

**Comment 1 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: Ben

Last Name: Apple

Email Address: ben.apple@envcomcorp.com

Affiliation: Environmental Commodities Corporation

Subject: Comments on Discussion Draft MMC Protocol

Comment:

Our comments on the draft MMC protocol are in the attached document.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1-discussion-draft-ws-B2oFbgRmBwsCdAJw.docx>

Original File Name: MMC Protocol Comments, ECC, 20140210.docx

Date and Time Comment Was Submitted: 2014-02-10 12:46:01

No Duplicates.

**Comment 2 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: Chuck

Last Name: White

Email Address: cwhite1@wm.com

Affiliation: Waste Management

Subject: Amendments to CA Capon Greanhouse Emissions & Market-Based Compliance Mechanisms

Comment:

Please see attached comments letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/2-discussion-draft-ws-B3AFbIYIVnIKeANq.pdf>

Original File Name: WM WTI 15-Day Language ARB Legacy Amendment.pdf

Date and Time Comment Was Submitted: 2014-02-11 14:43:53

No Duplicates.

**Comment 3 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: John

Last Name: Onderdonk

Email Address: john.onderdonk@caltech.edu

Affiliation:

Subject: Caltech Comments - 15 Day Discussion Draft

Comment:

Please see the attached letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/3-discussion-draft-ws- VTYHYFE8WH9XNAFi.pdf>

Original File Name: Caltech Comments\_15 Day Discussion Draft 02.13.14.docx.pdf

Date and Time Comment Was Submitted: 2014-02-13 08:44:03

No Duplicates.

**Comment 4 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: Charles

Last Name: Purhouse

Email Address: charles.purhouse@camcocleanenergy.com

Affiliation:

Subject: CODA Comments to 15-Day Changes

Comment:

Please find attached comments from the Compliance Offset Developers Association (CODA) to the 15-day changes to the proposed amendments to the California cap on GHG emissions and market-based compliance mechanisms.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/4-discussion-draft-ws-VTZWPwFkADJXDgc2.pdf>

Original File Name: CODA\_15Day\_Comments\_20140213.pdf

Date and Time Comment Was Submitted: 2014-02-13 15:59:16

No Duplicates.

**Comment 5 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: Derik

Last Name: Broekhoff

Email Address: derik@climateactionreserve.org

Affiliation: Climate Action Reserve

Subject: Comments on Proposed Regulation Amendments and Mine Methane Capture Protocol

Comment:

Please see the attached comments identifying suggested clarifications and edits to proposed amendments and MMC protocol. The Climate Action Reserve supports proposed amendments related to the compliance carbon offset program and the MMC protocol, including clarifications related to the frequency and timing of assessments for project eligibility conditions.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/5-discussion-draft-ws-AmFVMgd0UV0EYVM8.pdf>

Original File Name: CAR Comments to ARB on January 2014 Discussion Drafts.pdf

Date and Time Comment Was Submitted: 2014-02-13 16:56:34

No Duplicates.

**Comment 6 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: Clare

Last Name: Breidenich

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

Affiliation: Western Power Trading Forum

Subject: Comments on discussion draft changes to cap and trade

Comment:

Thank you,  
Clare Breidenich  
WPTF GHG Committee Director  
206.697.4946

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/6-discussion-draft-ws-BjRReldnAmIKIQQ1.pdf>

Original File Name: 2-13-14 WPTF on informal C&T.pdf

Date and Time Comment Was Submitted: 2014-02-14 06:48:37

No Duplicates.

**Comment 7 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: Laurie Williams

Last Name: Allan Zabel

Email Address: williams.zabel@gmail.com

Affiliation: Volunteer Citizens Climate Lobby

Subject: Draft Coal Mine Methane Protocol

Comment:

The January 31, 2014 Draft Coal Mine Methane Protocol released by the California Air Resources Board (CARB) does not comply with AB 32 Section 38562(d)(2) because it fails to reliably exclude non-additional offsets. Specifically, United States EPA has found that approximately 23 million metric tons CO<sub>2</sub>e of Coal Mine Methane was captured for a variety of uses in the United States in 2010, and the protocol does not describe how to reliably exclude this profitable practice. See attached EPA PowerPoint pdf at p. 28.

Further as noted by the Stanford Law School comments, issuance of the protocol will have the "perverse effect" of increasing resistance to appropriate regulation of coal mine methane as coal mine owners and operators seek to hang onto the profits from the offset credits associated with the protocol.

Finally, we request that when the protocol is issued for a final public comment period that all information relied upon and considered for issuing the protocol be made available online so that the public can see the documentation that was considered by CARB in considering and potentially approving the protocol. We also request that all documents at the following web addresses be added to the Administrative Record for any coal mine methane protocol considered and/or adopted by CARB:

U.S. EPA Coal Mine Methane Conference 2012:

[http://www.epa.gov/cmop/conf/cmm\\_conference\\_sept12.html](http://www.epa.gov/cmop/conf/cmm_conference_sept12.html)

U.S. EPA Coal Mine Methane Outreach Program (all pages):

<http://www.epa.gov/cmop/index.html>

Climate Action Reserve Coal Mine Methane (all pages):

<http://www.climateactionreserve.org/how/protocols/coal-mine-methane/>

Thank you for your consideration.

Laurie Williams and Allan Zabel

[williams.zabel@gmail.com](mailto:williams.zabel@gmail.com)

Volunteers for Citizens Climate Lobby

Oakland, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-02-14 08:35:06

No Duplicates.

## **Comment 8 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: Laurie Williams

Last Name: Allan Zabel

Email Address: williams.zabel@gmail.com

Affiliation: Volunteers Citizens Climate Lobby

Subject: Supplemental Comment on Draft Coal Mine Methane Protocol

Comment:

<http://www.arb.ca.gov/lispub/comm2/bcproc.php>

Our attachment seems to have been excluded from our prior submission of our comment. As we are having difficulty attaching a document to our comment, please find the document we would like you to consider at p. 28 here (EPA website):

[http://www.epa.gov/cmop/docs/cmm\\_conference\\_sep12/01\\_Somers.pdf](http://www.epa.gov/cmop/docs/cmm_conference_sep12/01_Somers.pdf)

The January 31, 2014 Draft Coal Mine Methane Protocol released by the California Air Resources Board (CARB) does not comply with AB 32 Section 38562(d)(2) because it fails to reliably exclude non-additional offsets. Specifically, United States EPA has found that approximately 23 million metric tons CO2e of Coal Mine Methane

was captured for a variety of uses in the United States in 2010, and the protocol does not describe how to reliably exclude this profitable practice. See attached EPA PowerPoint pdf at p. 28.

Further as noted by the Stanford Law School comments, issuance of the protocol will have the "perverse effect" of increasing resistance to appropriate regulation of coal mine methane as coal mine owners and operators seek to hang onto the profits from the offset credits associated with the protocol.

Finally, we request that when the protocol is issued for a final public comment period that all information relied upon and considered for issuing the protocol be made available online so that the public can see the documentation that was considered by CARB in considering and potentially approving the protocol. We also

request that all documents at the following web addresses be added to the Administrative Record for any coal mine methane protocol considered and/or adopted by CARB:

U.S. EPA Coal Mine Methane Conference 2012:

[http://www.epa.gov/cmop/conf/cmm\\_conference\\_sept12.html](http://www.epa.gov/cmop/conf/cmm_conference_sept12.html)

U.S. EPA Coal Mine Methane Outreach Program (all pages):

<http://www.epa.gov/cmop/index.html>

Thank you for your consideration.

Laurie Williams & Allan Zabel

[williams.zabel@gmail.com](mailto:williams.zabel@gmail.com)

Volunteers Citizens Climate Lobby

Oakland, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-02-14 09:05:06

No Duplicates.

**Comment 9 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: Angus

Last Name: Crane

Email Address: acrane@naima.org

Affiliation: NAIMA

Subject: NAIMA's Support of CARB'S Amendment to Cap and Trade Regulation

Comment:

Please find attached a letter from the North American Insulation Manufacturers Association ("NAIMA") supporting CARB's Amendment to the Cap and Trade regulation.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/9-discussion-draft-ws-UyECZVQ2WDhXZAU9.pdf>

Original File Name: RAC3584andAttachment.pdf

Date and Time Comment Was Submitted: 2014-02-14 09:23:39

No Duplicates.

**Comment 10 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: Amber

Last Name: Riesenhuber

Email Address: amber@iepa.com

Affiliation: IEP

Subject: IEP's Comments on Cap and Trade Discussion Draft

Comment:

Attached Please find IEP's Comments on the Cap and Trade Discussion Draft.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/10-discussion-draft-ws-WzJQM1cmVloBZANs.pdf>

Original File Name: IEP Comments on CARB Cap and Trade Discussion Draft FINAL.pdf

Date and Time Comment Was Submitted: 2014-02-14 09:31:33

No Duplicates.

**Comment 11 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: Thomas

Last Name: Corr

Email Address: thomaspcorr@gmail.com

Affiliation:

Subject: Noble Solutions' Comments on RPS Adjustment

Comment:

Noble Solutions' Comments on RPS Adjustment

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/11-discussion-draft-ws-AWICa1A8AD4CYVU7.pdf>

Original File Name: Comments of Noble Solutions on the RPS Adjustment final w attach 14feb2014.pdf

Date and Time Comment Was Submitted: 2014-02-14 11:26:16

No Duplicates.

**Comment 12 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: Gerald

Last Name: Miller, Praxair, Inc

Email Address: [gerald\\_miller@praxair.com](mailto:gerald_miller@praxair.com)

Affiliation:

Subject: Comments on 15-Day Discussion Draft

Comment:

Dear Air Resources Board,

Please find attached Praxair, Inc.'s Comments on the January 31, 2014 Discussion Draft of Potential Amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms ("January 31st Discussion Draft").

Kind regards,

Gerald Miller  
Vice President, West Region  
Praxair, Inc.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/12-discussion-draft-ws-AjNTYVFgVjcBNgA0.pdf>

Original File Name: 140214\_Praxair Comments on 1.31 15-Day Proposed CNT Amendments (00219123).pdf

Date and Time Comment Was Submitted: 2014-02-14 11:33:23

No Duplicates.

**Comment 13 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: Kathleen

Last Name: Schroder

Email Address: kschrader@bjorklindley.com

Affiliation: Vessels Coal Gas

Subject: Comments on Jan. 31, 2014 Draft MMC Protocol

Comment:

Please see attached file.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/13-discussion-draft-ws-UDNTOlwwWWcDYAFv.pdf>

Original File Name: Comments on 01 31 14 Draft MMC Protocol Final.pdf

Date and Time Comment Was Submitted: 2014-02-14 11:55:32

No Duplicates.

**Comment 14 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: Ken

Last Name: Nold

Email Address: [krnold@TID.org](mailto:krnold@TID.org)

Affiliation: Turlock Irrigation District ("TID")

Subject: Comments on 15-Day Discussion Draft

Comment:

Dear Air Resources Board,

On behalf of Turlock Irrigation District ("TID"), please find attached our Comments on the Discussion Draft of 15-Day Changes to the Proposed Amendments to the Cap-and-Trade Regulation.

Sincerely,

Ken Nold  
Turlock Irrigation District

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/14-discussion-draft-ws-BzZRY1dmUTAHMFVh.pdf>

Original File Name: 140214\_TID Cmts on 1.31 ARB Proposed CNT Amendments (00219125).pdf

Date and Time Comment Was Submitted: 2014-02-14 12:09:49

No Duplicates.

**Comment 15 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: Melissa

Last Name: Poole

Email Address: melissap@paramountfarming.com

Affiliation:

Subject: Comment on Discussion Draft for Proposed Amendments to the Cap-and-Trade Program

Comment:

Please finds comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/15-discussion-draft-ws-UyNQNwFyBzUHbFU6.pdf>

Original File Name: Paramount Cap-and-Trade Comment.pdf

Date and Time Comment Was Submitted: 2014-02-14 12:17:23

No Duplicates.

**Comment 16 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: William

Last Name: Ferretti

Email Address: [wferretti@v-c-s.org](mailto:wferretti@v-c-s.org)

Affiliation: Verified Carbon Standard (VCS)

Subject: 15-day changes to the proposed amendments to the California Cap-and Trade regulation

Comment:

The VCS is pleased to offer the attached comments in support of the potential amendments to the California Cap-and-Trade Regulation and the proposed offset protocol for mine methane capture. Should you have any questions, please do not hesitate to contact me by telephone (+1 202 470 5661) or email ([wferretti@v-c-s.org](mailto:wferretti@v-c-s.org)).

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/17-discussion-draft-ws-VCJQNVEjBzVXDIIx.pdf>

Original File Name: VCSA comments on ARB proposed regulatory amendments (FINAL), 14 FEB 2014.pdf

Date and Time Comment Was Submitted: 2014-02-14 13:16:50

No Duplicates.

**Comment 17 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: Bill  
Last Name: Buchan  
Email Address: [buchan@mktpotential.com](mailto:buchan@mktpotential.com)  
Affiliation: Cardinal Cogen, Inc.

Subject: Cardinal Cogen Comments to Legacy Contract Provisions in Cap and Trade Amendments 1-31-14  
Comment:

ARB:

Cardinal Cogen is pleased that ARB continues to address the legacy contract issues under the cap and trade program. Please accept our attached comments to these provisions in the discussion draft of the 2013 cap and trade amendments dated January 31, 2014. Cardinal Cogen would be happy to discuss these comments at length with ARB as desired.

Regards,

Bill Buchan, P.E.  
CEO, Market Potential, Inc.  
510 928 5786  
On Behalf of Cardinal Cogen, Inc.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/18-discussion-draft-ws-WzhRNIMgBzBQPwln.pdf>

Original File Name: Cardinal Cogen Comment Letter to ARB 2013 CT Amendments - Feb 2014.pdf

Date and Time Comment Was Submitted: 2014-02-14 13:18:11

No Duplicates.

**Comment 18 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: Tamara

Last Name: Rasberry

Email Address: [trasberry@semprautilities.com](mailto:trasberry@semprautilities.com)

Affiliation: Sempra Energy utilities

Subject: Cap on Greenhouse Gas Emissions and Market-based Compliance Mechanisms

Comment:

Attached are comments from the Sempra Energy utilities, SoCalGas and San Diego Gas & Electric.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/20-discussion-draft-ws-VyQGZQdzWFQHYglm.pdf>

Original File Name: SEu commts-Cap&Trade 2.14.14f.pdf

Date and Time Comment Was Submitted: 2014-02-14 13:46:58

No Duplicates.

**Comment 19 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: Lily

Last Name: Mitchell

Email Address: lmitchell@hanmor.com

Affiliation: Hanna and Morton for SCPPA

Subject: SCPPA comments on discussion draft 15-day changes

Comment:

Please find attached the comments of the Southern California Public Power Authority on the discussion draft 15-day changes to the Cap and Trade Regulation.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/22-discussion-draft-ws-VGcFMwY3AmNWYgE3.pdf>

Original File Name: 300226001lmm021414 SCPPA comment to ARB on 013114 cap and trade changes.pdf

Date and Time Comment Was Submitted: 2014-02-14 13:52:17

No Duplicates.

**Comment 20 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: Lily

Last Name: Mitchell

Email Address: lmitchell@hanmor.com

Affiliation: Hanna and Morton for SCPPA

Subject: SCPPA Magnolia comments on draft 15-day changes

Comment:

Please find attached the comments of the SCPPA Magnolia participants on the discussion draft 15-day changes to the Cap and Trade Regulation.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/23-discussion-draft-ws-UWIGMAC2VDVYQM1.pdf>

Original File Name: 300226008lmm021414 Magnolia comments to ARB on 013114 Cap and Trade changes.pdf

Date and Time Comment Was Submitted: 2014-02-14 13:55:57

No Duplicates.

**Comment 21 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: Sean

Last Name: Beatty

Email Address: sean.beatty@nrgenergy.com

Affiliation: NRG Energy, Inc.

Subject: NRG Energy's Comments on Proposed Amendments

Comment:

Please see the attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/24-discussion-draft-ws-UjNVIVIxVloKIQdY.doc>

Original File Name: ARB - Comments on 1-31-14 Cap and Trade Amendment language.doc

Date and Time Comment Was Submitted: 2014-02-14 13:57:32

No Duplicates.

**Comment 22 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

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

**Comment 23 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: Ralph

Last Name: Moran

Email Address: moranrj1@bp.com

Affiliation:

Subject: BP Comments on Discussion Draft 1/31/14 Cap and Trade Amendments

Comment:

BP Comments

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/26-discussion-draft-ws-VzVVI1ULADADagRp.pdf>

Original File Name: BP comment ltr on CARB cap and trade reg amendments 2 14.pdf

Date and Time Comment Was Submitted: 2014-02-14 14:37:42

No Duplicates.

**Comment 24 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: Jodean

Last Name: Giese

Email Address: jodean.giese@ladwp.com

Affiliation: LADWP

Subject: LADWP Comments - Cap & Trade Informal Discussion Draft

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/27-discussion-draft-ws-VDhdOIUwBCBXIQBf.pdf>

Original File Name: LADWP Comments - ARB Informal C&T Discussion Draft.pdf

Date and Time Comment Was Submitted: 2014-02-14 14:39:44

No Duplicates.

**Comment 25 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: Joseph

Last Name: Seymour

Email Address: jseymour@ttcorp.com

Affiliation: Renewable Energy Markets Association

Subject: REMA Comments on ARB Potential Cap and Trade Amendments

Comment:

Please accept the comments from the Renewable Energy Markets Association (REMA) on the potential Cap and Trade amendments at they relate to renewable energy.

The previous message indicated that the file did not load. This submission contains a Word version.

Please contact me should you have any questions on program definitions, recommendations, and revisions.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/29-discussion-draft-ws-UiACYQNvBzVWD1Mw.doc>

Original File Name: REMA\_comments\_ARB\_CT\_amendments\_2.14.2014\_.doc

Date and Time Comment Was Submitted: 2014-02-14 14:46:08

No Duplicates.

**Comment 26 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: John

Last Name: Leslie

Email Address: [jleslie@mckennalong.com](mailto:jleslie@mckennalong.com)

Affiliation: McKenna Long & Aldridge LLP

Subject: Comments of Shell Energy on January 31, 2014 Discussion Draft

Comment:

Attached are Shell Energy's comments dated February 14, 2014, addressing the ARB Staff's January 31, 2014 Discussion Draft regarding potential amendments to Cap and Trade Regulations. If you have any questions, please contact Marcie Milner, Shell Energy, or John Leslie, McKenna Long & Aldridge.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/30-discussion-draft-ws-BWZcNQdrWGYAYwNt.pdf>

Original File Name: Comments of Shell Energy on January 31, 2014 Discussion Draft.pdf

Date and Time Comment Was Submitted: 2014-02-14 14:50:19

No Duplicates.

**Comment 27 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: Dwayne

Last Name: Phillips

Email Address: Dwayne.Phillips@Airliquide.com

Affiliation: Air Liquide Large Industries U.S. LP

Subject: Comments on Discussion Draft of Proposed Amendments to Cap-and-Trade Regulation

Comment:

Please see the attached letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/31-discussion-draft-ws-ADJSZFNjAmUAKwIw.pdf>

Original File Name: 2014-2-14 Air Liquide Large Industries US Comments on Jan 31 Discussion Draft.pdf

Date and Time Comment Was Submitted: 2014-02-14 14:24:04

No Duplicates.

**Comment 28 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: David

Last Name: Huard

Email Address: [dhuard@manatt.com](mailto:dhuard@manatt.com)

Affiliation:

Subject: PEC Discussion Draft Comments

Comment:

Please find comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/32-discussion-draft-ws-BnZXNFIwV1tXMgRr.pdf>

Original File Name: PEC Comments on January 31 Discussion Draft.pdf

Date and Time Comment Was Submitted: 2014-02-14 15:09:06

No Duplicates.

**Comment 29 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: Ann

Last Name: Trowbridge

Email Address: [atrowbridge@daycartermurphy.com](mailto:atrowbridge@daycartermurphy.com)

Affiliation: Inergy West Coast LLC

Subject: Inergy West Coast LLC-Discussion Draft Comments

Comment:

Please see the attached Discussion Draft Comments for Inergy West Coast LLC.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/33-discussion-draft-ws-Vz5QOABkU3JSMwJ7.pdf>

Original File Name: Inergy Comments on Discussion Draft Potential Amendments.pdf

Date and Time Comment Was Submitted: 2014-02-14 15:14:17

No Duplicates.

**Comment 30 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: Todd

Last Name: English

Email Address: tenglish@eosclimate.com

Affiliation:

Subject: ARB 15-day Period Comments- EOS Climate

Comment:

To whom it may concern,

Attached are EOS Climate's 15-day period comments to the Regulation changes. Please feel free to contact me directly for clarifications or questions.

Best regards  
Todd English

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/34-discussion-draft-ws-UzZUPQFzAw9VYIVg.pdf>

Original File Name: EOS\_15 day\_Comments .pdf

Date and Time Comment Was Submitted: 2014-02-14 15:05:56

No Duplicates.

**Comment 31 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: Kassandra

Last Name: Gough

Email Address: Kassandra.Gough@calpine.com

Affiliation: Calpine Corporation

Subject: Comments on Discussion draft of 15-Day Changes to Cap-and-Trade Regulation

Comment:

Please find attached the comments of Calpine Corporation on the discussion draft of proposed 15-day changes to the Proposed Amendments to the Cap-and-Trade Regulation.

Thank you for the opportunity to submit these comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/35-discussion-draft-ws-AWJXPgZqAD5SMVQ6.pdf>

Original File Name: Comments on Discussion Draft 15-Day Changes of Calpine.pdf

Date and Time Comment Was Submitted: 2014-02-14 15:26:51

No Duplicates.

**Comment 32 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: Katy

Last Name: Wilson

Email Address: kmwilson@semprausgp.com

Affiliation: Sempra Generation

Subject: Comments on Discussion Draft Changes to the Cap-and-Trade Regulations

Comment:

Attached please find the comments of Sempra Generation ("SGEN") regarding the 'Discussion Draft' of proposed changes to the Cap-and-Trade Regulations, issued on January 31, 2014.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/36-discussion-draft-ws-UzBTOgZqBTtVNIU7.pdf>

Original File Name: Comments of SGEN - 02142014.pdf

Date and Time Comment Was Submitted: 2014-02-14 15:29:44

No Duplicates.

**Comment 33 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: Lynn

Last Name: Bragg

Email Address: lbragg@gpi.org

Affiliation: President, Glass Packaging Institute

Subject: Glass Packaging Institute (GPI) - Comments to CARB GHG Emissions and Compliance  
Comment:

Please find the attached comments from the Glass Packaging Institute (GPI) on the Discussion Draft of the Proposed Amendments to the CA Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulation.

Please contact me with any questions.

Thank you,

Lynn

Lynn M. Bragg  
President  
Glass Packaging Institute (GPI)  
703-684-6359  
lbragg@gpi.org  
www.gpi.org

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/37-discussion-draft-ws-VDIHaFU6BTcGbFcI.pdf>

Original File Name: Final - GPI CARB Letter.pdf

Date and Time Comment Was Submitted: 2014-02-14 15:43:22

No Duplicates.

**Comment 34 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-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 Discussion Draft

Comment:

Attached please find the Northern California Power Agency Comments on the Discussion Draft of proposed 15-day changes to the cap-and-trade regulation amendments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/38-discussion-draft-ws-VzlSN1MiBzVRCAhr.pdf>

Original File Name: NCPA comments re 1-31-14 Discussion Draft (2-14-14).pdf

Date and Time Comment Was Submitted: 2014-02-14 15:51:04

No Duplicates.

**Comment 35 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: Susie  
Last Name: Berlin  
Email Address: [berlin@susieberlinlaw.com](mailto:berlin@susieberlinlaw.com)  
Affiliation: M-S-R Public Power Agency

Subject: Comments on Discussion Draft  
Comment:

Attached please find the M-S-R Public Power Agency Comments on the Discussion Draft of proposed 15-day changes to the cap-and-trade regulation amendments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/39-discussion-draft-ws-VzpSeVUnUC4KfgBf.pdf>

Original File Name: M-S-R comments re 1-31-14 discussion draft (final 1-14-14).pdf

Date and Time Comment Was Submitted: 2014-02-14 15:53:59

No Duplicates.

**Comment 36 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: Jon

Last Name: Lambeck

Email Address: jlambbeck@mwdh2o.com

Affiliation: Metropolitan Water District of S. CA

Subject: Section 95895

Comment:

The Metropolitan Water District of Southern California provides the attached comments regarding Section 95895: Allocation to Public Wholesale Water Agencies for Protection of Water Ratepayers of the California Air Resources Board's Cap-and-Trade Regulation 15-Day Discussion Draft posted on January 31, 2014.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/40-discussion-draft-ws-B2pXJIE0BwtVMABv.pdf>

Original File Name: MWD comments to C&T 15 Day Draft language 01312014.pdf

Date and Time Comment Was Submitted: 2014-02-14 15:49:36

No Duplicates.

**Comment 37 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-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 Draft 15-day Amendments

Comment:

PG&E Comments on Draft 15-day Amendments

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/41-discussion-draft-ws-WipcPQFfAjRWDwlq.pdf>

Original File Name: PG&E Comments on draft 15-day amendments to cap-and-trade regulation.pdf

Date and Time Comment Was Submitted: 2014-02-14 16:08:23

No Duplicates.

**Comment 38 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: Jennifer

Last Name: Haley

Email Address: [jhaley@caseyoil.com](mailto:jhaley@caseyoil.com)

Affiliation: Kern Oil & Refining Co.

Subject: Discussion Draft Comments

Comment:

Kern Oil & Refining Co.'s comments on the Discussion Draft are attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/43-discussion-draft-ws-WzBQOVMgUV0FZwJr.pdf>

Original File Name: KOR\_Discussion\_Draft\_Comments\_2\_14\_14.pdf

Date and Time Comment Was Submitted: 2014-02-14 16:21:51

No Duplicates.

**Comment 39 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: Beth

Last Name: Vaughan

Email Address: beth@beth411.com

Affiliation:

Subject: Comments on the Discussion Draft Proposed Amendments to the Cap and Trade Regulation

Comment:

Comments attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/44-discussion-draft-ws-UWNQe1dnVzAKIQIz.pdf>

Original File Name: 2-14-14\_CCC\_Comments\_legacy contracts final.pdf

Date and Time Comment Was Submitted: 2014-02-14 16:46:14

No Duplicates.

**Comment 40 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: Dan

Last Name: Consie

Email Address: dconsie@camsops.com

Affiliation:

Subject: Crockett Cogeneration

Comment:

See attached comments

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/45-discussion-draft-ws-BjQAKwY2UjVWFVRI.pdf>

Original File Name: 2-14-14\_Crockett comments ARB discussion.pdf

Date and Time Comment Was Submitted: 2014-02-14 16:47:21

No Duplicates.

**Comment 41 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: Ellie

Last Name: Booth

Email Address: [ebooth@covantaenergy.com](mailto:ebooth@covantaenergy.com)

Affiliation:

Subject: 15 day language technical changes

Comment:

Covanta has concerns with the mechanics of the exemption as outlined in § 95852(k)(5).

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/46-discussion-draft-ws-V2VXYV1tUDcBWAU0.pdf>

Original File Name: 2014 15day cap and trade language mvb.pdf

Date and Time Comment Was Submitted: 2014-02-14 16:28:44

No Duplicates.

**Comment 42 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: Robin

Last Name: Fraser

Email Address: [fraser@ieta.org](mailto:fraser@ieta.org)

Affiliation: IETA

Subject: IETA comments on ARB informal C&T discussion draft ammendments

Comment:

Thank you for your consideration of IETA's comments.

Robin Fraser  
+1.416.992.1540

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/47-discussion-draft-ws-WzJWNV0oWWsLUgRn.pdf>

Original File Name: IETA Comments on ARB Cap-and-Trade Discussion Draft Proposed Amendments\_14Feb2014.pdf

Date and Time Comment Was Submitted: 2014-02-14 16:49:40

No Duplicates.

**Comment 43 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: Jon  
Last Name: Costantino  
Email Address: jcostantino@manatt.com  
Affiliation: Small Refiner Coalition

Subject: Comments on Jointly Operated and Atypical CWB  
Comment:

Please find attached Coalition comments:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/48-discussion-draft-ws-BWZTOlExVWoCcANq.pdf>

Original File Name: Coaltion Comments on Jointly Operate Issue and CWB benchmark.pdf

Date and Time Comment Was Submitted: 2014-02-14 16:52:13

No Duplicates.

**Comment 44 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: Barbara

Last Name: Haya

Email Address: bhaya@law.stanford.edu

Affiliation: Stanford Law School

Subject: Comments on draft Mine Methane Capture offset protocol

Comment:

Please find attached comments from the Stanford Law School on the draft Mine Methane Capture Offset Protocol

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/49-discussion-draft-ws-VCdUJl09VGIWNgRr.pdf>

Original File Name: Stanford comments on draft MMC Protocol released 31-Jan-2013.pdf

Date and Time Comment Was Submitted: 2014-02-14 16:47:31

No Duplicates.

**Comment 45 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: Peter

Last Name: Weiner

Email Address: peterweiner@paulhastings.com

Affiliation:

Subject: PH Comments to CARB January 2014 Discussion Draft--Cap-and-Trade Amendments

Comment:

Please find attached our comment letter on CARB's January 31, 2014 Discussion Draft Regarding Potential Amendments to California's Cap-and-Trade Regulation.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/50-discussion-draft-ws-AnIGaFIMBTUCaQh8.pdf>

Original File Name: PH Cmt. Ltr. to CARB re January 2014 Discussion Draft (2.14.14).pdf

Date and Time Comment Was Submitted: 2014-02-14 17:05:48

No Duplicates.

**Comment 46 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: Stephanie

Last Name: Williams

Email Address: [Stephanie.R.Williams@p66.com](mailto:Stephanie.R.Williams@p66.com)

Affiliation:

Subject: P66 comments draft 15 day package

Comment:

If you have any questions please contact Stephanie Williams  
at 916-447-5572.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/51-discussion-draft-ws-UCAFNQQzVFhRZIJn.pdf>

Original File Name: P66 15 day draft comments 2142014.pdf

Date and Time Comment Was Submitted: 2014-02-14 17:56:48

No Duplicates.

**Comment 47 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: Thomas J.

Last Name: Vessels

Email Address: tvessels@vesselscoalgas.com

Affiliation: Vessels Coal Gas

Subject: Vessels Comments on Discussion Draft MMC Protocol

Comment:

Attached are the comments by Vessels Coal Gas on the ARB discussion draft MMC Protocol released for comment on 31 January 2014.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/52-discussion-draft-ws-VCJSMQZ0U3NVNgBs.pdf>

Original File Name: Vessels Comments on Discussion Drat MMC Protocol 14Feb2014.pdf

Date and Time Comment Was Submitted: 2014-02-14 17:58:55

No Duplicates.

**Comment 48 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: Steve

Last Name: Huhman

Email Address: Steven.Huhman@morganstanley.com

Affiliation: Morgan Stanley

Subject: 1-31-14 Cap-and-Trade 15-day discussion draf

Comment:

See attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/53-discussion-draft-ws-BWRSJgNgU18DN1B9.docx>

Original File Name: ARB 2-14-14 C-a-T comments.docx

Date and Time Comment Was Submitted: 2014-02-18 08:12:24

No Duplicates.

**Comment 49 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: Rebecca

Last Name: Meiers-De Pastino

Email Address: [Rebecca.Meiers-DePastino@SCE.com](mailto:Rebecca.Meiers-DePastino@SCE.com)

Affiliation: Southern California Edison Company

Subject: SCE's Comments on Informal Discussion Draft of Amendments to Cap-and-Trade Program

Comment:

Attached the Comments of Southern California Edison Company on the California Air Resources Board's January 2014 Informal Discussion Draft of Amendments to the California Cap-and-Trade Program.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/54-discussion-draft-ws-UTdW0V0yAzFRO1IN.pdf>

Original File Name: FINAL SCE Comments Discussion Draft of Amendments to the CA Cap-and-Trade Program.pdf

Date and Time Comment Was Submitted: 2014-02-18 13:11:11

No Duplicates.

**Comment 50 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: Jayne  
Last Name: Somers  
Email Address: somers.jayne@epa.gov  
Affiliation: USEPA

Subject: EPA Comments on MMC Protocol  
Comment:

Attached please find our comments on the draft MMC Protocol.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/55-discussion-draft-ws-AWBWIgFiAg4HMwUo.docx>

Original File Name: ARB 2-14-14 C-a-T comments.docx

Date and Time Comment Was Submitted: 2014-02-18 13:17:51

No Duplicates.

**Comment 51 for Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) - 1st Workshop.**

First Name: Timothy

Last Name: Tutt

Email Address: Timothy.Tutt@smud.org

Affiliation: SMUD

Subject: Discussion Draft 15-day Cap and Trade Comments

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/56-discussion-draft-ws-BnVSOVELAjUKU1Q3.pdf>

Original File Name: SMUD Comments on Discussion Draft 15-Day Language Cap-and-Trade.pdf

Date and Time Comment Was Submitted: 2014-02-18 14:36:36

No Duplicates.

**There are no comments posted to Informal public comments on the proposed draft 15-day changes to the Cap-and-Trade Regulation (discussion-draft-ws) that were presented during the Workshop at this time.**