

**STATE OF CALIFORNIA
ENVIRONMENTAL PROTECTION AGENCY
AIR RESOURCES BOARD**

**Comments of AmeriGas Propane, L.P.
to Proposed Second 15-Day Modifications to the
Regulation for the Mandatory Reporting of Greenhouse Gas Emissions**

Dated: April 28, 2017

AmeriGas Propane, L.P.¹ (“AmeriGas”) provides the following comments in further response to the California Air Resources Board’s (“ARB”) proposed amendments to California’s existing Regulation for the Mandatory Reporting of Greenhouse Gas Emissions² (“MRR”). AmeriGas offers the following comments in support of the ARB’s latest amendments to the proposed “Importer of fuel” definition.

As outlined in its initial comments³ and reiterated in its supplementary comments,⁴ AmeriGas continues to strongly support the ARB in maintaining a robust and accurate greenhouse gas reporting program through the amendments to the MRR when necessary. AmeriGas’s prior comments proposed further edits to the “Importer of fuel” definition designed to address the risks of potential disaggregation of emissions positions within the industry. AmeriGas appreciates the ARB’s consideration of those comments and supports the revised definition of “Importer of fuel” as a careful and appropriate way to address these concerns.

We believe that the revised “Importer of fuel” definition is comprehensive and clear and that it will work to further reduce system leakage. We encourage the ARB to use revised supplementary guidance materials as a way to further elucidate the implications of this new definition. In particular, such guidance could make clear that entities may not use multiple contract (“daisy”) chains, collaborate with unaffiliated entities, or employ other complicated distribution schemes to avoid becoming a point of regulation under the MRR.

¹ AmeriGas is a nationwide distributor of liquefied petroleum gas (“LPG”) with extensive operations in California and is currently subject to the MRR as a California consignee of imported LPG. *See* 17 CCR § 95101(c)(5).

² 17 CCR § 95100, et seq. The MRR was developed pursuant to the Global Warming Solutions Act of 2006 (“AB 32”).

³ Comments of AmeriGas Propane, L.P. to Proposed Amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions, September 12, 2016.

⁴ Further Comments of AmeriGas Propane, L.P. to Proposed Amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions, January 20, 2017.

In sum, AmeriGas applauds the ARB for its thoughtful consideration of further amendments to the MRR and strongly supports the currently proposed definition of “Importer of fuel” reflected in the Proposed Second 15-Day Modifications.

Respectfully submitted,

Michael P. Daly
Michael.Daly@dbi.com
Brian C. Pickard
Brian.Pickard@dbi.com

Drinker Biddle & Reath LLP
One Logan Square, Suite 2000
Philadelphia, PA 19103-6996
(215) 988-2700 phone
(215) 988-2757 fax

Christopher B. Berendt
Christopher.Berendt@dbi.com

Drinker Biddle & Reath LLP
1500 K Street, N.W.
Washington, DC 20005-1209
(202) 842-8800 phone
(202) 842-8465 fax

Counsel for AmeriGas Propane, L.P.

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