Email Address: ombcomm@arb.ca.gov  
Affiliation: Latham & Watkins

Subject: White Paper comments  
Comment:

See attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/57-ct-3-2-18-wkshp-ws-BmpXJlMNU28Lewdi.pdf>

Original File Name: LW Oversupply White Paper.pdf

Date and Time Comment Was Submitted: 2018-03-19 09:24:42

No Duplicates.

**Comment 52 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Sam  
Last Name: Bayless  
Email Address: bayless@cioma.com  
Affiliation: CIOMA

Subject: CIOMA comments  
Comment:

See attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/58-ct-3-2-18-wkshp-ws-WmhddlY0BDZXIVIz.docx>

Original File Name: 2-capandtradeghg18.docx

Date and Time Comment Was Submitted: 2018-03-19 09:38:45

No Duplicates.

**Comment 53 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Jeremy D.

Last Name: Weinstein

Email Address: [jweinstein@jweinsteinlaw.com](mailto:jweinstein@jweinsteinlaw.com)

Affiliation: Law Offices of Weinstein

Subject: Workshop comments

Comment:

See attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/59-ct-3-2-18-wkshp-ws-BXFQPgFhWWQEaVQL.docx>

Original File Name: Thank you for a helpful session.docx

Date and Time Comment Was Submitted: 2018-03-19 09:40:48

No Duplicates.

**Comment 54 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Dan B.

Last Name: Severson

Email Address: ombcomm@arb.ca.gov

Affiliation: Turlock Irrigation District

Subject: Comment submittal

Comment:

See attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/60-ct-3-2-18-wkshp-ws-ADRUf1AyV2UDdQZn.pdf>

Original File Name: 4-capandtradeghg18-U2JWaAY3UTEBNgYw.pdf

Date and Time Comment Was Submitted: 2018-03-21 08:31:23

No Duplicates.

**Comment 55 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Nicholas W.

Last Name: van Aelstyn

Email Address: ombcomm@arb.ca.gov

Affiliation: IPRE

Subject: Comment from IPRE

Comment:

See attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/61-ct-3-2-18-wkshp-ws-ADMHLAdlADJWIFc2.pdf>

Original File Name: 3-capandtradeghg18-UWNWYFV1VT4CKQk5.pdf

Date and Time Comment Was Submitted: 2018-03-21 08:31:23

No Duplicates.

**Comment 56 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Timothy

Last Name: Tutt

Email Address: ombcomm@arb.ca.gov

Affiliation: SMUD

Subject: Comment from SMUD

Comment:

See attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/62-ct-3-2-18-wkshp-ws-BnVXPFImWW4DWgZl.pdf>

Original File Name: SMUD Comments\_3.2.2018\_workshop.pdf

Date and Time Comment Was Submitted: 2018-03-21 08:31:23

No Duplicates.

**Comment 57 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Amy

Last Name: Vanderwarker

Email Address: amy@caleja.org

Affiliation:

Subject: Comments

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/63-ct-3-2-18-wkshp-ws-VDcBZlUKVFhXMAdp.pdf>

Original File Name: Cap and Trade Comments 032118.pdf

Date and Time Comment Was Submitted: 2018-03-22 12:31:44

No Duplicates.

**Comment 58 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Ralph J.  
Last Name: Moran  
Email Address: [ombcomm@arb.ca.gov](mailto:ombcomm@arb.ca.gov)  
Affiliation: BP America, Inc

Subject: Comments  
Comment:

See attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/64-ct-3-2-18-wkshp-ws-AGIAdlAOVGRVPFQ5.pdf>

Original File Name: BP Comments to CARB re Cap and Trade Amends March 18.pdf

Date and Time Comment Was Submitted: 2018-03-22 12:31:44

No Duplicates.

**Comment 59 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Andre

Last Name: Templeman

Email Address: andre@alphainception.com

Affiliation:

Subject: Comments from CMCA on recent ARB workshop

Comment:

Andre

See attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/65-ct-3-2-18-wkshp-ws-BWgGYQNwWWIQPlAP.pdf>

Original File Name: March 2 2018 Workshop Comments CMCA - Submitted March 16 2018.pdf

Date and Time Comment Was Submitted: 2018-03-28 15:00:05

No Duplicates.

**Comment 60 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Tiffany

Last Name: Roberts

Email Address: troberts@wspa.org

Affiliation: WSPA

Subject: WSPA comment letter

Comment:

See attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/66-ct-3-2-18-wkshp-ws-UiVdKFAhBTcBWANg.pdf>

Original File Name: WSPA comment letter on CARB Price Ceiling Concept Paper Final.pdf

Date and Time Comment Was Submitted: 2018-03-29 12:39:00

No Duplicates.

**Comment 61 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Laura  
Last Name: Cottrell  
Email Address: laura@houstonmagnani.com  
Affiliation:

Subject: CSCME Comments  
Comment:

See attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/67-ct-3-2-18-wkshp-ws-AjEGLVFiAmMAKwk4.pdf>

Original File Name: 3-22-18 CSCME Letter on CAF Methodology.pdf

Date and Time Comment Was Submitted: 2018-04-11 10:27:44

No Duplicates.

**Comment 62 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: David  
Last Name: Phillips  
Email Address: ombcomm@arb.ca.gov  
Affiliation:

Subject: Comments  
Comment:

See attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/68-ct-3-2-18-wkshp-ws-UmRUYAMvBCILblUK.pdf>

Original File Name: 62-UC Berkeley.pdf

Date and Time Comment Was Submitted: 2018-04-13 15:26:55

No Duplicates.

**Comment 63 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Nico

Last Name: van Aelstyn

Email Address: nvanaelstyn@sheppardmullin.com

Affiliation:

Subject: 2018-03-19 IPRE Comment Letter on CARB Discussion Draft.pdf

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/69-ct-3-2-18-wkshp-ws-BzVWYFdnuZgKIQAw.pdf>

Original File Name: 2018-03-19 IPRE Comment Letter on CARB Discussion Draft (2).pdf

Date and Time Comment Was Submitted: 2018-04-17 12:40:12

No Duplicates.

**Comment 64 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Tiffany

Last Name: Roberts

Email Address: troberts@wspa.org

Affiliation: WSPA

Subject: Additional WSPA comments on 3rd Compliance Period

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/70-ct-3-2-18-wkshp-ws-BnFXIIIjBTcDWgBh.pdf>

Original File Name: WSPA additional comments 3CP.pdf

Date and Time Comment Was Submitted: 2018-04-17 12:40:12

No Duplicates.

**Comment 65 for Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) - 1st Workshop.**

First Name: Warren  
Last Name: MacGillivray  
Email Address: ombcomm@arb.ca.gov  
Affiliation: Panoche Energy Center

Subject: PEC Supplemental Comments  
Comment:

See attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/72-ct-3-2-18-wkshp-ws-WytUNwFjWFQBdFMm.pdf>

Original File Name: PEC Supplemental Comment Letter-final.pdf

Date and Time Comment Was Submitted: 2018-04-17 12:40:12

No Duplicates.

**There are no comments posted to Possible Revisions to the Cap-and-Trade Regulation (ct-3-2-18-wkshp-ws) that were presented during the Workshop at this time.**