

## **Comment 1 for Mandatory Reporting of GHG Emissions (ghg2010) - 45 Day.**

First Name: Keith

Last Name: Foszcz

Email Address: kfoszcz@sonoma-county.org

Affiliation: County of Sonoma DTPW

Subject: Third Party Verification

Comment:

The County of Sonoma operates a large landfill including stationary combustion with electricity generation. Our only source of fuel is landfill gas so all our emissions are from biomass. The proposed changes are for alignment with EPA but also to support cap and trade. Since all our emissions are from biomass we do not fall under cap and trade. ARB's proposed changes include going to an annual verification where EPA does not even require third party verification. Would ARB consider having an exemption for biomass CO2 emissions and require only triennial verification?

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-11-18 07:08:23

No Duplicates.

## **Comment 2 for Mandatory Reporting of GHG Emissions (ghg2010) - 45 Day.**

First Name: Michelle

Last Name: Passero

Email Address: mpassero@tnc.org

Affiliation:

Subject: TNC comments on mandatory reporting

Comment:

Please accept The Nature Conservancy's comments on the cap and trade program and mandatory reporting with respect to biomass energy and fuels.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/2-tnc\_commentsCapandTradeFinal2.pdf'

Original File Name: TNC\_CommentsCapandTradeFinal2.pdf

Date and Time Comment Was Submitted: 2010-11-23 16:47:13

No Duplicates.

### **Comment 3 for Mandatory Reporting of GHG Emissions (ghg2010) - 45 Day.**

First Name: David

Last Name: Chase

Email Address: dchase@smallbusinessmajority.org

Affiliation: Small Business Majority

Subject: Economic Opportunities for Small Businesses Under AB 32

Comment:

Small Business Majority released an in-depth report on Oct. 18, 2010, that focuses on the opportunities AB 32 provides to California's small businesses. The findings show that the increased investments, energy savings and innovation prompted by the law's requirements will boost small businesses' bottom lines and stimulate job creation. It will increase demand for the goods and services California small businesses provide, which will benefit the state as a whole. The report concludes that the economic potential AB 32 creates for small businesses is substantial.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/3-sbm-ab32-report\_101810.pdf'

Original File Name: SBM-AB32-Report\_101810.pdf

Date and Time Comment Was Submitted: 2010-11-24 14:47:13

No Duplicates.

## **Comment 4 for Mandatory Reporting of GHG Emissions (ghg2010) - 45 Day.**

First Name: Jeremy

Last Name: Weinstein

Email Address: jweinstein@prodigy.net

Affiliation: Law Offices of Jeremy D. Weinstein, P.C.

Subject: Comment Letter on Sections 95852.2 and 95131(i)

Comment:

Attached please find a comment letter following up on a recent very helpful phone call with staff.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/4-weinstein\_carb\_12.1.10\_comment\_letter.pdf'

Original File Name: Weinstein CARB 12.1.10 comment letter.pdf

Date and Time Comment Was Submitted: 2010-12-01 13:57:51

No Duplicates.

## **Comment 5 for Mandatory Reporting of GHG Emissions (ghg2010) - 45 Day.**

First Name: Clare  
Last Name: Breidenich  
Email Address: clare@wptf.org  
Affiliation: Western Power Trading Forum

Subject: Proposed Revised Regulation for Mandatory Reporting Greenhouse Gas Emissions  
Comment:

Attached please find comments of the Western Power Trading Forum to the Air Resources Board on the of the Proposed Revised Regulation for Mandatory Reporting Greenhouse Gas Emissions.  
Thank you,  
Clare Breidenich  
WPTF GHG Consultant  
1.206.697.4946

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/5-12-3-2010\_wptf\_to\_arb\_on\_reporting\_prr.pdf'

Original File Name: 12-3-2010 WPTF to ARB on Reporting PRR.pdf

Date and Time Comment Was Submitted: 2010-12-04 11:32:29

No Duplicates.

## **Comment 6 for Mandatory Reporting of GHG Emissions (ghg2010) - 45 Day.**

First Name: Norman

Last Name: Pedersen

Email Address: npedersen@hanmor.com

Affiliation: Southern Calif. Public Power Authority

Subject: Comment on Proposed Revisions to MRR

Comment:

Please find attached the SOUTHERN CALIFORNIA PUBLIC POWER AUTHORITY  
COMMENT ON PROPOSED REVISIONS TO THE REGULATION FOR THE MANDATORY  
REPORTING OF GREENHOUSE GAS EMISSIONS

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/6-300226001lmm120510001\_comment\_on\_mrr.pdf'

Original File Name: 300226001lmm120510001 Comment on MRR.pdf

Date and Time Comment Was Submitted: 2010-12-05 19:18:16

No Duplicates.

## **Comment 7 for Mandatory Reporting of GHG Emissions (ghg2010) - 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 ARB's October 28, 2010 Revisions to Regulation for  
Mandatory Reporting  
Comment:

Attached, in PDF format, are Pacific Gas and Electric Company's  
Comments on the Air Resources Board's October 28, 2010 Revisions to  
the Regulation for Mandatory Reporting of Greenhouse Gas Emissions.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/7-  
clean\_00110128.pdf'

Original File Name: clean\_00110128.pdf

Date and Time Comment Was Submitted: 2010-12-06 15:13:02

No Duplicates.

## **Comment 8 for Mandatory Reporting of GHG Emissions (ghg2010) - 45 Day.**

First Name: John  
Last Name: Bloom  
Email Address: houstgrp@pacbell.net  
Affiliation:

Subject: The Houston Group  
Comment:

Please see attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/8-houstongroup.pdf>'

Original File Name: HoustonGroup.pdf

Date and Time Comment Was Submitted: 2010-12-07 13:27:33

No Duplicates.



## **Comment 9 for Mandatory Reporting of GHG Emissions (ghg2010) - 45 Day.**

First Name: Melvin  
Last Name: Zeldin  
Email Address: melz@capcoa.org  
Affiliation:

Subject: CAPCOA  
Comment:

Please see attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/9-capcoa.pdf'

Original File Name: CAPCOA.pdf

Date and Time Comment Was Submitted: 2010-12-08 17:04:49

No Duplicates.

## **Comment 10 for Mandatory Reporting of GHG Emissions (ghg2010) - 45 Day.**

First Name: John

Last Name: Bloom

Email Address: johnt.bloomjr@cemex.com

Affiliation:

Subject: ARB Mandatory Reporting Regulations

Comment:

Attached are comments from the Coalition for Sustainable Cement Manufacturing & Environment on the ARB Mandatory Reporting Regulations for Quantifying Emissions from Biomass-Containing Fuel Mixtures that are not 100% Biomass.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/10-doc003.pdf'

Original File Name: DOC003.pdf

Date and Time Comment Was Submitted: 2010-12-09 10:13:46

No Duplicates.

## **Comment 11 for Mandatory Reporting of GHG Emissions (ghg2010) - 45 Day.**

First Name: John

Last Name: Bloom

Email Address: johnt.bloomjr@cemex.com

Affiliation: CSCME

Subject: AB 32 Mandatory Reporting Regulations Missing Data

Comment:

Attached are the comments from the Coalition for Sustainable Cement Manufacturing & Environment on the ARB Draft Revised AB 32 Mandatory Reporting Regulations Missing Data Provisions for Continuous Emission Monitoring Systems.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/12-december\_9th\_letter.pdf'

Original File Name: December 9th letter.pdf

Date and Time Comment Was Submitted: 2010-12-09 12:45:12

No Duplicates.

## **Comment 12 for Mandatory Reporting of GHG Emissions (ghg2010) - 45 Day.**

First Name: Tod

Last Name: Delaney, AAVB

Email Address: tod@firstenvironment.com

Affiliation: Assoc. of Accredited Verification Bodies

Subject: Section 95132 lacks the rigor associated with the best practice for accrediting V/VBs

Comment:

Please see letter attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/13-arb\_response\_letter.pdf'

Original File Name: ARB response letter.pdf

Date and Time Comment Was Submitted: 2010-12-09 12:51:00

No Duplicates.

## **Comment 13 for Mandatory Reporting of GHG Emissions (ghg2010) - 45 Day.**

First Name: Braxton

Last Name: Cook

Email Address: yaralindi@yahoo.com

Affiliation:

Subject: Mandatory reporting of greenhouse emissions

Comment:

Doing this at this time would be bad for business. The economy is just starting to turn around. Why risk scaring away potential businesses that might want to come to California? Why make it more difficult for current businesses to grow?

Stop this. Wait until unemployment is below 5% and then work on emissions.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-10 10:13:43

No Duplicates.

## **Comment 14 for Mandatory Reporting of GHG Emissions (ghg2010) - 45 Day.**

First Name: Kelly

Last Name: O'Donnell

Email Address: kelly.odonnell@sce.com

Affiliation: Southern California Edison

Subject: SCE's Comments on Proposed Amendments to GHG Reporting Requirements

Comment:

I have attached Southern California Edison's comments on the Amendments to the Regulation for Mandatory Reporting of Greenhouse Gas Emissions. Please contact me with any questions.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/15-sce\_comments\_\_12-10-10\_.pdf'

Original File Name: SCE comments (12-10-10).pdf

Date and Time Comment Was Submitted: 2010-12-10 11:15:46

No Duplicates.

## **Comment 15 for Mandatory Reporting of GHG Emissions (ghg2010) - 45 Day.**

First Name: Steve

Last Name: Huhman

Email Address: Steven.Huhman@morganstanley.com

Affiliation: Morgan Stanley Capital Group, Inc.

Subject: Mandatory Reporting Rule amendments

Comment:

Attached please find comments of Morgan Stanley Capital Group, Inc.  
on the proposed revision to the Mandatory Reporting Rules.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/16-arb\_draft\_comments\_on\_mandatory\_reporting\_rule\_12-6-10.doc'

Original File Name: ARB Draft Comments on Mandatory Reporting Rule 12-6-10.doc

Date and Time Comment Was Submitted: 2010-12-13 13:44:45

No Duplicates.

## **Comment 16 for Mandatory Reporting of GHG Emissions (ghg2010) - 45 Day.**

First Name: Michael

Last Name: Huber

Email Address: michael.huber@navy.mil

Affiliation: U.S. Department of Defense

Subject: DoD Comments on Greenhouse Gas Mandatory Reporting Rule 13Dec10

Comment:

Attached are DoD's Comments on the Greenhouse Gas Mandatory Reporting Rule.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/17-038\_dod\_ghg\_mandatory\_report\_ltr\_13dec10.pdf'

Original File Name: 038 DoD GHG Mandatory Report ltr 13Dec10.PDF

Date and Time Comment Was Submitted: 2010-12-13 16:38:52

No Duplicates.



## **Comment 17 for Mandatory Reporting of GHG Emissions (ghg2010) - 45 Day.**

First Name: Casey  
Last Name: Creamer  
Email Address: casey@ccgga.org  
Affiliation: Ag Coalition

Subject: Ag Coalition Comments  
Comment:

Attached are comments from several agricultural organizations on the Mandatory Reporting and Cap and Trade Regulations.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/18-ag\_coalition\_comments\_12.13.10.pdf'

Original File Name: Ag Coalition Comments 12.13.10.pdf

Date and Time Comment Was Submitted: 2010-12-13 20:38:36

No Duplicates.

## **Comment 18 for Mandatory Reporting of GHG Emissions (ghg2010) - 45 Day.**

First Name: Justin

Last Name: Oldfield

Email Address: justin@calcattlemen.org

Affiliation: California Cattlemen's Association

Subject: Comments from California Livestock Industry

Comment:

Please see pdf attachment.

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/20-livestock\\_industry\\_camrr\\_comments.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/20-livestock_industry_camrr_comments.pdf)'

Original File Name: Livestock Industry CAMRR Comments.pdf

Date and Time Comment Was Submitted: 2010-12-14 10:16:39

No Duplicates.

## **Comment 19 for Mandatory Reporting of GHG Emissions (ghg2010) - 45 Day.**

First Name: Al

Last Name: Javier

Email Address: javiera@emwd.org

Affiliation: Eastern Municipal Water District

Subject: EMWD comments on Mandatory Reporting

Comment:

Please see comments in attachment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/21-3612\_2010-12-15\_-\_cc\_-\_ca\_air\_resources\_bd\_mandatory\_reporting.pdf'

Original File Name: 3612 2010-12-15 - CC - CA Air Resources Bd Mandatory Reporting.pdf

Date and Time Comment Was Submitted: 2010-12-14 10:53:18

No Duplicates.

## **Comment 20 for Mandatory Reporting of GHG Emissions (ghg2010) - 45 Day.**

First Name: Tamara

Last Name: Raspberry

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

Affiliation: Sempra Energy Utilities

Subject: Proposed Amendments to the Regulation for Mandatory Reporting of GHG Emissions  
Comment:

Attached are comments from the Sempra Energy utilities regarding the proposed Regulation for the Mandatory Reporting of GHG emissions.

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/22-seu.mandatoryrptg.arb\\_12.13.10.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/22-seu.mandatoryrptg.arb_12.13.10.pdf)'

Original File Name: SEu.MandatoryRptg.ARB 12.13.10.pdf

Date and Time Comment Was Submitted: 2010-12-14 13:55:47

No Duplicates.

## **Comment 21 for Mandatory Reporting of GHG Emissions (ghg2010) - 45 Day.**

First Name: Brian  
Last Name: McQuown  
Email Address: BMcquown@rrienergy.com  
Affiliation: RRI Energy, Inc.

Subject: RRI Energy, Inc. Comments on the Amended GHG Reporting Regulation  
Comment:

To whom it may concern:

Please find attached comments from RRI Energy, Inc. on CARB's proposed amendments to the mandatory GHG reporting regulation.

Thank you,  
Brian McQuown

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/24-rri\_energy\_inc\_\_comments\_for\_carb\_-\_ghg\_reporting.pdf'

Original File Name: RRI Energy Inc Comments for CARB - GHG Reporting.pdf

Date and Time Comment Was Submitted: 2010-12-14 14:11:31

No Duplicates.

## **Comment 22 for Mandatory Reporting of GHG Emissions (ghg2010) - 45 Day.**

First Name: Barry  
Last Name: Wallerstein  
Email Address: bwallerstein@aqmd.gov  
Affiliation: South Coast AQMD

Subject: Mandatory Reporting and Cap on GHG Emissions  
Comment:

Please see the attached comment letter on this item from SCAQMD.  
Thank you.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/25-carb\_re\_mandatory\_reporting\_ghg\_emis\_12-14-2010.pdf'

Original File Name: CARB re Mandatory Reporting GHG Emis 12-14-2010.pdf

Date and Time Comment Was Submitted: 2010-12-14 17:20:47

No Duplicates.

## **Comment 23 for Mandatory Reporting of GHG Emissions (ghg2010) - 45 Day.**

First Name: Eric  
Last Name: Chung  
Email Address: eric.chung@pacificorp.com  
Affiliation: PacifiCorp

Subject: Comments from PacifiCorp regarding Amendments to Mandatory Reporting Requirements

Comment:

Attached please find comments of PacifiCorp regarding the California Air Resources Board October 28, 2010 proposed amendments to the regulation for Mandatory Reporting of Greenhouse Gas Emissions.

Regards,

Eric Chung  
Director, Environmental Policy & Strategy  
PacifiCorp

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/26-20101215-pacificorp-mrr\_amendments-45\_day\_lang-final.pdf'

Original File Name: 20101215-PacifiCorp-MRR\_Amendments-45\_day\_lang-FINAL.pdf

Date and Time Comment Was Submitted: 2010-12-14 18:04:33

No Duplicates.

## **Comment 24 for Mandatory Reporting of GHG Emissions (ghg2010) - 45 Day.**

First Name: Sarah

Last Name: Merrill

Email Address: smerrill@ch2m.com

Affiliation: BACWA AIR Committee

Subject: BACWA AIR Comments on Amendments to the Regulation for Mandatory Reporting of GHGs

Comment:

Please see the attached letter for the BACWA AIR Committee's comments regarding the Amendments to the Regulation for Mandatory Reporting of Greenhouse Gas Emissions.

The Air Issues and Regulations (AIR) Committee is a coalition of San Francisco Bay Area Publicly Owned Treatment Works (POTWs) working cooperatively to address air quality issues, under the guidance of the Bay Area Clean Water Agencies (BACWA).

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/27-bacwa\\_air\\_mrr\\_comments\\_final.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/27-bacwa_air_mrr_comments_final.pdf)'

Original File Name: BACWA AIR\_MRR\_comments\_final.pdf

Date and Time Comment Was Submitted: 2010-12-14 18:14:36

No Duplicates.



## **Comment 25 for Mandatory Reporting of GHG Emissions (ghg2010) - 45 Day.**

First Name: Lily

Last Name: Mitchell

Email Address: l Mitchell@hanmor.com

Affiliation: Southern Calif. Public Power Authority

Subject: SCPPA comments on definition of "facility" in MRR

Comment:

Please find attached the comments of the Southern California Public Power Authority on the definition of "facility" in the revised Regulation for Mandatory Reporting of Greenhouse Gas Emissions.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/28-300226001lmm12141001\_comment\_on\_mrr\_facility\_definition\_final.pdf'

Original File Name: 300226001lmm12141001 comment on MRR facility definition final.pdf

Date and Time Comment Was Submitted: 2010-12-14 18:39:40

No Duplicates.

## **Comment 26 for Mandatory Reporting of GHG Emissions (ghg2010) - 45 Day.**

First Name: Courtney

Last Name: Olive

Email Address: jcolive@bpa.gov

Affiliation: Bonneville Power Administration

Subject: Bonneville Power Administration comment on Amendments to Reg for GHG Reporting  
Comment:

Attached please find Bonneville Power Administration's comments on  
Amendments to the Regulation for Mandatory Reporting of Greenhouse  
Gas Emissions.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/29-  
12.15.10\_comment\_to\_carb\_letter.pdf'

Original File Name: 12.15.10 Comment to CARB letter.pdf

Date and Time Comment Was Submitted: 2010-12-15 09:47:36

No Duplicates.

## **Comment 27 for Mandatory Reporting of GHG Emissions (ghg2010) - 45 Day.**

First Name: Jacqueline  
Last Name: Kepke  
Email Address: jkepke@ch2m.com  
Affiliation: CA Wastewater Climate Change Group

Subject: Comments of the California Wastewater Climate Change Group  
Comment:

Attached please find the comments of the California Wastewater Climate Change Group on Amendments to the Regulation for Mandatory Reporting of Greenhouse Gas Emissions.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/30-cwccg\_mrr\_comments\_final.pdf'

Original File Name: CWCCG\_MRR\_comments\_final.pdf

Date and Time Comment Was Submitted: 2010-12-15 10:06:45

No Duplicates.

## **Comment 28 for Mandatory Reporting of GHG Emissions (ghg2010) - 45 Day.**

First Name: Steven

Last Name: Smith

Email Address: Steven.B.Smith@Saint-Gobain.com

Affiliation:

Subject: MRR Comments

Comment:

Attached please find our comments on the CARB Mandatory Reporting Regulation for GHG.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/31-carb\_mrr\_12-15-10.pdf'

Original File Name: CARB MRR 12-15-10.pdf

Date and Time Comment Was Submitted: 2010-12-15 10:46:05

No Duplicates.

## **Comment 29 for Mandatory Reporting of GHG Emissions (ghg2010) - 45 Day.**

First Name: Elizabeth

Last Name: Hadley

Email Address: ehadley@reupower.com

Affiliation:

Subject: MRR Comments from Modesto, Redding, and Turlock

Comment:

Please find the attached comments from the Modesto Irrigation District, Redding Electric Utility, and Turlock Irrigation District on the "Proposed Amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions".

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/33-mrr\_comments\_from\_mid\_reu\_tid\_\_final.pdf'

Original File Name: MRR Comments from MID\_REU\_TID \_FINAL.pdf

Date and Time Comment Was Submitted: 2010-12-15 10:56:14

No Duplicates.

## **Comment 30 for Mandatory Reporting of GHG Emissions (ghg2010) - 45 Day.**

First Name: Shawn

Last Name: Bailey

Email Address: sbailey@semprageneration.com

Affiliation: Sempra Generation

Subject: CARB Mandatory Reporting Rule Comments

Comment:

Please find attached Sempra Generation's comments on the Reporting Rule.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/34-carb\_reproting\_rule\_-\_comments\_of\_sempra\_generation.pdf'

Original File Name: CARB Reproting Rule - Comments of Sempra Generation.pdf

Date and Time Comment Was Submitted: 2010-12-15 10:23:37

No Duplicates.

## **Comment 31 for Mandatory Reporting of GHG Emissions (ghg2010) - 45 Day.**

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

Subject: Western States Petroleum Comments on Mandatory Reporting Regulation  
Comment:

Please see attach Western States Petroleum Association comments on the proposed revisions to the Air Resources Board, Mandatory Reporting Regulation released October 28, 2010 [Agenda 10-11-2 Public Hearing to Consider Amendments to the Regulation for Mandatory Reporting of Greenhouse Gas Emissions]

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/35-wspa\\_comments\\_on\\_mandatory\\_reporting\\_regulation\\_final.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/35-wspa_comments_on_mandatory_reporting_regulation_final.pdf)'

Original File Name: WSPA Comments on Mandatory Reporting Regulation Final.pdf

Date and Time Comment Was Submitted: 2010-12-15 11:09:15

No Duplicates.

## **Comment 32 for Mandatory Reporting of GHG Emissions (ghg2010) - 45 Day.**

First Name: Scott

Last Name: Hernandez

Email Address: scotth@acwa.com

Affiliation: Assoc. of California Water Agencies

Subject: ACWA Comments on Mandatory GHG Emissions Reporting  
Comment:

Please find attached ACWA's comments on the Amendments to the Regulation for Mandatory Reporting of Greenhouse Gas Emissions.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/36-acwa\_comment\_letter\_mandatory\_ghg\_reporting.pdf'

Original File Name: ACWA Comment Letter Mandatory GHG Reporting.pdf

Date and Time Comment Was Submitted: 2010-12-15 11:17:15

No Duplicates.



## **Comment 33 for Mandatory Reporting of GHG Emissions (ghg2010) - 45 Day.**

First Name: Frank  
Last Name: Caponi  
Email Address: fcaponi@lacsds.org  
Affiliation:

Subject: ghg2010  
Comment:

LACSD comment letter to consider amendments to the Regulation of  
Mandatory Reporting of Greenhouse Gas Emissions.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/37-  
ghg2010.pdf'

Original File Name: ghg2010.pdf

Date and Time Comment Was Submitted: 2010-12-15 11:19:43

No Duplicates.

## **Comment 34 for Mandatory Reporting of GHG Emissions (ghg2010) - 45 Day.**

First Name: Kirk

Last Name: Marckwald

Email Address: Sarah@ceaconsulting.com

Affiliation: California Railroad Industry

Subject: Comments on Mandatory Reporting

Comment:

The enclosed letter provides the comments of BNSF Railway Company and Union Pacific Railroad Company ("the Railroads") on the "Proposed California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulations," adding Article 5 (§§ 95800 et seq.) to Title 17 of the California Code of Regulations ("the Cap-and-Trade Rule" or "the Rule"), as well as the proposed "Amendment to the Regulation for Mandatory Reporting of Greenhouse Gas Emissions (Title 17, §§ 95100 et seq.) ("the MRR)". The Railroads appreciate the opportunity to comment on the Rule and the MRR, as well as the Air Resources Board's consideration of these comments.

We look forward to continuing to work cooperatively with ARB staff.

Please contact me at 415-421-4213 x 12, or Sarah Weldon at 415-421-4213 x 34 if you have any questions.

Sincerely yours,

Kirk Marckwald

On Behalf of the Association of American Railroads, BNSF Railway,  
and Union Pacific Railroad

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/38-12\_15\_2010\_rr\_comments\_on\_cap\_and\_trade\_and\_mrr.pdf'

Original File Name: 12\_15\_2010 RR Comments on Cap and Trade and MRR.pdf

Date and Time Comment Was Submitted: 2010-12-15 11:34:30

No Duplicates.

## **Comment 35 for Mandatory Reporting of GHG Emissions (ghg2010) - 45 Day.**

First Name: William

Last Name: Westerfield

Email Address: wwester@smud.org

Affiliation: Sacramento Municipal Utility District

Subject: SMUD Comments on Mandatory Reporting

Comment:

Attached please find SMUD's Comments on Mandatory Reporting.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/39-carb\_comments\_on\_mandatory\_reporting.pdf'

Original File Name: CARB Comments on Mandatory Reporting.pdf

Date and Time Comment Was Submitted: 2010-12-15 11:45:22

No Duplicates.

## **Comment 36 for Mandatory Reporting of GHG Emissions (ghg2010) - 45 Day.**

First Name: Thomas

Last Name: Carter

Email Address: tcarter@calera.com

Affiliation: Calera Corporation

Subject: Calera Comments on Proposed Amendments

Comment:

Calera Corporation welcomes the opportunity to comment on the California Air Resources Board's (ARB) proposed revisions to California's mandatory greenhouse gas (GHG) emission reporting rule. Calera is an innovative carbon capture firm based in Los Gatos, California. At our demonstration plant in Moss Landing, California, we capture carbon dioxide emissions from the flue gas of an operating power plant and convert the carbon dioxide (CO<sub>2</sub>) to carbonate (CO<sub>3</sub>) forms. We are developing processes for cost-effectively producing both mineral carbonates for building materials—such as cement—and bicarbonates for products and/or geologic reinjection. In either case, this conversion to solid or liquid carbonate forms would be stable and not revert to carbon dioxide under anything short of apocalyptic temperature and acidity conditions.

The Governor, the California legislature, and the ARB are to be commended for taking a leadership role in the important mission of reducing GHGs and lessening man's adverse impact on global climate systems. This program promises to be a model for compliance mechanisms in other states and in the federal governments of the United States and abroad. For that reason, Calera would like to suggest a few changes that will make the regulation even more forward thinking and supportive of innovation, particularly innovative technologies born in the State.

The most effective way of maintaining stable levels of atmospheric GHG concentrations is to prevent emissions from entering the atmosphere. This can be done in one of two ways: by using less energy and energy-intensive products, or by producing energy and goods in ways that result in lower emissions. Calera's process would enable the use of domestic fossil fuel resources to create energy without the conventionally attendant GHG emissions. Unlike traditional carbon capture and storage (CCS), carbon conversion does not simply store captured CO<sub>2</sub> and transport it to a storage facility. It is instead a means of avoiding CO<sub>2</sub> emissions by converting the gas to a carbonate solid or liquid state, which is no longer a greenhouse gas and will not revert to one.

Calera therefore urges the ARB to revise the mandatory reporting rule so that major emission sources in the State of California are required to report only GHG emissions that leave their plant premises. Greenhouse gases emitted directly to the atmosphere from the facility or transported out in carbon dioxide or other GHG forms should be reported as emissions. While carbon dioxide that is captured on-site before it exits the stack and subsequently converted non-GHG chemical forms—such as carbonate—should not be

part of the source's emission profile. The source would therefore not require matching these would-be emissions with allowances or offsets.

The rule should treat on-site carbon conversion equipment as back-end equipment. Any energy demand from the carbon conversion equipment should be treated as part of the power plant's net emission profile.

Calera would like to meet with ARB staff early in 2011 to discuss our processes and changes in the rule in more detail, but it is important that the reporting rule encourage innovations that convert greenhouse gases to stable non-GHG forms. Specifically, Calera suggests the following language changes to the Proposed Amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions:

§ 95101 (f) Exclusions - add subsection (6) "Carbon dioxide or other greenhouse gases that are captured onsite at covered units and chemically converted to stable non-GHG forms, such as carbonates."

§ 95102 (a) Definitions - add a subsection for the following definition: " 'Carbon conversion' means the generally permanent conversion of carbon dioxide to non-GHG forms, such as carbonate, calcium carbonate, magnesium carbonate, bicarbonate, and other stable chemicals that are not greenhouse gases and will not readily revert to GHG forms."

§ 95102 (a) (156) - add the following language to the end of the current definition for "greenhouse gas emission reduction": "...and shall include chemical conversion of greenhouse gases to stable non-GHG forms."

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-12-15 11:48:26

No Duplicates.

## **Comment 37 for Mandatory Reporting of GHG Emissions (ghg2010) - 45 Day.**

First Name: Ivor

Last Name: John

Email Address: [ivor.john@lr.org](mailto:ivor.john@lr.org)

Affiliation: Ryerson, Master, and Associates, Inc

Subject: Ryerson, Master, and Associates, Inc, comments on revised Regulation

Comment:

Please see attached PDF.

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/41-rma\\_comments\\_12-15-10.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/41-rma_comments_12-15-10.pdf)'

Original File Name: RMA Comments 12-15-10.pdf

Date and Time Comment Was Submitted: 2010-12-15 11:42:22

No Duplicates.

## **Comment 38 for Mandatory Reporting of GHG Emissions (ghg2010) - 45 Day.**

First Name: Cindy

Last Name: Parsons

Email Address: cindy.parsons@ladwp.com

Affiliation: Los Angeles Department of Water & Power

Subject: LADWP comments on proposed amendments to ARB Mandatory Reporting Regulation  
Comment:

See attached comments

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/42-ladwp\\_comments\\_on\\_revisions\\_to\\_arb\\_mandatory\\_reporting\\_regulation.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/42-ladwp_comments_on_revisions_to_arb_mandatory_reporting_regulation.pdf)'

Original File Name: LADWP Comments on Revisions to ARB Mandatory Reporting Regulation.pdf

Date and Time Comment Was Submitted: 2010-12-15 12:03:38

No Duplicates.

## **Comment 39 for Mandatory Reporting of GHG Emissions (ghg2010) - 45 Day.**

First Name: Rick

Last Name: Coleman

Email Address: Non-web submitted comment

Affiliation:

Subject: Trinity P.U.D.

Comment:

Please see attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/43-trinity.pdf'

Original File Name: Trinity.pdf

Date and Time Comment Was Submitted: 2010-12-15 15:23:09

No Duplicates.



**Comment 40 for Mandatory Reporting of GHG Emissions (ghg2010) - 45 Day.**

First Name: Bret W.

Last Name: Reich

Email Address: [bret.reich@kernrivergas.com](mailto:bret.reich@kernrivergas.com)

Affiliation:

Subject: Kern River Gas Transmission Company

Comment:

Please see attached

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/44-bret.pdf>'

Original File Name: Bret.pdf

Date and Time Comment Was Submitted: 2010-12-15 15:37:56

No Duplicates.

**Comment 41 for Mandatory Reporting of GHG Emissions (ghg2010) - 45 Day.**

First Name: Burl

Last Name: Ackerman

Email Address: dedra.williams@simplot.com

Affiliation:

Subject: J.R. Simplot Company

Comment:

Please see attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/45-simplot.pdf'

Original File Name: simplot.pdf

Date and Time Comment Was Submitted: 2010-12-15 15:37:56

No Duplicates.

## **Comment 42 for Mandatory Reporting of GHG Emissions (ghg2010) - 45 Day.**

First Name: Jackie

Last Name: Zorovich

Email Address: jacqueline@theclimateregistry.org

Affiliation:

Subject: The Climate Registry

Comment:

Please see attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtrade10/1264-jackie.pdf'

Original File Name: Jackie.pdf

Date and Time Comment Was Submitted: 2010-12-21 13:07:06

No Duplicates.

## **Comment 43 for Mandatory Reporting of GHG Emissions (ghg2010) - 45 Day.**

First Name: Jack

Last Name: Broadbent

Email Address: Non-web submitted comment

Affiliation:

Subject: Bay Area Air Quality Management District

Comment:

Please see attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/47-broadbent.pdf'

Original File Name: Broadbent.pdf

Date and Time Comment Was Submitted: 2010-12-22 11:27:46

No Duplicates.

**Comment 1 for Mandatory Reporting of GHG Emissions (ghg2010). (At Hearing)**

First Name: Hans

Last Name: Kernkamp

Email Address: Non-web submitted comment

Affiliation:

Subject: Riverside County Wast Management Department

Comment:

Please see attached

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/48-hans\\_kernkamp.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/48-hans_kernkamp.pdf)

Original File Name: Hans Kernkamp.pdf

Date and Time Comment Was Submitted: 2011-03-17 09:48:27

No Duplicates.

**Comment 2 for Mandatory Reporting of GHG Emissions (ghg2010). (At Hearing)**

First Name: Bill

Last Name: Snyder

Email Address: bill.snyder@fire.ca.gov

Affiliation:

Subject: Department of Forestry and Fire Protection

Comment:

Please see attached.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtrade10/1223-bill\\_snyder.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtrade10/1223-bill_snyder.pdf)

Original File Name: Bill Snyder.pdf

Date and Time Comment Was Submitted: 2010-12-20 14:09:50

No Duplicates.

**Comment 3 for Mandatory Reporting of GHG Emissions (ghg2010). (At Hearing)**

First Name: Tod

Last Name: Delaney

Email Address: Non-web submitted comment

Affiliation:

Subject: First Environment

Comment:

Please see attached.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtrade10/1224-tod\\_delaney.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtrade10/1224-tod_delaney.pdf)

Original File Name: Tod Delaney.pdf

Date and Time Comment Was Submitted: 2010-12-20 14:09:50

No Duplicates.

**Comment 4 for Mandatory Reporting of GHG Emissions (ghg2010). (At Hearing)**

First Name: Norman

Last Name: Plotkin

Email Address: Non-web submitted comment

Affiliation:

Subject: Plotkin Zins

Comment:

Please see attached.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtrade10/1226-norman\\_plotkin.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtrade10/1226-norman_plotkin.pdf)

Original File Name: Norman Plotkin.pdf

Date and Time Comment Was Submitted: 2010-12-20 14:09:50

No Duplicates.



**Comment 5 for Mandatory Reporting of GHG Emissions (ghg2010). (At Hearing)**

First Name: Frank

Last Name: Harris

Email Address: Non-web submitted comment

Affiliation:

Subject: Public Utilities

Comment:

Please see attached.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtrade10/1245-frank\\_harris.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtrade10/1245-frank_harris.pdf)

Original File Name: Frank Harris.pdf

Date and Time Comment Was Submitted: 2010-12-20 15:32:30

No Duplicates.

## **Comment 1 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: John

Last Name: Larimer

Email Address: johntlarimer@gmail.com

Affiliation: tea party

Subject: Global Warming and Greenhouse Gases

Comment:

The theory, and it never was more than a theory, that the earth is warming abnormally has been thoroughly debunked and those who sought to take advantage of it have changed it to climate change. since there is no global warming CO2 emissions could not have caused it. The Agenda 21 forces, hopefully, will be rejected as soon as the public learns what is happening to them.

Sadly, this fiction, has been codified in California and it is your job to reduce carbon emissions; a pointless exercise. Do us a favor abandon this folly.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-07-29 08:13:59

No Duplicates.

## **Comment 2 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: Courtney

Last Name: Olive

Email Address: jcolive@bpa.gov

Affiliation: Bonneville Power Administration

Subject: Bonneville Power Administration comment on Amendments to Reg for GHG Reporting  
Comment:

Attached please find Bonneville Power Administration's comments.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/55-8.1.11\\_comment\\_to\\_carb\\_letter.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/55-8.1.11_comment_to_carb_letter.pdf)

Original File Name: 8.1.11 Comment to CARB letter.pdf

Date and Time Comment Was Submitted: 2011-08-01 14:46:00

No Duplicates.

### **Comment 3 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

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

Subject: Board Item: ghg2010  
Comment:

Please accept the attached comments from the Gypsum Association addressing board item ghg 2010.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/56-080911\\_gypsum\\_association\\_comment\\_to\\_carb\\_on\\_ghg2010.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/56-080911_gypsum_association_comment_to_carb_on_ghg2010.pdf)

Original File Name: 080911 Gypsum Association Comment to CARB on ghg2010.pdf

Date and Time Comment Was Submitted: 2011-08-05 12:18:07

No Duplicates.

## **Comment 4 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: Koji

Last Name: Kawamura

Email Address: kawamura@wapa.gov

Affiliation: Western Area Power Admin

Subject: Comments

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/57-comments.8.3.11.v5fi.2.pdf>

Original File Name: Comments.8.3.11.v5fi.2.pdf

Date and Time Comment Was Submitted: 2011-08-08 09:13:31

No Duplicates.

## **Comment 5 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: Elizabeth

Last Name: Hadley

Email Address: ehadley@reupower.com

Affiliation: Redding Electric Utility

Subject: MRR Comments from Modesto, Redding, & Turlock

Comment:

The Modesto Irrigation District, Redding Electric Utility, and Turlock Irrigation District submit the attached comments on the proposed amendments to the Mandatory Reporting Regulation.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/58-mid\\_reu\\_tid\\_mrr\\_comments\\_\\_8-9-11\\_.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/58-mid_reu_tid_mrr_comments__8-9-11_.pdf)

Original File Name: MID\_REU\_TID MRR Comments (8-9-11).pdf

Date and Time Comment Was Submitted: 2011-08-09 10:27:09

No Duplicates.

## **Comment 6 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: Randal

Last Name: Friedman

Email Address: Randal.Friedman@navy.mil

Affiliation: Navy Region Southwest

Subject: MANDATORY REPORTING AMENDMENTS

Comment:

Attached please find our comments.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/59-dod\\_mrr\\_comments\\_9aug11.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/59-dod_mrr_comments_9aug11.pdf)

Original File Name: DoD MRR comments 9Aug11.PDF

Date and Time Comment Was Submitted: 2011-08-09 12:50:02

No Duplicates.

## **Comment 7 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

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



## **Comment 8 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: Chuck

Last Name: Solt

Email Address: chuck@csolt.net

Affiliation: Kurz Instruments Inc.

Subject: Instrument Accuracy for Mandatory Reporting of GHJG

Comment:

See attached letter:

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/61-second\\_draft\\_comments\\_r06.docx](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/61-second_draft_comments_r06.docx)

Original File Name: Second Draft Comments\_r06.docx

Date and Time Comment Was Submitted: 2011-08-09 15:04:18

No Duplicates.

## **Comment 9 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: Gerald

Last Name: Miller

Email Address: Steve\_Botic@Praxair.com

Affiliation: Praxair, Inc.

Subject: Comments of Praxair, Inc. on July 25, 2011 Revisions to the Mandatory Reporting Regulation

Comment:

Comments of Praxair, Inc. on July 25, 2011 of Revisions to the Mandatory Reporting Regulation.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/62-110809\\_praxair\\_comments\\_on\\_the\\_mrr\\_\\_00017098\\_.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/62-110809_praxair_comments_on_the_mrr__00017098_.pdf)

Original File Name: 110809\_Praxair Comments on the MRR (00017098).PDF

Date and Time Comment Was Submitted: 2011-08-09 15:40:08

No Duplicates.

## **Comment 10 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: Camille

Last Name: Kustin

Email Address: camille@betterworldgroup.com

Affiliation:

Subject: Coalition letter on Mandatory Reporting Rule, Biomass Reporting Provisions

Comment:

Attached are two letters: 1) Coalition comment letter on the 15-Day Changes to the MRR and recommendations on the biomass reporting provisions; and 2) a letter that was previously sent to ARB staff on incorporation of biomass combustion emissions into the AB 32 cap-and-trade program and greenhouse gas mandatory reporting regulation.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/63-mrr\\_15\\_daychanges\\_and\\_biomass\\_in\\_ab32.zip](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/63-mrr_15_daychanges_and_biomass_in_ab32.zip)

Original File Name: MRR\_15\_DayChanges\_and\_Biomass\_In\_AB32.zip

Date and Time Comment Was Submitted: 2011-08-09 16:12:20

No Duplicates.

## **Comment 11 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: Catherine

Last Name: Reheis-Boyd

Email Address: joey@wspace.org

Affiliation: Western States Petroleum Association

Subject: WSPA Comments on Mandatory Reporting GHG

Comment:

Please see attached Western States Petroleum Association Comments on Mandatory Reporting of Greenhouse Gas Emissions – Proposed 15-Day Modifications. If you have any questions, please call Cathy at (916) 498-7752 or email: cathy@wspace.org. Thank you.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtrade10/1386-wspace\\_final\\_comments\\_on\\_mandatory\\_reporting\\_ghg.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/capandtrade10/1386-wspace_final_comments_on_mandatory_reporting_ghg.pdf)

Original File Name: WSPA Final Comments on Mandatory Reporting GHG.pdf

Date and Time Comment Was Submitted: 2011-08-10 11:59:50

No Duplicates.

## **Comment 12 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: John

Last Name: Bloom

Email Address: houstgrp@pacbell.net

Affiliation: CSCME

Subject: Comments on the ARB Revised AB 32 Mandatory Reporting Regulation Issued 7/7/11  
Comment:

Please accept our attached comments on the ARB Revised AB 32  
Mandatory Reporting Regulations Issued July 7, 2011.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/65-cscme\\_ab\\_32\\_mandatory\\_reporting\\_aug\\_10\\_2011.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/65-cscme_ab_32_mandatory_reporting_aug_10_2011.pdf)

Original File Name: CSCME AB 32 Mandatory Reporting Aug 10 2011.pdf

Date and Time Comment Was Submitted: 2011-08-10 14:33:37

No Duplicates.

## **Comment 13 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: Janet

Last Name: Bell

Email Address: jbell@mwdh2o.com

Affiliation:

Subject: Comments Letter on Proposed Amendments to Mandatory Reporting Rule

Comment:

Attached are Metropolitan Water District's comments on ARB's  
Proposed Amendments to the Mandatory Reporting Rule.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/66-carb.mrrcommentsletter.august102011.pdf>

Original File Name: CARB.MRRCommentsletter.August102011.pdf

Date and Time Comment Was Submitted: 2011-08-10 16:06:45

No Duplicates.

## **Comment 14 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: Steven

Last Name: Huhman

Email Address: steven.huhman@morganstanley.com

Affiliation: Morgan Stanley Capital Group Inc

Subject: MSCG's Comments on MRR

Comment:

Please find attached MSCG's comments on the above noted subject matter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/67-mscg.carb.mandatoryreportingcomments.august.11.2011.doc>

Original File Name: MSCG.CARB.MandatoryReportingComments.August.11.2011.doc

Date and Time Comment Was Submitted: 2011-08-11 08:03:41

No Duplicates.

## **Comment 15 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: Tom

Last Name: Christofk

Email Address: fernando@capcoa.org

Affiliation:

Subject: Comments on proposed 15-day changes to the Mandatory Reporting Requirements

Comment:

CAPCOA is pleased to submit the attached comments regarding the  
Mandatory Reporting regulations

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/68-cap.trade.15\\_day\\_comments.08.11.11.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/68-cap.trade.15_day_comments.08.11.11.pdf)

Original File Name: Cap.Trade.15 day comments.08.11.11.pdf

Date and Time Comment Was Submitted: 2011-08-11 08:11:44

No Duplicates.



## **Comment 16 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: Frank  
Last Name: Caponi  
Email Address: fcaponi@lacsds.org  
Affiliation: LACSD

Subject: Comment Letter on Amendments to Regulation for Mandatory Reporting of GHG Emissions  
Comment:

From Mr. Frank Caponi, LACSD re Comment Letter on Amendments to Regulation for Mandatory Reporting of GHG Emissions.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/69-lacsds\\_comment\\_ltr\\_carbs\\_amended\\_regulation\\_for\\_ghg\\_mrr\\_aug\\_2011.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/69-lacsds_comment_ltr_carbs_amended_regulation_for_ghg_mrr_aug_2011.pdf)

Original File Name: LACSD Comment Ltr CARBs Amended Regulation for GHG MRR Aug 2011.pdf

Date and Time Comment Was Submitted: 2011-08-11 10:52:28

No Duplicates.

## **Comment 17 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: Shelly

Last Name: Sullivan

Email Address: ssullivan@onemain.com

Affiliation: AB 32 Implementation Group

Subject: MRR 15-Day Rulemaking Package Comments

Comment:

Attached please find comments submitted on behalf of the AB 32 Implementation Group regarding CARB's MRR 15-day rulemaking package.

Should you have any questions please feel free to contact us at (916) 858-8686.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/70-ig\\_mrr\\_final\\_comments\\_8\\_11.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/70-ig_mrr_final_comments_8_11.pdf)

Original File Name: IG\_MRR\_FINAL\_Comments\_8\_11.pdf

Date and Time Comment Was Submitted: 2011-08-11 10:38:28

No Duplicates.

## **Comment 18 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: John  
Last Name: Pastore  
Email Address: jpastore@scap1.org  
Affiliation: SCAP

Subject: Comment Letter re Amendments to Regulation for Mandatory Reporting of GHG Emissions  
Comment:

From John Pastore of SCAP.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/71-scap\\_110810\\_letter\\_to\\_carb\\_re\\_mand.\\_ghg\\_reporting.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/71-scap_110810_letter_to_carb_re_mand._ghg_reporting.pdf)

Original File Name: SCAP 110810 Letter to CARB re Mand. GHG Reporting.pdf

Date and Time Comment Was Submitted: 2011-08-11 10:56:37

No Duplicates.

## **Comment 19 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: Judi

Last Name: Mosley

Email Address: jkm8@pge.com

Affiliation: Pacific Gas and Electric Company

Subject: PG&E's Comments on the ARB's July 25, 2011 Proposed Modifications to the MRR  
Comment:

Attached, in PDF format, are Pacific Gas and Electric Company's  
Comments on the Air Resources Board's July 25, 2011 Proposed  
Modifications to the Mandatory Reporting Regulation.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/72-081111\\_mrr\\_pg\\_ecomments\\_00118449.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/72-081111_mrr_pg_ecomments_00118449.pdf)

Original File Name: 081111\_MRR\_PG&EComments\_00118449.pdf

Date and Time Comment Was Submitted: 2011-08-11 10:58:41

No Duplicates.

## **Comment 20 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: Carl

Last Name: Wirdak

Email Address: carl\_wirdak@oxy.com

Affiliation: Occidental Petroleum

Subject: Occidental Petroleum comments

Comment:

Please see attached Occidental Petroleum comments on Mandatory Reporting of GHG Emissions - Proposed 15-Day Modifications.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/73-oxy\\_comments\\_jul\\_15d\\_mrr.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/73-oxy_comments_jul_15d_mrr.pdf)

Original File Name: Oxy comments Jul 15d MRR.pdf

Date and Time Comment Was Submitted: 2011-08-11 11:05:34

No Duplicates.

## **Comment 21 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

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

## **Comment 22 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: Margaret

Last Name: Orr

Email Address: Non-web submitted comment

Affiliation:

Subject: Central Contra Costa Sanitary District

Comment:

please see attached.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/75-central\\_contra\\_costa\\_sanitary\\_discript\\_mmr\\_15\\_day\\_comment.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/75-central_contra_costa_sanitary_discript_mmr_15_day_comment.pdf)

Original File Name: Central Contra Costa Sanitary Discript MMR 15 Day Comment.pdf

Date and Time Comment Was Submitted: 2011-08-11 11:22:02

No Duplicates.

## **Comment 23 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: Matthew

Last Name: Hodges

Email Address: matt.hodges@valero.com

Affiliation: Valero Companies

Subject: Valero Comments, CARB Mandatory Reporting 15- Day Rulemaking Package  
Comment:

Valero Comments, CARB Mandatory Reporting 15- Day Rulemaking  
Package

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/76-valero\\_comment\\_letter\\_concerning\\_the\\_ab32\\_inventory\\_rule\\_8-11-11.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/76-valero_comment_letter_concerning_the_ab32_inventory_rule_8-11-11.pdf)

Original File Name: Valero Comment letter Concerning the AB32 inventory rule 8-11-11.pdf

Date and Time Comment Was Submitted: 2011-08-11 12:43:24

No Duplicates.



## **Comment 24 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: Justin

Last Name: Oldfield

Email Address: justin@calcattlemen.org

Affiliation: California Cattlemen's Association

Subject: Mandatory Reporting Comments

Comment:

See attached.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/77-15\\_day\\_change\\_cca\\_comments.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/77-15_day_change_cca_comments.pdf)

Original File Name: 15 day change CCA Comments.pdf

Date and Time Comment Was Submitted: 2011-08-11 12:54:17

No Duplicates.

## **Comment 25 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: William

Last Name: Westerfield

Email Address: wwester@smud.org

Affiliation: Sacramento Municipal Utility District

Subject: SMUD Comments on Proposed 15-Day Modifications to Reg for Mandatory Reporting of GHG Em.

Comment:

Attached find SMUD Comments on Proposed 15-Day Modifications to Regulation for Mandatory Reporting of Greenhouse Gas Emissions.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/78-smud\\_comments\\_on\\_proposed\\_15-day\\_modifications\\_to\\_reg.\\_for\\_mandatory\\_reporting\\_of\\_ghg\\_emissions.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/78-smud_comments_on_proposed_15-day_modifications_to_reg._for_mandatory_reporting_of_ghg_emissions.pdf)

Original File Name: SMUD Comments on Proposed 15-day Modifications to Reg. for Mandatory Reporting of GHG Emissions.pdf

Date and Time Comment Was Submitted: 2011-08-11 13:12:13

No Duplicates.

## **Comment 26 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: Ashley

Last Name: Charest

Email Address: acharest@glasswebsite.com

Affiliation: Glass Association of North America

Subject: Comments for Board Item ghg2010

Comment:

Attached is a comment letter on behalf of the Glass Association of North America, via its Flat Glass Manufacturing Division Environmental Committee.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/79-gana\\_15-day\\_cap\\_and\\_trade\\_comments\\_-\\_final\\_-\\_2011.08.11.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/79-gana_15-day_cap_and_trade_comments_-_final_-_2011.08.11.pdf)

Original File Name: GANA 15-day cap and trade comments - FINAL - 2011.08.11.pdf

Date and Time Comment Was Submitted: 2011-08-11 13:19:09

No Duplicates.

## **Comment 27 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: Keith

Last Name: Adams

Email Address: ADAMSKB@airproducts.com

Affiliation: Air Products

Subject: Air Products Comments on the 15-Day Modifications to the MRR

Comment:

Air Products Comments on 15-Day Modifications to the MRR

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/81-air\\_products\\_comments\\_-\\_proposed\\_mandatory\\_reporting\\_regulation\\_modifications\\_20110811.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/81-air_products_comments_-_proposed_mandatory_reporting_regulation_modifications_20110811.pdf)

Original File Name: Air Products Comments - Proposed Mandatory Reporting Regulation Modifications 20110811.pdf

Date and Time Comment Was Submitted: 2011-08-11 13:49:29

No Duplicates.

## **Comment 28 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: Bret

Last Name: Reich

Email Address: [bret.reich@kernrivergas.com](mailto:bret.reich@kernrivergas.com)

Affiliation: Kern River Gas Transmission Company

Subject: Comments to the Mandatory Reporting Requirements

Comment:

Kern River respectfully submits the attached comments for consideration by the California Air Resources Board.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/82-kern\\_river\\_mandatory\\_reporting\\_rule\\_comments.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/82-kern_river_mandatory_reporting_rule_comments.pdf)

Original File Name: Kern River Mandatory Reporting Rule Comments.pdf

Date and Time Comment Was Submitted: 2011-08-11 13:50:22

No Duplicates.

## **Comment 29 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: Dorothy

Last Name: Rothrock

Email Address: drothrock@cmta.net

Affiliation: Calif. Manufacturers & Technology Assn.

Subject: Proposed Amendments to the Regulation for the Mandatory Reporting of GHG Emissions

Comment:

Comments by the California Manufacturers & Technology Association are attached.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/83-cmta\\_mrr\\_comments\\_final.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/83-cmta_mrr_comments_final.pdf)

Original File Name: CMTA MRR Comments Final.pdf

Date and Time Comment Was Submitted: 2011-08-11 14:01:10

No Duplicates.

## **Comment 30 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: Barbara  
Last Name: McBride  
Email Address: bmcbride@calpine.com  
Affiliation: Calpine

Subject: Proposed 15-Day Modifications to the Proposed Amendments - Mandatory Reporting  
GHG Emissio

Comment:

Attached are Calpine's comments on the Proposed 15-Day  
Modifications to the Proposed Amendments to the Regulation for the  
Mandatory Reporting of Greenhouse Gas Emissions.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/84-8-11-2011\\_calpine\\_comments\\_re\\_proposed\\_15-day\\_modifications\\_-\\_mandatory\\_reporting\\_\\_ghg.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/84-8-11-2011_calpine_comments_re_proposed_15-day_modifications_-_mandatory_reporting__ghg.pdf)

Original File Name: 8-11-2011 Calpine Comments re Proposed 15-Day Modifications -  
Mandatory Reporting GHG.pdf

Date and Time Comment Was Submitted: 2011-08-11 14:01:03

No Duplicates.

## **Comment 31 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: Seema

Last Name: Srinivasan

Email Address: sls@a-klaw.com

Affiliation:

Subject: EPUC/CAC Comments

Comment:

The Energy Producers & Users Coalition and the Cogeneration Association of California comments on Revised Definition of Cogeneration in Reporting Regulations

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/85-cac.epuc\\_comments\\_on\\_revised\\_reporting\\_regulations\\_8.11.11.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/85-cac.epuc_comments_on_revised_reporting_regulations_8.11.11.pdf)

Original File Name: CAC.EPUC Comments on Revised Reporting Regulations 8.11.11.pdf

Date and Time Comment Was Submitted: 2011-08-11 14:33:23

No Duplicates.



## **Comment 32 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: Jerry

Last Name: Schwartz

Email Address: jerry\_schwartz@afandpa.org

Affiliation: AF&PA

Subject: AF&PA Comments on Cap and Trade Proposal

Comment:

Attached are AF&PA's comments on the Notice of Availability of Modified Text and Availability of Additional Documents for the Amendments to the Regulation for Mandatory Reporting of Greenhouse Gas Emissions.

Thank you. Jerry Schwartz

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/86-afpa\\_comments\\_on\\_proposed\\_california\\_cap\\_and\\_trade\\_final\\_8-11-11.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/86-afpa_comments_on_proposed_california_cap_and_trade_final_8-11-11.pdf)

Original File Name: AFPA comments on Proposed California Cap and Trade Final 8-11-11.pdf

Date and Time Comment Was Submitted: 2011-08-11 15:15:33

No Duplicates.

## **Comment 33 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: Clare

Last Name: Breidenich

Email Address: cbreidenich@aciem.us

Affiliation: Western Power Trading Forum

Subject: Comments on Reporting Regulation

Comment:

Attached please find comments of the Western Power Trading Forum on the Proposed Amendments to the Mandatory Reporting of GHG Emissions.

Thank You,  
Clare Breidenich  
WPTF GHG Committee

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/87-8-11-11\\_wptf\\_to\\_carb\\_on\\_amendments\\_to\\_mandatory\\_reporting.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/87-8-11-11_wptf_to_carb_on_amendments_to_mandatory_reporting.pdf)

Original File Name: 8-11-11 WPTF to CARB on Amendments to Mandatory Reporting.pdf

Date and Time Comment Was Submitted: 2011-08-11 15:37:50

No Duplicates.

## **Comment 34 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: Barry  
Last Name: Wallerstein  
Email Address: BWallerstein@aqmd.gov  
Affiliation: South Coast AQMD

Subject: SCAQMD Comments on the Amendments to the Regulation for the Mandatory Reporting of GHGs

Comment:

Please see comments provided in the attached file.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/88-scaqmd\\_staff\\_commentletter-mandatoryreportingghg.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/88-scaqmd_staff_commentletter-mandatoryreportingghg.pdf)

Original File Name: SCAQMD Staff CommentLetter-MandatoryReportingGHG.pdf

Date and Time Comment Was Submitted: 2011-08-11 15:29:48

No Duplicates.

### **Comment 35 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

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

## **Comment 36 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: Dan

Last Name: Kalb

Email Address: dkalb@ucsusa.org

Affiliation: Union of Concerned Scientists

Subject: UCS comments on GHG Mandatory Reporting regulation

Comment:

UCS comments on modified GHG Mandatory Reporting regulation are attached. There are two comments: One dealing with the definition of replacement electricity; and one dealing with reaccreditation of offset verification entities.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/91-ucs\\_comments\\_on\\_ghg\\_mandatory\\_reporting\\_regulation.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/91-ucs_comments_on_ghg_mandatory_reporting_regulation.pdf)

Original File Name: UCS comments on GHG Mandatory Reporting regulation.pdf

Date and Time Comment Was Submitted: 2011-08-11 15:51:58

No Duplicates.

## **Comment 37 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: Kelly

Last Name: O'Donnell

Email Address: kelly.odonnell@sce.com

Affiliation: Southern California Edison

Subject: SCE's Comments on 15-Day Proposed Modifications to GHG Reporting Requirements  
Comment:

SCE's comments are attached. Please contact me with any questions.  
Thank you.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/92-sce\\_comments\\_on\\_15-day\\_language\\_for\\_mandatory\\_reporting\\_regulation.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/92-sce_comments_on_15-day_language_for_mandatory_reporting_regulation.pdf)

Original File Name: SCE comments on 15-day language for mandatory reporting regulation.pdf

Date and Time Comment Was Submitted: 2011-08-11 15:57:41

No Duplicates.

## **Comment 38 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: Rob

Last Name: Simon

Email Address: Robert\_Simon@americanchemistry.com

Affiliation: American Chemistry Council

Subject: Rulemaking to Consider Amendments to the Regulation for Mandatory Reporting of Greenhouse

Comment:

The Industrial Gases Panel of the American Chemistry Council appreciates the opportunity to submit comments on the "Proposed 15 Day Modifications" posted on July 25, 2011. We offer the enclosed comments to inform and enhance the Air Resource Board's efforts.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/93-igp\\_comments\\_arb\\_15\\_day\\_final\\_reporting.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/93-igp_comments_arb_15_day_final_reporting.pdf)

Original File Name: IGP Comments ARB 15 day FINAL REPORTING.pdf

Date and Time Comment Was Submitted: 2011-08-11 16:03:22

No Duplicates.

## **Comment 39 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: James

Last Name: Campbell

Email Address: james.campbell@pacificorp.com

Affiliation:

Subject: PacifiCorp MRR 15-day Comments

Comment:

Please find comments attached.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/94-final\\_mrr\\_july\\_25\\_15-day\\_comments.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/94-final_mrr_july_25_15-day_comments.pdf)

Original File Name: Final MRR July 25 15-Day Comments.pdf

Date and Time Comment Was Submitted: 2011-08-11 16:04:38

No Duplicates.



## **Comment 40 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: Jimmy

Last Name: Samartzis

Email Address: jimmy.samartzis@united.com

Affiliation: United Airlines, Inc.

Subject: United Airlines, Inc. Comments on California Mandatory Reporting Regulation  
Comment:

Please find attached the United Airlines, Inc. comments on the California Regulation for Mandatory Reporting of Greenhouse Gas Emissions.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/95-united\\_airlines\\_\\_inc.\\_california\\_cap\\_and\\_trade\\_comments\\_8.11.2011.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/95-united_airlines__inc._california_cap_and_trade_comments_8.11.2011.pdf)

Original File Name: United Airlines, Inc. California Cap and Trade Comments 8.11.2011.PDF

Date and Time Comment Was Submitted: 2011-08-11 16:08:50

No Duplicates.

## **Comment 41 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: Shawn

Last Name: Bailey

Email Address: sbailey@semprageneration.com

Affiliation: Sempra Generation

Subject: Mandatory Reporting Rule Comments

Comment:

Please find attached comments regarding the Mandatory Reporting Rule.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/96-carb\\_7-2011\\_reporting\\_rule\\_-\\_sempra\\_generation\\_comments.docx](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/96-carb_7-2011_reporting_rule_-_sempra_generation_comments.docx)

Original File Name: CARB 7-2011 Reporting Rule - Sempra Generation Comments.docx

Date and Time Comment Was Submitted: 2011-08-11 16:13:17

No Duplicates.

## **Comment 42 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: Norman

Last Name: Plotkin

Email Address: norm@pzallc.com

Affiliation: California Independent Petroleum Associa

Subject: CIPA MRR Comments

Comment:

Please find attached comments from the California Independent Petroleum Association (CIPA) on the Mandatory Reporting Requirement.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/97-cipa\\_mandatory\\_reporting\\_requirement\\_comments\\_august\\_11\\_2011.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/97-cipa_mandatory_reporting_requirement_comments_august_11_2011.pdf)

Original File Name: CIPA Mandatory Reporting Requirement Comments August 11,2011.pdf

Date and Time Comment Was Submitted: 2011-08-11 16:23:24

No Duplicates.

## **Comment 43 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: Milan

Last Name: Steube

Email Address: milans@cox.net

Affiliation:

Subject: GHG MRR Section 95153(v) - Produced Water Dissolved CO2

Comment:

Regarding Section 95153(v) - Produced Water Dissolved CO2:

1. The first line says: "Produced Water Dissolved CO2. The operator must calculate dissolved CO2 and CH4 in produced water as follows:" The remainder of the section does not mention CH4. Are CH4 emissions required to be reported or not?

2. Item (3) provides an exemption for "EOR operations that route produced water from separation directly to re-injection into the hydrocarbon reservoir in a closed loop system without any leakage to atmosphere".

a. Section 95102(a)(128) appears to define "EOR" to include water flooding. Is this a correct interpretation?

b. Since no system is 100% leak free 100% of the time, what is the definition of "a closed loop system without any leakage to the atmosphere"? Can such a system include a water storage or surge tank that is connected to a typical oilfield vapor recovery system upstream of the re-injection pumps (and which may vent to atmosphere via a pressure relief valve when process conditions are abnormal)? Does a system ((even if it does not include any tanks) qualify if it has an occasional leak (e.g., water with dissolved gases dripping from a valve stem or flange)?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-08-11 16:24:24

No Duplicates.

## **Comment 44 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: Julee

Last Name: Malinowski-Ball

Email Address: julee@ppallc.com

Affiliation: California Biomass Energy Alliance

Subject: Comments on the treatment of biomass power in the Air Resources Board's Proposed Mandatory

Comment:

Attached please find California Biomass Energy Alliance Comments on the treatment of biomass power in the Air Resources Board's Proposed Mandatory Reporting of Greenhouse Gas Emissions 15-day Language

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/99-arb\\_mandatory\\_reporting\\_15-day\\_language\\_comments\\_final\\_8-11-11.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/99-arb_mandatory_reporting_15-day_language_comments_final_8-11-11.pdf)

Original File Name: ARB Mandatory Reporting 15-day Language Comments FINAL 8-11-11.pdf

Date and Time Comment Was Submitted: 2011-08-11 16:32:43

No Duplicates.

## **Comment 45 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: John

Last Name: Larrea

Email Address: john@clfp.com

Affiliation:

Subject: Comments on 15-day changes to MRR

Comment:

California League of Food Processors submits the attached comments on the proposed changes to the Mandatory Reporting of Greenhouse Gases.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/100-clfp\\_mrr\\_comments\\_-\\_8-11-2011.docx](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/100-clfp_mrr_comments_-_8-11-2011.docx)

Original File Name: CLFP MRR Comments - 8-11-2011.docx

Date and Time Comment Was Submitted: 2011-08-11 16:35:03

No Duplicates.

## **Comment 46 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: Nicholas W.  
Last Name: van Aelstyn  
Email Address: nvanaelstyn@bdlaw.com  
Affiliation: Beveridge & Diamond, P.C.

Subject: Comments of Powerex Corp. on Proposed Modifications to Mandatory Reporting Rule  
Comment:

On behalf of Powerex Corp., I submit the following comments on the California Air Resources Board's Proposed Modifications to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions.

Sincerely,

Nicholas W. van Aelstyn

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/101-2011-08-11\\_powerex\\_comments\\_on\\_proposed\\_modifications\\_to\\_mrr\\_and\\_cap-and-trade\\_rule.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/101-2011-08-11_powerex_comments_on_proposed_modifications_to_mrr_and_cap-and-trade_rule.pdf)

Original File Name: 2011-08-11 Powerex Comments on Proposed Modifications to MRR and Cap-and-Trade Rule.pdf

Date and Time Comment Was Submitted: 2011-08-11 16:33:57

No Duplicates.

## **Comment 47 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: Robert

Last Name: Lucas

Email Address: bob.lucas@calobby.com

Affiliation:

Subject: CCEEB Comment Letter re Amendments to Mandatory Reporting Reg.  
Comment:

Thank you for the opportunity to comment. If you have any questions, please do not hesitate to contact me at 916444-7337.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/102-cceeb\\_comment\\_ltr\\_re\\_15\\_day\\_notice\\_on\\_mandatory\\_reporting.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/102-cceeb_comment_ltr_re_15_day_notice_on_mandatory_reporting.pdf)

Original File Name: CCEEB Comment Ltr re 15 day Notice on Mandatory Reporting.pdf

Date and Time Comment Was Submitted: 2011-08-11 16:36:58

No Duplicates.



## **Comment 48 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: Thomas

Last Name: Corr

Email Address: thomaspcorr@gmail.com

Affiliation:

Subject: COMMENTS OF NOBLE SOLUTIONS ON MRR AND CAP-AND-TRADE  
PROPOSED REGULATIONS

Comment:

COMMENTS OF NOBLE SOLUTIONS

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/103-noble\\_solutions\\_comments\\_on\\_mrr\\_and\\_c\\_t\\_.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/103-noble_solutions_comments_on_mrr_and_c_t_.pdf)

Original File Name: NOBLE SOLUTIONS COMMENTS on MRR and C&T .pdf

Date and Time Comment Was Submitted: 2011-08-11 16:45:54

No Duplicates.

## **Comment 49 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: Lily

Last Name: Mitchell

Email Address: l Mitchell@hanmor.com

Affiliation: SCPPA

Subject: SCPPA comments on 15-day changes to Mandatory Reporting Regulation

Comment:

Please find attached the comments of the Southern California Public Power Authority on the 15-day changes to the Mandatory Reporting Regulation.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/104-300226001lmm08111102\\_mrr\\_comment\\_15-day\\_\\_1\\_.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/104-300226001lmm08111102_mrr_comment_15-day__1_.pdf)

Original File Name: 300226001lmm08111102 MRR comment 15-day \_1\_.pdf

Date and Time Comment Was Submitted: 2011-08-11 16:50:17

No Duplicates.

## **Comment 50 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: Lily

Last Name: Mitchell

Email Address: l Mitchell@hanmor.com

Affiliation: SCPPA

Subject: SCPPA comments on biomass-derived fuel provisions in MRR and Cap and Trade Regulation

Comment:

Please find attached the comments of the Southern California Public Power Authority on the provisions on biomass-derived fuel in the 15-day versions of the Mandatory Reporting Regulation and the Cap and Trade Regulation.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/105-300226001lmm08111103\\_biofuel\\_comment\\_15-day\\_\\_1\\_.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/105-300226001lmm08111103_biofuel_comment_15-day__1_.pdf)

Original File Name: 300226001lmm08111103 Biofuel comment 15-day \_1\_.pdf

Date and Time Comment Was Submitted: 2011-08-11 16:52:27

No Duplicates.

## **Comment 51 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: Cindy

Last Name: Parsons

Email Address: cindy.parsons@ladwp.com

Affiliation: Los Angeles Department of Water & Power

Subject: Comments on Proposed Modifications to Mandatory Reporting Regulation dated 7-25-11

Comment:

See attached comments.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/106-ladwp\\_comments\\_on\\_proposed\\_modifications\\_to\\_mandatory\\_reporting\\_regulation\\_dated\\_7-25-11.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/106-ladwp_comments_on_proposed_modifications_to_mandatory_reporting_regulation_dated_7-25-11.pdf)

Original File Name: LADWP Comments on Proposed Modifications to Mandatory Reporting Regulation dated 7-25-11.pdf

Date and Time Comment Was Submitted: 2011-08-11 16:53:30

No Duplicates.

## **Comment 52 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: James

Last Name: Wintergreen

Email Address: jtw@firstenvironment.com

Affiliation: First Environment, Inc.

Subject: First Environment's 15-day comments on the MRR

Comment:

First Environment's 15-day comments on the Mandatory GHG Reporting Regulation are provided in the attached letter.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/108-firstenvironment\\_15daycomments\\_mrr.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/108-firstenvironment_15daycomments_mrr.pdf)

Original File Name: FirstEnvironment\_15daycomments\_MRR.pdf

Date and Time Comment Was Submitted: 2011-08-11 16:54:44

No Duplicates.

## **Comment 53 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: Brenda

Last Name: Coleman

Email Address: [brenda.coleman@calchamber.com](mailto:brenda.coleman@calchamber.com)

Affiliation: California Chamber of Commerce

Subject: California Chamber comments on MRR

Comment:

Please see attached.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/109-mrr\\_comments.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/109-mrr_comments.pdf)

Original File Name: MRR comments.pdf

Date and Time Comment Was Submitted: 2011-08-11 16:57:02

No Duplicates.

## **Comment 54 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: Casey

Last Name: Creamer

Email Address: casey@ccgga.org

Affiliation: CCGGA/WAPA/Nisei

Subject: Mandatory Reporting

Comment:

see attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/110-doc081111.pdf>

Original File Name: DOC081111.pdf

Date and Time Comment Was Submitted: 2011-08-11 17:00:23

No Duplicates.

## **Comment 55 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: Tamara  
Last Name: Raspberry  
Email Address: TRaspberry@semprautilities.com  
Affiliation:

Subject: Sempra Energy Utilities  
Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/111-sempra.pdf>

Original File Name: Sempra.pdf

Date and Time Comment Was Submitted: 2011-08-12 10:45:23

No Duplicates.



## **Comment 56 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-1.**

First Name: Brian  
Last Name: Bateman  
Email Address: BBateman@baaqmd.gov  
Affiliation:

Subject: Bay Area AQMD  
Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/112-ghg.pdf>

Original File Name: GHG.pdf

Date and Time Comment Was Submitted: 2011-08-12 10:45:23

No Duplicates.

## **Comment 1 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-2.**

First Name: Kurt

Last Name: Werner

Email Address: ktwerner@mmm.com

Affiliation: 3M

Subject: GHG Reporting / Definition of Fluorinated greenhouse gas

Comment:

3M recognizes that the definition of fluorinated ghg is consistent with the U.S. EPA definition and that both definitions exempt materials with a vapor pressure of less than 1 mmHg at 25C. Please be aware that the vapor pressure threshold in this definition raised concerns because EPA also defined, "heat transfer fluids" and tied the definition of a heat transfer fluid to the definition of a fluorinated ghg. The concern, simply stated, is that heat transfer fluids are used at elevated temperatures so their vapor pressures at 25C are not indicative of emission potential. EPA has recently proposed amending the definition of a heat transfer fluid to address this concern. EPA's proposal is attached (pg 56022). 3M calls CARB's attention to this issue in the event CARB, in the future, also defines heat transfer fluid.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/113-epa\\_ghg\\_reporting\\_rule\\_subpart\\_i\\_proposed\\_rule\\_to\\_correct\\_htfs.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/113-epa_ghg_reporting_rule_subpart_i_proposed_rule_to_correct_htfs.pdf)

Original File Name: EPA GHG Reporting Rule Subpart I Proposed Rule to correct HTFs.pdf

Date and Time Comment Was Submitted: 2011-09-13 10:47:49

No Duplicates.

## **Comment 2 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-2.**

First Name: Courtney

Last Name: Olive

Email Address: jcolive@bpa.gov

Affiliation: Bonneville Power Administration

Subject: Bonneville Power Administration comment on Amendments to Reg for GHG Reporting  
Comment:

Please see attachment

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/114-9.20.11\\_comment\\_to\\_carb\\_letter\\_\\_version\\_filed\\_.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/114-9.20.11_comment_to_carb_letter__version_filed_.pdf)

Original File Name: 9.20.11\_comment\_to\_carb\_letter (version filed).pdf

Date and Time Comment Was Submitted: 2011-09-20 12:28:02

No Duplicates.

### **Comment 3 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-2.**

First Name: Koji

Last Name: Kawamura

Email Address: kawamura@wapa.gov

Affiliation:

Subject: Western Area Power Admin Comments

Comment:

See attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/115-carbltr9.21.11.pdf>

Original File Name: CARBltr9.21.11.pdf

Date and Time Comment Was Submitted: 2011-09-22 07:54:24

No Duplicates.

#### **Comment 4 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-2.**

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

## **Comment 5 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-2.**

First Name: John

Last Name: Bloom

Email Address: houstgrp@pacbell.net

Affiliation: CSCME

Subject: Comments on the ARB Revised AB 32 Mandatory Reporting Regulations Issued Sept 12, 2011

Comment:

Please accept the attached comments from the Coalition for Sustainable Cement Manufacturing & Environment (CSCME) on the ARB revised AB 32 Mandatory Reporting Regulations issued on September 12, 2011.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/117-ab\\_32\\_mandatory\\_reporting\\_comments.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/117-ab_32_mandatory_reporting_comments.pdf)

Original File Name: AB 32 Mandatory Reporting Comments.pdf

Date and Time Comment Was Submitted: 2011-09-26 13:04:14

No Duplicates.

## **Comment 6 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-2.**

First Name: Shelly

Last Name: Sullivan

Email Address: ssullivan@onemain.com

Affiliation: AB 32 Implementation Group

Subject: AB 32 IC Comments on 2nd 15-day MRR rulemaking package

Comment:

Attached please find comments submitted on behalf of the AB 32 Implementation Group regarding CARB's 2nd 15-day rulemaking package for the MRR.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/118-ig\\_2nd\\_15\\_day\\_mrr\\_comments\\_9\\_26\\_final.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/118-ig_2nd_15_day_mrr_comments_9_26_final.pdf)

Original File Name: IG 2nd\_15\_day MRR comments\_9\_26\_FINAL.pdf

Date and Time Comment Was Submitted: 2011-09-26 13:54:56

No Duplicates.

## **Comment 7 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-2.**

First Name: Craig  
Last Name: Moyer  
Email Address: cmoyer@manatt.com  
Affiliation: WIRA

Subject: WIRA's MRR Comments on 2nd 15 Day Package  
Comment:

Please see attached the Western Independent Refiners Association  
Comments on the Mandatory Reporting Regulation (Sept. 12 2011  
Proposed 15 Day Modifications). Thank you.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/119-wira\\_mrr\\_comments\\_9-26-11.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/119-wira_mrr_comments_9-26-11.pdf)

Original File Name: WIRA MRR Comments 9-26-11.pdf

Date and Time Comment Was Submitted: 2011-09-26 16:45:01

No Duplicates.



## **Comment 8 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-2.**

First Name: Bart

Last Name: Leininger

Email Address: bleininger@algcorp.com

Affiliation: Ashworth Leininger Group

Subject: Liability Insurance Requirements for Verification Bodies

Comment:

Please see the attached letter.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/122-alg\\_-\\_carb\\_ghg\\_comment\\_letter\\_-\\_insurance\\_requirement\\_-\\_2011-09-27.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/122-alg_-_carb_ghg_comment_letter_-_insurance_requirement_-_2011-09-27.pdf)

Original File Name: ALG - CARB GHG comment letter - insurance requirement - 2011-09-27.pdf

Date and Time Comment Was Submitted: 2011-09-27 13:31:21

No Duplicates.

## **Comment 9 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-2.**

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

Subject: WSPA Comments on Mandatory Reporting of GHG Emissions  
Comment:

Please see attached WSPA Mandatory Reporting of Greenhouse Gas Emissions - Comments on 2nd Proposed 15-Day Modifications.Thank you.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/123-wspa\\_comments\\_on\\_mandatory\\_reporting\\_ghg\\_emissions\\_092711\\_\\_2\\_.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/123-wspa_comments_on_mandatory_reporting_ghg_emissions_092711__2_.pdf)

Original File Name: WSPA Comments on Mandatory Reporting GHG Emissions 092711 (2).pdf

Date and Time Comment Was Submitted: 2011-09-27 13:28:54

No Duplicates.

## **Comment 10 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-2.**

First Name: Steve

Last Name: Huhman

Email Address: steven.huhman@morganstanley.com

Affiliation: Morgan Stanley Capital Group, Inc.

Subject: Comments on Mandatory Reporting Rule

Comment:

Attached please find comments of Morgan Stanley Capital Group Inc.  
on the 9/12/11 version of the Mandatory Reporting Rule

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/124-arb\\_mandatory\\_reporting\\_rule\\_comments\\_9-27-11.doc](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/124-arb_mandatory_reporting_rule_comments_9-27-11.doc)

Original File Name: ARB Mandatory Reporting Rule Comments 9-27-11.doc

Date and Time Comment Was Submitted: 2011-09-27 13:37:55

No Duplicates.

## **Comment 11 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-2.**

First Name: Bruce

Last Name: Moore

Email Address: bruce.moore@ladwp.com

Affiliation: LADWP

Subject: AB32 Mandatory Reporting Regulation, Comment Letter from LADWP

Comment:

Submitted on 9/27/11 to ARB.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/126-ladwp\\_to\\_arb\\_\\_ab32\\_mandatory\\_reporting\\_regulation\\_\\_comment\\_letter\\_\\_final\\_9-27-11.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/126-ladwp_to_arb__ab32_mandatory_reporting_regulation__comment_letter__final_9-27-11.pdf)

Original File Name: LADWP to ARB, AB32 Mandatory Reporting Regulation, Comment Letter, Final 9-27-11.pdf

Date and Time Comment Was Submitted: 2011-09-27 13:38:05

No Duplicates.

## **Comment 12 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-2.**

First Name: Shawn

Last Name: Bailey

Email Address: sbailey@semprageneration.com

Affiliation: Sempra Generation

Subject: Comments on Second Modified Mandatory Reporting Rule

Comment:

Attached are the comments of Sempra Generation on the second modified mandatory reporting rule.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/127-carb\\_9-2011\\_reporting\\_rule\\_-\\_sempra\\_generation\\_comments.docx](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/127-carb_9-2011_reporting_rule_-_sempra_generation_comments.docx)

Original File Name: CARB 9-2011 Reporting Rule - Sempra Generation Comments.docx

Date and Time Comment Was Submitted: 2011-09-27 13:59:10

No Duplicates.

## **Comment 13 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-2.**

First Name: Marcie

Last Name: Milner

Email Address: marcie.milner@shell.com

Affiliation:

Subject: Comments to the Modifications of the Mandatory Reporting Regulation  
Comment:

Please find attached the comments of Shell Energy North America (US), L.P. "Shell Energy" to the proposed modifications of the Mandatory Reporting Regulation.

Regards,

Marcie Milner

Vice President, Regulatory Affairs

Shell Energy North America (US), L.P.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/129-shell\\_energy\\_comments\\_to\\_carb\\_mandatory\\_reporting\\_regulation\\_\\_9-27-11\\_.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/129-shell_energy_comments_to_carb_mandatory_reporting_regulation__9-27-11_.pdf)

Original File Name: Shell Energy Comments to CARB Mandatory Reporting Regulation (9-27-11).pdf

Date and Time Comment Was Submitted: 2011-09-27 15:12:11

No Duplicates.

## **Comment 14 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-2.**

First Name: Judi

Last Name: Mosley

Email Address: jkm8@pge.com

Affiliation: Pacific Gas and Electric Company

Subject: PG&E's Comments on ARB's Sept. 12, 2011 Proposed Modifications to the MRR.

Comment:

Attached in PDF format, are Pacific Gas and Electric Company's  
Comments on the Air Resources Board's September 12, 2011 Proposed  
Modifications to the Mandatory Reporting Regulation ("MRR").

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/130-clean\\_092711\\_final\\_mrr\\_pg\\_ecomments\\_00119575.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/130-clean_092711_final_mrr_pg_ecomments_00119575.pdf)

Original File Name: clean\_092711\_FINAL\_MRR\_PG&EComments\_00119575.pdf

Date and Time Comment Was Submitted: 2011-09-27 15:11:26

No Duplicates.

## **Comment 15 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-2.**

First Name: Carl

Last Name: Wirdak

Email Address: carl\_wirdak@oxy.com

Affiliation: Occidental Petroleum

Subject: Oxy comments on September 15-day changes

Comment:

Please see attached Occidental Petroleum comments on Mandatory Reporting of GHG Emissions – Proposed 15-Day Modifications.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/131-oxy\\_comments\\_sep\\_15d\\_mrr\\_092711.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/131-oxy_comments_sep_15d_mrr_092711.pdf)

Original File Name: Oxy comments Sep 15d MRR 092711.pdf

Date and Time Comment Was Submitted: 2011-09-27 15:56:07

No Duplicates.



## **Comment 16 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-2.**

First Name: Clare

Last Name: Breidenich

Email Address: cbreidenich@aciem.us

Affiliation: Western Power Trading Forum

Subject: Comments on Reporting Regulation (2nd package)

Comment:

Please find attached comments of the Western Power Trading Forum on the 2nd proposed modifications to the Mandatory Reporting Regulation.

Thank you,

Clare Breidenich

WPTF GHG Committee Director

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/132-9-27-11\\_wptf\\_comments\\_to\\_carb\\_on\\_2nd\\_mrr\\_amendments.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/132-9-27-11_wptf_comments_to_carb_on_2nd_mrr_amendments.pdf)

Original File Name: 9-27-11 WPTF Comments to CARB on 2nd MRR Amendments.pdf

Date and Time Comment Was Submitted: 2011-09-27 16:02:18

No Duplicates.

## **Comment 17 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-2.**

First Name: Brenda

Last Name: Coleman

Email Address: [brenda.coleman@calchamber.com](mailto:brenda.coleman@calchamber.com)

Affiliation: California Chamber of Commerce

Subject: Second 15-Day Rulemaking Comments

Comment:

Please see attached

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/133-second\\_15-day\\_comments.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/133-second_15-day_comments.pdf)

Original File Name: Second 15-day Comments.pdf

Date and Time Comment Was Submitted: 2011-09-27 16:05:08

No Duplicates.

## **Comment 18 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-2.**

First Name: Joyce  
Last Name: Dillard  
Email Address: dillardjoyce@yahoo.com  
Affiliation:

Subject: ghg2010.  
Comment:

We do not understand your authority over 40 CFR Parts 75 and Parts 98.

We do not understand the regulatory agency over such data as the law appears to really be the Clean Air Act.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-09-27 16:28:28

No Duplicates.

## **Comment 19 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-2.**

First Name: Barbara

Last Name: McBride

Email Address: Barbara.McBride@calpine.com

Affiliation: Calpine Corporation

Subject: Calpine Comments

Comment:

Attached are Calpine's comments re Proposed Second 15-Day Modifications to Proposed Amendments to the Regulation for Mandatory Reporting of Greenhouse Gas Emissions.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/135-9-27-2011\\_calpine\\_comments\\_re\\_proposed\\_15-day\\_modifications\\_-\\_mandatory\\_reporting\\_\\_ghg.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/135-9-27-2011_calpine_comments_re_proposed_15-day_modifications_-_mandatory_reporting__ghg.pdf)

Original File Name: 9-27-2011 Calpine Comments re Proposed 15-Day Modifications - Mandatory Reporting GHG.pdf

Date and Time Comment Was Submitted: 2011-09-27 16:33:29

No Duplicates.

## **Comment 20 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-2.**

First Name: Kirk

Last Name: Marckwald

Email Address: kirk@ceaconsulting.com

Affiliation:

Subject: Railroad Industry Comments on the 2nd 15-Day Change Notice for MRR and CTR  
Comment:

Please see attached.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/136-11\\_0927\\_railroad\\_industry\\_comments\\_on\\_2nd\\_15-day\\_change\\_notice\\_for\\_mrr\\_and\\_ctr.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/136-11_0927_railroad_industry_comments_on_2nd_15-day_change_notice_for_mrr_and_ctr.pdf)

Original File Name: 11\_0927\_Railroad Industry Comments on 2nd 15-Day Change Notice for MRR and CTR.pdf

Date and Time Comment Was Submitted: 2011-09-27 16:14:56

No Duplicates.

## **Comment 21 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-2.**

First Name: Lily

Last Name: Mitchell

Email Address: l Mitchell@hanmor.com

Affiliation: SCPPA

Subject: SCPPA comments on second 15-day changes to Mandatory Reporting Regulation  
Comment:

Please find attached the comments of the Southern California Public Power Authority on the second 15-day changes to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/137-300226001lmm09271102\\_mrr\\_comment\\_15-day\\_\\_2\\_.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/137-300226001lmm09271102_mrr_comment_15-day__2_.pdf)

Original File Name: 300226001lmm09271102 MRR comment 15-day \_2\_.pdf

Date and Time Comment Was Submitted: 2011-09-27 16:44:49

No Duplicates.

## **Comment 22 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-2.**

First Name: Nicholas  
Last Name: van Aelstyn  
Email Address: nvanaelstyn@bdlaw.com  
Affiliation: Beveridge & Diamond, PC

Subject: Comments of Powerex Corp. on 2d Set of Proposed Modifications to Mandatory Reporting Rule

Comment:

On behalf of Powerex Corp., I submit the following comments on the California Air Resources Board's second set of Proposed 15-Day Modifications to the Regulation for Mandatory Reporting of Greenhouse Gas Emissions.

Sincerely,

Nicholas W. van Aelstyn

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/138-2011-09-27\\_powerex\\_comments\\_on\\_2d\\_sets\\_of\\_proposed\\_15-day\\_modifications\\_to\\_mrr\\_and\\_cap-and-trade\\_rule.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/138-2011-09-27_powerex_comments_on_2d_sets_of_proposed_15-day_modifications_to_mrr_and_cap-and-trade_rule.pdf)

Original File Name: 2011-09-27 Powerex Comments on 2d Sets of Proposed 15-Day Modifications to MRR and Cap-and-Trade Rule.pdf

Date and Time Comment Was Submitted: 2011-09-27 16:28:08

No Duplicates.

## **Comment 23 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-2.**

First Name: Robert

Last Name: Lucas

Email Address: bob.lucas@calobby.com

Affiliation: CCEEB/Lucas Advocates

Subject: CCEEB's Comment Letter on 15-day Changes to the Mandatory Reporting Regulation  
Comment:

If there are any questions please contact Bob Lucas (916) 444-7337.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/140-cceeb\\_mrr\\_september\\_15-day\\_comment\\_-\\_final.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/140-cceeb_mrr_september_15-day_comment_-_final.pdf)

Original File Name: CCEEB MRR September 15-Day Comment - Final.pdf

Date and Time Comment Was Submitted: 2011-09-27 16:56:39

No Duplicates.



## **Comment 24 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-2.**

First Name: Margaret

Last Name: Orr

Email Address: Non-web submitted comment

Affiliation:

Subject: Central Contra Costa Sanitary District

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/141-mmr.pdf>

Original File Name: MMR.pdf

Date and Time Comment Was Submitted: 2011-09-29 10:29:59

No Duplicates.

## **Comment 25 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-2.**

First Name: Eugene

Last Name: Mitchell

Email Address: emitchell@semprautilities.com

Affiliation:

Subject: Sempra Energy

Comment:

Please see attached.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/142-eugene\\_mitchell.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/142-eugene_mitchell.pdf)

Original File Name: Eugene Mitchell.pdf

Date and Time Comment Was Submitted: 2011-09-30 15:19:53

No Duplicates.

## **Comment 26 for Mandatory Reporting of GHG Emissions (ghg2010) - 15-2.**

First Name: Kelly

Last Name: O'Donnell

Email Address: kelly.odonnell@sce.com

Affiliation:

Subject: Southern California Edison Company

Comment:

Please see attached.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/143-kelly\\_odonnell.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/ghg2010/143-kelly_odonnell.pdf)

Original File Name: Kelly ODonnell.pdf

Date and Time Comment Was Submitted: 2011-10-06 16:13:19

No Duplicates.