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

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

Dear Mr. Corey,

Pacific Gas and Electric Company (PG&E) appreciates this opportunity to comment on the Air Resources Board's (ARB's) April 2017 changes to the Proposed Amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (MRR). We appreciate ARB's efforts to improve the greenhouse gas (GHG) regulations and provide clarity to entities subject to mandatory reporting.

The following comments address issues that will allow entities subject to the regulation to continue reporting in a timely and accurate manner in support of the MRR and the Cap-and-Trade regulations:

1. Sections 95103 – Verification Requirement and Deadlines

PG&E appreciates the proposed shift of the verification deadline from August 1 to August 10. As many stakeholders have commented, the rigor of the verification process makes every additional day valuable as entities seek to provide accurate, verified data. This change, while positive, still moves up the verification deadline by almost three weeks. Recognizing that ARB staff also need enough time to perform their required tasks, PG&E repeats the recommendation to split the difference and advance the verification deadline to August 15.

2. Section 95105(c)(3) – Recordkeeping Requirements, GHG Monitoring Plan for Facilities and Suppliers

PG&E supports ARB's clarification to this section which preserves the value of the diagrams while eliminating the administratively burdensome need to include an excessive level of detail.

3. Section 95111(h) – Reporting Requirements for the California Independent System Operator (CAISO) Energy Imbalance Market (EIM)

PG&E supports these changes to bring the MRR in-line with provisions of the Cap-and-Trade Regulation which establish ARB's interim methodology for addressing the GHG obligation for secondary emissions from the EIM. We expect that the interim methodology will address ARB's concerns in the short term, and that the ARB and CAISO will achieve their objective of accurately and fairly accounting for these emissions in the near future.

PG&E supports ARB's efforts to improve the MRR and Cap-and-Trade regulations in support of AB 32, and appreciates ARB's willingness to work with stakeholders to maintain an MRR that minimizes unnecessary risks of non-compliance for reporters and safeguards the integrity of California's GHG inventory.

Sincerely,

/s/

Nathan Bengtsson
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Pacific Gas and Electric Company

cc:

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