

**Comment 1 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Advisory Commitee  
Last Name: Envriotional Justic  
Email Address: ombcomm@arb.ca.gov  
Affiliation:

Subject: Environmental Justice Advisory Committee Draft Recommendations  
Comment:

Please see attached document.

Attachment: 'www.arb.ca.gov/lists/com-attach/1-capandtrade16-B2NQJAFhWWxXJQBf.pdf'

Original File Name: draft\_ejac\_recommendations082616revised.pdf

Date and Time Comment Was Submitted: 2016-08-30 13:56:14

No Duplicates.

## **Comment 2 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Eli  
Last Name: Gilbert  
Email Address: Egilbert@surety.org  
Affiliation: The Surety & Fidelity Association of Ame

Subject: Notice of Public Hearing to Consider Amendments to California GHG proposed regulations

Comment:

Thank you for the opportunity to provide comments in regards to the proposed amendments to the California Greenhouse Gas proposed regulations.

The attachment includes SFAA's comments regarding the proposed amendments.

Regards,

Eli Gilbert  
The Surety & Fidelity Association of America ("SFAA")  
Director of Underwriting

Attachment: 'www.arb.ca.gov/lists/com-attach/2-capandtrade16-VCdcPF09BzVSOAJn.pdf'

Original File Name: SFAALetter\_California Cap and Trade\_v1.pdf

Date and Time Comment Was Submitted: 2016-08-30 14:01:13

No Duplicates.

**Comment 3 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Barbara

Last Name: Bramble

Email Address: Bramble@nwf.org

Affiliation: National Wildlife Federation

Subject: Comments by National Wildlife Federation

Comment:

Attached Please Find the Comments by National Wildlife Federation on the proposed amendments to the cap-and-trade and market-based compliance mechanisms regulation.

Thank you,

bjb

Attachment: 'www.arb.ca.gov/lists/com-attach/3-capandtrade16-VzlQN1MmVW8FbFc5.pdf'

Original File Name: National Wildlife Federation CARB Letter of Support.pdf

Date and Time Comment Was Submitted: 2016-09-02 12:31:23

No Duplicates.

**Comment 4 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Nico

Last Name: van Aelstyn

Email Address: nvanaelstyn@bdlaw.com

Affiliation: Beveridge & Diamond, PC

Subject: Powerex Corp. Comments

Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/4-capandtrade16-WzhQOQRoWGYGZQRq.pdf'

Original File Name: Comments of Powerex Corp on Proposed Amendments to the Cap-and-Trade Reg....pdf

Date and Time Comment Was Submitted: 2016-09-09 15:23:50

No Duplicates.

**Comment 5 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Jon

Last Name: Costantino

Email Address: jcostantino@manatt.com

Affiliation: Manatt, Phelps, and Phillips, LLP

Subject: Panoche Energy Comments

Comment:

See Attached

Attachment: 'www.arb.ca.gov/lists/com-attach/5-capandtrade16-UCBdPgFjVFgDalc5.pdf'

Original File Name: PEC One Pager 9-2016 v2.pdf

Date and Time Comment Was Submitted: 2016-09-13 11:54:06

No Duplicates.

**Comment 6 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Simon

Last Name: Martin

Email Address: martin.sp.1@pg.com

Affiliation:

Subject: Comments to Board Item "capandtrade16"

Comment:

Comments attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/6-capandtrade16-VSVcPVMNWWIWPwRp.pdf'

Original File Name: PG\_Comment\_Letter-Proposed\_Amendment\_(9-13-2016).pdf

Date and Time Comment Was Submitted: 2016-09-13 15:43:46

No Duplicates.

## **Comment 7 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Jonah

Last Name: Busch

Email Address: jbusch@cgdev.org

Affiliation: Center for Global Development

Subject: Strong support for accelerating sector-based credits for tropical forest protection

Comment:

Dear ARB,

I write in strong support of accelerating sector-based credits for tropical forest protection within the California cap-and-trade program in time for use in the third compliance period.

California now faces the urgent, important, and globally significant challenge of reducing its greenhouse gas emissions by 40% below 1990 levels by 2030, as recently signed into law by Governor Brown. To achieve this worthy goal effectively, efficiently, and equitably, ARB will need to employ many measures, including strengthening cap-and-trade by incorporating sector-based credits for tropical forest protection. As detailed in previous public comments (e.g. "Eight reasons for California to lead on climate and tropical forests," October 2015) during ARB's thorough and open public consultation process, inclusion of sectoral offset credits for tropical forest protection can:

- Fight climate change abroad as well as at home
- Contain costs for California companies and their customers
- Make California the standard-setter for the world
- Provide side benefits for sustainable development goals and biodiversity conservation
- Adapt a model that has already been tested using public funds
- Support indigenous peoples' rights and aspirations
- Demonstrate that technical issues are surmountable
- Jumpstart actions in other states and provinces that could finance tropical forest protection

For all these reasons, ARB should accelerate the inclusion of sector-based credits for tropical forest protection within the California cap-and-trade program in time for use in the third compliance period.

Thank you,

Jonah Busch, Ph.D.  
Center for Global Development  
2055 L St, Fifth Floor  
Washington, DC 20009

References:

"Eight Reasons for California to Lead on Climate and Tropical Forests." Jonah Busch. Center for Global Development Blog. October 27th, 2015.

<http://www.cgdev.org/blog/eight-reasons-california-lead-climate-and-tropical-forests>

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2016-09-14 11:08:41

No Duplicates.



**Comment 8 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Amber  
Last Name: Blixt  
Email Address: amber@iepa.com  
Affiliation: IEP

Subject: IEP Comments on Cap and Trade Amendments  
Comment:

Attached are IEP's Comments on the Proposed Cap and Trade Amendments.

Attachment: 'www.arb.ca.gov/lists/com-attach/8-capandtrade16-UjtQMwZ3U19SNwNs.pdf'

Original File Name: IEP comments on Cap and Trade Proposed Amendments Sept 2016 FINAL.pdf

Date and Time Comment Was Submitted: 2016-09-14 12:42:46

No Duplicates.

**Comment 9 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Evelyn

Last Name: Kahl

Email Address: ek@a-klaw.com

Affiliation: Alcantar & Kahl LLP

Subject: Energy Producers and Users Coalition Comments on Proposed Cap & Trade  
Comment:

Attached for submission:

Comments on the proposed amendments to the California Cap and Trade  
program.

Attachment: 'www.arb.ca.gov/lists/com-attach/9-capandtrade16-B2IGcF0pUGAEXQNg.pdf'

Original File Name: EPUC CARB Comments proposed CT amendments.pdf

Date and Time Comment Was Submitted: 2016-09-15 14:07:14

No Duplicates.

**Comment 10 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Andre

Last Name: Templeman

Email Address: andre@alphainception.com

Affiliation: Carbon Market Compliance Association

Subject: 2016 Proposed Cap and Trade Amendments

Comment:

Please post attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/10-capandtrade16-UTJdNgdlU2FQCVU2.pdf'

Original File Name: CMCA Comments on 2016 Proposed Cap and Trade Amendments.pdf

Date and Time Comment Was Submitted: 2016-09-15 15:50:15

No Duplicates.

**Comment 11 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

**Comment 12 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Harrison

Last Name: Clay

Email Address: hclay@cleanenergyfuels.com

Affiliation:

Subject: Clean Energy Cap & Trade Comments

Comment:

Please see the attached comments from Clean Energy.

Attachment: 'www.arb.ca.gov/lists/com-attach/12-capandtrade16-UjEBa1I2WWsEbFcI.pdf'

Original File Name: Clean Energy Cap and Trade Comments\_091616.pdf

Date and Time Comment Was Submitted: 2016-09-16 11:14:56

No Duplicates.

## **Comment 13 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Bill

Last Name: Buchan

Email Address: buchana@mktpotential.com

Affiliation: GRAPHIC PACKAGING INTERNATIONAL INC

Subject: Leakage Approach Needs to Prevent Leakage

Comment:

At Graphic Packaging International, we applaud ARB for continuing to address leakage issues for energy-intensive, trade-exposed entities like our Santa Clara Mill. We encourage ARB to adopt a goal to develop methodology that will prevent domestic and international leakage where California facilities do not compete on equal regulatory climate change footing. Leakage undermines our ability to maintain jobs and sustainably produce local products for Californians. While the proposed approach addresses leakage, we do not yet believe this approach does enough to prevent leakage for California covered entities.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2016-09-16 13:14:23

No Duplicates.

## **Comment 14 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Bill

Last Name: Buchan

Email Address: buchana@mktpotential.com

Affiliation: GRAPHIC PACKAGING INTERNATIONAL INC

Subject: Assistance Factors to 2030 - Work With Industry

Comment:

Graphic Packaging International asks that ARB direct staff to work with each affected industrial sector in the development of the assistance factors for that sector. We note that the current approach does not require that staff will work with industry or even allow for critical industry trade data to be incorporated with the theoretical domestic and international leakage analyses performed. We worked very effectively with ARB in 2011-12 in the development of the assistance factors currently used for our industry, providing key industry trade data. We hope to work with ARB in this same capacity as new assistance factors are established through 2030. Please direct staff to work with industry and incorporate industry trade data into the development of industry assistance factors.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2016-09-16 13:17:22

No Duplicates.

## **Comment 15 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Bill

Last Name: Buchan

Email Address: buchana@mktpotential.com

Affiliation: GRAPHIC PACKAGING INTERNATIONAL INC

Subject: Validate Leakage Theory With Trade Data

Comment:

Graphic Packaging International appreciates the theoretical analyses that has been conducted for domestic and international leakage. It represents solid, critical thinking as to what should or might happen in the marketplace. What is unsettling about the ARB approach is that these theoretical analyses are solely based on business school theory and some data prior to 2013 before California's cap and trade program was implemented. No effort has been made to validate the theory with present day data to determine what output has actually been lost from 2013-15 since cap and trade begun. Theory must be validated before putting it to use. Industry can provide insight into the actual impact the cap and trade program has had on lost output, if not actual data in the 2013-15 period, and the current competitive pressures it faces from international and domestic entities without a similar cap and trade program. We encourage ARB to validate these theoretical approaches with actual, recent trade data wherever possible and work with industry to gain insight as to the impact that the cap and trade program has had and the real competitive pressures facing California energy-intensive, trade-exposed entities.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2016-09-16 13:19:31

No Duplicates.



## **Comment 16 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Bill

Last Name: Buchan

Email Address: buchana@mktpotential.com

Affiliation: GRAPHIC PACKAGING INTERNATIONAL INC

Subject: Needed Improvements For International Leakage - Numerical Results and Expand Past China

Comment:

Graphic Packaging International found the domestic leakage analysis detailed enough to where the Value Added impact and Output impact were determined as a function of potential Assistance Factors by industrial sector. This was very helpful. Unfortunately, the international leakage analysis was not as detailed and did not provide these numerical results. As we have several competitors from China and other Asian countries, we ask that ARB develop the same Value Added impact and Output impact for international leakage too. Furthermore, we also understand that the international leakage analysis focused on China, but we ask that ARB expand the international analysis to include other Asian countries as well, as we compete with companies from several Asian countries in the recycled paperboard industry.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2016-09-16 13:21:20

No Duplicates.

**Comment 17 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Mike

Last Name: Gallo

Email Address: mgallo@josephfarms.com

Affiliation: Joseph Gallo Farms

Subject: 2016 Proposed Cap and Trade Amendments

Comment:

Comment letter attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/17-capandtrade16-WyhWMwFhBzoANgAw.pdf'

Original File Name: Scan0024.pdf

Date and Time Comment Was Submitted: 2016-09-16 16:38:49

No Duplicates.

## **Comment 18 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Mike  
Last Name: Sandler  
Email Address: mike@carbonshare.org  
Affiliation: Carbon Share

Subject: Cap & Dividend  
Comment:

Please see the attached comments on how to improve the program in its next phase, and perhaps gain supporters for the program's extension, by decreasing subsidies to the fossil fuel industry, and depoliticizing the way funds are used by moving the funding for environmental programs into the regular budget process and returning Cap & Trade revenues back to people as climate dividends.

-Mike Sandler  
www.carbonshare.org

Attachment: 'www.arb.ca.gov/lists/com-attach/18-capandtrade16-B2RXPgdrUW9RMgdp.pdf'

Original File Name: CommenttoARB9-17-16Sandler.pdf

Date and Time Comment Was Submitted: 2016-09-17 19:17:48

No Duplicates.

## **Comment 19 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Frank

Last Name: Lossy

Email Address: ftlossy322@comcast.net

Affiliation: Physician in private practic

Subject: CAPANDTRADE16

Comment:

California has shown leadership on climate change by creating a price on carbon. But the program can still be improved in several ways.

The Petroleum Refining, Natural Gas Extraction, and Cement sectors received over 49 million free allowances in 2016. At \$12.73 per allowance, that subsidy is worth over \$629 million per year. That is in my opinion grossly unwarranted. Reducing or eliminating this subsidy would help bolster demand which has been lagging in recent permit auctions.

The California Climate Credit that appears twice a year on electricity bills can be turned into an off-bill per-capita dividend that would be simple, transparent, and inclusive of disadvantaged communities. The State can gain supporters for the program's extension, by moving the funding for environmental programs into the regular budget process and returning Cap & Trade revenues back to people as climate dividends. That would be a much more advantageous use of the funds.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2016-09-17 21:35:27

No Duplicates.

## **Comment 20 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Stacey  
Last Name: Meinzen  
Email Address: staceymeinzen@gmail.com  
Affiliation: Mrs.

Subject: AB32 Cap and Dividend  
Comment:

California has shown leadership on climate change by creating a price on carbon. But the program can still be improved in several ways. The Petroleum Refining, Natural Gas Extraction, and Cement sectors received over 49 million free allowances in 2016. At \$12.73 per allowance, that subsidy is worth over \$629 million per year. Reducing or eliminating this subsidy would help bolster demand which has been lagging in recent permit auctions. The California Climate Credit that appears twice a year on electricity bills can be turned into an off-bill per-capita dividend that would be simple, transparent, and inclusive of disadvantaged communities. The State can gain supporters for the program's extension, by moving the funding for environmental programs into the regular budget process and returning Cap & Trade revenues back to people as climate dividends.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2016-09-18 16:04:09

No Duplicates.

**Comment 21 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Dell

Last Name: Majure

Email Address: dell.majure@kcc.com

Affiliation:

Subject: Cap-and-Trade16 - Kimberly Clark Comments

Comment:

Please see attached comments.

Attachment: 'www.arb.ca.gov/lists/com-attach/21-capandtrade16-VDdcO1AhVmQAaAdj.pdf'

Original File Name: CapandTrade16 - Kimberly Clark Comments.pdf

Date and Time Comment Was Submitted: 2016-09-19 04:35:55

No Duplicates.

## **Comment 22 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Christine

Last Name: Kirsten

Email Address: christine.kirsten@pacificorp.com

Affiliation:

Subject: Joint Comments of the EIM Entities

Comment:

I am filing comments on behalf of the current and future EIM Entities as defined in the attached joint comments document.

Attachment: 'www.arb.ca.gov/lists/com-attach/22-capandtrade16-B2IGaVA8U15WNQnt.pdf'

Original File Name: EIM Entity CARB Comments (5).pdf

Date and Time Comment Was Submitted: 2016-09-19 09:24:49

No Duplicates.

**Comment 23 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Elysia

Last Name: Treanor

Email Address: Elysia.Treanor@pgn.com

Affiliation: Portland General Electric Company

Subject: PGE Comments on Proposed Cap and Trade Regulation

Comment:

Please see attached for PGE's comments on the Proposed Cap and Trade Regulation.

Attachment: 'www.arb.ca.gov/lists/com-attach/23-capandtrade16-VDdWP1wwVmhVNgVr.pdf'

Original File Name: Comments on CARB 2016 CapTrade Regulatory Changes - PGE final 091916.pdf

Date and Time Comment Was Submitted: 2016-09-19 10:03:58

No Duplicates.



**Comment 24 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Janet

Last Name: Bell

Email Address: jbell@mwdh2o.com

Affiliation: Metropolitan Water District

Subject: Comments on Proposed Amendments to the Cap-and-Trade Regulation

Comment:

See attached comment letter.

Attachment: 'www.arb.ca.gov/lists/com-attach/24-capandtrade16-WjxSPVM8AzFQOgNc.pdf'

Original File Name: Final\_CARB Letter dated 9-19-16 Proposed Amendments CA Greenhouse (2).pdf

Date and Time Comment Was Submitted: 2016-09-19 11:06:21

No Duplicates.

## **Comment 25 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Sheldon

Last Name: Zakreski

Email Address: [szakreski@climatetrust.org](mailto:szakreski@climatetrust.org)

Affiliation:

Subject: Comments

Comment:

Thank you for the opportunity to submit comments to the proposed cap and trade amendments. The Climate Trust's comments are attached.

Attachment: '[www.arb.ca.gov/lists/com-attach/25-capandtrade16-UiYBZARxWVUAZQdo.pdf](http://www.arb.ca.gov/lists/com-attach/25-capandtrade16-UiYBZARxWVUAZQdo.pdf)'

Original File Name: TCT Comments on ARB Cap and Trade Regulation Amendments160916-FNL.pdf

Date and Time Comment Was Submitted: 2016-09-19 11:07:08

No Duplicates.

## **Comment 26 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Adrianna

Last Name: Kripke

Email Address: akripke@semprautilities.com

Affiliation:

Subject: Comments on 45-Day MRR Changes

Comment:

Attached are comments from San Diego Gas & Electric regarding  
45-Day Cap-and-Trade Regulation Changes.

Attachment: 'www.arb.ca.gov/lists/com-attach/26-capandtrade16-WikCYFI0U2UEXVMw.pdf'

Original File Name: SDGE Cmts Cap-and-Trade Amends to Regulation 9.19.16.pdf

Date and Time Comment Was Submitted: 2016-09-19 11:42:16

No Duplicates.

**Comment 27 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Michael

Last Name: Van Brunt

Email Address: mvanbrunt@covanta.com

Affiliation:

Subject: Covanta comments on CA cap and trade program

Comment:

Please see attached comments from Covanta.

Attachment: 'www.arb.ca.gov/lists/com-attach/27-capandtrade16-BTcBN1NjB2IAK1Bg.pdf'

Original File Name: 2016-09 Covanta Comments on changes to cap & trade program.pdf

Date and Time Comment Was Submitted: 2016-09-19 11:47:32

No Duplicates.

## **Comment 28 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Lynn

Last Name: Bragg

Email Address: lbragg@gpi.org

Affiliation: Glass Packaging Institute (GPI)

Subject: Comments to the ARB Proposed Amendments on GHG Emissions & Market Based Compliance

Comment:

Please see the attached comments of the Glass Packaging Institute (GPI), on ARB's Proposed Amendments to the Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulation.

Regards,

Lynn

Lynn M. Bragg

President

Glass Packaging Institute (GPI)

Attachment: 'www.arb.ca.gov/lists/com-attach/28-capandtrade16-Wj1XPVU1UHBQJVMM.pdf'

Original File Name: Glass Packaging Institute (GPI) - Letter to CARB, September 19, 2016.pdf

Date and Time Comment Was Submitted: 2016-09-19 11:55:22

No Duplicates.

**Comment 29 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Andrew  
Last Name: Ulmer  
Email Address: [aulmer@caiso.com](mailto:aulmer@caiso.com)  
Affiliation: California ISO

Subject: Comments on Amendments to the California Cap on Greenhouse Gas Emissions and Market-Based

Comment:

Please find the California ISO's comments to Proposed Amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulation.

Respectfully submitted,

Andrew Ulmer  
Director, Federal Regulatory Affairs  
California Independent System Operator Corp.  
Tel. 916.608.7209  
Cell. 916.673.7797

Attachment: '[www.arb.ca.gov/lists/com-attach/29-capandtrade16-WjlXMFwvAjNWDwR2.pdf](http://www.arb.ca.gov/lists/com-attach/29-capandtrade16-WjlXMFwvAjNWDwR2.pdf)'

Original File Name: CARB\_Regulations\_Comments\_20160919\_Final.pdf

Date and Time Comment Was Submitted: 2016-09-19 12:00:19

No Duplicates.

**Comment 30 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Nathan

Last Name: Rockliff

Email Address: nathan.rockliff@cbourses.com

Affiliation:

Subject: CBL Markets comments

Comment:

Please see attached comments from CBL Markets.

Attachment: 'www.arb.ca.gov/lists/com-attach/31-capandtrade16-WzhTN1c6VVkLYAlo.pdf'

Original File Name: CBL Markets - Submission re Transferring Units out of an ECHA.pdf

Date and Time Comment Was Submitted: 2016-09-19 12:20:28

No Duplicates.

**Comment 31 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: John  
Last Name: Bloom  
Email Address: [laura@houstonmagnani.com](mailto:laura@houstonmagnani.com)  
Affiliation: CSCME

Subject: CSCME Comments  
Comment:

Please accept the attached comments on behalf of the Coalition for Sustainable Cement Manufacturing and Environment (CSCME).

Attachment: '[www.arb.ca.gov/lists/com-attach/32-capandtrade16-VjAFalwzVGYHbQNc.pdf](http://www.arb.ca.gov/lists/com-attach/32-capandtrade16-VjAFalwzVGYHbQNc.pdf)'

Original File Name: FINAL 9-19-16 CSCME Comments on Draft Reg and ISOR with Attachments.pdf

Date and Time Comment Was Submitted: 2016-09-19 12:29:34

No Duplicates.



## **Comment 32 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Charles

Last Name: Purshouse

Email Address: charles.purshouse@camcocleanenergy.com

Affiliation:

Subject: CODA comments on proposed GHG cap-and-trade amendments

Comment:

Please find attached comments from CODA

Regards

Charles Purshouse

Attachment: 'www.arb.ca.gov/lists/com-attach/33-capandtrade16-AGMAaV04VmRRCAVm.pdf'

Original File Name: CODA Comments September 2016 Proposed Amendments.pdf

Date and Time Comment Was Submitted: 2016-09-19 12:44:00

No Duplicates.

## **Comment 33 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Angus

Last Name: Crane

Email Address: [acrane@naima.org](mailto:acrane@naima.org)

Affiliation: NAIMA

Subject: NAIMA's Comments on CARB's Proposed Amendments to the California CAP on Greenhouse Gas

Comment:

Please find attached the North American Insulation Manufacturers Association's ("NAIMA") comments and an attached report from The Brattle Group addressing CARB's Proposed Amendments to the California Cap on Greenhouse Gas Emissions.

Attachment: '[www.arb.ca.gov/lists/com-attach/34-capandtrade16-WjQAZ1I6UW8BZlc0.pdf](http://www.arb.ca.gov/lists/com-attach/34-capandtrade16-WjQAZ1I6UW8BZlc0.pdf)'

Original File Name:

NAIMACommentsCARBProposedAmendmentsGHGEmissionsCapMarketBasedComplianceRegulation.pdf

Date and Time Comment Was Submitted: 2016-09-19 13:02:15

No Duplicates.

## **Comment 34 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Kraig

Last Name: Kurucz

Email Address: kraig.kurucz@lmco.com

Affiliation: Lockheed Martin Space Systems Company

Subject: Comments on CALIFORNIA CAP ON GREENHOUSE GAS EMISSIONS AND MARKET-BASED COMPLIANCE MECHANISMS

Comment:

Lockheed Martin is a global security and aerospace company that employs approximately 98,000 people worldwide and is principally engaged in the research, design, development, manufacture, integration and sustainment of advanced technology systems, products and services. We appreciate the opportunity to provide comments to the California Air Resource Board (known herein as 'Board') regarding the proposed amendments to the CALIFORNIA CAP ON GREENHOUSE GAS EMISSIONS AND MARKET-BASED COMPLIANCE MECHANISMS REGULATION, particularly the amendment set forth in Appendix A: Proposed Regulation Order, Section 95852.2(b)(2), which removes the compliance obligation exemption on emissions from natural gas hydrogen fuel cells. Lockheed Martin respectfully disagrees with the Board's intention to eliminate the aforementioned exemption. Natural gas hydrogen fuel cells efficiently and electrochemically convert fuel into low-carbon, baseload electricity. Greater energy efficiency means less fuel consumed to produce the same output of electricity, and that lower fuel consumption corresponds to fewer CO2 emissions. Even when compared to advanced centralized combined cycle gas turbine power plants equipped with the best available control technology (BACT) – the US EPA's benchmark – natural gas hydrogen fuel cells delivers a lower CO2 footprint due to higher electricity efficiency.

Companies like Lockheed Martin recently invested in this technology with the understanding that the Board would continue to include such emissions in the compliance obligations (exemptions) of Section 95852.2. We invested significant money into the design and purchase of the capital equipment. We have also devoted substantial time into the operation and maintenance of the equipment to maximize efficiencies. All of these actions were completed under the assumption of regulatory relief from the Cap and Trade program.

For the reasons outlined above, Lockheed Martin recommends that the Board retain the language in Section 95852.2(b)(2). By retaining this language, the regulated community will be able to recognize the existing benefits (investments) in clean electricity producing technology, while potentially investing in future cleaner technologies. At a minimum, the Board should consider retaining the exemption and offering a compliance date of no less than 3 years for newly installed fuel cells. This would enable existing sites with fuel cells to fully recognize the benefit of their investments, while providing time for new projects to evaluate the benefits of the investment.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2016-09-19 13:06:29

No Duplicates.

## **Comment 35 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Vincent  
Last Name: Pouliot  
Email Address: vpouliot@gazmetro.com  
Affiliation:

Subject: Comments - Gaz Metro Limited Partnership  
Comment:

Dear ARB members and staff,

Gaz Métro is a diversified energy company established in the province of Québec, in Canada. We distribute natural gas in Québec and Vermont, and we develop and operate a wide range of energy projects, including natural gas as fuel, liquefied natural gas as a replacement for higher emission-producing energies, wind and solar power, and biomethane.

Please find attached Gaz Métro's comments and recommendations in relation with the proposed amendments to this regulation.

Yours sincerely,

Vincent Pouliot  
Carbon Market and Energy Efficiency Manager  
GAZ MÉTRO LIMITED PARTNERSHIP

Attachment: 'www.arb.ca.gov/lists/com-attach/36-capandtrade16-BzZTbFY+AyhXYFNI.pdf'

Original File Name: 19ix16 Gaz Metro LP - Comments to ARB.pdf

Date and Time Comment Was Submitted: 2016-09-19 13:14:47

No Duplicates.

## **Comment 36 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: David

Last Name: Huck

Email Address: david.huck@simplot.com

Affiliation: JR Simplot Company

Subject: Public Comments to CARB

Comment:

Please find attached public comments to the California Air Resources Board regarding the proposed changes to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulation. Please note a duplicate of these comments has also been submitted to CARB regarding the proposed amendments to the regulation for the mandatory reporting of greenhouse gas emissions.

Attachment: '[www.arb.ca.gov/lists/com-attach/37-capandtrade16-VT9RJVEPUHBQPwlk.pdf](http://www.arb.ca.gov/lists/com-attach/37-capandtrade16-VT9RJVEPUHBQPwlk.pdf)'

Original File Name: JR Simplot\_Public Comments\_MRR Ammendments.pdf

Date and Time Comment Was Submitted: 2016-09-19 13:31:41

No Duplicates.

## **Comment 37 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Michelle  
Last Name: Passero  
Email Address: mpassero@tnc.org  
Affiliation:

Subject: Comments from The Nature Conservancy on proposed amendments to the cap and trade program

Comment:

Hello:

Please accept comments from the Nature Conservancy on the proposed regulatory changes to the cap and market-based compliance mechanism.

Attachment: 'www.arb.ca.gov/lists/com-attach/38-capandtrade16-UycAaFw+BwsEYQhn.pdf'

Original File Name: TNC\_Comments\_DraftCapandTradeRegs\_08\_02\_16.pdf

Date and Time Comment Was Submitted: 2016-09-19 13:33:41

No Duplicates.

**Comment 38 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Zach  
Last Name: Eyler  
Email Address: zeyler@rubycanyoneng.com  
Affiliation: Ruby Canyon Engineering, Inc.

Subject: Comments on Proposed Amendments to Cap-and-Trade Regulation  
Comment:

Please see attached comments.

Thank you,

Zach Eyler  
Ruby Canyon Engineering, Inc.

Attachment: 'www.arb.ca.gov/lists/com-attach/39-capandtrade16-VCYHdFU2UHoFXARn.pdf'

Original File Name: Ruby Canyon Engineering\_C&T Amendments Comments\_September 2016.pdf

Date and Time Comment Was Submitted: 2016-09-19 13:42:59

No Duplicates.



**Comment 39 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Sean  
Last Name: Carney  
Email Address: scarney@finitecarbon.com  
Affiliation: Finite Carbon

Subject: Finite Carbon 45 day Public Comments  
Comment:

Finite Carbon is pleased to submit the attached comments to the proposed updated Regulation.

Sean Carney  
President  
Finite Carbon  
484-586-3092

Attachment: '[www.arb.ca.gov/lists/com-attach/40-capandtrade16-VDJRPIQ7VW8HdVUw.pdf](http://www.arb.ca.gov/lists/com-attach/40-capandtrade16-VDJRPIQ7VW8HdVUw.pdf)'

Original File Name: Finite Carbon ARB Public Comments 9-19-2016.pdf

Date and Time Comment Was Submitted: 2016-09-19 13:45:28

No Duplicates.

**Comment 40 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Dwayne

Last Name: Phillips

Email Address: [dwayne.phillips@airliquide.com](mailto:dwayne.phillips@airliquide.com)

Affiliation: Air Liquide Large Industries U.S. LP

Subject: Air Liquide's Comments on CARB's Proposed Amendments to Cap and Trade Regulations

Comment:

Attached please find Air Liquide's comments on CARB's proposed amendments to the cap-and-trade and market-based compliance mechanisms regulation.

Thank you,

Dwayne Phillips

Attachment: '[www.arb.ca.gov/lists/com-attach/41-capandtrade16-VjcCbV0uBQlWPAdU.pdf](http://www.arb.ca.gov/lists/com-attach/41-capandtrade16-VjcCbV0uBQlWPAdU.pdf)'

Original File Name: Air Liquide Comment Letter to CARB re Cap and Trade Regulations.pdf

Date and Time Comment Was Submitted: 2016-09-19 14:14:33

No Duplicates.

**Comment 41 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Jodean

Last Name: Giese

Email Address: jodean.giese@ladwp.com

Affiliation: LADWP

Subject: LADWP Comments on Proposed Cap & Trade Amendments

Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/42-capandtrade16-UmsFL11tUDoLIAQ1.pdf'

Original File Name: 9-19-16 LADWP Comments on Proposed Amendments to the California Gas Cap-and-Trade Regulation (2).pdf

Date and Time Comment Was Submitted: 2016-09-19 14:32:30

No Duplicates.

**Comment 42 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Rachel

Last Name: Tornek

Email Address: rachel@climateactionreserve.org

Affiliation: Climate Action Reserve

Subject: Climate Action Reserve Comments on 2016 Amendments

Comment:

Please see attached for comments by the Climate Action Reserve.

Thank you

Attachment: 'www.arb.ca.gov/lists/com-attach/43-capandtrade16-AWJVP101U20AZwN3.pdf'

Original File Name: Climate\_Action\_Reserve\_Comments\_2016\_CT\_Amendments.pdf

Date and Time Comment Was Submitted: 2016-09-19 14:33:02

No Duplicates.

**Comment 43 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

**Comment 44 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Alia

Last Name: Schoen

Email Address: alia.schoen@bloomenergy.com

Affiliation:

Subject: Bloom Energy's comments on proposed Cap and Trade amendments

Comment:

Please find attached Bloom Energy's comments on the August 2, 2016 amendments to the Cap-and-Trade regulation and a suggested Board Resolution to enact Bloom's proposed change to the amendments.

Thank you,  
Alia Schoen  
Public Policy Manager

Attachment: 'www.arb.ca.gov/lists/com-attach/45-capandtrade16-AGJTOVc5VmoHbABf.zip'

Original File Name: Bloom Cap-and-Trade Comments 160915.zip

Date and Time Comment Was Submitted: 2016-09-19 14:36:00

No Duplicates.

## **Comment 45 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Melissa

Last Name: Poole

Email Address: melissa.poole@wonderful.com

Affiliation:

Subject: WPA Comments to CAPANDTRADE16

Comment:

Attached, please find Wonderful Pistachios and Almonds' comments on the 2016 proposed amendments to the Cap-and-Trade regulations.

Thank you for the opportunity to provide feedback on the proposed changes to the regulations.

Attachment: 'www.arb.ca.gov/lists/com-attach/46-capandtrade16-Wi1QJgZmAw8DZgNs.pdf'

Original File Name: WPA Comments on C&T Amendments\_2016.pdf

Date and Time Comment Was Submitted: 2016-09-19 14:34:57

No Duplicates.

## **Comment 46 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Josie  
Last Name: Hickel  
Email Address: josie.hickel@chugach.com  
Affiliation: Chugach Alaska Corporation

Subject: Comments re: cap and trade ammendments  
Comment:

September 19, 2016

Via Electronic Submission

Clerk of the Board  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95812

Re: Comments of Chugach Alaska Corp. and Sealaska Corp. on the Proposed Amendments to the Cap-and-Trade Regulation Regarding Forest Offset Projects.

Dear Chairwoman Nichols and Members of the Air Resources Board,

Thank you for the opportunity to comment on the proposed amendments to the Cap-and-Trade Regulation, 17 Cal. Code. Regs. § 95800 et seq. (the "Regulation" or "CTR"). Overall, we commend the California Air Resources Board ("ARB") for undertaking these amendments, which in large part provide necessary clarifications and improvements, particularly as they relate to forest offset projects. Offset projects have provided the Cap-and-Trade Program with a flexible mechanism by which to ease the burden of compliance on the regulated community, while incentivizing environmental stewardship outside of California and Québec. We are excited to participate in the program, and look forward to helping to shape the forest offset program for the benefit of California, as well as our shareholders, our region and the global environment.

Chugach Alaska Corporation (Chugach) is an Alaska Native Regional Corporation established pursuant to the Alaska Native Claims Settlement Act (ANCSA) of 1971, as amended, 43 U.S.C. § 1601, et seq. We represent approximately 2600 Alaska native shareholders in our region. As an Alaska Native Corporation we understand the unique challenges associated with development of ANCSA lands, which must be done responsibly in order to maintain cultural values and protect subsistence rights, while also providing economic benefits to the people of the region. Chugach, as well as several other Alaska Native Corporations, is in the process of developing a carbon project under the California cap and trade program. We believe participation in the California cap and trade program is a way for us to support environmentally friendly policies that are consistent with our goals of protecting our lands and maintaining long term sustainability for our region and our shareholders.

We strongly support California's commitment to addressing climate



change by both reducing GHG emissions and sequestering GHGs. Forest offset projects made possible by the Program enable millions of tons of carbon to be sequestered while also providing critical co-benefits to native peoples in rural Alaska, allowing them to sustain their traditional culture and way-of-life and protect the environment that they have called home for some ten thousand years.

As noted above, in general we believe that most of ARB's proposed amendments will improve the CTR and the Offset Program in particular. We also want to call attention to several proposed changes that we specifically support as making real improvements. That said, we also believe that certain adjustments will better effectuate the goals of the amendments and provide those with forest offset projects better guidance as to the Program's operation. We offer these stakeholder comments in a spirit of support and hope that ARB may find them helpful.

1. We Welcome ARB's Amendment of the Regulatory Compliance Requirement, though More Clarification is Needed.

ARB's clarification in proposed Appendix E of what activities may offend the regulatory compliance requirement set forth in CTR Sections 95973(b) and 95985(c)(2) is a much needed improvement. Specifically, Section (d) of Appendix E brings into the Regulation the commonsense notion that only those activities that actually affect carbon stocks in a forest offset project should be considered for the regulatory compliance requirement. While Appendix E provides much needed clarity, its utility is diminished by the ambiguities in Section 95973(b) that remain unaddressed. The proposed text of CTR Section 95973(b) reads:

Local, Regional, State, and National Regulatory Compliance and Environmental Impact Assessment Requirements. An Offset Project Operator or Authorized Project Designee must fulfill all local, regional, state, and national requirements on environmental impact assessments that apply based on the offset project location. In addition, an offset project must also fulfill all local, regional, state, and national environmental and health and safety laws and regulations that apply based on the offset project location and that directly apply to the offset project, including as specified in a Compliance Offset Protocol. The project is considered out of regulatory compliance if the project activities were subject to enforcement action by a regulatory oversight body during the Reporting Period, although whether such enforcement action has occurred is not the only consideration ARB may use in determining whether a project is out of regulatory compliance.

The troublesome ambiguity lies in the sentence with the highlighted "and," an ambiguity that is underscored by the somewhat open-ended language that is proposed at the end of the provision. We believe that the correct reading of the sentence with the highlighted "and" is that compliance is required at the risk of invalidation only with those legal requirements that both apply to the project location and are directly applicable to the offset project. This is consistent with the thrust of Appendix E's focus on project activities, and also with the language now proposed for inclusion in CTR Section 95973(b)(2) that also focuses on project activities.

However, the provision remains a bit ambiguous. The "and" sentence also can be read to require compliance with legal requirements that apply to the project location in addition to those legal requirements that directly apply to the project itself. Under this interpretation, the violation of, say, a local reporting requirement that is not applicable to the offset project activities but that does apply to the project location could invalidate an entire reporting period's worth of ARBOCs. Such a result would be draconian, especially if it occurs during the initial years of a

forest offset project, which is when most of its credits are earned.

In a previous rulemaking addressing section 95973(b), ARB explained that the section only applied to project activities, and went so far as to state "[r]egulatory conformance is intended to be limited to project activities." However, to our knowledge ARB has never directly addressed the ambiguity identified above. We therefore request that ARB reaffirm its interpretation that CTR Sections 95973(b) and 95985(c)(2) as amended mandate compliance at the risk of invalidation only with those legal requirements that directly apply to project activities, thereby making Appendix E the meaningful and helpful addition to the Regulation that it is intended to be.

2. We Welcome the Expanded Reporting Deadline for Submitting a Project's First Offset Project Data Report.

ARB's proposal to expand the reporting deadline for the first offset project data report ("OPDR") for a project is a significant improvement over the CTR's current deadlines. Extending the deadline for the submittal of the first OPDR from 24 to 28 months in order to allow a full 24 months of data to be included, giving the project operator four months to prepare the report itself, is both prudent and practical. Many of the ARBOCs generated by a project likely will occur within the first reporting periods, and allowing projects to capture these credits during the initial phase without having to wait for another reporting period will enhance the timely generation of ARBOCs for use within the Cap-and-Trade Program. It also will facilitate annualized reporting periods.

3. We Welcome the Proposed Allowance of Late-Filed Offset Project Data Reports to Satisfy the Continuous Reporting Requirement.

Allowing a tardy OPDR to satisfy the continuous reporting requirement found in proposed CTR Section 95976(d) provides much needed breathing room in what may otherwise be a fairly drastic provision. Forest projects with vast acreages such as many of those in Alaska will require a lengthy, dedicated effort to ensure that all of the information included in the OPDR is complete and accurate. Given the size of the task for these large projects, there is a chance that a report may not be timely submitted. We thus appreciate ARB's clarification as to what will happen if such an event does occur.

4. Adding Overestimations Due to the Use of Approved Growth Models to the Definition of Intentional Reversal is Inappropriate.

ARB's proposed definition of "intentional reversal" appears to alter what was previously the touchstone of determining the status of a reversal - that is, whether the reversal was "caused by a forest owner's negligence, gross negligence, or willful intent . . . ." CTR Section 95802(a)190. A forest owner that so causes a reversal is, appropriately in our view, responsible for replacing the requisite amount of ARBOCs. *Id.* at 95983(c)(3). However, the proposed definition of "intentional reversal" now includes those reversals that are "caused by approved growth models overestimating carbon stocks." Proposed CTR Section 95802(a). It is difficult to understand how using a growth model approved by ARB is tantamount to "negligence, gross negligence, or willful intent."

It would be far more appropriate to treat as unintentional any reversal due to an overestimation of carbon stocks that results from the use of an approved growth model and not negligence or worse. Such an overestimation may not be the result of an Act of God such as disease and wildfires, the examples cited in the current definition of "unintentional reversal," but they are the result of well-intentioned human acts that cause a reversal just as the intentional setting of a back burn, the exception cited in the definition of "intentional reversal." In both instances, the

reversals are the result of acts by persons other than the forest owner. The forest owner should not be held responsible for the acts of others in positions of authority as if she was guilty of negligence, gross negligence, or willful intent. In short, overestimations that result from the use of an approved growth model should be treated as unintentional and not intentional reversals. We therefore respectfully suggest the following modifications to the proposed amendments to CTR Section 95802(a) (italicized words are those already proposed by ARB; our proposed additions are underlined):

"Intentional Reversal" means any reversal, except as provided below, which is caused by a forest owner's negligence, gross negligence, or willful intent, including harvesting, development, and harm to the area within the offset project boundary, or caused by approved growth models overestimating carbon stocks. A reversal caused by an intentional back burn set by, or at the request of, a local, state, or federal fire protection agency for the purpose of protecting forestlands from an advancing wildfire that began on another property through no negligence, gross negligence, or willful misconduct of the forest owner is not considered an intentional reversal but, rather, an unintentional reversal. Receiving Adverse Offset Verification Statements on two consecutive offset verifications after the end of the final crediting period will be considered an intentional reversal.

\* \* \*

"Unintentional Reversal" means any reversal, including wildfires or disease that is not the result of the forest owner's negligence, gross negligence, or willful intent, including a reversal caused by approved growth models overestimating carbon stocks. In the case of a wildfire, only trees identified as dead or dying, in the post-event inventory, as a result of the fire will be removed from the project's inventory and compensated from the Forest Buffer Account minus any salvage harvest accounted for under long-term storage.

5. We Welcome ARB's Proposed Amendment Extending the Timeline for Conducting a Post-Unintentional Reversal Carbon Stock Estimate. Because it is not hard to foresee a situation in which it would be necessary, we welcome ARB's proposal to expand the timeline to complete a post-unintentional reversal carbon stock estimate. ARB's proposed section 95983(b)(1) will allow 23 months for such a carbon stock estimate to be conducted. Depending on the acreage involved in such a reversal, providing a complete and accurate carbon estimate may take a significant amount of time. This is especially true for many of the forest projects in Alaska where the acreages are vast. We also welcome as reasonable and practicable ARB's proposal to toll the requirement of submitting an offset project data report while this carbon estimate is being completed.

6. We Support the Purpose of ARB's Proposal Regarding Required GHG Emission Reductions But it Should Be Broadened to Include Jurisdictions Other than California and Linked Jurisdictions. ARB staff has explained that it "is proposing clarification that if a law, regulation, or legally binding mandate to limit GHG emissions that directly applies to an offset project goes into effect during the crediting period of a project, then the project may continue to receive ARB offset credits for the remainder of their crediting period, but may not renew their crediting period." Initial Statement of Reasons (August 2016) (the "ISOR") at 56. We support the spirit of this proposal to protect the expectations of those that have made financial investments in the generation of ARBOCs. Protecting such expectations ensures the continued participation of entities willing to undertake the significant effort and expenditure required to develop compliance offset

projects.

However, the regulatory language proposed by ARB does not fully support the purpose identified in the ISOR. Proposed CTR Section 95973(a)(2)(G) speaks only to situations where a GHG reduction requirement "comes into effect in California or in a linked jurisdiction." It does not address what happens with offset projects in jurisdictions such as Alaska. Thus, to account for those jurisdictions outside of California and linked jurisdictions, we respectfully propose the following modification to proposed CTR Section 95973(a)(2)(G):

If any law, regulation, or legally binding mandate requiring GHG emission reductions or GHG removal enhancements comes into effect in California or in a linked jurisdiction pursuant to section 95943 the jurisdiction where the offset project is located during an offset project's crediting period, then the offset project is eligible to continue to receive ARB offset credits for those GHG emission reductions and GHG removal enhancements for the remainder of the offset project's crediting period, but the offset project may not renew that crediting period. If an offset project has not been listed prior to the law, regulation, or legally binding mandate going into effect, or the law, regulation, or legally binding mandate goes into effect before the offset project's crediting period renews, then only emission reductions or removal enhancements that are in excess of what is required to comply with those laws, regulations, and/or legally binding mandates are eligible for ARB offset credits.

This modification will ensure that offset projects in all jurisdictions are treated equally under the Cap-and-Trade Program, and will incentivize the continued participation of entities outside of California and linked jurisdictions.

7. ARB's Proposal to Require Forest Owners to Replace Invalidated Offset Credits in the Forest Buffer Account Should be Improved. Proposed CTR Sections 95985(h)(3) and (i)(3) require the Offset Project Operator (which for a forest offset project is the forest owner) to replace 50% of any ARBOCs are located within the Forest Buffer Account ("FBA") that have been invalidated. Although at first blush it seems logical that these credits would need to be replaced, the proposed requirement actually does not make sense in the context of the regulatory scheme as a whole.

Under the current Regulation, the only invalidated ARBOCs that must be replaced are those that have been used and thus are in a retirement account. CTR Sections 95985(h) and (i). ARBOCs in the FBA, however, have not yet been used. They have not been surrendered to meet a compliance burden, but rather are placed in the FBA to serve as insurance against unintentional reversals. ARBOCs that have been invalidated pursuant to CTR Section 95985(c) reflect a determination that the credits never should have been issued in the first place - and if they had not been issued, then there would have been no need to insure them against reversal. ARB's proposed requirement that only half of the invalidated ARBOCs in the FBA be replaced appears to be a concession that these credits really do not truly need to be replaced. If not, why is ARB only solving half the problem? (The ISOR does not address the 50% replacement rate.)

We suggest that if ARB wishes to require the replacement of invalidated ARBOCs in the FBA, then to be consistent with the rest of the Regulation the number to be replaced should be tied to the number of credits that have been retired from the FBA. This could be done by administering the FBA in such a way that an equal percentage of credits present in the FBA from each offset project are used to compensate for an unintentional reversal. This equalizes the risk of invalidation with the requirement to replace

credits retired from the FBA across all forest offset projects, which would harmonize better with the general insurance goals of the FBA. While we do not anticipate ever being in a position where the invalidation provisions affect us, ensuring the integrity of the Program as a whole can only benefit all involved.

Conclusion

Many of the proposed amendments take steps in the right direction for ensuring the long-term integrity of the forest offset projects.

With a few minor adjustments, and further input from the stakeholders involved, we believe that many of the issues addressed in the rulemaking may be resolved to the benefit of the Cap-and-Trade Program, its stakeholders and the global environment.

Once again, we salute California for its commitment to addressing climate change, a commitment that we share, and we thank you for your consideration of these comments. We look forward to continuing to work with ARB regarding this important program.

Sincerely,

Josie Hickel  
SVP Energy & Resources  
Chugach Alaska Corporation

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2016-09-19 14:37:30

No Duplicates.

**Comment 47 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Barbara

Last Name: McBride

Email Address: barbara.mcbride@calpine.com

Affiliation: Calpine Corporation

Subject: Calpine Comments on Proposed Amendments to Cap-and-Trade Regulation  
Comment:

Please find attached Calpine's comments on the proposed amendments to the Cap-and-Trade Regulation, Mandatory Reporting Rule and proposed Clean Power Plan compliance plan. Thank you for the opportunity to submit these comments. Please contact me if you should have any questions regarding these comments.

Attachment: 'www.arb.ca.gov/lists/com-attach/48-capandtrade16-UTJcOwBtU3ADbAhm.pdf'

Original File Name: Calpine Comments on 2016 Cap-and-Trade Amendments, MRR Amendments and Proposed CPP Compliance Plan.pdf

Date and Time Comment Was Submitted: 2016-09-19 15:01:27

No Duplicates.

**Comment 48 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Stephen  
Last Name: McComb  
Email Address: stephen.mccomb@theice.com  
Affiliation: ICE Inc.

Subject: Participation of Derivatives Clearing Organizations in CITSS  
Comment:

Notice of public hearing to consider amendments to the California  
Cap on greenhouse gas emissions and market based compliance  
mechanisms regulation-Participation of Derivatives Clearing  
Organizations in CITSS

Attachment: 'www.arb.ca.gov/lists/com-attach/49-capandtrade16-WjNTNIYyAg5VOgFv.pdf'

Original File Name: ICE Inc Comments on CITSS Registration.pdf

Date and Time Comment Was Submitted: 2016-09-19 15:07:35

No Duplicates.

**Comment 49 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Danny

Last Name: Cullenward

Email Address: dcullenward@carnegiescience.edu

Affiliation:

Subject: Legal comment letter on post-2020 cap-and-trade proposal

Comment:

Please see attached PDF.

Attachment: 'www.arb.ca.gov/lists/com-attach/50-capandtrade16-UGJRZwY2VDFSeQMz.pdf'

Original File Name: 2016-09-19 CARB post-2020 C&T (legal).pdf

Date and Time Comment Was Submitted: 2016-09-19 15:12:44

No Duplicates.



**Comment 50 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Nathan

Last Name: Bengtsson

Email Address: Nathan.Bengtsson@pge.com

Affiliation:

Subject: PG&E Comments on the 2016 Proposed Amendments to California's Cap-and-Trade Regulation

Comment:

Comments attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/51-capandtrade16-VSVQMVQKU2VVDFQ3.pdf'

Original File Name: PG&E Comments - 2016 C&T Amendments.pdf

Date and Time Comment Was Submitted: 2016-09-19 15:13:46

No Duplicates.

**Comment 51 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Michael

Last Name: Wara

Email Address: mwara@stanford.edu

Affiliation:

Subject: Policy comment letter on post-2020 cap-and-trade proposal

Comment:

Please see attached PDF.

Attachment: 'www.arb.ca.gov/lists/com-attach/52-capandtrade16-BjQHMQQ0WTwKIVJi.pdf'

Original File Name: 2016-09-19 CARB post-2020 C&T (policy).pdf

Date and Time Comment Was Submitted: 2016-09-19 15:15:58

No Duplicates.

**Comment 52 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Mary

Last Name: Wiencke

Email Address: mary.wiencke@pacificorp.com

Affiliation:

Subject: PacifiCorp Comments

Comment:

PacifiCorp comments to the August 2, 2016 Proposed Amendments to the Cap-and-Trade and Mandatory Reporting Programs

Attachment: 'www.arb.ca.gov/lists/com-attach/53-capandtrade16-WzpUIF0+Ag4CZQl8.pdf'

Original File Name: ARB\_August 2 Amendments Comments\_FINAL.pdf

Date and Time Comment Was Submitted: 2016-09-19 15:17:52

No Duplicates.

## **Comment 53 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: James

Last Name: Wintergreen

Email Address: jtw@firstenvironment.com

Affiliation: First Environment, Inc.

Subject: Comments regarding proposed revisions to the Cap and Trade regulation

Comment:

First Environment offers the following comments regarding proposed revisions to the Cap and Trade regulation.

Proposed revision to the regulation:

95977.1(b)(3)(R)8 -

If ARB or the Offset Project Registry determines that the detailed verification report required pursuant to 95977.1(b)(3)(R)4.a. does not contain sufficient information to substantiate the attestations in the Offset Verification Statement, then the verification body must submit a revised verification report and a revised Offset Verification Statement to ARB or the Offset Project Registry within 15 calendar days.

Comment:

The language "does not contain sufficient information to substantiate the attestations in the Offset Verification Statement" is vague and does not provide an objective basis for the Offset Project Registry (or verification bodies) to determine whether the verification report meets the requirements of 95977.1(b)(3)(R)4a. To ensure consistency across Offset Project Registries and between verification bodies, the regulation should state the specific criteria that a verification report must meet or refer back to 95977.1(b)(3)(R)4a for the requirements that the report must address to be considered in conformance with the regulation.

Proposed revision to the regulation:

95977.1(b)(3)(R) -

Offset verification services are not complete until ARB offset credits are issued for the GHG emission reductions and GHG removal enhancements reported in an Offset Project Data.

Comment:

While verification bodies may anticipate questions and comments from ARB or the OPR after submittal of the verification report and statement, the regulation should not define the period between this submission and issuance of ARB offset credits to be part of "verification services." Consistent with international best practices in financial auditing, third party audit services must have a defined scope including specific starting and ending dates during which the assessment of evidence was performed. To avoid unnecessary uncertainty regarding the scope of the verification process, verification services should be considered complete after the submission of the report and statement to the OPR. This proposed revision should be removed and the regulation can continue to rely on the existing text at 95977.1(b)(3)(S), which states that verification requirements are considered to be met when ARB Offsets

are issued.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2016-09-19 15:17:40

No Duplicates.

## **Comment 54 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Patrick

Last Name: Wood

Email Address: patrick@agmethaneadvisors.com

Affiliation: Ag Methane Advisors

Subject: Support for Proposed Amendments to C&T regulation

Comment:

Please find comments attached. Thank you for the opportunity and for your consideration.

Attachment: 'www.arb.ca.gov/lists/com-attach/56-capandtrade16-BWRXNIQ4WW8GdFI6.pdf'

Original File Name: AgMethane\_Comments Re\_2016 C&T Regulation Amendments  
9.19.16.pdf

Date and Time Comment Was Submitted: 2016-09-19 15:20:36

No Duplicates.

**Comment 55 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Todd

Last Name: Jones

Email Address: todd.jones@resource-solutions.org

Affiliation: Center for Resource Solutions (CRS)

Subject: CRS Comments on Proposed Amendments to Cap-and-trade Regulation

Comment:

Please find Comments of Center for Resource Solutions (CRS) on proposed amendments to the California cap on greenhouse gas emissions and market-based compliance mechanisms attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/57-capandtrade16-VDcFcVwuVGQCawBt.pdf'

Original File Name: CRScomment\_C&TAmendments\_9-19-2016.pdf

Date and Time Comment Was Submitted: 2016-09-19 15:24:58

No Duplicates.

**Comment 56 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Tim  
Last Name: Haines  
Email Address: thaines@swc.org  
Affiliation:

Subject: SWC Comments on CA Cap on Greenhouse Gas Emissions  
Comment:

Good afternoon,

Please except State Water Contractors Comments.

If you have any questions, please contact Tim Haines at (916)  
447-7357 ext. 205.

Thank you!

Attachment: 'www.arb.ca.gov/lists/com-attach/58-capandtrade16-BnVQIVY0UV1VMAZn.pdf'

Original File Name: SWC Cap and Trade Comments 9-19-16.pdf

Date and Time Comment Was Submitted: 2016-09-19 15:28:17

No Duplicates.



**Comment 57 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Therese

Last Name: Hampton

Email Address: thampton@publicgeneratingpool.com

Affiliation:

Subject: Comments on Cap and Trade 2016

Comment:

Attached please find comments from Public Generating Pool

Attachment: 'www.arb.ca.gov/lists/com-attach/59-capandtrade16-VydVNF0sBQIRNANs.pdf'

Original File Name: PGP Comments to CA Air Resources Board\_9-19-16.pdf

Date and Time Comment Was Submitted: 2016-09-19 15:29:24

No Duplicates.

**Comment 58 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: William

Last Name: Westerfield

Email Address: William.Westerfield@smud.org

Affiliation: Sacramento Municipal Utility District

Subject: SMUD Comments on Proposed 2016 Cap-and-Trade Amendments

Comment:

Attached are SMUD's Comments on Proposed 2016 Cap-and-Trade Amendments.

Attachment: 'www.arb.ca.gov/lists/com-attach/60-capandtrade16-BmoHZFI0UV0ANwYw.pdf'

Original File Name: LEG 16-0595 SMUD Comments on Proposed 2016 Cap-And-Trade Amendments.pdf

Date and Time Comment Was Submitted: 2016-09-19 15:39:19

No Duplicates.

**Comment 59 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Brent

Last Name: Newell

Email Address: bnewell@crpe-ej.oeg

Affiliation: Center on Race, Poverty & the Environmen

Subject: Comments on Proposed Amendments to the California Cap and Trade Program

Comment:

AMENDED comments submitted on behalf of 30 environmental justice and environmental organizations.

Attachment: 'www.arb.ca.gov/lists/com-attach/61-capandtrade16-WmgGMAAwUzYFLQAw.pdf'

Original File Name: 2016.09.19 CT ISR comment letter FINAL AMENDED.pdf

Date and Time Comment Was Submitted: 2016-09-19 15:41:01

No Duplicates.

## **Comment 60 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Katie  
Last Name: Sullivan  
Email Address: sullivan@ieta.org  
Affiliation: IETA

Subject: IETA Comments on Proposed C&T Amendments  
Comment:

Dear Staff,

Attached, find IETA's comments on ARB's Proposed Amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulation.

We recognize the hard work and leadership put forward by your team in recent months. Our community looks forward to further collaboration with ARB as California's program continues to improve and seek future linkage with partner jurisdictions.

Best,

Katie

Director of Americas & Climate Finance, IETA  
Sullivan@ieta.org

Attachment: 'www.arb.ca.gov/lists/com-attach/62-capandtrade16-AGITMF0oU2EDWgZn.pdf'

Original File Name: IETA ARB Comments\_CT Reg Amendments\_19Sept2016.pdf

Date and Time Comment Was Submitted: 2016-09-19 15:44:19

No Duplicates.

**Comment 61 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Leslie

Last Name: Bryan

Email Address: labryan@reupower.com

Affiliation:

Subject: Redding Electric Utility Comments on Proposed 2016 Cap-and-Trade Amendments  
Comment:

Attached are Redding Electric Utility's Comments on Proposed 2016  
Cap-and-Trade Amendments.

Attachment: 'www.arb.ca.gov/lists/com-attach/63-capandtrade16-B3VWNVM2VWJRPgZo.pdf'

Original File Name: Redding Electric Utility Comments on the Proposed Amendments to Cap  
and Trade Regulations 9\_19\_16.pdf

Date and Time Comment Was Submitted: 2016-09-19 15:52:15

No Duplicates.

**Comment 62 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

**Comment 63 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Clare

Last Name: Breidenich

Email Address: cbreidenich@aciem.us

Affiliation: Western Power Trading Forum

Subject: WPTF Comments on proposed cap and trade changes

Comment:

Attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/65-capandtrade16-UWgBKINjVz0KIQQ1.pdf'

Original File Name: 9-19-16 WPTF Comments on Proposed Cap and Trade Amendments.pdf

Date and Time Comment Was Submitted: 2016-09-19 16:03:35

No Duplicates.

**Comment 64 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: C.C.

Last Name: Song

Email Address: csong@mcecleanenergy.org

Affiliation:

Subject: Comments of Community Choice Aggregators on RPS Adjustment

Comment:

Please see attached PDF for the comments of Community Choice Aggregators.

Attachment: 'www.arb.ca.gov/lists/com-attach/66-capandtrade16-ADBValR4UzECPQAt.pdf'

Original File Name: 09-19-2016 CCA Comments on RPS Adjustment Elimination.pdf

Date and Time Comment Was Submitted: 2016-09-19 16:05:46

No Duplicates.



**Comment 65 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Ellen

Last Name: Wolfe

Email Address: ewolfe@resero.com

Affiliation: Resero Consulting

Subject: Executed version of VEA's cap and trade comments

Comment:

Please find attached an executed copy of VEA's cap and trade comments.

Attachment: '[www.arb.ca.gov/lists/com-attach/67-capandtrade16-UScHZFU1VVkLbIU0.pdf](http://www.arb.ca.gov/lists/com-attach/67-capandtrade16-UScHZFU1VVkLbIU0.pdf)'

Original File Name: VEA Cap & Trade Comments executed.pdf

Date and Time Comment Was Submitted: 2016-09-19 16:07:04

No Duplicates.

## **Comment 66 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Shelly  
Last Name: Sullivan  
Email Address: ssullivan@onemain.com  
Affiliation: Climate Change Policy Coalition

Subject: CCPC Comments -- Proposed ARB Cap-and-Trade Amendments  
Comment:

Attached please find comments submitted on behalf of the Climate Change Policy Coalition regarding ARB's proposed cap-and-trade regulatory amendments.

If you have any questions please feel free to contact Shelly Sullivan at (916) 858-8686.

Attachment: 'www.arb.ca.gov/lists/com-attach/68-capandtrade16-WjxRPIY5BDZQOIN.pdf'

Original File Name: FINAL CCPC Cap\_Trade\_Comments\_9\_\_19\_2016.pdf

Date and Time Comment Was Submitted: 2016-09-19 16:10:23

No Duplicates.

**Comment 67 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Adam

Last Name: Smith

Email Address: adam.smith@sce.com

Affiliation: Southern California Edison

Subject: Joint Utilities Group (JUG) Comments on the Proposed Cap-and-Trade Amendments  
Comment:

Please reference the attached document.

Sincerely,

Adam R. Smith

Attachment: '[www.arb.ca.gov/lists/com-attach/69-capandtrade16-UjgAaV01Aj8KeFcI.pdf](http://www.arb.ca.gov/lists/com-attach/69-capandtrade16-UjgAaV01Aj8KeFcI.pdf)'

Original File Name: JOINT UTILITY GROUP.pdf

Date and Time Comment Was Submitted: 2016-09-19 16:12:41

No Duplicates.

**Comment 68 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Ken

Last Name: Nold

Email Address: [krnold@tid.org](mailto:krnold@tid.org)

Affiliation:

Subject: TID Comments on Proposed Cap & Trade Amendments

Comment:

Comments attached.

Attachment: '[www.arb.ca.gov/lists/com-attach/70-capandtrade16-UiZRPI04U18GY1Ax.pdf](http://www.arb.ca.gov/lists/com-attach/70-capandtrade16-UiZRPI04U18GY1Ax.pdf)'

Original File Name: TID Cap-and-Trade Comments Final 9-19-16.pdf

Date and Time Comment Was Submitted: 2016-09-19 16:17:00

No Duplicates.

**Comment 69 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Tanya

Last Name: DeRivi

Email Address: tderivi@scppa.org

Affiliation: Southern CA Public Power Authority

Subject: SCPPA Comments on 2016 Proposed Amendments to the Cap-and-Trade Regulations  
Comment:

Please see attached document.

Attachment: 'www.arb.ca.gov/lists/com-attach/71-capandtrade16-Bj8AK1RkVz0KIQg6.pdf'

Original File Name: 9-19-2016 SCPPA Comments for ARB 2016 Cap-and-Trade Amendments  
Final (Clean).pdf

Date and Time Comment Was Submitted: 2016-09-19 16:18:30

No Duplicates.

## **Comment 70 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Gus

Last Name: Silva-Chavez

Email Address: gsilva@forest-trends.org

Affiliation: Forest Trends

Subject: capandtrade16

Comment:

Please see our attached letter in regards to the notice of public hearing to consider amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulation.

Attachment: 'www.arb.ca.gov/lists/com-attach/72-capandtrade16-AWdXOFE+UmABa1cI.doc'

Original File Name: Final FT REDD letter CARB SEP 2016.doc

Date and Time Comment Was Submitted: 2016-09-19 16:23:46

No Duplicates.

## **Comment 71 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Rachael  
Last Name: O'Brien  
Email Address: rachael@agcouncil.org  
Affiliation: Ag Council

Subject: Ag Council and AECA Comments on Proposed 2016 Cap-and-Trade Amendments  
Comment:

To Whom it May Concern:

Attached are comments from Ag Council and AECA regarding the Proposed 2016 Cap-and-Trade Amendments. Please feel free to contact me at (916) 443-4887 or rachael@agcouncil.org if you have any questions.

~Rachael O'Brien

Attachment: '[www.arb.ca.gov/lists/com-attach/73-capandtrade16-UTIGYVEgVSsKbQNt.pdf](http://www.arb.ca.gov/lists/com-attach/73-capandtrade16-UTIGYVEgVSsKbQNt.pdf)'

Original File Name: Cap-and-Trade FINAL Comment Letter\_Sep192016.pdf

Date and Time Comment Was Submitted: 2016-09-19 16:24:50

No Duplicates.

**Comment 72 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Joshua

Last Name: Strauss

Email Address: jstrauss@bluesource.com

Affiliation: Blue Source

Subject: Blue Source Comments on the Proposed Amendments to the Cap and Trade Regulation  
Comment:

Please see the attached file.

Attachment: 'www.arb.ca.gov/lists/com-attach/74-capandtrade16-AGIAaImVGILflQ7.docx'

Original File Name: Bluesource\_Sept.19.2016\_Reg\_Amendment\_Coments.docx

Date and Time Comment Was Submitted: 2016-09-19 16:25:23

No Duplicates.



## **Comment 73 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Jeffrey

Last Name: Adkins

Email Address: JAdkins@sierraresearch.com

Affiliation:

Subject: Comments on Proposed Cap and Trade Amendments

Comment:

Comments on the proposed amendments to the Cap and Trade Regulation from the California ethanol manufacturers.

Attachment: 'www.arb.ca.gov/lists/com-attach/75-capandtrade16-UDUCcFM6VWcEbFI9.pdf'

Original File Name: Ethanol Manufacturers Comments 091916 R2.pdf

Date and Time Comment Was Submitted: 2016-09-19 16:27:30

No Duplicates.

**Comment 74 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Adam  
Last Name: Smith  
Email Address: adam.smith@sce.com  
Affiliation: SCE

Subject: Southern California Edison comments on the Proposed Cap & Trade Regulatory Amendments

Comment:

Please find attached Southern California Edison's comments on the proposed Cap & Trade regulatory amendments.

Sincerely,  
Adam R. Smith

Attachment: 'www.arb.ca.gov/lists/com-attach/76-capandtrade16-BnVTogZyVHMEagJn.pdf'

Original File Name: Southern California Edison CnT comments (2).pdf

Date and Time Comment Was Submitted: 2016-09-19 16:24:29

No Duplicates.

**Comment 75 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Alisa

Last Name: Kaseweter

Email Address: [alkaseweter@bpa.gov](mailto:alkaseweter@bpa.gov)

Affiliation: Bonneville Power Administration

Subject: Comments on the Proposed Amendments to the California Cap on Greenhouse Gas Emissions and

Comment:

Please see attached PDF for comments. Thanks.

Attachment: '[www.arb.ca.gov/lists/com-attach/77-capandtrade16-UzFRJ1AwVFhRNFM8.pdf](http://www.arb.ca.gov/lists/com-attach/77-capandtrade16-UzFRJ1AwVFhRNFM8.pdf)'

Original File Name: BPA Comments to CARB\_09192016.pdf

Date and Time Comment Was Submitted: 2016-09-19 16:33:07

No Duplicates.

**Comment 76 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Fariya

Last Name: Ali

Email Address: fxao@pge.com

Affiliation:

Subject: Gas Utility Group (GUG) Comments for 2016 Cap and Trade Amendments

Comment:

See attached comment letter.

Attachment: 'www.arb.ca.gov/lists/com-attach/78-capandtrade16-Bz4BKgMzUDoAKwEw.pdf'

Original File Name: 9-19-16 GUG-2016 Cap and Trade Amendments\_Letter.pdf

Date and Time Comment Was Submitted: 2016-09-19 15:36:10

No Duplicates.

**Comment 77 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: John

Last Name: Larrea

Email Address: john@clfp.com

Affiliation: CA League of Food Processors

Subject: Comments on Proposed Changes to Climate Regulations

Comment:

Attached are CLFP Comments to Proposed Regulation Changes

Attachment: 'www.arb.ca.gov/lists/com-attach/79-capandtrade16-VDcAalw7ACMHXghr.pdf'

Original File Name: CLFP Comments Sept 19 2016.pdf

Date and Time Comment Was Submitted: 2016-09-19 16:25:21

No Duplicates.

## **Comment 78 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Brian

Last Name: Nowicki

Email Address: bnowicki@biologicaldiversity.org

Affiliation: Center for Biological Diversity

Subject: Comments on cap-and-trade beyond 2020

Comment:

The Center for Biological Diversity very strongly supports California's continuing commitment to statewide reductions in greenhouse gas emissions beyond 2020. However, the Center has deep concerns with the Proposed Amendments as they overwhelmingly rely on cap-and-trade as the primary mechanism for achieving emissions reductions, and they would perpetuate certain crucial failings of California's current greenhouse gas Cap-and-Trade program. Therefore, the Center respectfully urges the Board to reject the Proposed Amendments to extend the existing Cap-and-Trade program beyond 2020, and to pursue alternative, non-cap-and-trade approaches to achieving California's greenhouse gas reductions.

Attachment: '[www.arb.ca.gov/lists/com-attach/80-capandtrade16-VDdTMFU6AyRRMgd1.pdf](http://www.arb.ca.gov/lists/com-attach/80-capandtrade16-VDdTMFU6AyRRMgd1.pdf)'

Original File Name: Center comments 09 19 2016 re capandtrade beyond 2020 .pdf

Date and Time Comment Was Submitted: 2016-09-19 16:34:42

No Duplicates.

**Comment 79 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Gail  
Last Name: Welch  
Email Address: gwelch@qualcomm.com  
Affiliation:

Subject: Qualcomm Comments of the August 2, 2016 Amendments to the Cap-and-Trade Regulation

Comment:

Dear Richard Corey,

Qualcomm, Inc. appreciates the opportunity to submit these comments.

Kind regards,

Gail Welch  
Director of Corporate Sustainability

Attachment: 'www.arb.ca.gov/lists/com-attach/81-capandtrade16-AXBQI1Q0VmkLbgRr.pdf'

Original File Name: Qualcomm Comments (19Sept2016) (00372912xBA8E1).pdf

Date and Time Comment Was Submitted: 2016-09-19 16:24:09

No Duplicates.

**Comment 80 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Gary

Last Name: Soiseth

Email Address: kelsey.gowans@mid.org

Affiliation: Modesto Irrigation District

Subject: Modesto Irrigation District's Comments on the Cap-and-Trade and MRR  
Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/82-capandtrade16-BmtRPIM2WFQGYwVk.zip'

Original File Name: MID Cap-and-Trade Comments.zip

Date and Time Comment Was Submitted: 2016-09-19 16:12:10

No Duplicates.



**Comment 81 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Erica

Last Name: Morehouse

Email Address: emorehouse@edf.org

Affiliation: Environmental Defense Fund

Subject: 45 Day comment

Comment:

Attached are EDF's comments

Attachment: 'www.arb.ca.gov/lists/com-attach/83-capandtrade16-Bz4dPgBlUWsLm0d.pdf'

Original File Name: EDF C-T 45 day comments 2016.pdf

Date and Time Comment Was Submitted: 2016-09-19 16:39:44

No Duplicates.

**Comment 82 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Martin

Last Name: Hopper

Email Address: berlin@susieberlinlaw.com

Affiliation: M-S-R Public Power Agency

Subject: Comments on Cap-and-Trade Program Amendments

Comment:

M-S-R Public Power Agency Comments on Proposed Amendments to  
Cap-and-Trade Program.

Attachment: 'www.arb.ca.gov/lists/com-attach/84-capandtrade16-VThXfFEjA30KfgNc.pdf'

Original File Name: M-S-R comments re proposed amendments (9-19-16 final).pdf

Date and Time Comment Was Submitted: 2016-09-19 16:34:59

No Duplicates.

## **Comment 83 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: John

Last Name: Leslie

Email Address: john.leslie@dentons.com

Affiliation: Attorney for Shell Energy

Subject: Shell Energy North America (US), L.P. Comments on Proposed Amendments  
Comment:

Attached are Shell Energy North America (US), L.P.'s Comments on Proposed Amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulation.

Attachment: '[www.arb.ca.gov/lists/com-attach/85-capandtrade16-AnEFa1QwAD8DaVMM.pdf](http://www.arb.ca.gov/lists/com-attach/85-capandtrade16-AnEFa1QwAD8DaVMM.pdf)'

Original File Name: Shell Energy North America (US), L.P. Comments on Proposed Amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulation.pdf

Date and Time Comment Was Submitted: 2016-09-19 16:18:59

No Duplicates.

**Comment 84 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Ellen

Last Name: Wolfe

Email Address: ewolfe@resero.com

Affiliation: Resero Consulting

Subject: Valley Electric Association MRR Comments

Comment:

Please find attached Valley Electric Association's MRR comments.

Attachment: 'www.arb.ca.gov/lists/com-attach/86-capandtrade16-AHZTMFY2UFwGbQBy.pdf'

Original File Name: VEA MRR Comments-Final.pdf

Date and Time Comment Was Submitted: 2016-09-19 16:40:29

No Duplicates.

**Comment 85 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Jack

Last Name: Horowitz

Email Address: jhorowitz@earthinnovation.org

Affiliation:

Subject: Earth Innovation Institute Comments on Proposed 2016 Cap-and-Trade Amendments  
Comment:

Please see comments from Earth Innovation Institute in the attached file.

Attachment: 'www.arb.ca.gov/lists/com-attach/88-capandtrade16-BWAFagRsAw9VIwB1.docx'

Original File Name: EII\_Public Comments\_For 09-22-2016 ARB Public Hearing.docx

Date and Time Comment Was Submitted: 2016-09-19 16:44:51

No Duplicates.

**Comment 86 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Susie

Last Name: Berlin

Email Address: berlin@susieberlinlaw.com

Affiliation: Northern California Power Agency (NCPA)

Subject: Comments on Cap-and-Trade Program Amendments

Comment:

Comments of the Northern California Power Agency on Proposed  
Amendments to the Cap-and-Trade Program Regulation

Attachment: 'www.arb.ca.gov/lists/com-attach/89-capandtrade16-BWtdOFAhUWMLUgdk.pdf'

Original File Name: NCPA comments re Aug 2 proposed amendments (final 9-19-16).pdf

Date and Time Comment Was Submitted: 2016-09-19 16:43:10

No Duplicates.

## **Comment 87 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Alex

Last Name: Jackson

Email Address: [ajackson@nrdc.org](mailto:ajackson@nrdc.org)

Affiliation: NRDC

Subject: NRDC comments on proposed cap-and-trade amendments

Comment:

Please find attached NRDC's comments on the 45-day proposed amendments to the cap-and-trade program.

Attachment: '[www.arb.ca.gov/lists/com-attach/90-capandtrade16-AW9VIVcyUGAAWQBj.pdf](http://www.arb.ca.gov/lists/com-attach/90-capandtrade16-AW9VIVcyUGAAWQBj.pdf)'

Original File Name: NRDC Comments on 45-Day Cap and Trade Amendments.pdf

Date and Time Comment Was Submitted: 2016-09-19 16:49:49

No Duplicates.

**Comment 88 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Monica  
Last Name: Wilson  
Email Address: monica@no-burn.org  
Affiliation: GAIA

Subject: Comments on CA CPP cap and trade  
Comment:

See Attached

Attachment: 'www.arb.ca.gov/lists/com-attach/91-capandtrade16-Wj0GYQZuVmQKUwNg.docx'

Original File Name: GAIA comments on CA CPP cap and trade.docx

Date and Time Comment Was Submitted: 2016-09-19 16:52:35

No Duplicates.



**Comment 89 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Amy

Last Name: Mmagu

Email Address: amy.mmagu@calchamber.com

Affiliation:

Subject: Comments on the Amendments to the Market-Based Compliance Mechanisms  
Regulation

Comment:

Please see attached comments.

Attachment: 'www.arb.ca.gov/lists/com-attach/92-capandtrade16-  
BWRHclYkUWMDRm0d.pdf'

Original File Name: CalChamber Comments on the Amendments to the Cap on GHG Emissions  
and Market-based compliance 9-19-16 MS.pdf

Date and Time Comment Was Submitted: 2016-09-19 16:53:08

No Duplicates.

**Comment 90 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Syche

Last Name: Cai

Email Address: scai@3degreesinc.com

Affiliation: Regulatory Affairs Manager

Subject: 3Degrees Cap & Trade Comments

Comment:

3Degrees comments on CARB VRE Set-Aside\_9.19.16\_Final

Attachment: 'www.arb.ca.gov/lists/com-attach/93-capandtrade16-V2RTMVw4UWUFcQRh.pdf'

Original File Name: 3Degrees comments on CARB VRE Set-Aside\_9.19.16\_Final.pdf

Date and Time Comment Was Submitted: 2016-09-19 16:57:50

No Duplicates.

**Comment 91 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Michelle  
Last Name: Anderson  
Email Address: manderson@ahtna.net  
Affiliation: Ahtna, Incorporated

Subject: Ahtna, Inc. Comments Proposed Amendments Cap Trade Regulation  
Comment:

Good day,

Please find attached comments from Ahtna, Incorporated regarding the proposed amendments to the Cap-and-Trade Regulation Regarding Forest Offset Projects.

Thank you.

Attachment: '[www.arb.ca.gov/lists/com-attach/94-capandtrade16-U2NXaAY2UzlWYQQy.pdf](http://www.arb.ca.gov/lists/com-attach/94-capandtrade16-U2NXaAY2UzlWYQQy.pdf)'

Original File Name: 091916 Ahtna Comments on CARB Reg Amendments re Forest Offset Projects.pdf

Date and Time Comment Was Submitted: 2016-09-19 16:51:12

No Duplicates.

## **Comment 92 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Amy

Last Name: Vanderwarker

Email Address: amy@caleja.org

Affiliation:

Subject: Comments on proposed cap and trade regulations

Comment:

Attached please find our comment letter on the proposed regulations. Thank you,  
CEJA

Attachment: 'www.arb.ca.gov/lists/com-attach/95-capandtrade16-AWJdPgRvUWMCW1A0.pdf'

Original File Name: CEJA Draft C&T Regs\_FINAL.pdf

Date and Time Comment Was Submitted: 2016-09-19 16:59:21

No Duplicates.

**Comment 93 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Michael

Last Name: Shaw

Email Address: mshaw@cmta.net

Affiliation: CMTA

Subject: CMTA Cap and Trade Amendment Comments

Comment:

California Manufacturers & Technology Association (CMTA) Comments on the California Cap on Greenhouse Gas Emission and Market-based Compliance Mechanisms Regulation.

Attachment: 'www.arb.ca.gov/lists/com-attach/96-capandtrade16-VDdSOV0oUGIKU1c0.pdf'

Original File Name: CMTA Cap and Trade Amendments Comments 9-19-2016.pdf

Date and Time Comment Was Submitted: 2016-09-19 17:02:10

No Duplicates.

**Comment 94 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Keith

Last Name: Adams

Email Address: Non-web submitted comment

Affiliation: Air Products and Chemicals

Subject: Air Products Comments - Proposed cap and trade regulation amendments

Comment:

See Attached

Attachment: 'www.arb.ca.gov/lists/com-attach/36-ghg2016-VjcBbgR3VloFcwJw.pdf'

Original File Name: Air Products Comments - Proposed cap and trade regulation amendments.pdf

Date and Time Comment Was Submitted: 2016-09-20 16:17:50

No Duplicates.

**Comment 95 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Syche

Last Name: Cai

Email Address: Non-web submitted comment

Affiliation: Regulatory Affairs Manager

Subject: Proposed Amendments to the CA Cap On GHG Emissions and Market-based  
Compliance Mech

Comment:

Late Comment. See Attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/108-capandtrade16-BzRUNIQwBzMEcAZj.pdf'

Original File Name: 3Degrees comments on CARB VRE Set-Aside\_9.19.16\_Final.pdf

Date and Time Comment Was Submitted: 2016-09-29 09:30:20

No Duplicates.

**Comment 96 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Diana

Last Name: Lee

Email Address: diana.lee@cpuc.ca.gov

Affiliation: Office of Ratepayer Advocates

Subject: ORA Comments on Proposed Amendments to GHG Regulation

Comment:

Please see the attached comments of the Office of Ratepayer Advocates on the Proposed Amendments to the California Cap on GHG Emissions and Market-based Compliance Mechanisms.

Thanks,  
Diana Lee

Attachment: 'www.arb.ca.gov/lists/com-attach/31-ghg2016-WzQBdVc3WVVQNQVq.pdf'

Original File Name: ORA Comments CARB ProposedAmendRegulation 9.19.16.pdf

Date and Time Comment Was Submitted: 2016-09-19 16:31:07

No Duplicates.



**Comment 97 for Cap and Trade 2016 (capandtrade16) - 45 Day.**

First Name: Todd

Last Name: Jones

Email Address: Non-web submitted comment

Affiliation:

Subject: Proposed Amendments to the California Cap on Greenhouse Gas Emissions and Market-bas

Comment:

Late Comment. See Attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/227-capandtrade16-AGNXI1cIBSUKeVMj.pdf'

Original File Name: CRSSupCommenton45-daychangestoCTrule\_4-28-2017.pdf

Date and Time Comment Was Submitted: 2017-05-05 16:23:36

No Duplicates.

## **Comment 1 for Cap and Trade 2016 (capandtrade16). (At Hearing)**

First Name: Nicholas

Last Name: van Aelstyn

Email Address: Non-web submitted comment

Affiliation: Beveridge & Diamond

Subject: Comments of Sealaska Corp on Proposed Amend to Cap-and-trade Reg re Forest Offsets

Comment:

See Attached

Attachment: [www.arb.ca.gov/lists/com-attach/98-capandtrade16-VmdWZl1xBG9RegUx.pdf](http://www.arb.ca.gov/lists/com-attach/98-capandtrade16-VmdWZl1xBG9RegUx.pdf)

Original File Name: 16-8-4 Nicholas van Aelstyn.pdf

Date and Time Comment Was Submitted: 2016-09-28 14:49:41

No Duplicates.

## **Comment 2 for Cap and Trade 2016 (capandtrade16). (At Hearing)**

First Name: Erin

Last Name: Grizard

Email Address: Non-web submitted comment

Affiliation: National Fuel Cell Research Center

Subject: Qualification of Fuel Cells as Emissions w/o a Compliance Obligation

Comment:

See Attached

Attachment: [www.arb.ca.gov/lists/com-attach/99-capandtrade16-BjcBMVJ+VzwFLgM3.pdf](http://www.arb.ca.gov/lists/com-attach/99-capandtrade16-BjcBMVJ+VzwFLgM3.pdf)

Original File Name: 16-8-4 Erin Grizard.pdf

Date and Time Comment Was Submitted: 2016-09-28 14:49:41

No Duplicates.

### **Comment 3 for Cap and Trade 2016 (capandtrade16). (At Hearing)**

First Name: Tim

Last Name: Carmichael

Email Address: Non-web submitted comment

Affiliation: SoCalGas

Subject: Comments on Proposed 2016 Amendments to the Cap-and-Trade Reg  
Comment:

See Attached

Attachment: [www.arb.ca.gov/lists/com-attach/101-capandtrade16-BTQFNQAsUToAKwUx.pdf](http://www.arb.ca.gov/lists/com-attach/101-capandtrade16-BTQFNQAsUToAKwUx.pdf)

Original File Name: 16-8-4 Tim Carmichael.pdf

Date and Time Comment Was Submitted: 2016-09-28 14:49:41

No Duplicates.

## **Comment 4 for Cap and Trade 2016 (capandtrade16). (At Hearing)**

First Name: Craig

Last Name: Anderson

Email Address: Non-web submitted comment

Affiliation: Solar Turbines

Subject: Proposed Revisions to the CA Cap on GHG and Market-Based Compliance Mechanisms

Comment:

See Attached

Attachment: [www.arb.ca.gov/lists/com-attach/102-capandtrade16-VGVRYVJ+VzwHLFBk.pdf](http://www.arb.ca.gov/lists/com-attach/102-capandtrade16-VGVRYVJ+VzwHLFBk.pdf)

Original File Name: 16-8-4 Craig Anderson.pdf

Date and Time Comment Was Submitted: 2016-09-28 14:49:41

No Duplicates.

**Comment 5 for Cap and Trade 2016 (capandtrade16). (At Hearing)**

First Name: Robin

Last Name: Shropshire

Email Address: Non-web submitted comment

Affiliation: Panoche Energy Center

Subject: Comments on Amendments to the CA Cap on GHG and Market-Based Compliance Mechanisms

Comment:

See Attached

Attachment: [www.arb.ca.gov/lists/com-attach/103-capandtrade16-U2JdbQYqUToAKwg8.pdf](http://www.arb.ca.gov/lists/com-attach/103-capandtrade16-U2JdbQYqUToAKwg8.pdf)

Original File Name: 16-8-4 Robin Shropshire.pdf

Date and Time Comment Was Submitted: 2016-09-28 14:49:41

No Duplicates.

## **Comment 6 for Cap and Trade 2016 (capandtrade16). (At Hearing)**

First Name: Jan

Last Name: Dietrick

Email Address: Non-web submitted comment

Affiliation: Rincon-Vitora

Subject: Citizen's Climate Lobby

Comment:

See Attached

Attachment: [www.arb.ca.gov/lists/com-attach/104-capandtrade16-UGFRYQAsVj0CKQI2.pdf](http://www.arb.ca.gov/lists/com-attach/104-capandtrade16-UGFRYQAsVj0CKQI2.pdf)

Original File Name: 16-8-4 Jan Dietrick.pdf

Date and Time Comment Was Submitted: 2016-09-28 14:49:41

No Duplicates.

**Comment 7 for Cap and Trade 2016 (capandtrade16). (At Hearing)**

First Name: Mikhael

Last Name: Skvarla

Email Address: Non-web submitted comment

Affiliation: CCEEB

Subject: Potential 2016 Amendments to Cap-and-Tade Reg

Comment:

See Attached

Attachment: [www.arb.ca.gov/lists/com-attach/105-capandtrade16-BjcBMQYqVT4ELM0d.pdf](http://www.arb.ca.gov/lists/com-attach/105-capandtrade16-BjcBMQYqVT4ELM0d.pdf)

Original File Name: 16-8-4 Michael Skvarla.pdf

Date and Time Comment Was Submitted: 2016-09-28 14:49:41

No Duplicates.



## **Comment 8 for Cap and Trade 2016 (capandtrade16). (At Hearing)**

First Name: Neil

Last Name: Black

Email Address: Non-web submitted comment

Affiliation: California Bioenergy

Subject: Proposed Amend to Mandatory GHG Reg & CA Cap on GHG & Market-Based Compliance Mech

Comment:

See Attached

Attachment: [www.arb.ca.gov/lists/com-attach/106-capandtrade16-BzZdbVZ6WDMGLVNn.pdf](http://www.arb.ca.gov/lists/com-attach/106-capandtrade16-BzZdbVZ6WDMGLVNn.pdf)

Original File Name: 16-8-4 Neil Black.pdf

Date and Time Comment Was Submitted: 2016-09-28 14:49:41

No Duplicates.

## **Comment 9 for Cap and Trade 2016 (capandtrade16). (At Hearing)**

First Name: WSPA

Last Name: Western States Petro

Email Address: Non-web submitted comment

Affiliation:

Subject: Enclosure A

Comment:

See Attached

Attachment: [www.arb.ca.gov/lists/com-attach/107-capandtrade16-VWRRYVR4VzxQewMw.pdf](http://www.arb.ca.gov/lists/com-attach/107-capandtrade16-VWRRYVR4VzxQewMw.pdf)

Original File Name: 16-8-3 WSPA.pdf

Date and Time Comment Was Submitted: 2016-09-28 14:49:41

No Duplicates.

## **Comment 1 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Andy

Last Name: Friedl

Email Address: andy@ondaenergy.com

Affiliation:

Subject: Correction Required in Table 8-1 for NAICS 325194

Comment:

Table 8-1 on page 161 of the revised Cap and Trade Regulation incorrectly shows NAICS code 325194 in the Medium Leakage Risk Category with an Assistance Factor of 75% for the Third Compliance Period. Both the 15-Day Notice text (p. 14) and Table 5 of Attachment B show NAICS in the High Leakage Risk Category with an Assistance Factor of 100% for the Third Compliance Period. This should be corrected in the second 15-day regulatory package.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2017-01-02 18:40:19

No Duplicates.

**Comment 2 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Advisory Committee  
Last Name: Environmental Justic  
Email Address: ombcomm@arb.ca.gov  
Affiliation:

Subject: Environmental Justice Advisory Committee Recommendations  
Comment:

Please see attached document.

Attachment: [www.arb.ca.gov/lists/com-attach/111-capandtrade16-UzZdMV09WGgAWQFo.pdf](http://www.arb.ca.gov/lists/com-attach/111-capandtrade16-UzZdMV09WGgAWQFo.pdf)

Original File Name: EJAC\_Industry\_Recommendations122216.pdf

Date and Time Comment Was Submitted: 2017-01-13 17:18:32

No Duplicates.

### **Comment 3 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Dillon

Last Name: Kass

Email Address: dkass@windset.com

Affiliation: Windset Farms

Subject: Comment Letter RE: Proposed Changes to CA Cap & Trade  
Comment:

Comment letter uploaded to this page.

Attachment: [www.arb.ca.gov/lists/com-attach/113-capandtrade16-UCdTPAZpV2AKfwBl.pdf](http://www.arb.ca.gov/lists/com-attach/113-capandtrade16-UCdTPAZpV2AKfwBl.pdf)

Original File Name: Windset Farms Ltr 1-18-2017.pdf

Date and Time Comment Was Submitted: 2017-01-18 13:33:55

No Duplicates.

**Comment 4 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Angus

Last Name: Crane

Email Address: [acrane@naima.org](mailto:acrane@naima.org)

Affiliation: NAIMA

Subject: NAIMA Comments on CARB's Modified Text and Availability of Additional Documents

Comment:

Please find attached NAIMA's comments on CARB's Proposed Modified Text and Availability of Additional Documents and/or Information.

Attachment: [www.arb.ca.gov/lists/com-attach/114-capandtrade16-AWIAZ1YIBDVVZwQ0.docx](http://www.arb.ca.gov/lists/com-attach/114-capandtrade16-AWIAZ1YIBDVVZwQ0.docx)

Original File Name: CARB4044.docx

Date and Time Comment Was Submitted: 2017-01-19 09:48:50

No Duplicates.

**Comment 5 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Nicol

Last Name: Gagstetter

Email Address: nicol.gagstetter@riotinto.com

Affiliation:

Subject: U.S. Borax Comments

Comment:

U.S. Borax, part of Rio Tinto Borates, is pleased to submit the following comments on the California Air Resources Board's 15-Day Amendment Text to the Proposed Amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulation issued on December 21, 2016 ("15-Day Amendment Text").

Attachment: [www.arb.ca.gov/lists/com-attach/115-capandtrade16-VyVdLwZIU18FYAhp.pdf](http://www.arb.ca.gov/lists/com-attach/115-capandtrade16-VyVdLwZIU18FYAhp.pdf)

Original File Name: RTB CARB 15 Day Amdt Comments Jan 20 2017.pdf

Date and Time Comment Was Submitted: 2017-01-19 11:21:55

No Duplicates.

**Comment 6 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Badia

Last Name: Harrell

Email Address: bharrell@cityofpasadena.net

Affiliation: Pasadena Water and Power

Subject: Pasadena Comments on 2016 15day Proposed Amendments to the Cap-and-Trade Regulation

Comment:

Please see attached document.

Attachment: [www.arb.ca.gov/lists/com-attach/116-capandtrade16-V2dXYANdWDoHOFUK.pdf](http://www.arb.ca.gov/lists/com-attach/116-capandtrade16-V2dXYANdWDoHOFUK.pdf)

Original File Name: 01\_19\_17 Pasadena Water and Power Comments on 15day proposed Cap and Trade\_Mandatory Reporting Regulation Amendments.pdf

Date and Time Comment Was Submitted: 2017-01-19 14:20:57

No Duplicates.



**Comment 7 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Clare

Last Name: Breidenich

Email Address: cbreidenich@aciem.us

Affiliation: Western Power Trading Forum

Subject: Comments on 15 day cap and trade amendments

Comment:

Thank you,  
Clare Breidenich  
WPTF GHG Committee Director

Attachment: [www.arb.ca.gov/lists/com-attach/117-capandtrade16-BjdXfAMwAmFWfQY3.pdf](http://www.arb.ca.gov/lists/com-attach/117-capandtrade16-BjdXfAMwAmFWfQY3.pdf)

Original File Name: 1-20-17 WPTF on 15-day cap and trade changes.pdf

Date and Time Comment Was Submitted: 2017-01-20 03:47:13

No Duplicates.

## **Comment 8 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Jessica

Last Name: Nelson

Email Address: goldenstatepowercooperative@gmail.com

Affiliation: Golden State Power Cooperative

Subject: GSPC's Comments on the Proposed EDU Allowance Allocations

Comment:

Golden State Power Cooperative appreciates the opportunity to provide comments. Please see the attached document.

Attachment: [www.arb.ca.gov/lists/com-attach/118-capandtrade16-VjEHclwtBTVQewBf.pdf](http://www.arb.ca.gov/lists/com-attach/118-capandtrade16-VjEHclwtBTVQewBf.pdf)

Original File Name: GSPC- Allowance Allocation comments- final.pdf

Date and Time Comment Was Submitted: 2017-01-20 06:27:32

No Duplicates.

**Comment 9 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Nick

Last Name: Balistreri

Email Address: [nick.balistreri@ucop.edu](mailto:nick.balistreri@ucop.edu)

Affiliation: University of California, Office of the

Subject: Cap-and-Trade Regulation Amendments, University of California  
Comment:

Please see uploaded comments.

Attachment: [www.arb.ca.gov/lists/com-attach/119-capandtrade16-VCFWPgFpVHEDYAd1.pdf](http://www.arb.ca.gov/lists/com-attach/119-capandtrade16-VCFWPgFpVHEDYAd1.pdf)

Original File Name: University of California Comments 1-20-17.pdf

Date and Time Comment Was Submitted: 2017-01-20 09:28:14

No Duplicates.

## **Comment 10 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Michael  
Last Name: Van Brunt  
Email Address: mvanbrunt@covanta.com  
Affiliation: Covanta

Subject: Comments from Covanta  
Comment:

Attached please find comments from Covanta on the December 21, 2016  
Proposed Amendments to the California Cap on Greenhouse Gas  
Emissions and Market-Based Compliance Mechanisms Regulation.

Attachment: [www.arb.ca.gov/lists/com-attach/120-capandtrade16-V2VUYIjiWDwDKAAw.pdf](http://www.arb.ca.gov/lists/com-attach/120-capandtrade16-V2VUYIjiWDwDKAAw.pdf)

Original File Name: 2017-01 Covanta Comments on Dec 21 Cap&Trade Proposal.pdf

Date and Time Comment Was Submitted: 2017-01-20 10:21:27

No Duplicates.

**Comment 11 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Ellen

Last Name: Wolfe

Email Address: ewolfe@resero.com

Affiliation: Resero Consulting

Subject: Valley Electric Association Cap and Trade 15-day comments

Comment:

Please find VEA's comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/121-capandtrade16-Wy1XNFw8U19QNVc2.pdf](http://www.arb.ca.gov/lists/com-attach/121-capandtrade16-Wy1XNFw8U19QNVc2.pdf)

Original File Name: VEA Cap and Trade 15-day comments 01 20 17.pdf

Date and Time Comment Was Submitted: 2017-01-20 10:29:46

No Duplicates.

## **Comment 12 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Suzy

Last Name: Hong

Email Address: shong@goodinmacbride.com

Affiliation: USS-POSCO Industries

Subject: Comments on Proposed Amendments to Cap-and-Trade

Comment:

Please find attached USS-POSCO Industries Comments on Proposed Amendments to to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms. If you have any questions concerning the document or any difficulty with the attachment, please contact me at shong@goodinmacbride.com or (415) 392-7900.

Regards,  
Suzy Hong

Attachment: [www.arb.ca.gov/lists/com-attach/122-capandtrade16-ViNcKIQ8Aw8HYgBv.pdf](http://www.arb.ca.gov/lists/com-attach/122-capandtrade16-ViNcKIQ8Aw8HYgBv.pdf)

Original File Name: UPI Comments on Proposed Amendment to C&T reg.pdf

Date and Time Comment Was Submitted: 2017-01-20 11:05:24

No Duplicates.

## **Comment 13 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Frank

Last Name: Caponi

Email Address: fcaconi@lacsds.org

Affiliation: LACSD

Subject: Comments Letter on Proposed California Cap on GHG Emissions

Comment:

Frank Caponi of the Los Angeles County Sanitation Districts is submitting a comment letter on the above-title document.

Attachment: [www.arb.ca.gov/lists/com-attach/123-capandtrade16-AmYHbgNhBGcBNgMx.pdf](http://www.arb.ca.gov/lists/com-attach/123-capandtrade16-AmYHbgNhBGcBNgMx.pdf)

Original File Name: DOC012017-01202017115857.pdf

Date and Time Comment Was Submitted: 2017-01-20 12:07:23

No Duplicates.

## **Comment 14 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Miles

Last Name: Heller

Email Address: miles.t.heller@tsocorp.com

Affiliation: Tesoro

Subject: 12-21-16 15-day package comments

Comment:

Please find comment letter attached.

Attachment: [www.arb.ca.gov/lists/com-attach/124-capandtrade16-B3NWNVMhVmoHc1M8.pdf](http://www.arb.ca.gov/lists/com-attach/124-capandtrade16-B3NWNVMhVmoHc1M8.pdf)

Original File Name: Tesoro comments re 12 -21-16 C&T 15-day package amendments.pdf

Date and Time Comment Was Submitted: 2017-01-20 12:58:26

No Duplicates.



## **Comment 15 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Peter

Last Name: Weiner

Email Address: peterweiner@paulhastings.com

Affiliation: Crockett Cogeneration

Subject: Comments of Crockett Cogeneration

Comment:

Please see attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/125-capandtrade16-VDdROFA8U21VNghm.pdf](http://www.arb.ca.gov/lists/com-attach/125-capandtrade16-VDdROFA8U21VNghm.pdf)

Original File Name: Comments of Crockett Cogeneration (Jan 20, 2017).pdf

Date and Time Comment Was Submitted: 2017-01-20 13:21:23

No Duplicates.

**Comment 16 for Cap and Trade 2016 (capandtrade16) - 15-1.**

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

## **Comment 17 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Melissa

Last Name: Poole

Email Address: melissa.poole@wonderful.com

Affiliation: The Wonderful Company

Subject: Wonderful Company Comments on CAPANDTRADE16 (1.20.17)

Comment:

Please find our comments on the "Notice of Public Availability of Modified Text and Availability of Additional Documents and/or Information for the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulation" attached.

Thank you for the opportunity to submit additional comments on this issue.

Attachment: [www.arb.ca.gov/lists/com-attach/127-capandtrade16-BTRUDVBjAGMGXwMy.pdf](http://www.arb.ca.gov/lists/com-attach/127-capandtrade16-BTRUDVBjAGMGXwMy.pdf)

Original File Name: 1 20 17 TWC ARB Comments.pdf

Date and Time Comment Was Submitted: 2017-01-20 13:21:34

No Duplicates.

## **Comment 18 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: James  
Last Name: Wintergreen  
Email Address: jtw@firstenvironment.com  
Affiliation: First Environment, Inc.

Subject: Comments on C&T regulation revisions  
Comment:

First Environment offers the following comments regarding proposed revisions to the Cap and Trade regulation.

Proposed revision to the regulation:

95977.1(b)(3)(R)8 -

If ARB or the Offset Project Registry determines that the detailed verification report required pursuant to 95977.1(b)(3)(R)4.a. does not contain sufficient information to substantiate the attestations in the Offset Verification Statement, then the verification body must submit a revised verification report and a revised Offset Verification Statement to ARB or the Offset Project Registry within 15 calendar days.

Comment:

The language "does not contain sufficient information to substantiate the attestations in the Offset Verification Statement" is vague and does not provide an objective basis for the Offset Project Registry (or verification bodies) to determine whether the verification report meets the requirements of 95977.1(b)(3)(R)4a. To ensure consistency across Offset Project Registries and between verification bodies, the regulation should state the specific criteria that a verification report must meet or refer back to 95977.1(b)(3)(R)4a for the requirements that the report must address to be considered in conformance with the regulation.

Proposed revision to the regulation:

95977.1(b)(3)(R) -

Offset verification services are not complete until ARB offset credits are issued for the GHG emission reductions and GHG removal enhancements reported in an Offset Project Data.

Comment:

While verification bodies may anticipate questions and comments from ARB or the OPR after submittal of the verification report and statement, the regulation should not define the period between this submission and issuance of ARB offset credits to be part of "verification services." Consistent with international best practices in financial auditing, third party audit services must have a defined scope including specific starting and ending dates during which the assessment of evidence was performed. To avoid unnecessary uncertainty regarding the scope of the verification process, verification services should be considered complete after the submission of the report and statement to the OPR. This proposed revision should be removed and the regulation can continue to rely on the existing text at 95977.1(b)(3)(S), which states that verification requirements are considered to be met when ARB Offsets

are issued.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2017-01-20 13:35:49

No Duplicates.

## **Comment 19 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Kassandra  
Last Name: Gough  
Email Address: [kassandra.gough@calpine.com](mailto:kassandra.gough@calpine.com)  
Affiliation: Calpine Corporation

Subject: Calpine Comments on 15-day Changes to Cap-and-Trade Regulation  
Comment:

Please see attached the comments of Calpine Corporation on the 15-day changes to the proposed amendments to the Cap-and-Trade Regulation. Thank you for the opportunity to submit these comments.

Attachment: [www.arb.ca.gov/lists/com-attach/129-capandtrade16-UTJSNQBtVnVSPQJs.pdf](http://www.arb.ca.gov/lists/com-attach/129-capandtrade16-UTJSNQBtVnVSPQJs.pdf)

Original File Name: Calpine Comments on 15-Day Changes to CT and MRR.pdf

Date and Time Comment Was Submitted: 2017-01-20 13:39:42

No Duplicates.

## **Comment 20 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Elysia

Last Name: Treanor

Email Address: Elysia.Treanor@pgn.com

Affiliation: Portland General Electric Company

Subject: PGE Comments on Proposed Cap and Trade Regulation - 15 Day Amendment Text  
Comment:

Please see the attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/130-capandtrade16-AnIHZlYyWFRXMgRr.pdf](http://www.arb.ca.gov/lists/com-attach/130-capandtrade16-AnIHZlYyWFRXMgRr.pdf)

Original File Name: PGE Comments on CARB 2017 CapTrade 15 day  
package\_final01202017.pdf

Date and Time Comment Was Submitted: 2017-01-20 13:47:33

No Duplicates.

## **Comment 21 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Mary

Last Name: Wiencke

Email Address: mary.wiencke@pacificorp.com

Affiliation: PacifiCorp

Subject: PacifiCorp Comments

Comment:

Please find attached PacifiCorp comments on proposed amendments to the cap-and-trade program and MRR.

Attachment: [www.arb.ca.gov/lists/com-attach/131-capandtrade16-VCRSNQFjVW8CYgBp.pdf](http://www.arb.ca.gov/lists/com-attach/131-capandtrade16-VCRSNQFjVW8CYgBp.pdf)

Original File Name: PacifiCorp\_ARB\_December 21 Amendments Comments\_012017.pdf

Date and Time Comment Was Submitted: 2017-01-20 13:48:46

No Duplicates.



## **Comment 22 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Stefanie

Last Name: Johnson

Email Address: stefanie.johnson@seattle.gov

Affiliation:

Subject: Seattle City Light Comments on the 15-Day Proposed Changes to the Cap-and-Trade Regulations

Comment:

Please see attached comments of Seattle City Light regarding the 15-Day Proposed Changes to the Cap-and-Trade Regulation, issued on December 21, 2016.

Thank you,  
Stefanie Johnson

Attachment: [www.arb.ca.gov/lists/com-attach/132-capandtrade16-AGNTOgdrWGYDYFM9.zip](http://www.arb.ca.gov/lists/com-attach/132-capandtrade16-AGNTOgdrWGYDYFM9.zip)

Original File Name: Comments of Seattle City Light on the 15-Day Proposed Changes to the Cap-and-Trade Regulation.zip

Date and Time Comment Was Submitted: 2017-01-20 13:37:29

No Duplicates.

## **Comment 23 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Jared

Last Name: Wittry

Email Address: [jared.wittry@airliquide.com](mailto:jared.wittry@airliquide.com)

Affiliation:

Subject: Air Liquide Comments on Proposed Amendments to Cap and Trade Regulations

Comment:

Attached please find comments submitted by Air Liquide Large Industries U.S. LP in response to the proposed amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulation.

Thank you,  
Jared Wittry

Attachment: [www.arb.ca.gov/lists/com-attach/133-capandtrade16-V2VVY1xsVDACKQk4.pdf](http://www.arb.ca.gov/lists/com-attach/133-capandtrade16-V2VVY1xsVDACKQk4.pdf)

Original File Name: 2017-1-20 Air Liquide Comments on Cap and Trade Regulatory Amendments.pdf

Date and Time Comment Was Submitted: 2017-01-20 13:53:33

No Duplicates.

## **Comment 24 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Mark

Last Name: Havel

Email Address: mhavel@climateactionreserve.org

Affiliation: Climate Action Reserve

Subject: The Reserve's Comments on the CT Reg 15-Day Modifications

Comment:

The Climate Action Reserve's comments on the 15-day modifications to the proposed amendments to the Cap-and-Trade Regulation are attached. Thank you for your consideration.

Attachment: [www.arb.ca.gov/lists/com-attach/135-capandtrade16-VyVVNIYkBTNRJVAm.docx](http://www.arb.ca.gov/lists/com-attach/135-capandtrade16-VyVVNIYkBTNRJVAm.docx)

Original File Name: Reserve Comments 2016 CT 15 day modifications.docx

Date and Time Comment Was Submitted: 2017-01-20 14:16:30

No Duplicates.

## **Comment 25 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Brett

Last Name: Guge

Email Address: [brett.guge@californiasteel.com](mailto:brett.guge@californiasteel.com)

Affiliation: California Steel Industries

Subject: California Steel Industries, Inc. 15 Day Comments

Comment:

Please see the attached letter and presentation regarding amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulation/

Attachment: [www.arb.ca.gov/lists/com-attach/136-capandtrade16-AmFTNFA9ADoGZgNs.zip](http://www.arb.ca.gov/lists/com-attach/136-capandtrade16-AmFTNFA9ADoGZgNs.zip)

Original File Name: California Steel Industries - Comments on 15 Cap and Trade Amendments.zip

Date and Time Comment Was Submitted: 2017-01-20 14:18:45

No Duplicates.

## **Comment 26 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Mary

Last Name: Wiencke

Email Address: mary.wiencke@pacificorp.com

Affiliation:

Subject: Joint Comments of the EIM Entities

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/137-capandtrade16-UjdXOFE9VFhXNFC5.pdf](http://www.arb.ca.gov/lists/com-attach/137-capandtrade16-UjdXOFE9VFhXNFC5.pdf)

Original File Name: EIM Entity Comments\_ARB December 21 Amendments\_012017.pdf

Date and Time Comment Was Submitted: 2017-01-20 14:45:55

No Duplicates.

## **Comment 27 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Andrew  
Last Name: Ulmer  
Email Address: [aulmer@caiso.com](mailto:aulmer@caiso.com)  
Affiliation: California ISO

Subject: ISO Comments on ARB 15 Day Notices  
Comment:

Attached please find the California ISO's comments on ARB's 15 Day Notices.

Andrew Ulmer  
Director, Federal Regulatory Affairs  
California Independent System Operator Corp.  
Tel. 916.608.7209  
Cell. 916.673.7797

Attachment: [www.arb.ca.gov/lists/com-attach/138-capandtrade16-AGldKFY4UV1WM1Q7.pdf](http://www.arb.ca.gov/lists/com-attach/138-capandtrade16-AGldKFY4UV1WM1Q7.pdf)

Original File Name: ISO Comments on ARB 15 Day Notices\_20170120.pdf

Date and Time Comment Was Submitted: 2017-01-20 14:45:46

No Duplicates.

## **Comment 28 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Rachael

Last Name: O'Brien

Email Address: rachael@agcouncil.org

Affiliation: Agricultural Council of California

Subject: Proposed 15-Day Modifications to the Cap-and-Trade Regulation

Comment:

We appreciate your consideration and the opportunity to comment. Our intention in these comments is to avoid simply shifting emissions to other locations outside of California. Should you have any questions or need anything further from us, please contact either Rachael O'Brien at (916) 443-4887 / Rachael@agcouncil.org or Rachel Kaldor at (916) 441-6921 / RKaldor@dairyinstitute.org.

Attachment: [www.arb.ca.gov/lists/com-attach/139-capandtrade16-WjtSM1Q2BztRIlc5.pdf](http://www.arb.ca.gov/lists/com-attach/139-capandtrade16-WjtSM1Q2BztRIlc5.pdf)

Original File Name: AgCouncil\_DairyInstitute\_15-Day Modified Regulation\_January2017.pdf

Date and Time Comment Was Submitted: 2017-01-20 15:00:18

No Duplicates.

## **Comment 29 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Bill

Last Name: Buchan

Email Address: buchana@mktpotential.com

Affiliation: GRAPHIC PACKAGING INTERNATIONAL INC

Subject: Comments to Post-2020 Assistance Factors for the Paperboard Industry

Comment:

To the Clerk of the Board:

Attached please find our comments to the proposed 15-Day Amendment to the cap and trade regulation for post-2020 assistance factors for our industry, the paperboard sector (NAICS Code 322130). ARB's approach and data for our sector do not adequately describe the paperboard market, and therefore the proposed post-2020 assistance factors are inappropriate. We provide recommendations for addressing shortfalls in ARB's approach and data so that a more accurate characterization of our sector with fair assistance factors can be developed. Under separate cover we are also providing more detailed confidential business information to support the attached recommendations. Please give these recommendations your strongest consideration in finalizing these cap and trade amendments.

Bill Buchan, P.E.

On Behalf of Graphic Packaging International, Inc.

Attachment: [www.arb.ca.gov/lists/com-attach/140-capandtrade16-VjFVIwNrBQkDZglm.pdf](http://www.arb.ca.gov/lists/com-attach/140-capandtrade16-VjFVIwNrBQkDZglm.pdf)

Original File Name: GPI Comments to ARB 15-Day Cap and Trade Amendments Jan 2017.pdf

Date and Time Comment Was Submitted: 2017-01-20 14:52:29

No Duplicates.



**Comment 30 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Sarah

Last Name: Taheri

Email Address: staheri@scppa.org

Affiliation: Southern Calif. Public Power Authority

Subject: SCPPA Comments on Cap-and-Trade 15-Day Language  
Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/141-capandtrade16-U2MCNQcrBWRQZIB9.pdf](http://www.arb.ca.gov/lists/com-attach/141-capandtrade16-U2MCNQcrBWRQZIB9.pdf)

Original File Name: 01-20-2017 SCPPA Comments on Cap-and-Trade Proposed Regulation final.pdf

Date and Time Comment Was Submitted: 2017-01-20 15:02:09

No Duplicates.

## **Comment 31 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Read  
Last Name: Comstock  
Email Address: Read.Comstock@directenergy.com  
Affiliation:

Subject: Direct Energy Business Comments on the 12/20/2016 Amendments to the CNT  
Regulation

Comment:

Dear Mr. Corey,

Direct Energy Business provides the following comments on the December 20, 2016 Proposed Amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulation ("Proposed Amendments").

Sincerely,

Read Comstock  
Direct Energy Business

Attachment: [www.arb.ca.gov/lists/com-attach/142-capandtrade16-WmsHNIJjVDZRZVBg.pdf](http://www.arb.ca.gov/lists/com-attach/142-capandtrade16-WmsHNIJjVDZRZVBg.pdf)

Original File Name: 170120\_DEB Comments on 12.20 15 Day Amds (00386682xBA8E1).pdf

Date and Time Comment Was Submitted: 2017-01-20 15:09:45

No Duplicates.

## **Comment 32 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: sheldon

Last Name: zakreski

Email Address: [szakreski@climatetrust.org](mailto:szakreski@climatetrust.org)

Affiliation: Climate Trust

Subject: comments on proposed cap and trade amendmens

Comment:

Attached please find The Climate Trust's comments on the proposed amendments to the cap and trade program.

Attachment: [www.arb.ca.gov/lists/com-attach/143-capandtrade16-BXEHYIInBAGLbAR2.pdf](http://www.arb.ca.gov/lists/com-attach/143-capandtrade16-BXEHYIInBAGLbAR2.pdf)

Original File Name: TCT ARB C&T proposed amendments comments-170120-CAM-FNL.pdf

Date and Time Comment Was Submitted: 2017-01-20 15:19:58

No Duplicates.

## **Comment 33 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: James  
Last Name: Hendry  
Email Address: jhendry@sfgwater.org  
Affiliation: San Francisco PUC

Subject: SFPUC Comments on CARB Cap on GHG Emissions  
Comment:

Dear Clerk of the Board:

Pursuant to the "Notice of Public Availability of Modified Text and Availability of Additional Documents and/or Information" (p. 25) on CARB's :

PUBLIC HEARING TO CONSIDER ADOPTION OF AMENDMENTS TO THE CALIFORNIA  
CAP ON GREENHOUSE GAS EMISSIONS AND MARKET-BASED COMPLIANCE  
MECHANISMS

Attached are the comments of the San Francisco Public Utilities  
Commission (SFPUC).

Please give us a call if there are any problems at (415) 554-1526.

Attachment: [www.arb.ca.gov/lists/com-attach/144-capandtrade16-ViVSMgBxVXMLbiUK.doc](http://www.arb.ca.gov/lists/com-attach/144-capandtrade16-ViVSMgBxVXMLbiUK.doc)

Original File Name: SFPUC Comments on CARB Proposal on Cap-and-Trade January 20,  
2017.doc

Date and Time Comment Was Submitted: 2017-01-20 15:17:12

No Duplicates.

## **Comment 34 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Jodean

Last Name: Giese

Email Address: jodean.giese@ladwp.com

Affiliation: LADWP

Subject: LADWP Comments on Proposed Cap & Trade Amendments

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/145-capandtrade16-UWBRel1uWToBKldm.pdf](http://www.arb.ca.gov/lists/com-attach/145-capandtrade16-UWBRel1uWToBKldm.pdf)

Original File Name: 1-20-17 LADWP Comments on Cap-and-Trade Regulatory Amendments.pdf

Date and Time Comment Was Submitted: 2017-01-20 15:25:21

No Duplicates.

## **Comment 35 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: James  
Last Name: Hendry  
Email Address: [jhendry@sfgwater.org](mailto:jhendry@sfgwater.org)  
Affiliation: San Francisco PUC

Subject: ATTACHMENT TO SFPUC Comments on CARB Cap on GHG Emissions  
Comment:

Dear Clerk of the Board:

This is Attachment A, which is part of and included by reference to the Comments of the San Francisco Public Utilities Commission (SFPUC) just submitted electronically to you for the:

PUBLIC HEARING TO CONSIDER ADOPTION OF AMENDMENTS TO THE CALIFORNIA CAP ON GREENHOUSE GAS EMISSIONS AND MARKET-BASED COMPLIANCE MECHANISMS

Please link, if possible, this attachment to our comment filing.

Please give us a call if there are any problems at (415) 554-1526.

Attachment: [www.arb.ca.gov/lists/com-attach/146-capandtrade16-AWAHdVUgU18LbARb.pdf](http://www.arb.ca.gov/lists/com-attach/146-capandtrade16-AWAHdVUgU18LbARb.pdf)

Original File Name: ATT A - SFPUC Comments on CARB Staff Proposal.pdf

Date and Time Comment Was Submitted: 2017-01-20 15:17:12

No Duplicates.

## **Comment 36 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Armando  
Last Name: Botello  
Email Address: armando\_botello@praxair.com  
Affiliation:

Subject: Praxair Comments on the December 20, 2016 Amendments to the Cap-and-Trade Regulation

Comment:

Dear Mr. Corey,

Praxair, Inc. ("Praxair") provides the following comments on the December 20, 2016 Proposed Amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulation ("Proposed Amendments").

Sincerely,

Armando Botello  
Vice President, West Region  
Praxair, Inc.

Attachment: [www.arb.ca.gov/lists/com-attach/147-capandtrade16-V2YAMQY3AmAHMwQ0.pdf](http://www.arb.ca.gov/lists/com-attach/147-capandtrade16-V2YAMQY3AmAHMwQ0.pdf)

Original File Name: 170120\_Praxair comments on 1-20 CNT Regs (00386687xBA8E1).pdf

Date and Time Comment Was Submitted: 2017-01-20 15:29:56

No Duplicates.

## **Comment 37 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Shelly

Last Name: Sullivan

Email Address: [ssullivan@onemain.com](mailto:ssullivan@onemain.com)

Affiliation: Climate Change Policy Coalition

Subject: CCPC Comments on the Proposed Cap-and-Trade Regulation Amendments

Comment:

Attached please find comments submitted on behalf of the Climate Change Policy Coalition regarding amendments to the cap-and-trade regulation.

Attachment: [www.arb.ca.gov/lists/com-attach/148-capandtrade16-VDdUMVIjUGACW1c0.pdf](http://www.arb.ca.gov/lists/com-attach/148-capandtrade16-VDdUMVIjUGACW1c0.pdf)

Original File Name: CCPC\_C\_T\_Reg Comments\_1\_20\_17.pdf

Date and Time Comment Was Submitted: 2017-01-20 15:37:05

No Duplicates.



## **Comment 38 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Lindsey

Last Name: Schlekeway

Email Address: LSchlekeway@nvenergy.com

Affiliation:

Subject: NV Energy Comments

Comment:

PLEASE SEE ATTACHMENT TO VIEW COMMENTS

Attachment: [www.arb.ca.gov/lists/com-attach/149-capandtrade16-BWtTIwBeUmRROQht.docx](http://www.arb.ca.gov/lists/com-attach/149-capandtrade16-BWtTIwBeUmRROQht.docx)

Original File Name: NV Energy Comments ARB GHG Interim Proposal\_MTS\_.docx

Date and Time Comment Was Submitted: 2017-01-20 15:32:59

No Duplicates.

## **Comment 39 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Jon

Last Name: Costantino

Email Address: jon@tradesmanadvisors.com

Affiliation: Ad Hoc Offsets Group

Subject: Ad Hoc Offset Group Comments on 1st 15-day Package

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/150-capandtrade16-V2ZRelZIVjVSeQg5.pdf](http://www.arb.ca.gov/lists/com-attach/150-capandtrade16-V2ZRelZIVjVSeQg5.pdf)

Original File Name: 1-20-17 Ad Hoc Offsets Group Comments on 1st 15-day CT package-final.pdf

Date and Time Comment Was Submitted: 2017-01-20 15:39:33

No Duplicates.

## **Comment 40 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Diana

Last Name: Tang

Email Address: diana.tang@longbeach.gov

Affiliation: City of Long Beach

Subject: Comments re: Cap and Trade Compliance and Waste-to-Energy Facilities

Comment:

Thank you for the opportunity to comment on the proposed cap and trade regulatory amendments. Please see attached for comments from the City of Long Beach. For ease of reading, the text is also pasted below.

Should you have questions, please contact Diana Tang, Manager of Government Affairs at 562-570-6506.

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January 20, 2017

Mary D. Nichols, Chair  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95812

RE: Public Comment on Amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulation (Attachment A: Proposed Amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulation)

On behalf of the City of Long Beach, I write to comment on the 15-day language issued by the California Air Resources Board (CARB) pertaining to Proposed Amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulation. Long Beach strongly supports CARB staff's recommendation to formalize the limited exemption in the 2nd compliance period for waste-to-energy facilities; and understands these facilities will be subject to compliance during the 3rd compliance period, beginning in 2018. The City looks forward to our continued partnership with CARB and other State agencies to continue greenhouse gas emission reductions through a multitude of means, including improved waste disposal options so as to reduce methane impacts associated with landfills.

In partnership with Covanta Energy, Long Beach proposes a long-term solution that would include waste-to-energy facilities in the cap beginning in the 3rd compliance period with a provision for allowances to be granted on the basis of the output-based allocation methodology. This approach provides a more level and equitable playing field in the waste management sector over the

long-term, thereby preventing emissions leakage out of the cap to landfills. The City of Long Beach supports the methodology proposed in Covanta Energy's comment letter on this issue.

Since Long Beach, in partnership with the Los Angeles County Sanitation District, began operating the Southeast Resource Recovery Facility (SERRF), our waste-to-energy facility, in 1988, the facility has processed approximately 1,400 tons of municipal solid waste (MSW) per day. Over the course of the past 28 years, 13.2 million tons of MSW has been processed through SERRF, creating 6.2 billion kilowatt-hours of electricity that has been loaded onto the regional grid. This MSW would have otherwise been sent to a landfill. Through the recovery process at SERRF, 5,115 tons of recyclable white goods and 184,000 tons of metal have also been extracted and sent to local recycling facilities as opposed to a landfill. Furthermore, based on CalRecycle assumptions on California landfill performance, facility specific greenhouse gas (GHG) emissions data as reported to the United States Environmental Protection Agency (U.S. EPA), as well as facility specific net electrical generation and the local electrical grid (based on U.S. EPA e-GRID data for the WECC California grid sub-region), the waste-to-energy facility in Long Beach enables the region to avoid approximately 0.6 tons of CO<sub>2</sub>e per ton of MSW processed. As a result of diverting MSW from landfills to SERRF, there has been a reduction of 7.92 million tons of carbon equivalent greenhouse gasses entering the environment.

Long Beach is proud to manage one of California's three waste-to-energy facilities, which provide an alternative to landfilling. The use of waste-to-energy technologies for waste disposal is consistent with the City's commitment to sustainability, recycling, and other environmentally friendly policies. We are pleased to share our facility consistently operates at 20% below pollutant concentration limits in the facility permit, and supplements local waste reduction efforts. While using waste-to-energy technologies in the City, Long Beach residents generate 4.0 pounds/person/day of solid waste, well below the current State target mandate of 7.6 pounds/person/day. The City also offers a Compost Pilot Program, collecting over 1,000 gallons of compost each week from local restaurants. Residents also benefit from a mulch program whereby City tree trimming operations offer mulch to individual families rather than send the materials to a landfill; more than 500 tons of mulch was used locally by Long Beach residents through this program in 2016 alone.

These programs are constantly evolving to meet State standards and the needs of our community. Long Beach's waste-to-energy facility is merely one component of a larger waste reduction strategy - but it is an integral component, and the City values its benefits.

Continued operation of the waste-to-energy facility in Long Beach is not guaranteed, especially with significant upcoming changes that will impact the economics of the facility. While Long Beach values the numerous environmental benefits afforded by SERRF, it is imperative to the City that the facility is economically sustainable as well.

Given these reasons, the City of Long Beach supports CARB's 15-day language pertaining to Amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms, and looks forward to working with CARB on a path towards allowances.

Should you have any questions, please contact Diana Tang, Manager of Government Affairs, at 562-570-6506 or Diana.Tang@longbeach.gov.

Sincerely,

Patrick H. West  
CITY MANAGER

cc: California Air Resource Board Members

Attachment: [www.arb.ca.gov/lists/com-attach/151-capandtrade16-VyVWNVQzAyUAdVA1.pdf](http://www.arb.ca.gov/lists/com-attach/151-capandtrade16-VyVWNVQzAyUAdVA1.pdf)

Original File Name: Refuse Disposal Options\_1-20-17.pdf

Date and Time Comment Was Submitted: 2017-01-20 15:47:29

No Duplicates.

**Comment 41 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Amy

Last Name: Mmagu

Email Address: amy.mmagu@calchamber.com

Affiliation:

Subject: Comments on the Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Reg

Comment:

Please see attached document.

Attachment: [www.arb.ca.gov/lists/com-attach/152-capandtrade16-UzBWMQZ1VmdRCAhr.pdf](http://www.arb.ca.gov/lists/com-attach/152-capandtrade16-UzBWMQZ1VmdRCAhr.pdf)

Original File Name: CARB Cap and Trade Comments 1-20-2017.pdf

Date and Time Comment Was Submitted: 2017-01-20 15:54:35

No Duplicates.

## **Comment 42 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Tim

Last Name: Carmichael

Email Address: TCarmichael@semprautilities.com

Affiliation:

Subject: SDG&E Comments on 15-Day Cap-and-Trade Regulation Changes

Comment:

Attached are comments from San Diego Gas & Electric Company on the 15-Day Cap-and-Trade Regulation Changes with an attached letter from the joint utilities concerning recommendations to improve implementation of the RPS Adjustment.

Attachment: [www.arb.ca.gov/lists/com-attach/153-capandtrade16-VzZQIgdyVWUBbwNu.pdf](http://www.arb.ca.gov/lists/com-attach/153-capandtrade16-VzZQIgdyVWUBbwNu.pdf)

Original File Name: Attchmt to SDG&E Cap-and-Trade ltr-Jan2017 Jt Util Commts RPS Adjstm.pdf

Date and Time Comment Was Submitted: 2017-01-20 15:51:08

No Duplicates.

## **Comment 43 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Tom

Last Name: Flynn

Email Address: tom.flynn@pse.com

Affiliation:

Subject: Puget Sound Energy Comments to 15-day Modifications

Comment:

Please see attached letter with Puget Sound Energy's comments.

Attachment: [www.arb.ca.gov/lists/com-attach/154-capandtrade16-ViYFcFI2BAgAZQNs.pdf](http://www.arb.ca.gov/lists/com-attach/154-capandtrade16-ViYFcFI2BAgAZQNs.pdf)

Original File Name: PSE Comments CARB Proposed Amendments 1-20-2017.pdf

Date and Time Comment Was Submitted: 2017-01-20 15:56:16

No Duplicates.



**Comment 44 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: John

Last Name: Nagle

Email Address: john.nagle@ejgallo.com

Affiliation: E&J Gallo Winery

Subject: E&J Gallo Winery Comments on Post 2020 Cap and Trade AF

Comment:

Comments are provided on the attached document

Attachment: [www.arb.ca.gov/lists/com-attach/155-capandtrade16-VjMFaVEPBDQCZVcn.pdf](http://www.arb.ca.gov/lists/com-attach/155-capandtrade16-VjMFaVEPBDQCZVcn.pdf)

Original File Name: EJ\_Cap and Trade Comments on Dec 21st 2016 package\_FINAL.pdf

Date and Time Comment Was Submitted: 2017-01-20 15:43:59

No Duplicates.

## **Comment 45 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Katie  
Last Name: Sullivan  
Email Address: sullivan@ieta.org  
Affiliation: IETA

Subject: IETA Comments on Proposed C&T Regulation Amendments  
Comment:

Dear Staff

Attached, find IETA's comments on ARB's December 2016 "Proposed Amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulation".

We appreciate this opportunity to help inform ARB's future program.

Best,

Katie

Managing Director  
IETA

Attachment: [www.arb.ca.gov/lists/com-attach/156-capandtrade16-WjNQM1ciVWdSC1Az.pdf](http://www.arb.ca.gov/lists/com-attach/156-capandtrade16-WjNQM1ciVWdSC1Az.pdf)

Original File Name: IETA Comments\_ARB Proposed CT Reg Amendments 15-day day\_20Jan.pdf

Date and Time Comment Was Submitted: 2017-01-20 15:51:17

No Duplicates.

## **Comment 46 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Lynn  
Last Name: Bragg  
Email Address: lbragg@gpi.org  
Affiliation: Glass Packaging Institute (GPI)

Subject: Comments of the Glass Packaging Institute - California Cap on Greenhouse Gas Emissions

Comment:

Attached are the comments of the Glass Packaging Institute (GPI), in response to the December 21, 2016 ARB issued Modified Text and Availability of Additional Documents and/or Information for the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulation.

Regards,

Lynn

Lynn M. Bragg  
President  
Glass Packaging Institute (GPI)  
1220 N. Fillmore Street, Suite 400  
Arlington, VA 22201

Attachment: [www.arb.ca.gov/lists/com-attach/157-capandtrade16-B2EFalM8U2EBawZZ.doc](http://www.arb.ca.gov/lists/com-attach/157-capandtrade16-B2EFalM8U2EBawZZ.doc)

Original File Name: FINAL - Testimony of the Glass Packaging Institute to CARB 1-20-2017.doc

Date and Time Comment Was Submitted: 2017-01-20 16:05:13

No Duplicates.

**Comment 47 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Lynn

Last Name: Bragg

Email Address: lbragg@gpi.org

Affiliation: Glass Packaging Institute (GPI)

Subject: Glass Packaging Institute Comments (Attachment 1)

Comment:

Attachment 1, GPI Comments on California Cap on Greenhouse Gas Emissions and Market-Based Compliance.

Lynn

Lynn M. Bragg

Glass Packaging Institute (GPI)

1220 N. Fillmore Street, Suite 400

Arlington, VA 22201

Attachment: [www.arb.ca.gov/lists/com-attach/158-capandtrade16-BWZSNQRaWW1XPVU0.xls](http://www.arb.ca.gov/lists/com-attach/158-capandtrade16-BWZSNQRaWW1XPVU0.xls)

Original File Name: CA Glass Container Manufacturing - Recycled Glass Use 2005-2009.xls

Date and Time Comment Was Submitted: 2017-01-20 16:16:41

No Duplicates.

**Comment 48 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Erin  
Last Name: Grizard  
Email Address: Erin.Grizard@bloomenergy.com  
Affiliation:

Subject: Bloom Energy Comments on the 12/21/2016 Proposed Amendments to the CNT Regulation

Comment:

Dear Mr. Corey,

Bloom Energy provides the following comments on the 15-day amendment text for the Proposed Amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulation released December 21, 2016.

Sincerely,

Erin Grizard  
Bloom Energy

Attachment: [www.arb.ca.gov/lists/com-attach/160-capandtrade16-BzZVZFZnBWcFMQMz.pdf](http://www.arb.ca.gov/lists/com-attach/160-capandtrade16-BzZVZFZnBWcFMQMz.pdf)

Original File Name: 170120\_Bloom Cap-and-Trade Comments (00386698xBA8E1).pdf

Date and Time Comment Was Submitted: 2017-01-20 16:09:06

No Duplicates.

**Comment 49 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Nico

Last Name: van Aelstyn

Email Address: [nvanaelstyn@bdlaw.com](mailto:nvanaelstyn@bdlaw.com)

Affiliation:

Subject: Powerex Comments on 15-Day Proposed Amendments

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/161-capandtrade16-U2ECNFRkVjILIFJi.pdf](http://www.arb.ca.gov/lists/com-attach/161-capandtrade16-U2ECNFRkVjILIFJi.pdf)

Original File Name: 2017-01-20 Powerex Comments on CARB Proposed 15-Day Amendments.PDF

Date and Time Comment Was Submitted: 2017-01-20 16:26:52

No Duplicates.

**Comment 50 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Brock

Last Name: Costalupes

Email Address: brock.costalupes@mid.org

Affiliation: Modesto Irrigation District

Subject: Comments to Cap-and-Trade 15-Day Revisions

Comment:

MID submits the attached document containing comments on the cap-and-trade 15-day revisions package for review by the California Air Resources Board.

Attachment: [www.arb.ca.gov/lists/com-attach/162-capandtrade16-B2pVOlcyBAgKb1I9.pdf](http://www.arb.ca.gov/lists/com-attach/162-capandtrade16-B2pVOlcyBAgKb1I9.pdf)

Original File Name: MID Comments Cap-and-Trade Rulemaking 15-Day Package FINAL.pdf

Date and Time Comment Was Submitted: 2017-01-20 16:17:59

No Duplicates.

## **Comment 51 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Adamdam.smith@sce.co

Last Name: Smith

Email Address: adam.smith@sce.com

Affiliation:

Subject: Southern California Edison comments

Comment:

Southern California Edison comments on the 15-day language.

All the best,  
Adam R. Smith  
Manager, Climate Policy

Attachment: [www.arb.ca.gov/lists/com-attach/163-capandtrade16-UCNUMQdjVStSNwh8.pdf](http://www.arb.ca.gov/lists/com-attach/163-capandtrade16-UCNUMQdjVStSNwh8.pdf)

Original File Name: SCE-CT Comments Jan20.pdf

Date and Time Comment Was Submitted: 2017-01-20 16:32:27

No Duplicates.



## **Comment 52 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: John

Last Name: Bloom

Email Address: [laura@houstonmagnani.com](mailto:laura@houstonmagnani.com)

Affiliation: CSCME

Subject: Comments on Proposed Amendments to the CA Cap on GHG Emissions and Market-Based Compliance

Comment:

Attached are the comments concerning proposed amendments to the California cap on greenhouse gas emissions and market-based compliance mechanisms from the Coalition for Sustainable Cement Manufacturing & Environment (CSCME).

Attachment: [www.arb.ca.gov/lists/com-attach/164-capandtrade16-WzgHclcl1U20KaQEv.pdf](http://www.arb.ca.gov/lists/com-attach/164-capandtrade16-WzgHclcl1U20KaQEv.pdf)

Original File Name: CSCME.CommentLetter.VFINAL.(01.20.17).pdf

Date and Time Comment Was Submitted: 2017-01-20 16:30:18

No Duplicates.

**Comment 53 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Nathan

Last Name: Bengtsson

Email Address: NXBZ@pge.com

Affiliation:

Subject: PG&E Comments on Cap-and-Trade Regulation Amendment 15-Day Revisions  
Comment:

Please find PG&E's comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/165-capandtrade16-AHACY1M3VloAZQRr.pdf](http://www.arb.ca.gov/lists/com-attach/165-capandtrade16-AHACY1M3VloAZQRr.pdf)

Original File Name: PGE Comments on CT Amendment 15 Day Language.pdf

Date and Time Comment Was Submitted: 2017-01-20 16:34:55

No Duplicates.

**Comment 54 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Robin  
Last Name: Shropshire  
Email Address: rshropshire@ppmsllc.com  
Affiliation: Panoche Energy Center

Subject: PEC Comments  
Comment:

Please see attached comments

Attachment: [www.arb.ca.gov/lists/com-attach/166-capandtrade16-BnYCYQdlWFQBZAdo.pdf](http://www.arb.ca.gov/lists/com-attach/166-capandtrade16-BnYCYQdlWFQBZAdo.pdf)

Original File Name: PEC Comments to CT 1st 15 day amendments 1-20-17.pdf

Date and Time Comment Was Submitted: 2017-01-20 16:41:16

No Duplicates.

**Comment 55 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Ken

Last Name: Nold

Email Address: [krnold@tid.org](mailto:krnold@tid.org)

Affiliation:

Subject: TID Comments on Proposed Cap & Trade Amendments

Comment:

TID Comments on Proposed Cap & Trade Amendments

Attachment: [www.arb.ca.gov/lists/com-attach/167-capandtrade16-UGEGN1VkBGYBNQQ0.pdf](http://www.arb.ca.gov/lists/com-attach/167-capandtrade16-UGEGN1VkBGYBNQQ0.pdf)

Original File Name: 170120 TID Cap & Trade Comments.pdf

Date and Time Comment Was Submitted: 2017-01-20 16:44:22

No Duplicates.

## **Comment 56 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Susie

Last Name: berlin

Email Address: admin@susieberlinlaw.com

Affiliation: Northern California Power Agency (NCPA)

Subject: NCPA Comments on 15-Day Changes

Comment:

Comments of the Northern California Power Agency on December 21, 2016 Modified Text 15-Day to the Proposed Amendments to the Cap-and-Trade Program Regulation.

Attachment: [www.arb.ca.gov/lists/com-attach/168-capandtrade16-AmxRNFQIBzVRCAhr.pdf](http://www.arb.ca.gov/lists/com-attach/168-capandtrade16-AmxRNFQIBzVRCAhr.pdf)

Original File Name: NCPA Comments re First 15-day changes (final 1-20-17).pdf

Date and Time Comment Was Submitted: 2017-01-20 16:47:07

No Duplicates.

**Comment 57 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Justin

Last Name: Wynne

Email Address: wynne@braunlegal.com

Affiliation: California Muni. Utilities Association

Subject: CMUA Comments on Proposed 15-Day Modifications

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/169-capandtrade16-WzgFblQgU2EDWglq.pdf](http://www.arb.ca.gov/lists/com-attach/169-capandtrade16-WzgFblQgU2EDWglq.pdf)

Original File Name: CMUA Comments on Cap and Trade and MRR 15 Day Language  
1\_20\_17.pdf

Date and Time Comment Was Submitted: 2017-01-20 16:42:54

No Duplicates.

## **Comment 58 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Martin

Last Name: Hopper

Email Address: berlin@susieberlinlaw.com

Affiliation: M-S-R Public Power Agency

Subject: M-S-R Comments re 15-Day Changes

Comment:

M-S-R Public Power Agency Comments on 15-Day Changes to  
Cap-and-Trade Program Regulation.

Attachment: [www.arb.ca.gov/lists/com-attach/170-capandtrade16-BmsAKwd1VykJfwVa.pdf](http://www.arb.ca.gov/lists/com-attach/170-capandtrade16-BmsAKwd1VykJfwVa.pdf)

Original File Name: M-S-R comments re 15-day changes (1-20-17).pdf

Date and Time Comment Was Submitted: 2017-01-20 16:49:32

No Duplicates.

**Comment 59 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Nick

Last Name: Facciola

Email Address: [nick@OriginClimate.com](mailto:nick@OriginClimate.com)

Affiliation:

Subject: Cap-and-Trade benefits Californians

Comment:

Please see the attached.

Attachment: [www.arb.ca.gov/lists/com-attach/171-capandtrade16-WmhTZVNjBWFwflBh.pdf](http://www.arb.ca.gov/lists/com-attach/171-capandtrade16-WmhTZVNjBWFwflBh.pdf)

Original File Name: 2017.1.20 Comments on Cap-and-Trade 15-day Amendment.pdf

Date and Time Comment Was Submitted: 2017-01-20 16:50:03

No Duplicates.



## **Comment 60 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Steve

Last Name: Hance

Email Address: berlin@susieberlinlaw.com

Affiliation: City of Santa Clara, Silicon Valley Powe

Subject: City of Santa Clara/Silicon Valley Power comment on 15-Day Changes

Comment:

City of Santa Clara/Silicon Valley Power comment on 15-Day Changes  
to the Cap-and-Trade Program Regulation

Attachment: [www.arb.ca.gov/lists/com-attach/172-capandtrade16-AnEAZwdoWX4HYAdY.pdf](http://www.arb.ca.gov/lists/com-attach/172-capandtrade16-AnEAZwdoWX4HYAdY.pdf)

Original File Name: Santa Clara comments re EDU allowance allocation (1-20-17).pdf

Date and Time Comment Was Submitted: 2017-01-20 16:51:26

No Duplicates.

## **Comment 61 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: William

Last Name: Westerfield

Email Address: [william.westerfield@smud.org](mailto:william.westerfield@smud.org)

Affiliation: Sacramento Municipal Utility District

Subject: SMUD Comments on Proposed 2016 Cap and Trade Amendments

Comment:

SMUD Comments on Proposed 2016 Cap and Trade Amendments.

Attachment: [www.arb.ca.gov/lists/com-attach/173-capandtrade16-Am5RMII0BAhQZFV1.pdf](http://www.arb.ca.gov/lists/com-attach/173-capandtrade16-Am5RMII0BAhQZFV1.pdf)

Original File Name: LEG 2017-0028 SMUD Comments on Proposed 2016 Cap and Trade Amendments.pdf

Date and Time Comment Was Submitted: 2017-01-20 16:50:47

No Duplicates.

## **Comment 62 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Tim

Last Name: Carmichael

Email Address: tcarmichael@semprautilities.com

Affiliation:

Subject: SoCalGas Comments on CT 15-day changes

Comment:

Please find our comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/174-capandtrade16-BjdXfAY1VDcBKgg5.pdf](http://www.arb.ca.gov/lists/com-attach/174-capandtrade16-BjdXfAY1VDcBKgg5.pdf)

Original File Name: 1-20-17 FINAL SoCalGas Comments 15-Day CT Amendments.pdf

Date and Time Comment Was Submitted: 2017-01-20 16:54:35

No Duplicates.

**Comment 63 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: John

Last Name: Larrea

Email Address: john@clfp.com

Affiliation: CA League of Food Processors

Subject: Comments on Proposed Amends to Cap on GHG and Market Compliance Mechanisms  
Reg

Comment:

CLFP comments on Proposed amends to the California Cap on  
Greenhouse Gas Emissions and Market-Based Compliance Mechanisms  
Regulation

Attachment: [www.arb.ca.gov/lists/com-attach/175-capandtrade16-UDMBa1UyUHMFXAFi.pdf](http://www.arb.ca.gov/lists/com-attach/175-capandtrade16-UDMBa1UyUHMFXAFi.pdf)

Original File Name: CLFP Comments on Proposed Amends to GHG Cap and Market  
Mechanisms Reg.pdf

Date and Time Comment Was Submitted: 2017-01-20 16:53:46

No Duplicates.

## **Comment 64 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Jerry  
Last Name: Secundy  
Email Address: jerrys@cceeb.org  
Affiliation: CCEEB

Subject: CnT and MRR comments  
Comment:

CCEEB's comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/176-capandtrade16-WzYFcVMgUV0LbFA+.pdf](http://www.arb.ca.gov/lists/com-attach/176-capandtrade16-WzYFcVMgUV0LbFA+.pdf)

Original File Name: MRR and CT - CCEEB Comments January 20\_2017 - Final.pdf

Date and Time Comment Was Submitted: 2017-01-20 16:50:58

No Duplicates.

## **Comment 65 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Diana

Last Name: Lee

Email Address: [diana.lee@cpuc.ca.gov](mailto:diana.lee@cpuc.ca.gov)

Affiliation: CPUC/ORCA

Subject: ORA Comments on GHG market based compliance regulation

Comment:

Please see ORA's attached comments re the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulation.

Thank you

Attachment: [www.arb.ca.gov/lists/com-attach/177-capandtrade16-VjlcKAdnBDQFbAlk.pdf](http://www.arb.ca.gov/lists/com-attach/177-capandtrade16-VjlcKAdnBDQFbAlk.pdf)

Original File Name: ORAComments CARBCTand MarketBasedCompliance 1.20.17 FINAL.pdf

Date and Time Comment Was Submitted: 2017-01-20 16:54:47

No Duplicates.

**Comment 66 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Kevin  
Last Name: Townsend  
Email Address: ktownsend@bluesource.com  
Affiliation: Blue Source

Subject: Comments  
Comment:

Please see attached

Attachment: [www.arb.ca.gov/lists/com-attach/178-capandtrade16-WzhTOgNvAjwCYVc5.pdf](http://www.arb.ca.gov/lists/com-attach/178-capandtrade16-WzhTOgNvAjwCYVc5.pdf)

Original File Name: Comment Letter\_Blue Source\_012017.pdf

Date and Time Comment Was Submitted: 2017-01-20 16:59:25

No Duplicates.

**Comment 67 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Tim

Last Name: Carmichael

Email Address: tcarmichael@semprautilities.com

Affiliation:

Subject: Gas Utility Group comments on CT 15 day changes

Comment:

please find comments attached

Attachment: [www.arb.ca.gov/lists/com-attach/179-capandtrade16-UWAAKwAzB2QLIAMy.pdf](http://www.arb.ca.gov/lists/com-attach/179-capandtrade16-UWAAKwAzB2QLIAMy.pdf)

Original File Name: 1-20-17 FINAL GUG Comments 15-Day CT Amendments3.pdf

Date and Time Comment Was Submitted: 2017-01-20 17:01:38

No Duplicates.



**Comment 68 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Michael

Last Name: Shaw

Email Address: mshaw@cmta.net

Affiliation: CMTA

Subject: capandtrade16 Comments

Comment:

CMTA comments on 15-day amendment package.

Attachment: [www.arb.ca.gov/lists/com-attach/180-capandtrade16-UjEFbInBzVXDghr.pdf](http://www.arb.ca.gov/lists/com-attach/180-capandtrade16-UjEFbInBzVXDghr.pdf)

Original File Name: CMTA Cap and Trade Amendments Comments 1-20-2017.pdf

Date and Time Comment Was Submitted: 2017-01-20 17:02:24

No Duplicates.

## **Comment 69 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Catherine

Last Name: Reheis-Boyd

Email Address: Non-web submitted comment

Affiliation: WSPA

Subject: WSPA Comments on ARB's First 15-day Package for the AB 32 Cap & Trade Regulation

Comment:

Late Comment.

See Attached.

Attachment: [www.arb.ca.gov/lists/com-attach/181-capandtrade16-VCNRJFEgBTdXDIAz.pdf](http://www.arb.ca.gov/lists/com-attach/181-capandtrade16-VCNRJFEgBTdXDIAz.pdf)

Original File Name: WSPA Comment Letter\_AB 32 Cap\_Trade\_01\_20\_2017 Final.pdf

Date and Time Comment Was Submitted: 2017-02-01 08:48:40

No Duplicates.

## **Comment 70 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Adam

Last Name: Smith

Email Address: Non-web submitted comment

Affiliation: Southern California Edison

Subject: JUG Comments on Proposed Electric Distribution Utility Allowance Allocation

Comment:

Late Comment.

See Attached.

Attachment: [www.arb.ca.gov/lists/com-attach/182-capandtrade16-AWtQI1YwVFgDaQFk.pdf](http://www.arb.ca.gov/lists/com-attach/182-capandtrade16-AWtQI1YwVFgDaQFk.pdf)

Original File Name: JUG Letter on EDU Allocation 2-6-2017.pdf

Date and Time Comment Was Submitted: 2017-02-08 12:32:17

No Duplicates.

## **Comment 71 for Cap and Trade 2016 (capandtrade16) - 15-1.**

First Name: Angus

Last Name: Crane

Email Address: Non-web submitted comment

Affiliation:

Subject: NAIMA Recommendation on Alternative Calculation Method for Mineral Wool Assistance F

Comment:

Late Comment.

See Attached

Attachment: [www.arb.ca.gov/lists/com-attach/183-capandtrade16-VzIWMQdvUG5QNwcp.pdf](http://www.arb.ca.gov/lists/com-attach/183-capandtrade16-VzIWMQdvUG5QNwcp.pdf)

Original File Name: NAIMA.pdf

Date and Time Comment Was Submitted: 2017-04-13 12:50:23

No Duplicates.

## **Comment 1 for Cap and Trade 2016 (capandtrade16) - 15-2.**

First Name: Timothy

Last Name: Brown

Email Address: [tim.brown@solvay.com](mailto:tim.brown@solvay.com)

Affiliation: Solvay Chemicals, Inc.

Subject: Comments to proposed amendments to California cap-and-trade regulation

Comment:

See attached uploaded comment letter

Attachment: [www.arb.ca.gov/lists/com-attach/184-capandtrade16-UGQBKIZIVjEAKwQ1.pdf](http://www.arb.ca.gov/lists/com-attach/184-capandtrade16-UGQBKIZIVjEAKwQ1.pdf)

Original File Name: 4-24-17 Signed Comment Letter.pdf

Date and Time Comment Was Submitted: 2017-04-24 09:24:35

No Duplicates.

## **Comment 2 for Cap and Trade 2016 (capandtrade16) - 15-2.**

First Name: DILLON

Last Name: KASS

Email Address: dkass@windset.com

Affiliation: WINDSET FARMS

Subject: Comments on Leakage Analysis for Ag Operations

Comment:

Windset Farms appreciates the opportunity to provide the attached letter to communicate our comments regarding the Leakage Analysis for Agricultural Operations.

Attachment: [www.arb.ca.gov/lists/com-attach/186-capandtrade16-VCNTPAFuU2RSJ1cy.pdf](http://www.arb.ca.gov/lists/com-attach/186-capandtrade16-VCNTPAFuU2RSJ1cy.pdf)

Original File Name: Windset Farms Comments on Leakage Analysis 4.20.2017.pdf

Date and Time Comment Was Submitted: 2017-04-25 15:36:24

No Duplicates.

### **Comment 3 for Cap and Trade 2016 (capandtrade16) - 15-2.**

First Name: Advisory Commitee  
Last Name: Environmental Justic  
Email Address: ombcomm@arb.ca.gov  
Affiliation:

Subject: Environmental Justice Advisory Committee Industry Recommendations  
Comment:

Please see attachment.

Attachment: [www.arb.ca.gov/lists/com-attach/187-capandtrade16-UTQFaV09UWEDWgh7.pdf](http://www.arb.ca.gov/lists/com-attach/187-capandtrade16-UTQFaV09UWEDWgh7.pdf)

Original File Name: EJAC\_SP\_Recommendations033017Industry.pdf

Date and Time Comment Was Submitted: 2017-04-26 11:04:22

No Duplicates.

**Comment 4 for Cap and Trade 2016 (capandtrade16) - 15-2.**

First Name: Nicol

Last Name: Gagstetter

Email Address: nicol.gagstetter@riotinto.com

Affiliation:

Subject: Comment on Modified 15 Day California Cap and Trade Text - April 2017

Comment:

We submit the following comments for consideration.

Attachment: [www.arb.ca.gov/lists/com-attach/188-capandtrade16-BXcBcwFiBwsFYAZn.pdf](http://www.arb.ca.gov/lists/com-attach/188-capandtrade16-BXcBcwFiBwsFYAZn.pdf)

Original File Name: RTB CARB 15 Day Amdt Comments April 28 2017.pdf

Date and Time Comment Was Submitted: 2017-04-27 10:51:51

No Duplicates.



**Comment 5 for Cap and Trade 2016 (capandtrade16) - 15-2.**

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

## **Comment 6 for Cap and Trade 2016 (capandtrade16) - 15-2.**

First Name: Sarah

Last Name: Taheri

Email Address: staheri@scppa.org

Affiliation: Southern Calif. Public Power Authority

Subject: SCPPA Comments on the Second 15-Day Modifications to the Cap-and-Trade Program Regulations

Comment:

Please see the attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/190-capandtrade16-BXZUMVAhV3RRNlcI.pdf](http://www.arb.ca.gov/lists/com-attach/190-capandtrade16-BXZUMVAhV3RRNlcI.pdf)

Original File Name: SCPPA Comments on Cap-and-Trade Second 15-Day Amendments 04-28-2017\_Final.pdf

Date and Time Comment Was Submitted: 2017-04-27 17:24:09

No Duplicates.

**Comment 7 for Cap and Trade 2016 (capandtrade16) - 15-2.**

First Name: Jim

Last Name: Halloran

Email Address: JPH@CAT.COM

Affiliation:

Subject: Solar Turbines Second Notice Comments

Comment:

Please see attached....

Attachment: [www.arb.ca.gov/lists/com-attach/191-capandtrade16-AnFQOVM+V2UFcVIN.pdf](http://www.arb.ca.gov/lists/com-attach/191-capandtrade16-AnFQOVM+V2UFcVIN.pdf)

Original File Name: Solar Turbine C&T.pdf

Date and Time Comment Was Submitted: 2017-04-27 21:48:49

No Duplicates.

## **Comment 8 for Cap and Trade 2016 (capandtrade16) - 15-2.**

First Name: Melissa

Last Name: Poole

Email Address: melissa.poole@wonderful.com

Affiliation: The Wonderful Company

Subject: Wonderful Company Comments on April 2017 C&T Regulations

Comment:

Please see attached comments on the proposed amendments to the regulatory text for the California Cap and Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulations.

Attachment: [www.arb.ca.gov/lists/com-attach/192-capandtrade16-B3NwJ1w+AAxQNwJw.pdf](http://www.arb.ca.gov/lists/com-attach/192-capandtrade16-B3NwJ1w+AAxQNwJw.pdf)

Original File Name: TWC ARB 4.28.17\_Comments.pdf

Date and Time Comment Was Submitted: 2017-04-28 08:46:51

No Duplicates.

## **Comment 9 for Cap and Trade 2016 (capandtrade16) - 15-2.**

First Name: Andrew  
Last Name: Ulmer  
Email Address: [aulmer@caiso.com](mailto:aulmer@caiso.com)  
Affiliation: California ISO

Subject: ISO Comments on ARB 15 Day Notice Cap and Trade Regulation  
Comment:

Please find attached comments of the California ISO on ARB's 15 day notice of changes. This version replaces the version submitted yesterday that had an incorrect date. Kindly discard that submission.

Thank you in advance for your consideration.

Andrew

Andrew Ulmer  
Director, Federal Regulatory Affairs  
California Independent System Operator Corp.  
Tel. 916.608.7209  
Cell. 916.673.7797

Attachment: [www.arb.ca.gov/lists/com-attach/193-capandtrade16-VTYGYV0uBTRVDAI7.pdf](http://www.arb.ca.gov/lists/com-attach/193-capandtrade16-VTYGYV0uBTRVDAI7.pdf)

Original File Name: CARB\_Regulations\_Comments\_20170428.pdf

Date and Time Comment Was Submitted: 2017-04-28 09:03:21

No Duplicates.

## **Comment 10 for Cap and Trade 2016 (capandtrade16) - 15-2.**

First Name: Miles

Last Name: Heller

Email Address: miles.t.heller@tsocorp.com

Affiliation: Tesoro

Subject: Limited Exemption Concern

Comment:

Tesoro disagrees with CARB's proposed revision to the limited exemption calculation in 95920(d)(2)(F). The proposal will substantially reduce our ability to manage the allowances needed for compliance and current compliance flexibility found in the regulation. We specifically oppose the reduction in the limited exemption by the amount of allowances that are required to be surrendered when an annual compliance obligation is due. We understand that CARB has proposed this in order to provide some 'equivalency' to linked programs in Canada, but the Canadian provinces do not have an annual surrender obligation so there is no need for CARB to reduce our compliance flexibility based on the approach in Canada. That is to say that the Canada requirements for surrender of obligations are already different than those in California; therefore, there is no need for equivalency in the amount of the limited exemption. This recent proposed change, when added to existing restrictive holding limits, just makes compliance more difficult for entities with large compliance obligations and adds no program environmental benefit.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2017-04-28 10:27:54

No Duplicates.

## **Comment 11 for Cap and Trade 2016 (capandtrade16) - 15-2.**

First Name: Suzy

Last Name: Hong

Email Address: shong@goodinmacbride.com

Affiliation: USS-POSCO Industries

Subject: UPI Comments on Proposed Amendments to C&T Regulation

Comment:

Please find attached USS-POSCO Industries Comments on Proposed Amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms. If you have any questions concerning this document or any difficulty with the attachment, please contact me at shong@goodinmacbride.com or (415) 392-7900.

Best regards,  
Suzy Hong

Attachment: [www.arb.ca.gov/lists/com-attach/195-capandtrade16-UCUGcF01Ag4FYFU6.pdf](http://www.arb.ca.gov/lists/com-attach/195-capandtrade16-UCUGcF01Ag4FYFU6.pdf)

Original File Name: UPI Comments on proposed C&T amendments (4-28-17).pdf

Date and Time Comment Was Submitted: 2017-04-28 11:24:52

No Duplicates.

## **Comment 12 for Cap and Trade 2016 (capandtrade16) - 15-2.**

First Name: Elysia

Last Name: Treanor

Email Address: elysia.treanor@pgn.com

Affiliation:

Subject: Portland General Electric Company Comments - 2nd 15 day amendment text  
Comment:

Please find attached Portland General Electric Company's comments on the 2nd 15 day amendment text.

Attachment: [www.arb.ca.gov/lists/com-attach/196-capandtrade16-VCRRMFUxUFxWMwRr.pdf](http://www.arb.ca.gov/lists/com-attach/196-capandtrade16-VCRRMFUxUFxWMwRr.pdf)

Original File Name: PGE Comments on CARB 2017 2nd 15 day package.pdf

Date and Time Comment Was Submitted: 2017-04-28 11:41:13

No Duplicates.



**Comment 13 for Cap and Trade 2016 (capandtrade16) - 15-2.**

First Name: Nico

Last Name: van Aelstyn

Email Address: [nvanaelstyn@sheppardmullin.com](mailto:nvanaelstyn@sheppardmullin.com)

Affiliation: Sheppard Mullin Richter & Hampton LLP

Subject: Powerex Corp. Comments on Second 15-Day Rulemaking  
Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/197-capandtrade16-AjBRZ1FhVzMLUldn.pdf](http://www.arb.ca.gov/lists/com-attach/197-capandtrade16-AjBRZ1FhVzMLUldn.pdf)

Original File Name: 2017 04 28 Powerex Comments on Second 15-Day Rulemaking.pdf

Date and Time Comment Was Submitted: 2017-04-28 12:39:58

No Duplicates.

## **Comment 14 for Cap and Trade 2016 (capandtrade16) - 15-2.**

First Name: Amy

Last Name: Mmagu

Email Address: amy.mmagu@calchamber.com

Affiliation:

Subject: Comments on the amendments to California Cap and Trade Regulation

Comment:

Please see attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/199-capandtrade16-UGQBKVJhVj1SegAx.pdf](http://www.arb.ca.gov/lists/com-attach/199-capandtrade16-UGQBKVJhVj1SegAx.pdf)

Original File Name: 4.28.17 CalChamber Comments on C&T amendments.pdf

Date and Time Comment Was Submitted: 2017-04-28 13:40:48

No Duplicates.

## **Comment 15 for Cap and Trade 2016 (capandtrade16) - 15-2.**

First Name: Steve

Last Name: Hance

Email Address: admin@susieberlinlaw.com

Affiliation: City of Santa Clara, Silicon Valley Powe

Subject: City of Santa Clara/Silicon Valley Power comment on Second 15-Day Changes

Comment:

Attached please find the City of Santa Clara/Silicon Valley Power comments on the second 15-day changes.

Attachment: [www.arb.ca.gov/lists/com-attach/200-capandtrade16-ViUBZlc4WH9QN1UK.pdf](http://www.arb.ca.gov/lists/com-attach/200-capandtrade16-ViUBZlc4WH9QN1UK.pdf)

Original File Name: Santa Clara comments re EDU allowance allocation (4-28-17).pdf

Date and Time Comment Was Submitted: 2017-04-28 13:52:30

No Duplicates.

## **Comment 16 for Cap and Trade 2016 (capandtrade16) - 15-2.**

First Name: Jodean

Last Name: Giese

Email Address: jodean.giese@ladwp.com

Affiliation: LADWP

Subject: LADWP Comments on 2nd 15-Day Amendments

Comment:

Please see attached letter.

Attachment: [www.arb.ca.gov/lists/com-attach/201-capandtrade16-AW1cOwBIUHQAclI.pdf](http://www.arb.ca.gov/lists/com-attach/201-capandtrade16-AW1cOwBIUHQAclI.pdf)

Original File Name: LADWP Comments on 2nd 15-Day Amendment Text.pdf

Date and Time Comment Was Submitted: 2017-04-28 14:04:48

No Duplicates.

## **Comment 17 for Cap and Trade 2016 (capandtrade16) - 15-2.**

First Name: John

Last Name: Larrea

Email Address: john@clfp.com

Affiliation: CA League of Food Processors

Subject: Comments on Proposed Amends to Cap on GHG and Market Compliance Mechanisms  
Reg

Comment:

CLFP Comments. Final form. Accidentally sent draft previously.  
Please use this one.

Call if have questions

John Larrea

Attachment: [www.arb.ca.gov/lists/com-attach/203-capandtrade16-VDddN106ByRSCwZl.pdf](http://www.arb.ca.gov/lists/com-attach/203-capandtrade16-VDddN106ByRSCwZl.pdf)

Original File Name: CLFP Comments on Proposed Amends to MRR Regulation.pdf

Date and Time Comment Was Submitted: 2017-04-28 14:33:10

No Duplicates.

**Comment 18 for Cap and Trade 2016 (capandtrade16) - 15-2.**

First Name: Peter

Last Name: Weiner

Email Address: peterweiner@paulhastings.com

Affiliation: Crockett Cogeneration

Subject: Comments of Crockett Cogeneration

Comment:

Please see attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/205-capandtrade16-BmVcNVc7VGoEZ1I8.pdf](http://www.arb.ca.gov/lists/com-attach/205-capandtrade16-BmVcNVc7VGoEZ1I8.pdf)

Original File Name: Comments of Crockett Cogeneration (Apr. 28, 2017).pdf

Date and Time Comment Was Submitted: 2017-04-28 14:58:47

No Duplicates.

## **Comment 19 for Cap and Trade 2016 (capandtrade16) - 15-2.**

First Name: Katelyn

Last Name: Roedner Sutter

Email Address: kroedner@edf.org

Affiliation: Environmental Defense Fund

Subject: Proposed Second 15-Day Change Amendments

Comment:

Attached please find comments from the Environmental Defense Fund regarding the proposed Second 15-Day Change Amendments package, as well as a relevant letter to the editor from the Environmental Defense Fund to the journal "Nature."

Thank you for your consideration.

Attachment: [www.arb.ca.gov/lists/com-attach/206-capandtrade16-BjcCMVEPAjULbAlw.zip](http://www.arb.ca.gov/lists/com-attach/206-capandtrade16-BjcCMVEPAjULbAlw.zip)

Original File Name: 15 day C&T comments April 2017.zip

Date and Time Comment Was Submitted: 2017-04-28 15:01:14

No Duplicates.

## **Comment 20 for Cap and Trade 2016 (capandtrade16) - 15-2.**

First Name: James

Last Name: Hendry

Email Address: [jhendry@sfgwater.org](mailto:jhendry@sfgwater.org)

Affiliation: San Francisco Public Utilities Commissio

Subject: SFPUC Comments on 2nd 15-day cap and trade package

Comment:

Attached please find the comments of the San Francisco Public Utilities Commission on the 2nd 15-day package associated with CARB's development of its "Proposed Amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanism Regulation."

Attachment: [www.arb.ca.gov/lists/com-attach/207-capandtrade16-WilXN1QIWX8Kb1UK.doc](http://www.arb.ca.gov/lists/com-attach/207-capandtrade16-WilXN1QIWX8Kb1UK.doc)

Original File Name: SFPUC Comments on CARB Proposal on 2nd 15-day package Cap-and-Trade April 28, 2017.doc

Date and Time Comment Was Submitted: 2017-04-28 15:18:14

No Duplicates.



**Comment 21 for Cap and Trade 2016 (capandtrade16) - 15-2.**

First Name: Robin  
Last Name: Shropshire  
Email Address: rshropshire@ppmsllc.com  
Affiliation: Panoche Energy Center

Subject: PEC Comments  
Comment:

Please find attached PEC's Comments

Attachment: [www.arb.ca.gov/lists/com-attach/208-capandtrade16-ViYFZgRmV1sGYwlm.pdf](http://www.arb.ca.gov/lists/com-attach/208-capandtrade16-ViYFZgRmV1sGYwlm.pdf)

Original File Name: PEC Comments to Proposed CT 2nd 15 day amendments.pdf

Date and Time Comment Was Submitted: 2017-04-28 15:27:37

No Duplicates.

## **Comment 22 for Cap and Trade 2016 (capandtrade16) - 15-2.**

First Name: Susie

Last Name: Berlin

Email Address: admin@susieberlinlaw.com

Affiliation: Northern California Power Agency (NCPA)

Subject: NCPA Comments on Second 15-Day Changes

Comment:

Attached please find the Northern California Power Agency comments on the second 15-day changes.

Attachment: [www.arb.ca.gov/lists/com-attach/210-capandtrade16-AG4CZ1cmBDZWDwZl.pdf](http://www.arb.ca.gov/lists/com-attach/210-capandtrade16-AG4CZ1cmBDZWDwZl.pdf)

Original File Name: NCPA Comments re 2d - 15-day changes (final 4-28-17).pdf

Date and Time Comment Was Submitted: 2017-04-28 15:27:52

No Duplicates.

**Comment 23 for Cap and Trade 2016 (capandtrade16) - 15-2.**

First Name: Nathan  
Last Name: Bengtsson  
Email Address: NXBZ@pge.com  
Affiliation:

Subject: PG&E Comments on April 2017 Cap-and-Trade 15-Day Text  
Comment:

PG&E's comments are attached.

Attachment: [www.arb.ca.gov/lists/com-attach/211-capandtrade16-AWcBbgRrVGZROwlW.pdf](http://www.arb.ca.gov/lists/com-attach/211-capandtrade16-AWcBbgRrVGZROwlW.pdf)

Original File Name: FINAL - PGE Comments on April 2017 15-Day Cap-and-Trade  
4.28.17.pdf

Date and Time Comment Was Submitted: 2017-04-28 15:28:25

No Duplicates.

## **Comment 24 for Cap and Trade 2016 (capandtrade16) - 15-2.**

First Name: Rachael  
Last Name: O'Brien  
Email Address: rachael@agcouncil.org  
Affiliation: Ag Council

Subject: 2nd 15-day Comments on Cap-and-Trade and MRR  
Comment:

Ag Council appreciates the opportunity to comment in response to the April 13, 2017, Proposed Amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulation and the Proposed Amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions.

Attachment: [www.arb.ca.gov/lists/com-attach/212-capandtrade16-UDFSMwBiVmpWJQBu.pdf](http://www.arb.ca.gov/lists/com-attach/212-capandtrade16-UDFSMwBiVmpWJQBu.pdf)

Original File Name: AgCouncil\_ARB MRR 2nd 15-Day Comment Letter.pdf

Date and Time Comment Was Submitted: 2017-04-28 15:25:48

No Duplicates.

## **Comment 25 for Cap and Trade 2016 (capandtrade16) - 15-2.**

First Name: Keith

Last Name: Adams

Email Address: adamskb@airproducts.com

Affiliation: Air Products and Chemicals, Inc.

Subject: Comments on Second Proposed 15-Day Amendments to CA Cap & Trade Program  
Comment:

Air Products comments on Second Proposed 15-Day Amendments to CA  
Cap & Trade Program

Attachment: [www.arb.ca.gov/lists/com-attach/213-capandtrade16-BWQBblckBQkDdQBy.pdf](http://www.arb.ca.gov/lists/com-attach/213-capandtrade16-BWQBblckBQkDdQBy.pdf)

Original File Name: Air Products Comments - Proposed cap and trade regulation amendments -  
April 28 2017.pdf

Date and Time Comment Was Submitted: 2017-04-28 15:31:36

No Duplicates.

## **Comment 26 for Cap and Trade 2016 (capandtrade16) - 15-2.**

First Name: Severin

Last Name: Borenstein

Email Address: severinborenstein@berkeley.edu

Affiliation: University of California

Subject: California Cap on Greenhouse Gas Emissions and Market-Based Compliance Measures  
Comment:

our comments are in the attached

Attachment: [www.arb.ca.gov/lists/com-attach/214-capandtrade16-BmdWIGNgUmIEbQVo.pdf](http://www.arb.ca.gov/lists/com-attach/214-capandtrade16-BmdWIGNgUmIEbQVo.pdf)

Original File Name: ARBcomment170428\_Final.pdf

Date and Time Comment Was Submitted: 2017-04-28 16:01:02

No Duplicates.

## **Comment 27 for Cap and Trade 2016 (capandtrade16) - 15-2.**

First Name: Shelly

Last Name: Sullivan

Email Address: [ssullivan@onemain.com](mailto:ssullivan@onemain.com)

Affiliation: Climate Change Policy Coalition

Subject: CCPC Comments on the Proposed Amendments to the GHG Market Mechanism and MRR

Comment:

Attached please find the CCPC comments regarding proposed amendments to both the GHG emissions market-based compliance mechanisms and the MRR regulations.

If you have any questions please feel free to contact us.

Attachment: [www.arb.ca.gov/lists/com-attach/215-capandtrade16-BWYAZVwtBDQBWFAz.pdf](http://www.arb.ca.gov/lists/com-attach/215-capandtrade16-BWYAZVwtBDQBWFAz.pdf)

Original File Name: CCPC\_C\_T\_MRR\_Coments\_4\_28\_17.pdf

Date and Time Comment Was Submitted: 2017-04-28 15:57:41

No Duplicates.

**Comment 28 for Cap and Trade 2016 (capandtrade16) - 15-2.**

First Name: Fariya

Last Name: Ali

Email Address: fxao@pge.com

Affiliation: PG&E

Subject: Gas Utility Group (GUG) Comments on Second 15-Day Cap-and-Trade Changes  
Comment:

See attached letter.

Attachment: [www.arb.ca.gov/lists/com-attach/216-capandtrade16-UGQAK1xvBW5SeVNi.pdf](http://www.arb.ca.gov/lists/com-attach/216-capandtrade16-UGQAK1xvBW5SeVNi.pdf)

Original File Name: 4-28-17 Final 15-Day CT Amendments GUG Letter\_Final.pdf

Date and Time Comment Was Submitted: 2017-04-28 15:38:34

No Duplicates.



## **Comment 29 for Cap and Trade 2016 (capandtrade16) - 15-2.**

First Name: Gerald  
Last Name: Secundy  
Email Address: jerrys@cceb.org  
Affiliation:

Subject: CCEEB CnT April 15-Day Comments  
Comment:

Attached is a comment letter from the California Council for Environmental and Economic Balance.

Attachment: [www.arb.ca.gov/lists/com-attach/217-capandtrade16-UDNVMFUxVmAAZAVa.pdf](http://www.arb.ca.gov/lists/com-attach/217-capandtrade16-UDNVMFUxVmAAZAVa.pdf)

Original File Name: CCEEB CnT April 15-Day Comments\_4-28.pdf

Date and Time Comment Was Submitted: 2017-04-28 16:04:50

No Duplicates.

## **Comment 30 for Cap and Trade 2016 (capandtrade16) - 15-2.**

First Name: Kevin

Last Name: Townsend

Email Address: ktownsend@bluesource.com

Affiliation: Bluesource

Subject: Bluesource Comments to Proposed Amendments

Comment:

Thank you for the opportunity to comment.

Attachment: [www.arb.ca.gov/lists/com-attach/218-capandtrade16-UjEBZlAhUV1RNglN.pdf](http://www.arb.ca.gov/lists/com-attach/218-capandtrade16-UjEBZlAhUV1RNglN.pdf)

Original File Name: Cap and Trade Amendment Comments\_Blue Source\_042817.pdf

Date and Time Comment Was Submitted: 2017-04-28 16:13:49

No Duplicates.

**Comment 31 for Cap and Trade 2016 (capandtrade16) - 15-2.**

First Name: William

Last Name: Westerfield

Email Address: [william.westerfield@smud.org](mailto:william.westerfield@smud.org)

Affiliation:

Subject: SMUD Comments on April 13th Proposed Cap and Trade Amendments

Comment:

SMUD Comments on April 13th Proposed Cap and Trade Amendments.

Attachment: [www.arb.ca.gov/lists/com-attach/219-capandtrade16-B2tSMVM1BwsBNQY2.pdf](http://www.arb.ca.gov/lists/com-attach/219-capandtrade16-B2tSMVM1BwsBNQY2.pdf)

Original File Name: LEG 2017-0212 SMUD Comments Cap and Trade.pdf

Date and Time Comment Was Submitted: 2017-04-28 16:13:49

No Duplicates.

## **Comment 32 for Cap and Trade 2016 (capandtrade16) - 15-2.**

First Name: Samuel

Last Name: Bayless

Email Address: bayless@cioma.com

Affiliation: California Independent Oil Marketers

Subject: CIOMA Comments Cap and Trade Amendments

Comment:

The California Independent Oil Marketers Association (CIOMA) represents about 300 members, including nearly 90% of all the independent petroleum marketers in the state and about one quarter of the state's 10,000 service stations. Our members are small, family- and minority-owned businesses that provide services to nearly every family in California. Additionally, CIOMA members fuel local governments, law enforcement, city and county fire departments, ambulances/emergency vehicles, school district bus fleets, construction firms, marinas, public and private transit companies, hospital emergency generators, trucking fleets, independent fuel retailers (small chains and mom-and-pop gas stations) and California agriculture, among many others.

Attachment: [www.arb.ca.gov/lists/com-attach/220-capandtrade16-UTJRPgBuU21XMAFe.pdf](http://www.arb.ca.gov/lists/com-attach/220-capandtrade16-UTJRPgBuU21XMAFe.pdf)

Original File Name: CIOMA Cap and Trade 15 day Notice Comments.pdf

Date and Time Comment Was Submitted: 2017-04-28 16:23:49

No Duplicates.

## **Comment 33 for Cap and Trade 2016 (capandtrade16) - 15-2.**

First Name: Adam

Last Name: Smith

Email Address: adam.smith@sce.com

Affiliation: Southern California Edison

Subject: Southern California Edison comments

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/221-capandtrade16-VSYBZFYyB3IRNAh8.pdf](http://www.arb.ca.gov/lists/com-attach/221-capandtrade16-VSYBZFYyB3IRNAh8.pdf)

Original File Name: SCE-CT Comments Apr28.pdf

Date and Time Comment Was Submitted: 2017-04-28 16:27:41

No Duplicates.

## **Comment 34 for Cap and Trade 2016 (capandtrade16) - 15-2.**

First Name: Kelsey

Last Name: Gowans

Email Address: kelsey.gowans@mid.org

Affiliation: Modesto Irrigation District

Subject: Modesto Irrigation District's Comments on the Second Cap-and-Trade Rulemaking 15-Day Packa

Comment:

Please see the attached comments on behalf of the Modesto Irrigation District.

Attachment: [www.arb.ca.gov/lists/com-attach/222-capandtrade16-VjsBbl04AAwGYwBv.pdf](http://www.arb.ca.gov/lists/com-attach/222-capandtrade16-VjsBbl04AAwGYwBv.pdf)

Original File Name: MID Comments Cap-and-Trade Rulemaking Second 15-Day Package 4\_28\_17.pdf

Date and Time Comment Was Submitted: 2017-04-28 16:28:23

No Duplicates.

## **Comment 35 for Cap and Trade 2016 (capandtrade16) - 15-2.**

First Name: Dan  
Last Name: Severson  
Email Address: dbseverson@TID.ORG  
Affiliation:

Subject: TID Comments of the Cap-and-Trade Regulatory Amendments Noticed on April 13, 2017

Comment:

Ms. Rajinder Sahota,

Please find attached Turlock Irrigation District's ("TID") comments on the Cap-and-Trade Regulatory Amendments that were noticed on April 13, 2017. Thank you.

Sincerely,

Dan B. Severson and Ken R. Nold  
Turlock Irrigation District

Attachment: [www.arb.ca.gov/lists/com-attach/223-capandtrade16-UGFdbAAxWD8LPwU9.pdf](http://www.arb.ca.gov/lists/com-attach/223-capandtrade16-UGFdbAAxWD8LPwU9.pdf)

Original File Name: 170428\_TID Comments on Cap-and-Trade Second 15-Day Language (00396771xBA8E1).pdf

Date and Time Comment Was Submitted: 2017-04-28 16:16:25

No Duplicates.

**Comment 36 for Cap and Trade 2016 (capandtrade16) - 15-2.**

First Name: Adam

Last Name: Smith

Email Address: adam.smith@sce.com

Affiliation: Joint Utility Group

Subject: Joint Utility Group comments

Comment:

Please see the attached.

Attachment: [www.arb.ca.gov/lists/com-attach/224-capandtrade16-VzFXOFY5U2FSOFQL.pdf](http://www.arb.ca.gov/lists/com-attach/224-capandtrade16-VzFXOFY5U2FSOFQL.pdf)

Original File Name: FINAL LETTER- JUG Allowance Allocation.pdf

Date and Time Comment Was Submitted: 2017-04-28 16:32:10

No Duplicates.



**Comment 37 for Cap and Trade 2016 (capandtrade16) - 15-2.**

First Name: Martin

Last Name: Hopper

Email Address: admin@susieberlinlaw.com

Affiliation: M-S-R Public Power Agency

Subject: M-S-R Comments re second 15-Day Changes

Comment:

Attached please find the M-S-R Public Power Agency comments on the second 15-day changes.

thank you and have a nice weekend.

Attachment: [www.arb.ca.gov/lists/com-attach/225-capandtrade16-Uz5Qe1clWScLfwdY.pdf](http://www.arb.ca.gov/lists/com-attach/225-capandtrade16-Uz5Qe1clWScLfwdY.pdf)

Original File Name: M-S-R comments re second 15-day changes (final 4-28-17).pdf

Date and Time Comment Was Submitted: 2017-04-28 16:43:08

No Duplicates.

## **Comment 38 for Cap and Trade 2016 (capandtrade16) - 15-2.**

First Name: Michael

Last Name: Shaw

Email Address: mshaw@cmta.net

Affiliation: CMTA

Subject: CMTA Comment on Second 15-Day Cap and Trade Amendments

Comment:

Attached are the comments of the California Manufacturers & Technology Association (CMTA).

Attachment: [www.arb.ca.gov/lists/com-attach/226-capandtrade16-UDNVPIYjBDYKUwlq.pdf](http://www.arb.ca.gov/lists/com-attach/226-capandtrade16-UDNVPIYjBDYKUwlq.pdf)

Original File Name: CMTA Cap and Trade Amends Second 15-Day Comments 4-28-2017.pdf

Date and Time Comment Was Submitted: 2017-04-28 17:01:19

No Duplicates.