

**Comment 1 for Cap and Trade Linkage 2012 (capandtradelinkage12) - 45 Day.**

First Name: Judi

Last Name: Mosley

Email Address: jkm8@pge.com

Affiliation: Pacific Gas and Electric Company

Subject: PG&E's Comments on Proposed Amendments

Comment:

Attached, in PDF format, are Pacific Gas and Electric Company's Comments on the Proposed Amendments to the California Cap-and-Trade Regulations to Allow for the Use of Compliance Instruments Issued by Linked Jurisdictions.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/1-061812\_pg\_e\_comments\_to\_arb.pdf'

Original File Name: 061812\_PG&E Comments to ARB.pdf

Date and Time Comment Was Submitted: 2012-06-18 14:18:19

No Duplicates.

**Comment 2 for Cap and Trade Linkage 2012 (capandtradelinkage12) - 45 Day.**

First Name: Norman

Last Name: Pedersen

Email Address: npedersen@hanmor.com

Affiliation: SCPPA

Subject: SCPPA comments on linking rulemaking

Comment:

Please find attached the comments of the Southern California Public Power Authority on the linking changes to the Cap and Trade Regulation released in May 2012.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/2-300226001lmm06181201\_scppa\_comment\_to\_arb\_on\_may\_linking\_rulemaking.pdf'

Original File Name: 300226001lmm06181201 SCPPA comment to ARB on May linking rulemaking.pdf

Date and Time Comment Was Submitted: 2012-06-18 18:13:43

No Duplicates.

**Comment 3 for Cap and Trade Linkage 2012 (capandtradelinkage12) - 45 Day.**

First Name: Nancy

Last Name: Allred

Email Address: nancy.allred@sce.com

Affiliation: Southern California Edison Company

Subject: SCE Comments on Cap-and-Trade Regulatory Amendments June 2012

Comment:

Please see attached comments of Southern California Edison Company.

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/3-2012-06-22\\_comments\\_on\\_45-day\\_changes\\_and\\_linkage.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/3-2012-06-22_comments_on_45-day_changes_and_linkage.pdf)'

Original File Name: 2012-06-22 Comments on 45-Day Changes and Linkage.pdf

Date and Time Comment Was Submitted: 2012-06-22 16:02:06

No Duplicates.

## **Comment 4 for Cap and Trade Linkage 2012 (capandtradelinkage12) - 45 Day.**

First Name: Michael  
Last Name: Gardner  
Email Address: mgardner@gypsum.org  
Affiliation: Gypsum Association

Subject: capandtradelinkage12  
Comment:

The Industry Benchmark for the Gypsum Product Manufacturing Industry should be Revised from a Weight-Based Metric to a Production-Based Metric

When cap and trade regulations were established by the California Air Resources Board (CARB), the Gypsum Product Manufacturing (GPM) industry agreed to use a benchmark of metric tons CO<sub>2</sub>e per short ton of stucco used to produce wallboard. This permitted the CARB benchmark for gypsum board to be normalized with the EU ETS benchmark for plasterboard.

In the interim period since the establishment of the regulations, GPM industry manufacturers have modified formulations for some commodity products. The re-formulation process has resulted in the production of gypsum board materials that are characterized by a lighter average product weight than those produced a few years earlier. This trend in weight reduction is on-going and points toward a composite gypsum board product weight metric that will continue to decline on an annual basis for the foreseeable future.

The Gypsum Association believes the downward trend in product weight has created a scenario that will not allow the industry to take advantage of improvements in energy utilization. While formulation changes have permitted the GPM industry some reductions in energy consumption, the rate of energy consumption decrease has not kept pace with, and likely will not keep pace with, the rate of decrease in product weight.

The denominator in the product-based metric for gypsum board is weight-based. Conceptually, if product weight is continually decreased and energy usage does not decrease at a proportionate rate, members of the GPM industry may not be able to meet target CO<sub>2</sub>e allocations regardless of energy usage.

California is currently revising cap and trade regulations to harmonize its system with the cap and trade system that is being assembled by the Province of Quebec. Quebec has adopted a production-based metric for the GPM industry. In keeping with the goal to harmonize these two cap and trade systems, CARB should adopt industry benchmarks that are comparable wherever possible.

We propose that CARB work with the GPM industry through the Gypsum Association to solicit and establish a new production-based emissions benchmark for gypsum board production. The units of this benchmark should not be in terms of metric tons of stucco, but

should reflect a production-based metric, such as CO2e produced per a normalized unit or volume of board footage. The GPM industry is conducting an internal data review and intends to have a proposed metric available for presentation to CARB for review and discussion in the very near future. As with the Industry Assistance Factor, the Gypsum Association would appreciate being included in the stakeholder process to evaluate industry benchmarks in 2012.

(.pdf copy of statement attached)

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/5-062712\\_carb\\_comments\\_-\\_final\\_capandtradelinkage12.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/5-062712_carb_comments_-_final_capandtradelinkage12.pdf)'

Original File Name: 062712 CARB Comments - FINAL capandtradelinkage12.pdf

Date and Time Comment Was Submitted: 2012-06-27 08:27:43

No Duplicates.

**Comment 5 for Cap and Trade Linkage 2012 (capandtradelinkage12) - 45 Day.**

First Name: Sean

Last Name: Lane

Email Address: slane@olympuspower.com

Affiliation: Olympus Power, LLC

Subject: PEB's Comments to CARB's Amendments to Cap-and-Trade Regulation Re: Program Linkage

Comment:

Please see the attached comment letter.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/6-peb\_cmt.\_ltr.\_to\_carb\_re\_cap-and-trade\_program\_linkage\_\_6.27.12\_.pdf'

Original File Name: PEB Cmt. Ltr. to CARB re Cap-and-Trade Program Linkage (6.27.12).pdf

Date and Time Comment Was Submitted: 2012-06-27 09:01:53

No Duplicates.

**Comment 6 for Cap and Trade Linkage 2012 (capandtradelinkage12) - 45 Day.**

First Name: Kyle

Last Name: Danish

Email Address: kwd@vnf.com

Affiliation: Van Ness Feldman

Subject: CERP Comments on Proposed Amendments

Comment:

Attached please find comments from the Coalition for Emission Reduction Policy (CERP) on the Proposed Amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms to Allow for the Use of Compliance Instruments Issued by Linked Jurisdictions. Out of an abundance of caution, CERP has filed such comments in both ARB's open comment dockets regarding the cap-and-trade program.

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/7-cerp-arb\\_comments-june\\_2012.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/7-cerp-arb_comments-june_2012.pdf)'

Original File Name: CERP-ARB Comments-June 2012.pdf

Date and Time Comment Was Submitted: 2012-06-27 09:56:38

No Duplicates.

**Comment 7 for Cap and Trade Linkage 2012 (capandtradelinkage12) - 45 Day.**

First Name: Ann

Last Name: Chan

Email Address: ann\_chan@twc.org

Affiliation: The Wilderness Society

Subject: TWS Comments on Investment of Cap-and-Trade Auction Proceeds

Comment:

TWS appreciates the opportunity to comment on Proposed Amendments to Allow for Use of Compliance Instruments Issued by Linked Jurisdictions.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/8-tws\_comments\_on\_proposed\_linking\_amendments.pdf'

Original File Name: TWS comments on Proposed Linking Amendments.pdf

Date and Time Comment Was Submitted: 2012-06-27 09:57:13

No Duplicates.



**Comment 8 for Cap and Trade Linkage 2012 (capandtradelinkage12) - 45 Day.**

First Name: Catherine  
Last Name: Reheis-Boyd  
Email Address: joey@wspa.org  
Affiliation: WSPA

Subject: WSPA ARB Linkage Comments  
Comment:

Per Cathy Reheis-Boyd, please see attached Western States Petroleum Association Comments on the May 9, 2012 Amendments for Linking California's and Quebec's Cap-and-Trade (C/T) Programs.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/9-wspa\_ab\_32\_report\_final\_june19\_2012.zip'

Original File Name: WSPA AB 32 report FINAL June19 2012.zip

Date and Time Comment Was Submitted: 2012-06-27 10:17:19

No Duplicates.

**Comment 9 for Cap and Trade Linkage 2012 (capandtradelinkage12) - 45 Day.**

First Name: Stephen

Last Name: Burns

Email Address: Stephen.Burns@chevron.com

Affiliation: Chevron Corporation

Subject: Comments on the proposed rule to allow linkage

Comment:

Chevron Corporation's comments are attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/10-cvx\_comments\_on\_final\_linkage\_and\_general\_amendments\_6\_27\_12.pdf'

Original File Name: CVX Comments on Final Linkage and General Amendments 6\_27\_12.pdf

Date and Time Comment Was Submitted: 2012-06-27 10:42:23

No Duplicates.

**Comment 10 for Cap and Trade Linkage 2012 (capandtradelinkage12) - 45 Day.**

First Name: Patrick

Last Name: Covert

Email Address: pat.covert@valero.com

Affiliation:

Subject: Valero Comments on Proposed Amendments to CA GHG Cap-and-Trade Program - Linkage

Comment:

Valero Comments on Proposed Amendments to CA GHG Cap-and-Trade Program - Linkage

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/11-valero\_comments\_on\_proposed\_changes\_to\_the\_greenhouse\_gas\_cap-and-trade\_regulations\_\_6-27-2012\_.pdf'

Original File Name: Valero Comments on Proposed Changes to the Greenhouse Gas Cap-and-Trade Regulations (6-27-2012).pdf

Date and Time Comment Was Submitted: 2012-06-27 11:02:51

No Duplicates.

**Comment 11 for Cap and Trade Linkage 2012 (capandtradelinkage12) - 45 Day.**

First Name: Clare

Last Name: Breidenich

Email Address: cbreidenich@aciem.us

Affiliation: Western Power Trading Forum

Subject: WPTF Comments to CARB on cap and trade modification

Comment:

Please find attached comments of the Western Power Trading Forum to the California Air Resources Board on its consideration of proposed amendments to California greenhouse gas emissions cap-and-trade program and market-based compliance mechanisms to add security to the market system and help staff implement the cap-and-trade program.

Thank you,  
Clare Breidenich  
WPTF

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/12-6-27-12\_wptf\_comments\_to\_carb\_on\_cap\_and\_trade.pdf'

Original File Name: 6-27-12 WPTF comments to CARB on cap and trade.pdf

Date and Time Comment Was Submitted: 2012-06-27 11:11:38

No Duplicates.

**Comment 12 for Cap and Trade Linkage 2012 (capandtradelinkage12) - 45 Day.**

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

Subject: IEP comments on Amendments to Cap and Trade Program to Accomodate Linkage  
Comment:

IEP comments on Amendments to Cap and Trade Program to Accomodate  
Linkage

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/13-iep\_comments\_on\_amendments\_to\_cap\_and\_trade\_program.pdf'

Original File Name: IEP comments on Amendments to Cap and Trade Program.pdf

Date and Time Comment Was Submitted: 2012-06-27 11:14:37

No Duplicates.

**Comment 13 for Cap and Trade Linkage 2012 (capandtradelinkage12) - 45 Day.**

First Name: Charlotte

Last Name: Skidmore

Email Address: cskidmore@aham.org

Affiliation:

Subject: Comments

Comment:

Please see attached comments

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/14-aham\_comments\_ca\_capandtradejune2012final.pdf'

Original File Name: AHAM Comments CA CapandTradeJune2012Final.pdf

Date and Time Comment Was Submitted: 2012-06-27 11:17:17

No Duplicates.

**Comment 14 for Cap and Trade Linkage 2012 (capandtradelinkage12) - 45 Day.**

First Name: Shelly

Last Name: Sullivan

Email Address: ssullivan@onemain.com

Affiliation: AB 32 Implementation Group

Subject: AB 32 IG Comments Regarding Linkage to Quebec

Comment:

Attached please find comments from the AB 32 Implementation Group regarding the cap-and-trade program and linkage to Quebec.

Should you have any questions or need anything further, please feel free to contact me at (916) 858-8686

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/15-ab32ig\\_linkage\\_comments\\_6\\_27\\_2012.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/15-ab32ig_linkage_comments_6_27_2012.pdf)'

Original File Name: AB32IG\_Linkage Comments\_6\_27\_2012.pdf

Date and Time Comment Was Submitted: 2012-06-27 11:21:45

No Duplicates.

**Comment 15 for Cap and Trade Linkage 2012 (capandtradelinkage12) - 45 Day.**

First Name: Erica

Last Name: Morehouse

Email Address: emorehouse@edf.org

Affiliation: Environmental Defense Fund

Subject: Comments on Linkage Proposal

Comment:

Please find attached comments previously submitted by EDF and NRDC during the public workshop process.

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/16-edf\\_nrdclinkageworkshopcomments.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/16-edf_nrdclinkageworkshopcomments.pdf)'

Original File Name: EDF&NRDCLinkageWorkshopComments.pdf

Date and Time Comment Was Submitted: 2012-06-27 11:37:23

No Duplicates.



**Comment 16 for Cap and Trade Linkage 2012 (capandtradelinkage12) - 45 Day.**

First Name: Erica

Last Name: Morehouse

Email Address: emorehouse@edf.org

Affiliation: Environmental Defense Fund

Subject: EDF NRDC TNC and CRS comments on linkage

Comment:

Please find attached comments from Environmental Defense Fund, Natural Resources Defense Council, The Nature Conservancy and Center for Resource Solutions on the proposal to amend the cap-and-trade to all for the use of compliance instruments issued by linked jurisdictions.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/17-edf-nrdc-tnc-crslinkagecomments.pdf'

Original File Name: EDF-NRDC-TNC-CRSLinkageComments.pdf

Date and Time Comment Was Submitted: 2012-06-27 11:51:36

No Duplicates.

**Comment 17 for Cap and Trade Linkage 2012 (capandtradelinkage12) - 45 Day.**

First Name: Brian

Last Name: Nowicki

Email Address: bnowicki@biologicaldiversity.org

Affiliation: Centerfor Biological Diversity

Subject: comments to linking reg

Comment:

Comments for Center for Biological Diversity

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/18-cbd\_comments\_re\_linking\_reg\_06\_27\_12\_final\_.pdf'

Original File Name: CBD comments re linking reg 06\_27\_12(FINAL).pdf

Date and Time Comment Was Submitted: 2012-06-27 11:54:30

No Duplicates.

**Comment 18 for Cap and Trade Linkage 2012 (capandtradelinkage12) - 45 Day.**

First Name: Erica

Last Name: Morehouse

Email Address: emorehouse@edf.org

Affiliation: Environmental Defense Fund

Subject: Linkage

Comment:

Attached are comments that EDF and NRDC submitted when the draft regulatory amendments on linkage were released.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/19-edfnrdclinkageamendmentcomments4-13-12.pdf>'

Original File Name: EDFNRDCLinkageAmendmentComments4-13-12.pdf

Date and Time Comment Was Submitted: 2012-06-27 11:56:16

No Duplicates.

**Comment 19 for Cap and Trade Linkage 2012 (capandtradelinkage12) - 45 Day.**

First Name: Barbara

Last Name: Haya

Email Address: bhaya@berkeley.edu

Affiliation: Union of Concerned Scientists

Subject: Comments on linkage with Quebec

Comment:

Please find our comments attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/20-ucs\_comments\_on\_linking\_with\_quebec\_june\_27\_2.pdf'

Original File Name: UCS comments on linking with Quebec June 27 2.pdf

Date and Time Comment Was Submitted: 2012-06-27 11:49:45

No Duplicates.

**There are no comments posted to Cap and Trade Linkage 2012 (capandtradelinkage12) that were presented during the Board Hearing at this time.**

## **Comment 1 for Cap and Trade Linkage 2012 (capandtradelinkage12) - 15-2.**

First Name: Catherine  
Last Name: Reheis Boyd  
Email Address: joey@wspa.org  
Affiliation: WSPA

Subject: WSPA Comments on ARB's January 8, 2013 Second 15-Day Amendments  
Comment:

Please see attached WSPA Comments on ARB's January 8, 2013 Second 15-Day Amendments to the California Cap on Greenhouse Gas Emissions and Market-based Compliance Mechanisms to Allow for the Use of Compliance Instruments Issued by Linked Jurisdictions.

Thank you.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/21-wspa\\_comments\\_on\\_arb\\_january\\_8\\_second\\_15-day\\_ammendments\\_final.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/21-wspa_comments_on_arb_january_8_second_15-day_ammendments_final.pdf)

Original File Name: WSPA Comments on ARB January 8 Second 15-Day Amendments Final.pdf

Date and Time Comment Was Submitted: 2013-01-23 08:56:08

No Duplicates.

## **Comment 2 for Cap and Trade Linkage 2012 (capandtradelinkage12) - 15-2.**

First Name: Nancy

Last Name: Allred

Email Address: nancy.allred@sce.com

Affiliation: Southern California Edison

Subject: SCE Comments on 15-Day Changes

Comment:

Attached are the comments of Southern California Edison Company on the ARB's 15-day changes to allow for linkage.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/22-2013-01-23\\_comments\\_on\\_15-day\\_changes\\_to\\_california\\_cap-and-trade\\_program\\_to\\_allow\\_for\\_linkage.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/22-2013-01-23_comments_on_15-day_changes_to_california_cap-and-trade_program_to_allow_for_linkage.pdf)

Original File Name: 2013-01-23 Comments on 15-Day Changes to California CAP-And-Trade Program to Allow for Linkage.pdf

Date and Time Comment Was Submitted: 2013-01-23 12:33:24

No Duplicates.

### **Comment 3 for Cap and Trade Linkage 2012 (capandtradelinkage12) - 15-2.**

First Name: Brian

Last Name: Nowicki

Email Address: bnowicki@biologicaldiversity.org

Affiliation: Center for Biological Diversity

Subject: Comments re changes to linking regulation

Comment:

These comments are submitted on behalf of the Center for Biological Diversity.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/23-cbd\\_comments\\_re\\_linking\\_reg\\_01\\_23\\_13\\_attachments\\_.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/23-cbd_comments_re_linking_reg_01_23_13_attachments_.pdf)

Original File Name: CBD comments re linking reg 01\_23\_13(attachments).pdf

Date and Time Comment Was Submitted: 2013-01-23 12:30:21

No Duplicates.



## **Comment 4 for Cap and Trade Linkage 2012 (capandtradelinkage12) - 15-2.**

First Name: Tamara

Last Name: Raspberry

Email Address: [trasberry@semprautilities.com](mailto:trasberry@semprautilities.com)

Affiliation:

Subject: Comments on 15 day notice CT Linkage

Comment:

Attached are comments filed on behalf of Sempra Energy Utilities.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/24-seu\\_comments\\_to\\_ct-linking-2013-15-day\\_01232013.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/24-seu_comments_to_ct-linking-2013-15-day_01232013.pdf)

Original File Name: SEu Comments to CT-linking-2013-15-day\_01232013.pdf

Date and Time Comment Was Submitted: 2013-01-23 13:31:07

No Duplicates.

## **Comment 5 for Cap and Trade Linkage 2012 (capandtradelinkage12) - 15-2.**

First Name: Kassandra

Last Name: Gough

Email Address: Kassandra.Gough@calpine.com

Affiliation: Calpine Corporation

Subject: Comments on Proposed Amendments to the California Cap On Greenhouse Gas Emissions And Mar

Comment:

Attached are Calpine's Comments on Proposed Amendments to the California Cap On Greenhouse Gas Emissions And Market-Based Compliance Mechanisms to Allow for the Use of Compliance Instruments Issued by Linked Jurisdictions

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/25-1-23-2013\\_calpine\\_comments-\\_linked\\_jurisdictions.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/25-1-23-2013_calpine_comments-_linked_jurisdictions.pdf)

Original File Name: 1-23-2013 Calpine Comments- Linked Jurisdictions.pdf

Date and Time Comment Was Submitted: 2013-01-23 14:49:52

No Duplicates.

## **Comment 6 for Cap and Trade Linkage 2012 (capandtradelinkage12) - 15-2.**

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

## **Comment 7 for Cap and Trade Linkage 2012 (capandtradelinkage12) - 15-2.**

First Name: Robin

Last Name: Fraser

Email Address: fraser@ieta.org

Affiliation: International Emissions Trading Assoc.

Subject: IETA Comments on ARB Linking Amendment Regulatory Package

Comment:

To whom it may concern,

Please find attached the International Emissions Trading Association (IETA)'s comments relating to ARB's January 8th 2013 linking regulatory package. Please be in touch with any comments or concerns.

Thanks very much,

Robin Fraser

Analyst, IETA  
+1.416.992.1540

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/27-ieta\\_comments\\_to\\_arb\\_on\\_linking\\_23jan2013.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/27-ieta_comments_to_arb_on_linking_23jan2013.pdf)

Original File Name: IETA Comments to ARB on Linking\_23Jan2013.pdf

Date and Time Comment Was Submitted: 2013-01-23 15:56:01

No Duplicates.

## **Comment 8 for Cap and Trade Linkage 2012 (capandtradelinkage12) - 15-2.**

First Name: Judi

Last Name: Mosley

Email Address: jkm8@pge.com

Affiliation: Pacific Gas and Electric Company

Subject: PG&Es Comments on ARBs 15Day Language

Comment:

Attached, in PDF format, are Pacific Gas and Electric Company's Comments on the Air Resources Board 15-Day Language: Likage with Quebec.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/28-012313\\_pges\\_comments\\_on\\_arbs\\_15day\\_language.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/28-012313_pges_comments_on_arbs_15day_language.pdf)

Original File Name: 012313\_PGEs Comments on ARBs 15day Language.pdf

Date and Time Comment Was Submitted: 2013-01-23 16:01:25

No Duplicates.

## **Comment 9 for Cap and Trade Linkage 2012 (capandtradelinkage12) - 15-2.**

First Name: Stephen

Last Name: Burns

Email Address: Stephen.Burns@chevron.com

Affiliation: Chevron Corporation

Subject: Comments on ARB's January 8, 2013 Second 15 day Amendments on Linkage to Quebec

Comment:

Our comments are attached.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/29-cvx\\_comments\\_linkage\\_1\\_23\\_13\\_final.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/29-cvx_comments_linkage_1_23_13_final.pdf)

Original File Name: CVX Comments Linkage\_1\_23\_13\_final.pdf

Date and Time Comment Was Submitted: 2013-01-23 15:59:31

No Duplicates.

## **Comment 10 for Cap and Trade Linkage 2012 (capandtradelinkage12) - 15-2.**

First Name: Lily

Last Name: Mitchell

Email Address: l Mitchell@hanmor.com

Affiliation: SCPPA

Subject: SCPPA comments on linking amendments

Comment:

Please find attached the comments of the Southern California Public Power Authority on the proposed changes to the Cap and Trade Regulation to link with Quebec.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/30-300226001lmm01231301\\_scppa\\_comment\\_to\\_arb\\_on\\_linking.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/30-300226001lmm01231301_scppa_comment_to_arb_on_linking.pdf)

Original File Name: 300226001lmm01231301 SCPPA comment to ARB on linking.pdf

Date and Time Comment Was Submitted: 2013-01-23 16:08:36

No Duplicates.

## **Comment 11 for Cap and Trade Linkage 2012 (capandtradelinkage12) - 15-2.**

First Name: Erica

Last Name: Morehouse

Email Address: emorehouse@edf.org

Affiliation: Environmental Defense Fund

Subject: Comments on 15 day change Linkage Package

Comment:

Please find attached comments from EDF, TNC, and CRS on the 15-day change January 2013 Linkage package.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/31-linkage\\_comment\\_letteredf-tnc-crs1-23-13.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/31-linkage_comment_letteredf-tnc-crs1-23-13.pdf)

Original File Name: Linkage comment letterEDF-TNC-CRS1-23-13.pdf

Date and Time Comment Was Submitted: 2013-01-23 16:09:48

No Duplicates.



## **Comment 12 for Cap and Trade Linkage 2012 (capandtradelinkage12) - 15-2.**

First Name: Shelly

Last Name: Sullivan

Email Address: ssullivan@onemain.com

Affiliation: AB 32 Implementation Group

Subject: AB 32 IG Comments Regarding CARB's Second 15-Day Notice / Linking with Quebec  
Comment:

Good Afternoon:

Attached please find comments submitted on behalf of the AB 32 Implementation Group regarding CARB's Second 15-Day Notice / Linking with Quebec.

Should you have any questions, please feel free to contact me.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/32-linkage\\_comments\\_15\\_day\\_notice\\_1\\_23\\_13.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/32-linkage_comments_15_day_notice_1_23_13.pdf)

Original File Name: Linkage Comments 15 Day Notice\_1\_23\_13.pdf

Date and Time Comment Was Submitted: 2013-01-23 16:28:41

No Duplicates.

## **Comment 13 for Cap and Trade Linkage 2012 (capandtradelinkage12) - 15-2.**

First Name: Alex

Last Name: Jackson

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

Affiliation: NRDC

Subject: NRDC comments on 15-day linkage amendments

Comment:

Please find attached NRDC's comments on the proposed amendments to the cap-and-trade regulation to allow for the use of compliance instruments issued by linked jurisdictions.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/33-nrdc\\_15\\_day\\_linkage\\_comments\\_final.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/33-nrdc_15_day_linkage_comments_final.pdf)

Original File Name: NRDC 15 day linkage comments FINAL.pdf

Date and Time Comment Was Submitted: 2013-01-23 16:54:26

No Duplicates.

## **Comment 14 for Cap and Trade Linkage 2012 (capandtradelinkage12) - 15-2.**

First Name: Barbara

Last Name: Haya

Email Address: bhaya@berkeley.edu

Affiliation: Union of Concerned Scientists

Subject: UCS PFT CBD and Breathe California comments on linkage amendments

Comment:

Comments attached.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/35-ucs-breathe\\_california-pft-cbd\\_comments\\_on\\_linkage\\_amendments\\_resubmitted\\_with\\_correction.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtradelinkage12/35-ucs-breathe_california-pft-cbd_comments_on_linkage_amendments_resubmitted_with_correction.pdf)

Original File Name: UCS-Breathe California-PFT-CBD comments on linkage amendments  
RESUBMITTED WITH CORRECTION.pdf

Date and Time Comment Was Submitted: 2013-01-31 10:52:01

No Duplicates.

## **Comment 1 for Cap and Trade Linkage 2012 (capandtradelinkage12) - 15-3.**

First Name: Matthew

Last Name: Hodges

Email Address: matt.hodges@valero.com

Affiliation:

Subject: Valero Comments, Cap-and-Trade Amendments to Allow Linkage  
Comment:

Please see attached comment letter re: Third Notice of Public Availability of Modified Text to Consider Adoption of Amendments to the California Greenhouse Gas Emissions and Market-Based Compliance Mechanisms to Allow for the Use of Compliance Instruments Issued by Linked Jurisdictions

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/36-capandtradelinkage12-Wy1RNgrpBzEEcFU6.pdf>

Original File Name: Valero Comments , Proposed Amedments for Linking Jurisdictions, 3rd public comment period 4-5-13.pdf

Date and Time Comment Was Submitted: 2013-04-05 11:10:10

No Duplicates.

## **Comment 2 for Cap and Trade Linkage 2012 (capandtradelinkage12) - 15-3.**

First Name: Claire

Last Name: Halbrook

Email Address: cehu@pge.com

Affiliation:

Subject: PG&E Comments on 3rd 15-day Language: Linkage  
Comment:

PG&E Comments on 3rd 15-day Language: Linkage

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/37-capandtradelinkage12-UyMCY1E1AAwBZABv.docx>

Original File Name: PGE Comments on 3rd 15-day Language\_linkage.docx

Date and Time Comment Was Submitted: 2013-04-05 13:12:12

No Duplicates.

### **Comment 3 for Cap and Trade Linkage 2012 (capandtradelinkage12) - 15-3.**

First Name: Stephen

Last Name: Burns

Email Address: Stephen.Burns@chevron.com

Affiliation: Chevron Corporation

Subject: Comments on Third Notice of Amendments on Linkage to Quebec

Comment:

Attached please find our comments on the third notice of amendments proposing linkage to Quebec.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/38-capandtradelinkage12-AmFdLV0kUFxVMANs.pdf>

Original File Name: CVX Comments Linkage\_4\_5\_13\_final.pdf

Date and Time Comment Was Submitted: 2013-04-05 15:45:51

No Duplicates.

## **Comment 4 for Cap and Trade Linkage 2012 (capandtradelinkage12) - 15-3.**

First Name: Robin

Last Name: Fraser

Email Address: fraser@ieta.org

Affiliation: International Emissions Trading Assoc.

Subject: IETA Comments on ARB Linking Amendments

Comment:

To whom it may concern,

Enclosed please find IETA's comments related to ARB's latest round of amendments on linkage with Quebec.

Be in touch any time for questions or comments.

Best,

Robin Fraser

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/39-capandtradelinkage12-UDkBYgF0UGJRcfQ3.pdf>

Original File Name: IETA Comments on ARB Linking Amendments\_5April2013.pdf

Date and Time Comment Was Submitted: 2013-04-05 17:52:34

No Duplicates.

## **Comment 5 for Cap and Trade Linkage 2012 (capandtradelinkage12) - 15-3.**

First Name: Nancy

Last Name: Allred

Email Address: nancy.allred@sce.com

Affiliation: Southern California Edison

Subject: SCE Comments on Third Linkage Notice

Comment:

See attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/40-capandtradelinkage12-UWNcagExVDQDKAc3.pdf>

Original File Name: 2013-04-05 SCE Comments to CARB on the 3rd Notice of Public Availability of Modified Text-1.pdf

Date and Time Comment Was Submitted: 2013-04-05 20:24:45

No Duplicates.