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VIA ELECTRONIC SUBMISSION

April 28, 2017

Clerk of the Board, Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Trinity Comments on Mandatory Reporting Regulation Second 15-Day Modification Language

Trinity Consultants, Inc. (Trinity) is one of the most active Verification Bodies accredited by the California Air Resources Board (ARB) as our verification team has been performing numerous “independent” verifications of Greenhouse Gas (GHG) emission data reports by various industry reporting entities every year since the inception of the Mandatory Reporting program. This letter summarizes Trinity’s comments on the Proposed Second 15-day Modifications to the Proposed Amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions posted on April 13, 2017.

Trinity generally welcomes and supports most of the proposed changes on the Proposed Second 15-day Modification document. However, we have a serious concern for ARB staff’s proposed change of the deadline for completing verification from September 1 to August 10. Although an August 10 deadline may be feasible to complete verifications for reporting entities with straightforward or less complicated emission reports, we are worried that the earlier deadline will not provide enough time for verifier(s) to perform a thorough review, and thus it may lead to either a compromise in the quality of detailed verification work or premature adverse statements for those reporting entities with more complicated emission portfolios and reports.

The earlier verification deadline will adversely impact the Electric Power Entity (EPE) reports in particular as their verification period would be significantly shortened from three (3) months to two (2) months and 10 calendar days. Considering that the verification process typically includes site-visits, detailed data checks, resolving identified issues with the reporting entities, and developing verification report deliverables, the verifiers would need at least 3 months to complete all necessary verification activities without compromising work quality. Therefore, Trinity respectfully requests that ARB preserves the September 1 verification date, as stated in the current version of the regulation. If this is not feasible, we strongly recommend ARB to consider implementing a sector-specific deadline approach as opposed to one universal deadline. In other words, ARB could implement two different verification deadlines (similar to the reporting deadlines): i) August 10 for reporting entities with reporting deadline of April 10 and ii) September 1 for EPEs with reporting deadline of June 1. Trinity appreciates ARB staff for taking the comments of industry into consideration during this rule-making process.

Sincerely,

Trinity Consultants

Charles C. Lee, Ph.D.
Principal Consultant