

From: Nick Balistreri
To: [ARB Clerk of the Board](#)
Subject: Cap-and-Trade Regulation Amendments (GHG2018), University of California
Date: Monday, October 22, 2018 4:31:26 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Air Resources Board Members:

The University of California thanks the Air Resources Board's staff for their efforts in revising the regulations. As currently drafted, the proposed amendments to the Cap and Trade regulations address the University's request to adjust the baseline emissions for the Berkeley campus to the 2018 year to take into account the emissions from the recent ownership transfer of the combined heat and power (CHP) facility. Nevertheless, the amendments do not address the increased emissions from August 2017 through to December 2019 - the period between operations transfer and the effective date of the updated regulations.

To address this gap, the University suggests inserting transition assistance allocation true-up language similar to that which was previously in the regulations. In the 2013 version of regulations, section 95891(e) provided methodologies for calculating the true-up quantities for emission years 2013 and 2014. Much of the same language could be used to allocate allowances to the Berkeley campus to account for its assumption of ownership starting mid-2017 of the CHP. At current allowance prices, the University estimates that without the true-up the cost for the complying with the increased emissions would be about \$2.5 million for the period at hand. This cost will be in-part borne by students and will inhibit investments for further greenhouse gas reduction.

The University looks forward to working with CARB on these issues as updates to the regulations are compiled and approved.

Sincerely,
Nicholas Balistreri