



September 27, 2011

Clerk of the Board, Air Resources Board  
1001 I Street  
Sacramento, California 95814  
(Submitted electronically via CARB's online comment form)

Dear Board Members:

We appreciate this opportunity to submit our comments regarding one provision of the proposed amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions. The proposed modification to 95132(b)(1)(C) will require verification bodies to have four million dollars of professional liability insurance instead of one million dollars of liability insurance, and to maintain this level of insurance for three years after completing any verification services. This requirement applies to verifiers of emission data reports or offset project data reports, without distinction.

There is no logical reason why such a high liability should be associated with the verification of emissions data reports. The liability for any required offsets always remains with the facilities and not with the verification body. Furthermore, the requirement for verifiers to maintain such a high level of liability insurance may give the impression that such liability can or should be shifted to verifiers. Emissions data report verifications tend to be relatively small jobs, most less than \$8000. It does not make sense for a verification body to shoulder so much liability for such a job.

The Initial Statement of Reasons does not provide a very specific or substantial justification for the proposed change and its additional costs to reporters and verification bodies. We ask that you reconsider the potential costs - the loss of skilled verifiers who may exit the market and higher verification costs to reporters - weighed against the lack of clear benefit to any party. We respectfully take the position that the current liability insurance requirements are more than adequate to protect reporters, especially with respect to verification of emissions data reports, and request that no change be made to the current wording of 95132(b)(1)(C).

Sincerely,

A handwritten signature in black ink, appearing to read 'B. Leininger', written over a white background.

Bart Leininger, P.E.  
Principal  
Ashworth Leininger Group

601 EAST  
DAILYDRIVE  
SUITE 302  
CAMARILLO  
CALIFORNIA  
93010  
PH 805.764.6010  
FX 805.764.6011