

September 16, 2016

The Honorable Mary Nichols
Chair, California Air Resources Board
1001 I Street
Sacramento, CA 95814

SUBJECT: COMMENTS ON THE AMENDMENTS TO THE CALIFORNIA CAP ON GREENHOUSE GAS EMISSIONS AND MARKET-BASED COMPLIANCE MECHANISMS REGULATION

Dear Chairwoman Nichols:

The California Chamber of Commerce (CalChamber) appreciates the opportunity to comment on the California Air Resources Board (CARB) Proposed Amendments to the Mandatory Reporting of Greenhouse Gas Emissions released on July 19, 2016.

CalChamber is the largest broad-based business advocate in the state, representing the interests of over 13,000 California businesses, both large and small. Many of CalChamber's larger members are directly covered by the cap-and-trade regulation, while other smaller members experience the indirect impacts in the form of increased energy costs passed down from upstream fuel and energy providers.

CalChamber strives to remain a productive stakeholder throughout the AB 32 implementation process as well as in the future with post-2020 climate policies, in order to advance the greenhouse gas (GHG) emission reduction goals in the most cost-effective manner while protecting California businesses and allowing for economic growth across all sectors of the economy.

Moving the Mandatory Reporting Regulation (MRR) report deadline to August 1st will significantly burden both reporting entities and verifiers. While we understand that the CARB is interested in moving the date in order to provide more time for internal quality assurance checks, calculation, analysis, and the data notifications and postings needed to complete mandated activities under the cap-and-trade program, this shift will significantly negatively impact the regulated entities which have set up practices around the September 1st deadline.

Regulated entities in the state have incorporated the September 1st into their business practices to ensure that they are complying with the regulations as set forth by the CARB. Therefore, we recommend that you maintain the verification deadline of September 1st.

We appreciate the opportunity to comment on the MRR and look forward to continuing to work with you on the development of these regulations. Please do not hesitate to contact me with any questions.

Sincerely,



Amy Mmagu
Policy Advocate