

Subject: Delete NAICS Code Request For Offsite Users

Comment:

For 95112(a)(3)(B), a facility is requested to identify the NAICS code where power is sold to off-site users. In our case, we sell power to the grid to the utility with no knowledge of who the ultimate power users are. As such, I recommend the requirement to delete the NAICS code for the off-site user be deleted. Alternatively, it be feasible to classify a utility as a offsite user with a NAICS code.

Subject: Clarify 95112(a) For Cogen Operations Only

Comment:

For 95112(a): Cogeneration facilities are unique in that they have cogeneration operations as well as thermal host operations. The goal of AB32 is to collect data for the cogeneration operations only. To clarify this when we speak of the cogeneration facility, I recommend the following change in language in the first sentence of (a): "The operation of a cogeneration facility, excluding thermal host operations, subject..." This should also be clarified in the staff report, presumably on page 42, first paragraph under item 3.

Subject: Clarification for Accredited ARB Specialist For Utilities/Cogen

Comment:

For 95131(a)(2)(A): To clarify the requirement for an accredited ARB specialist for electric utilities and cogeneration facilities, I recommend replacing the concept of an "electricity transaction specialists" with the following language: "...accredited by ARB as an electric utility and cogeneration transaction specialist." Previous wording was unclear and did not include cogeneration.

Subject: Clarify Best Available Data And Methods Approach

Comment:

For 95112(a)(4)(C): Some cogeneration plants have multiple steam lines they generate, not all of which are measured (particularly minor ones) with totalizers for annual steam generation. As such, these cogeneration facilities may not be able to provide measureable data on all steam lines, particularly small lines. To be consistent with the "Best Available Data and Methods" approach for this regulation, please change the wording to read: "Estimated amount of thermal energy..." This would allow facilities to estimate the annual thermal output without having to install totalizers on every steam line, even minor steam lines.

Subject: Clarify Estimation of Efficiency of Electrical Generation

Comment:

In 95112(a)(5)(B)(1), the draft regulation requires that cogeneration facilities report their efficiency of electrical generation. This is not a measured parameter. Rather it will be estimated or assumed as part of the effort to generate the GHG inventory. To clarify that this is not a required measurement, please change the wording from "Efficiency" to "Estimated efficiency".