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Dave Edwards
Chief, Greenhouse Gas and Toxic Emission Inventory Branch

Greg Harris
Chief, Emission Inventory and Economic Assessment Branch
California Air Resources Board
1001 "I" Street, Sacramento, CA 95814

RE: Pacific Gas and Electric Comments on Amendments to the Emissions Inventory Criteria and Guidelines (EICG) Regulation for the AB 2588 Air Toxics Program

Dear Mr. Edwards and Mr. Harris,

Pacific Gas and Electric (PG&E) appreciates the opportunity to provide comments on the Air Resource Board's (ARB) proposed amendments to the Emission Inventory Criteria and Guidelines (EICG) Regulation, which was released on September 29, 2020.

PG&E respectfully submits the following comments on the proposed amendments, including suggestions for additional changes via 15-day public comment or further clarification in formal guidance.

1. Additional time for initial reporting

PG&E's system includes thousands of miles of pipelines in addition to compressor stations, boosting stations, storage facilities, and other supporting infrastructure. Given the extent of additional reporting requirements that need to be assessed for the new Appendix A chemicals across its facilities, PG&E believes that initial reporting obligations, currently due as early as May 1, 2023, does not provide sufficient time to collect data in an accurate manner. As such, PG&E recommends that additional time, beyond the May 1, 2023 date, be considered for initial reporting.

2. Clarification on emission factor development

Section IX in Appendix B of the proposed amendments notes that "best available methods and data" are to be used to arrive at accurate representations of air releases at a facility. PG&E requests clarification on how "best available" methods and data will be determined.

Additionally, PG&E would like to understand how the individual air districts will deal with source testing protocol backlogs, or how newly developed emissions quantification methods can be obtained. Specifically, we seek clarification on whether the development of emission estimation methods and factors will be tracked and processed by the local air districts.

PG&E recommends that CARB's oversight or involvement at the individual air districts be explicitly outlined in the proposed regulation.

3. District participation in determining exemptions and reinstatement

Sections II, III and IV in Appendix B of the proposed amendments outline provisions for exemptions, reprioritization and reinstatement for the AB2588 air toxics program. PG&E recommends that CARB update the proposed regulation to specifically state that the individual air districts will be responsible to track the following triggers as they relate to exemptions and reinstatements:

- i. Updates to scientific understanding of bio-accumulative properties, persistence, and multi-pathway exposure.
- ii. Population-wide impact assessments and/or cumulative impacts.
- iii. Changes in building parameters that may affect building downwash.

4. Cost of implementation

The Initial Statement of Reasons (ISOR) estimates an implementation cost per facility for the initial reporting year at \$560 to \$22,300 and annual reporting thereafter at \$300 to \$720. PG&E believes that these cost values are understated. PG&E estimates that initial reporting would cost at least two to three times more than the values presented in the ISOR and that annual reporting, for the simplest of facilities, would roughly cost \$1,000 per facility thereafter.

Thank you for the opportunity to submit these comments on the proposed amendments to the EICG Regulation. Please contact me if you have any questions or wish to discuss.

Sincerely,

/s/

Fariya Ali