



April 28, 2017

LEG 2017-0213

Ms. Rajinder Sahota
California Air Resources Board
1001 I Street
Sacramento, CA 95814

SMUD's Comments Regarding Proposed Amendments to the Mandatory Reporting of GHG Emissions

SMUD appreciates the opportunity to comment on the proposed amendments to the Mandatory Reporting Regulations (MRR) posted on April 13th.

SMUD appreciates the movement of the proposed deadline for verification from the previously proposed August 1st date to August 10th (significantly closer to the existing September 1st deadline). SMUD is not sure that the revised date will allow verification to proceed without difficulty in meeting the August 10th date, but commits to working with our verification contractors to attempt to meet that deadline. SMUD plans to test the feasibility of meeting the August 10th deadline with our ongoing verification efforts, even prior to the effective date of the new deadline. SMUD will provide ARB with relevant information from our experience attempting to meet the August 10th deadline prior to the effective date.

SMUD also appreciates the restoration of the exclusions in the requirement in section 95111(b)(2)(E)(1) to prepare a "lesser of" analysis for imported power. The previously proposed amendments from December 2016 had removed this exclusion for grandfathered RPS contracts and dynamically scheduled renewable imports, and SMUD and other stakeholders requested the exclusion be restored. These contracts are appropriately excluded from ARB's "lesser of" analysis because the companion "lesser of" analysis for qualifying "bucket 1" products in the State's Renewable Portfolio Standard program did not apply to these contracts.

Thanks again for the opportunity to comment.

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cc: Corporate Files