



## WASTE MANAGEMENT

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March 31, 2014

Dr. Steven Cliff  
Climate Change Program Evaluation Branch  
California Air Resource Board  
1001 I Street  
Sacramento, California 95812

Via Email: [scliff@arb.ca.gov](mailto:scliff@arb.ca.gov)

**Subject: Comments of Waste Management and Wheelabrator Technologies, Inc. on California Air Resources Board (ARB) 15-Day Modifications to the originally proposed regulation text of title 17, California Code of Regulations, sections 95802, 95811, 95812, 95813, 95814, 95821, 95830, 95831, 95832, 95833, 95834, 95841.1, 95851, 95852, 95852.1.1, 95852.2, 95853, 95856, 95857, 95870, 95890, 95891, 95892, 95893, 95894, 95895, 95910, 95911, 95912, 95913, 95914, 95920, 95921, 95922, 92923, 95942, 95970, 95971, 95972, 95973, 95974, 95975, 95976, 95977, 95977.1, 95978, 95979, 95979.1, 95980, 95980.1, 95981, 95981.1, 95982, 95983, 95984, 95985, 95986, 95987, 95990, 96022, including Appendix A, Appendix B, and Appendix C.**


Submitted via website: <http://www.arb.ca.gov/cc/capandtrade/comments.htm>

Dear Dr. Cliff:

On behalf of Waste Management (WM) and its subsidiary Wheelabrator Technologies, we wish to comment on the 15-Day Modifications to the California Cap on Greenhouse Emissions and Market-Based Compliance Mechanisms released March 21, 2014. Our comments are focused on proposed amendments impacting legacy contracts. We strongly support the revisions to the legacy contract provisions. Providing for transitional assistance through two triennial compliance periods is necessary to ensure that Legacy Contract generators do not face an untenable financial situation due to their inability to pass through GHG costs.

We appreciate ARB's proposal to provide recovery by assigning allowances to the Norwalk facility and other similarly situated power plants without cost recovery. Thank you for this opportunity to provide comments. We look forward to working with you to resolve this important issue.

Sincerely,



Charles White

Director of Regulatory Affairs, West

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