**Cap-and-Trade Regulation Amendment Request**

NOTE: Please use this form to highlight a request to amend a specific section (or related sections) of the Cap-and-Trade Regulation. Submission of this form aids staff in tracking requests and **does not mean** staff will ultimately propose an amendment in the version of the amendments noticed pursuant to the Administrative Procedure Act. This form is intended only as an additional tool ARB will use to evaluate requested changes to the regulation. Amendment requests may be for reasons of policy, clarity, or errors, etc. Staff may contact you if we need more information. Additionally, submission of this form will be a public record, and will be included in the ultimate rulemaking file related to these amendments, but may not be specifically answered in the Final Statement of Reasons. (Government Code section 11346.9(a)(3).) Please complete this form (with as much detail as possible, though it need not be formal regulatory language) and mail or email (preferred) to:

David Allgood ([dallgood@arb.ca.gov](mailto:dallgood@arb.ca.gov))

Stationary Source Division

P.O. Box 2815

Sacramento, CA 95812

**General Information**

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| August 2, 2013 |

Date:

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| Bill Buchan, Market Potential, Inc. |

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| Cardinal Cogen, Inc. |

Submitted by: Affiliation:

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| Buchan@mktpotential.com |

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| 510 928 5786 |

Contact Phone: E-mail:

**Section**

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| MMR |

Primary section(s):

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| ARB July 18 Presentation |

Related section(s):

**Amendment Request**

Type of amendment: xPolicy ☐Error ☐Clarity

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| In the ARB July 18 workshop presentation, ARB proposed to move up the deadline for annual verification by two weeks. This would provide a hardship for all 600 covered entities in the state. In the past few years our facility has completed verification right before the deadline, as our verifier works with all their covered entities to meet the September 1 deadline. Shortening the verification period by two weeks is not a feasible solution for us. |

Reason for amendment:

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| 1. Request that the verification deadline in the MMR remain unchanged. |

Additional information: