

**Comment 1 for Mandatory Reporting, Fee Regulation and Cap and Trade  
(ghg2012) - 45 Day.**

First Name: Clare

Last Name: Breidenich

Email Address: cbreidenich@aciem.us

Affiliation: Western Power Trading Forum

Subject: Comments on the Mandatory Reporting Regulation

Comment:

Attached please find comment of the Western Power Trading Forum on the Proposed Amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions.

Thank you,  
Clare Breidenich  
GHG Committee Director  
Western Power Trading Forum

Attachment: 'www.arb.ca.gov/lists/ghg2012/1-8-30-12\_wptf\_comments\_to\_mandatory\_reporting\_regulation.pdf'

Original File Name: 8-30-12 WPTF Comments to Mandatory Reporting Regulation.pdf

Date and Time Comment Was Submitted: 2012-08-30 15:10:51

No Duplicates.

**Comment 2 for Mandatory Reporting, Fee Regulation and Cap and Trade  
(ghg2012) - 45 Day.**

First Name: Braydon  
Last Name: Boulanger  
Email Address: braydon\_boulanger@transalta.com  
Affiliation: TransAlta

Subject: TransAlta comments 2012 MRR  
Comment:

Please find the attached.

Attachment: 'www.arb.ca.gov/lists/ghg2012/2-transalta\_mrr\_comments\_-\_sept\_2012.pdf'

Original File Name: TransAlta MRR comments - Sept 2012.pdf

Date and Time Comment Was Submitted: 2012-09-10 11:09:43

No Duplicates.

**Comment 3 for Mandatory Reporting, Fee Regulation and Cap and Trade  
(ghg2012) - 45 Day.**

First Name: Mark

Last Name: Krausse

Email Address: mark.krausse@pge.com

Affiliation: Pacific Gas and Electric Company

Subject: PG&E's Comments on Proposed Amendments to Regulation for Mandatory Rpting of  
GHG Emissions

Comment:

Attached in PDF format, are Pacific Gas and Electric Company's  
Comments on the Proposed Amendments to the Regulation for the  
Mandatory Reporting of Greenhouse Gas Emissions.

Attachment: 'www.arb.ca.gov/lists/ghg2012/3-091012\_mrr\_comments\_final.pdf'

Original File Name: 091012\_MRR Comments\_FINAL.pdf

Date and Time Comment Was Submitted: 2012-09-10 13:06:54

No Duplicates.

**Comment 4 for Mandatory Reporting, Fee Regulation and Cap and Trade  
(ghg2012) - 45 Day.**

First Name: Thomas

Last Name: Corr

Email Address: thomaspcorr@gmail.com

Affiliation:

Subject: Comments of Noble Americas Energy Solutions LLC

Comment:

Comments of Noble Americas Energy Solutions LLC

Attachment: 'www.arb.ca.gov/lists/ghg2012/4-final\_noble\_comments\_to\_arb\_13sep2012.pdf'

Original File Name: Final NOBLE COMMENTS TO ARB 13sep2012.pdf

Date and Time Comment Was Submitted: 2012-09-13 17:47:16

No Duplicates.

**Comment 5 for Mandatory Reporting, Fee Regulation and Cap and Trade  
(ghg2012) - 45 Day.**

First Name: Karl  
Last Name: Gawell  
Email Address: karl@geo-energy.org  
Affiliation: Geothermal Energy Assn

Subject: New Requirements for GHG Verification  
Comment:

The Proposed Rule of the California Air Resource Board (17 CCR 950101 et seq) would require some geothermal operators (those emitting > 25,000 MT CO<sub>2</sub>e) to annually provide third-party verified compliance data despite their being without a compliance obligation. Meeting these new requirements will add significant expenses to these operators, costing each reporting unit tens of thousands of dollars annually, without any corresponding benefits to the environment given that any reasonable alternative to geothermal power generation would significant increase the emissions produced.

We would urge CARB to modify this proposal and either remove the requirement for independent third-party verification or return to a 3- year verification requirement for these geothermal operators.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2012-09-14 09:37:05

No Duplicates.

**Comment 6 for Mandatory Reporting, Fee Regulation and Cap and Trade  
(ghg2012) - 45 Day.**

First Name: Norman

Last Name: Pedersen

Email Address: npedersen@hanmor.com

Affiliation: Southern California Public Power Authori

Subject: Proposed Amendments to the MRR

Comment:

Please find attached the Southern California Public Power Authority  
Comment on Proposed Changes to the Mandatory Reporting Regulation.

Attachment: 'www.arb.ca.gov/lists/ghg2012/6-300226001nap09141201\_scppa\_comment.pdf'

Original File Name: 300226001nap09141201 SCPPA comment.pdf

Date and Time Comment Was Submitted: 2012-09-14 14:25:32

No Duplicates.

**Comment 7 for Mandatory Reporting, Fee Regulation and Cap and Trade  
(ghg2012) - 45 Day.**

First Name: Lucia

Last Name: Moreno-Linares

Email Address: familyfcu@juno.com

Affiliation: wilmington resident

Subject: GHG2012

Comment:

I am opposed to the fee being added to industry to cover the cost of implementation by the ARB. It is clearly only a tax that will be passed on to consumers in the end.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2012-09-14 15:23:31

No Duplicates.

**Comment 8 for Mandatory Reporting, Fee Regulation and Cap and Trade  
(ghg2012) - 45 Day.**

First Name: Nancy

Last Name: Allred

Email Address: nancy.allred@sce.com

Affiliation: Southern California Edison

Subject: SCE Comments on MRR Amendments

Comment:

Attached are Southern California Edison Company's Comments on the Proposed Amendments to the Mandatory Reporting Regulation, the AB 32 Cost of Implementation Fee Regulation, and the Cap-and-Trade Regulation.

Attachment: 'www.arb.ca.gov/lists/ghg2012/10-2012-09-17\_comments\_on\_proposed\_mrr\_amendments.pdf'

Original File Name: 2012-09-17 Comments on Proposed MRR Amendments.pdf

Date and Time Comment Was Submitted: 2012-09-17 13:10:57

No Duplicates.



## **Comment 9 for Mandatory Reporting, Fee Regulation and Cap and Trade (ghg2012) - 45 Day.**

First Name: Bill

Last Name: Buchan

Email Address: buchana@mktpotential.com

Affiliation: Graphic Packaging Int, Inc.

Subject: Aggregation of Electric Generating Units

Comment:

We propose that all electric generating facility under 95112 be allowed to aggregate units up to the individual natural gas mains that enter the facility. For our facility and many across the state, the cogeneration facility and standby boiler come off the same natural gas main. Allowing electric generating facilities to aggregate sources up to individual gas mains will provide the most accurate possible emissions using the utility revenue meters on each natural gas main. Current regulations and amendments prevent such aggregation. Reporting in this manner would allow us minimize reporting costs and keep ARB reporting consistent with EPA GHG reporting, which is very important in the economically changed environment. Allowing continuation of this aggregation method of reporting will allow ensure future data are consistent with historical data that has been reported since 2008 to ARB.

ARB has a desire for supplemental data for specific processes, such as standby boilers or cogeneration processes. We have no objection to providing these subgrouping data, but the meter(s) on these subgroups will not be as accurate as the utility revenue meter. As such we request that emissions for subgrouping be treated as supplemental data where acceptance of less accurate meters is allowed.

As 95112 is written today, it does not strictly allow or prohibit aggregation of sources. The aggregation of sources is a subjective decision by ARB enforced by verifiers. We request that these decisions be part of the regulation and public comment period so that all can be part of the decision. Furthermore, we ask that ARB identify clearly what sources are required to meet the fuel accuracy requirement if we can no longer use our utility revenue meter.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2012-09-18 08:19:13

No Duplicates.

## **Comment 10 for Mandatory Reporting, Fee Regulation and Cap and Trade (ghg2012) - 45 Day.**

First Name: Braydon

Last Name: Boulanger

Email Address: braydon\_boulanger@transalta.com

Affiliation: TransAlta

Subject: Changes to the MRR

Comment:

TransAlta believes that ARB should develop their cap and trade program in a way that offers regulatory clarity and respects each state's own methods of transitioning to cleaner sources of energy. TransAlta encourages the California Air Resources Board to implement regional default emission averages for electricity imports. TransAlta recognizes that this type of approach would require a fundamental change to ARB regulations, which may not be feasible before program implementation in 2013. Therefore, until such a time when this type of change in program design can occur, TransAlta supports additional changes to the MRR that provide clarity. In particular, TransAlta supports WPTF's recommendation that ARB add a new definition of 'specified power contract' to the MRR and use this term in operational provisions that apply to specified imports.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2012-09-18 09:43:22

No Duplicates.

**Comment 11 for Mandatory Reporting, Fee Regulation and Cap and Trade  
(ghg2012) - 45 Day.**

First Name: Jennifer  
Last Name: Chamberlin  
Email Address: JChamberlin@LSPower.com  
Affiliation: LS Power

Subject: LS Power Comments on C&T, MRR, and COI Amendments  
Comment:

Dear Clerk of the Board,

Please find attached LS Power's Comments on the August 1, 2012  
Notice of Public Hearing to Consider Amendments to the Mandatory  
Reporting of GHG Emissions, the AB 32 Cost of Implementation Fee  
Regulation and the California Cap on GHG Emissions.

Sincerely,

Jennifer Chamberlin  
LS Power

Attachment: 'www.arb.ca.gov/lists/ghg2012/16-  
120918\_ls\_power\_comments\_on\_sep\_1\_ct\_mrr\_coi\_amendments\_\_00091410\_.pdf'

Original File Name: 120918\_LS Power Comments on Sep 1 CT MRR COI Amendments  
(00091410).PDF

Date and Time Comment Was Submitted: 2012-09-18 14:24:44

No Duplicates.

**Comment 12 for Mandatory Reporting, Fee Regulation and Cap and Trade  
(ghg2012) - 45 Day.**

First Name: Michal

Last Name: Kafka

Email Address: michael.kafka@aps.com

Affiliation:

Subject: APS Comments

Comment:

Thank you for the opportunity to comment. Please see the attachment.

Attachment: 'www.arb.ca.gov/lists/ghg2012/17-comments\_to\_mrr\_and\_cap\_and\_trade\_amendments\_\_9-19-12\_.pdf'

Original File Name: Comments to MRR and Cap and Trade Amendments (9-19-12).pdf

Date and Time Comment Was Submitted: 2012-09-18 16:57:48

No Duplicates.

## **Comment 13 for Mandatory Reporting, Fee Regulation and Cap and Trade (ghg2012) - 45 Day.**

First Name: Marcus

Last Name: Ruscio

Email Address: mruscio@worldoil.net

Affiliation: Lunday-Thagard Company

Subject: MRR Definition for Distillate Fuel Oils

Comment:

Lunday-Thagard Company (LTR) appreciates the opportunity to provide comments on the proposed amendments to the Mandatory Reporting Regulation (MRR). LTR is a small privately-owned petroleum refinery that produces a variety of paving and roofing asphalts from the distillation of crude oil. While our principal products are finished asphalts, our process concurrently produces straight-run, light distillate products (intermediates) that are sold to other refineries for further processing/refining. As a result, LTR is requesting that the California Air Resources Board modify the current draft language of Sec. 95121 (a), to clearly exclude the reporting of straight-run petroleum intermediates, which are not intended for use as a transportation fuel, even though these materials may meet the physical properties of "Distillate Fuel Oils."

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2012-09-18 16:44:21

No Duplicates.

**Comment 14 for Mandatory Reporting, Fee Regulation and Cap and Trade  
(ghg2012) - 45 Day.**

First Name: Barbara

Last Name: McBride

Email Address: Barbara.McBride@Calpine.com

Affiliation: Calpine Corporation

Subject: Comments on Proposed Amendments to Mandatory Reporting Rule

Comment:

Please find attached the comments of Calpine Corporation on the  
Proposed Amendments to the Mandatory Reporting Rule.

Attachment: 'www.arb.ca.gov/lists/ghg2012/19-2012-09-  
18\_calpine\_comments\_re\_proposed\_amendments\_to\_mrr.pdf'

Original File Name: 2012-09-18 Calpine Comments re Proposed Amendments to MRR.pdf

Date and Time Comment Was Submitted: 2012-09-18 19:37:08

No Duplicates.

**Comment 15 for Mandatory Reporting, Fee Regulation and Cap and Trade  
(ghg2012) - 45 Day.**

First Name: Craig

Last Name: Parker

Email Address: ceparker@calenergy.com

Affiliation: CalEnergy Operating Corporation

Subject: Comments on Mandatory Reporting of Greenhouse Gas Emissions

Comment:

Attached are CalEnergy Operating Corporation's comments on the Proposed Amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions.

Thank you,

Craig Parker

Director-IPP Environmental Services

CalEnergy Operating Corporation

Attachment: 'www.arb.ca.gov/lists/ghg2012/20-09\_19\_12\_mandatory\_reporting\_of\_ghg\_emissions.pdf'

Original File Name: 09 19 12 Mandatory Reporting of GHG Emissions.pdf

Date and Time Comment Was Submitted: 2012-09-19 08:39:44

No Duplicates.

**Comment 16 for Mandatory Reporting, Fee Regulation and Cap and Trade  
(ghg2012) - 45 Day.**

First Name: Robert

Last Name: Lucas

Email Address: bob.lucas@calobby.com

Affiliation:

Subject: Proposed Amendments to Mandatory Reporting Regulation

Comment:

CCEEB comment letter re Proposed Revisions to Mandatory Reporting  
Regulation/Penalty and Enforcement Guidance

Attachment: 'www.arb.ca.gov/lists/ghg2012/21-  
proposed\_revisions\_to\_mandatory\_reporting\_reg.\_penalty\_and\_enforcement\_guidance.pdf'

Original File Name: Proposed Revisions to Mandatory Reporting Reg.:Penalty and Enforcement  
Guidance.pdf

Date and Time Comment Was Submitted: 2012-09-19 10:21:29

No Duplicates.



**Comment 17 for Mandatory Reporting, Fee Regulation and Cap and Trade  
(ghg2012) - 45 Day.**

First Name: Cindy

Last Name: Parsons

Email Address: cindy.parsons@ladwp.com

Affiliation: LADWP

Subject: LADWP Comments on 2012 Amendments to the Mandatory Reporting Regulation  
Comment:

See attached comments.

Attachment: 'www.arb.ca.gov/lists/ghg2012/22-  
ladwp\_comments\_on\_2012\_amendments\_to\_mandatory\_reporting\_regulation.pdf'

Original File Name: LADWP Comments on 2012 Amendments to Mandatory Reporting  
Regulation.pdf

Date and Time Comment Was Submitted: 2012-09-19 11:13:45

No Duplicates.

**Comment 18 for Mandatory Reporting, Fee Regulation and Cap and Trade  
(ghg2012) - 45 Day.**

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

Subject: ghg2012  
Comment:

We do not understand why "Hydrocarbon basin" is limited to maps not readily available to the public and are determined by an industry association.

Basin Plans are a reference to Groundwater Basin Plans and are omitted in these definitions.

Why?

It is the contamination factor, and the heating factor or sea-level rise that are important in the emissions.

Joyce Dillard  
P.O. Box 31377  
Los Angeles, CA 90031

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2012-09-19 11:57:45

No Duplicates.

**Comment 19 for Mandatory Reporting, Fee Regulation and Cap and Trade  
(ghg2012) - 45 Day.**

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

Subject: Powerex Corp.'s Comments on the Proposed MRR Amendments  
Comment:

Please see the attached letter.

Attachment: 'www.arb.ca.gov/lists/ghg2012/24-  
powerex\_comments\_on\_proposed\_mrr\_amendments\_\_2012-09-19\_.pdf'

Original File Name: Powerex Comments on Proposed MRR Amendments (2012-09-19).pdf

Date and Time Comment Was Submitted: 2012-09-19 12:01:57

No Duplicates.

**Comment 1 for Mandatory Reporting, Fee Regulation and Cap and Trade  
(ghg2012). (At Hearing)**

First Name: Norman

Last Name: Plotkin

Email Address: norm@pzallc.com

Affiliation: CIPA

Subject: California Independent Petroleum Association-Mandatory Reporting/Greenhouse Gas  
Comment:

Please See Attached

Attachment: [www.arb.ca.gov/lists/ghg2012/25-cipa\\_ghg\\_2012\\_comment.pdf](http://www.arb.ca.gov/lists/ghg2012/25-cipa_ghg_2012_comment.pdf)

Original File Name: CIPA GHG 2012 Comment.pdf

Date and Time Comment Was Submitted: 2012-10-05 10:19:25

No Duplicates.

**Comment 2 for Mandatory Reporting, Fee Regulation and Cap and Trade  
(ghg2012). (At Hearing)**

First Name: Tamara

Last Name: Raspberry

Email Address: Non-web submitted comment

Affiliation: Sempra Energy Utilities

Subject: Sempra Energy Utilities-Mandatory Reporting/Greenhouse Gas

Comment:

Please See Attached

Attachment: [www.arb.ca.gov/lists/ghg2012/26-sempra\\_ghg\\_2012\\_comment.pdf](http://www.arb.ca.gov/lists/ghg2012/26-sempra_ghg_2012_comment.pdf)

Original File Name: Sempra GHG 2012 Comment.pdf

Date and Time Comment Was Submitted: 2012-10-05 10:19:25

No Duplicates.

**Comment 3 for Mandatory Reporting, Fee Regulation and Cap and Trade  
(ghg2012). (At Hearing)**

First Name: Catherine

Last Name: Reheis-Boyd

Email Address: Non-web submitted comment

Affiliation:

Subject: Comments on Proposed Amendments to the Mandatory Reptg of Greenhouse Gas  
Emission

Comment:

See attached Comment

Attachment: [www.arb.ca.gov/lists/ghg2012/27-wspa\\_comment\\_12-6-2.pdf](http://www.arb.ca.gov/lists/ghg2012/27-wspa_comment_12-6-2.pdf)

Original File Name: WSPA Comment 12-6-2.pdf

Date and Time Comment Was Submitted: 2012-10-10 11:57:07

No Duplicates.

## **Comment 1 for Mandatory Reporting, Fee Regulation and Cap and Trade (ghg2012) - 15-1.**

First Name: Bill

Last Name: Buchan

Email Address: buchana@mktpotential.com

Affiliation: Graphic Packaging International

Subject: 95112 - Aggregation of Electric Generating Plant Units

Comment:

We propose that all electric generating facility under 95112 be allowed to aggregate units up to the individual natural gas mains that enter the facility. For our facility and many across the state, our cogeneration facility and standby boiler come off the same natural gas main. Allowing electric generating facilities to aggregate sources up to individual gas mains will provide the most accurate possible emissions using the utility revenue meters on each natural gas main.

Reporting in this manner would also keep ARB reporting consistent with EPA GHG reporting, allow us to minimize GHG reporting costs. Allowing continuation of this method of reporting will allow ensure future data are consistent with historical data that has been reported since 2008 to ARB.

ARB has a desire for supplemental data for specific processes, such as standby boilers or cogeneration processes. We have no objection to providing these data as subgroups, but the meter(s) on these subgroups will not be as accurate as the utility revenue meter. As such we request that emissions for subgrouping be treated as supplemental data where acceptance of less accurate meters is allowed.

As 95112 is written today, it does not strictly allow or prohibit aggregation of sources. Clarification is needed. The aggregation of sources is a subjective decision by ARB enforced by verifiers. We request that these decisions be part of the regulation and public comment period so that all can be part of the decision. Furthermore, we ask that ARB identify clearly what sources are required to meet the fuel accuracy requirement if we can no longer use our utility revenue meter.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-10-17 10:16:43

No Duplicates.

**Comment 2 for Mandatory Reporting, Fee Regulation and Cap and Trade  
(ghg2012) - 15-1.**

First Name: Milan

Last Name: Steube

Email Address: milans@cox.net

Affiliation:

Subject: Section 95157(c) - Activity Data Reporting for Flare Emissions

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/ghg2012/29-comment\\_on\\_section\\_95157c\\_-\\_activity\\_data\\_reporting\\_for\\_flare\\_emissions.docx](http://www.arb.ca.gov/lists/ghg2012/29-comment_on_section_95157c_-_activity_data_reporting_for_flare_emissions.docx)

Original File Name: Comment on Section 95157c - Activity Data Reporting for Flare Emissions.docx

Date and Time Comment Was Submitted: 2012-10-26 10:21:37

No Duplicates.



**Comment 3 for Mandatory Reporting, Fee Regulation and Cap and Trade  
(ghg2012) - 15-1.**

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

Subject: WSPA Comments on ARB 15 day package  
Comment:

Please see attached Western States Petroleum Association Comments  
on ARB 15 day package. Thank you.

Attachment: [www.arb.ca.gov/lists/ghg2012/30-  
wspa\\_comments\\_on\\_arb\\_15\\_day\\_package\\_10292012\\_final.doc](http://www.arb.ca.gov/lists/ghg2012/30-wspa_comments_on_arb_15_day_package_10292012_final.doc)

Original File Name: WSPA Comments on ARB 15 day package 10292012 final.doc

Date and Time Comment Was Submitted: 2012-10-29 15:30:43

No Duplicates.

**Comment 4 for Mandatory Reporting, Fee Regulation and Cap and Trade  
(ghg2012) - 15-1.**

First Name: Lily

Last Name: Mitchell

Email Address: l Mitchell@hanmor.com

Affiliation: SCPPA

Subject: SCPPA comments on 15-day MRR changes

Comment:

Please find attached the comments of the Southern California Public Power Authority on the proposed changes to the Mandatory Reporting Regulation that were released for 15-day comment on October 12, 2012.

Attachment: [www.arb.ca.gov/lists/ghg2012/31-300226001lmm10291201\\_scppa\\_comment\\_on\\_mrr\\_15-day\\_changes.pdf](http://www.arb.ca.gov/lists/ghg2012/31-300226001lmm10291201_scppa_comment_on_mrr_15-day_changes.pdf)

Original File Name: 300226001lmm10291201 SCPPA comment on MRR 15-day changes.pdf

Date and Time Comment Was Submitted: 2012-10-29 16:00:02

No Duplicates.

**Comment 5 for Mandatory Reporting, Fee Regulation and Cap and Trade  
(ghg2012) - 15-1.**

First Name: Cindy

Last Name: Parsons

Email Address: cindy.parsons@ladwp.com

Affiliation: LADWP

Subject: LADWP Comments on 2012 MRR amendments (15-day changes)

Comment:

See attached comments.

Attachment: [www.arb.ca.gov/lists/ghg2012/33-](http://www.arb.ca.gov/lists/ghg2012/33-ladwp_comments_on_2012_mrr_amendments__15-day_changes__10-29-12_.pdf)

[ladwp\\_comments\\_on\\_2012\\_mrr\\_amendments\\_\\_15-day\\_changes\\_\\_10-29-12\\_.pdf](http://www.arb.ca.gov/lists/ghg2012/33-ladwp_comments_on_2012_mrr_amendments__15-day_changes__10-29-12_.pdf)

Original File Name: LADWP Comments on 2012 MRR Amendments, 15-day changes (10-29-12).pdf

Date and Time Comment Was Submitted: 2012-10-29 16:55:58

No Duplicates.

**Comment 6 for Mandatory Reporting, Fee Regulation and Cap and Trade  
(ghg2012) - 15-1.**

First Name: Darrell  
Last Name: Johnson  
Email Address: djohnson@semprautilities.com  
Affiliation:

Subject: ghg2012  
Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/ghg2012/34-sempra\\_15-day.pdf](http://www.arb.ca.gov/lists/ghg2012/34-sempra_15-day.pdf)

Original File Name: Sempra 15-Day.pdf

Date and Time Comment Was Submitted: 2012-10-30 10:53:32

No Duplicates.