



California Council for Environmental and Economic Balance

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April 28, 2017

Mr. Richard Corey
Executive Officer
California Air Resources Board
1001 I Street
Sacramento, California 95812

RE: Comments on the April 13, 2017, 15-Day Changes to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions

Dear Mr. Corey:

On behalf of the members of the California Council for Environmental and Economic Balance (“CCEEB”), we thank the California Air Resources Board (“ARB”) for this opportunity to comment on the proposed amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (“MRR”). CCEEB is a non-profit, non-partisan association of business, labor, and public leaders, which advances balanced policies for a strong economy and a healthy environment.

Sections 95103 – Verification Requirement and Deadlines

CCEEB appreciates the shift of the verification deadline from August 1 to August 10; however, we would like to reiterate the request from a large cross-section of stakeholders and compliance entities to accept the proposed compromise date of August 15. The thorough and time-intensive verification process makes every additional day valuable as compliance entities work to provide accurate and verified data. An August 10 deadline moves up the verification deadline by almost three weeks. We understand ARB staff needs sufficient time to perform its required tasks; however, compliance entities also require a great deal of time due to the risks associated with submitting inaccurate or flawed data. CCEEB again urges ARB to acknowledge the above-stated arguments and accept August 15 as an equitable compromise.

Conclusion

Thank you for considering our comments on the proposed amendments to the MRR. CCEEB represents a broad cross-section of the covered entities in California. As such, CCEEB is able to represent diverse industry sectors and to offer our assistance to the ARB in developing these proposals further. Should you wish to discuss our comments in more detail, please contact me or Jackson R. Gualco, Kendra Daijogo or Mikhael Skvarla, CCEEB’s governmental relations representatives at The Gualco Group, Inc. at (916) 441-1392.

Sincerely,

GERALD D. SECUNDY
President

cc: Honorable Chair & Members of the Air Resources Board
Mr. William J. Quinn
Ms. Janet Whittick
The Gualco Group, Inc.