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October 16, 2014

California Air Resources Board

Amendments to the Regulation for Mandatory Reporting Of Greenhouse Gas Emissions

TransAlta appreciates the opportunity to submit the following comments to The California Air Resources Board ("ARB") in regards to the 15 day notice to consider amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions. TransAlta is providing these comments specifically related to section 95111(b)(2).

TransAlta understands that these new amendments are intended to apply only when an importer wishes to register a particular generating unit within a larger specific facility; however, the regulatory changes have not made this clear. TransAlta therefore requests that ARB provide guidance explaining that these new requirements apply only in the case when a unit-specific emission factor is requested, reinforcing that new this level of granularity is not mandatory when reporting at the facility level.

TransAlta further requests ARB to clarify that when an importer is registering at the unit level, they may submit only the minimum contract terms necessary to demonstrate that the specific unit was identified as the intended specified source, while permitting the redaction of any confidential information. This clarification should also establish how reporting entities are expected to demonstrate proof of direct delivery within the current *Specified Facility Reporting Spreadsheet*. TransAlta proposes that a single e-tag showing delivery from the unit to California should be acceptable. TransAlta believes these issues can be appropriately addressed in guidance, or through a modified specified source registration form.

ARB's proposed changes introduce additional requirements for registering a specified source that are beyond the procedures currently agreed to by power marketers when transacting specified source power. As these are new requirements, TransAlta asks ARB to issue the clarifying guidance suggested above and ensure these amendments are not retroactive.

Yours truly,

Braydon Boulanger