The proposed revisions to Section 95157(c) say that "Both the vented and flared emissions will be reported under respective source types and not under flare source type." This is in conflict with what has been ARB guidance for reporting flare emissions in the Emissions Reporting Tool, which has allowed reporting of all flare emissions as flare emissions only. For flares that serve multiple sources but measure only the combined process stream at the flare, a requirement to apportion total flare emissions to individual sources feeding the flare will require the use of estimation techniques that may have significant error, rendering the results questionable (though total reported flare emissions are accurate). Please consider dropping the requirement to apportion flare emissions to individual sources, even if it applies only to the Activity Data Workbook and not to the Emissions Reporting Tool.