

**Comment 1 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 45 Day.**

First Name: Steve  
Last Name: Huhman  
Email Address: Steven.Huhman@morganstanley.com  
Affiliation: Morgan Stanley

Subject: Commetns on proposed Mandatory Reporting Regulation Amendments  
Comment:

Please find comments in attached PDF file.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1-ghg2013-WjtVIVQ3AAxRNABv.pdf>'

Original File Name: ARB Comments MRR 10-24-13.pdf

Date and Time Comment Was Submitted: 2013-10-03 10:35:11

No Duplicates.

**Comment 2 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 45 Day.**

First Name: Clare  
Last Name: Breidenich  
Email Address: [cbreidenich@aciem.us](mailto:cbreidenich@aciem.us)  
Affiliation: Western Power Trading Forum

Subject: Comments on Amendments to the MRR

Comment:

Please find attached comments of the Western Power Trading Forum on Proposed Amendments to the Mandatory Reporting Regulation.

Thank you,  
Clare Breidenich  
GHG Committee Director  
WPTF

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/2-ghg2013-U2IBN1F9VzxQewg5.pdf>'

Original File Name: 10-8-13 Final WPTF on MRR amendments.pdf

Date and Time Comment Was Submitted: 2013-10-08 09:36:44

No Duplicates.

**Comment 3 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 45 Day.**

First Name: John

Last Name: Nagle

Email Address: john.nagle@ejgallo.com

Affiliation: E&J Gallo Winery

Subject: Definition correction needed

Comment:

The following changes need to be made in order to correct two definitions in Appendix A to the staff report:

95102 Definitions, b (1) "Activin" is a brand name and not an accurate description of the material. The most accurate name of this product is "Grape Seed Extract." Please change 95102 b (1) to "Grape Seed Extract."

95102 Definitions, b (25) "Crystal Color Concentrate" Crystal is a brand and not an accurate description of the material. "Dry Color Concentrate" is a more accurate descripting of this product. Please change 95102 b (25) to "Dry Color Concentrate."

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2013-10-11 11:30:27

No Duplicates.

**Comment 4 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 45 Day.**

First Name: John  
Last Name: Nagle  
Email Address: john.nagle@ejgallo.com  
Affiliation: E&J Gallo Winery

Subject: Appendix C New and Modified Product-Based Benchmarks Table 2 correction  
Comment:

The following changes need to be made to correct two definitions in Appendix C New and Modified Product-Based Benchmarks staff report.

On page 9 Table2: Proposed Product Definitions for Beverage Sector (NAICS 312120 and 312130)

Crystal is a brand and not an accurate description of the material. "Dry Color Concentrate" is a more accurate describing of this product. Please change Crystal Color Concentrate "Dry Color Concentrate."

"Activin" is a brand name and not an accurate description of the material. The most accurate name of this product is "Grape Seed Extract." Please change Activin "Grape Seed Extract."

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2013-10-11 16:51:25

No Duplicates.

**Comment 5 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 45 Day.**

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

Subject: Amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions  
Comment:

Please find attached comments on the proposed amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions.

Thank you for your time,

Braydon Boulanger

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/6-ghg2013-VyNRJQFhVGIQJQVk.pdf>

Original File Name: TransAlta Comments on MRR revisions October 7 2013.pdf

Date and Time Comment Was Submitted: 2013-10-14 09:47:24

No Duplicates.

**Comment 6 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 45 Day.**

First Name: Sarah  
Last Name: Deslauriers  
Email Address: SDeslauriers@carollo.com  
Affiliation: CA Wastewater Climate Change Group

Subject: CWCCG Comments on the Amendments to the MRR of GHG Emissions  
Comment:

The California Wastewater Climate Change Group (CWCCG) appreciates the opportunity to comment on the Potential Amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions and we appreciate the leadership of the California Air Resources Board (CARB) on climate change issues. The focus of our comment letter is the amended language in § 95101(b)(2).

Please review our attached comments and contact me if you have any questions at (925) 705-6404 or sdeslauriers@carollo.com. We welcome the opportunity to further discuss the wastewater community's position.

Sincerely,  
Sarah Deslauriers  
CWCCG Program Manager

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/7-ghg2013-UjEAcQRmAjJRMABf.pdf>'

Original File Name: CWCCG MRR Comment Letter\_Final.pdf

Date and Time Comment Was Submitted: 2013-10-14 13:00:56

No Duplicates.

**Comment 7 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 45 Day.**

First Name: Keith

Last Name: Adams

Email Address: [adamskb@airproducts.com](mailto:adamskb@airproducts.com)

Affiliation: Air Products and Chemicals, Inc.

Subject: Comments regarding CA MRR proposed amendments

Comment:

Regarding Proposed Amendments to the California Mandatory Reporting Regulation (Released 4 September 2013)

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/8-ghg2013-VTRRPgNwAg4GcANx.pdf>

Original File Name: Air Products Comments - 2013 MRR Amendments.pdf

Date and Time Comment Was Submitted: 2013-10-15 13:55:30

No Duplicates.

**Comment 8 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 45 Day.**

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

Subject: WSPA GHG Comments

Comment:

Please see attached Western States Petroleum Association Comments on Proposed Amendments to the Regulation for Mandatory Reporting of Greenhouse Gas Emissions; 45-day Draft Comment.  
Thank you.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/11-ghg2013-UjNWMgY0WDkGXwZh.pdf>'

Original File Name: AB32 GHG Emissions (2).pdf

Date and Time Comment Was Submitted: 2013-10-15 22:08:53

No Duplicates.

**Comment 9 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 45 Day.**

First Name: Claire  
Last Name: Halbrook  
Email Address: cehu@pge.com  
Affiliation: PG&E

Subject: PG&E Comments on the 45-day Amendments to the MRR  
Comment:

PG&E Comments on the 45-day Amendments to the MRR

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/13-ghg2013-B3dSMwFfADYDWgNg.pdf>'

Original File Name: PG&E Comments on MRR 45 day language.pdf

Date and Time Comment Was Submitted: 2013-10-16 16:46:34

No Duplicates.

**Comment 10 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 45 Day.**

First Name: Lloyd  
Last Name: Avram  
Email Address: LloydAvram@chevron.com  
Affiliation: Chevron Corporation

Subject: Comments on the October 7 Workshop to Discuss Refineries and Related Industries  
Comment:

Chevron is pleased to submit our comments on the October 7 workshop which include comments on proposed CWB MRR definitions.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/14-ghg2013-B2QGaFA0AyZXI1I9.pdf>'

Original File Name: Chevron Comments October 7 Refinery Benchmark Workshop Final.pdf

Date and Time Comment Was Submitted: 2013-10-16 18:35:13

No Duplicates.

**Comment 11 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 45 Day.**

First Name: Harry

Last Name: Singh

Email Address: [harry.singh@gs.com](mailto:harry.singh@gs.com)

Affiliation: J. Aron & Co. / Goldman Sachs

Subject: Comments on Amendments to Mandatory Reporting Regulation

Comment:

Please find comments on proposed amendments to the MRR in attached PDF file.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/15-ghg2013-WzFTCIExUHEBaABu.pdf>'

Original File Name: J Aron Comments on MRR Changes October 2013.pdf

Date and Time Comment Was Submitted: 2013-10-17 07:24:07

No Duplicates.

**Comment 12 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 45 Day.**

First Name: Lily  
Last Name: Mitchell  
Email Address: lmitchell@hanmor.com  
Affiliation: SCPPA

Subject: SCPPA comments on 45-day changes to MRR

Comment:

Please find attached the comments of the Southern California Public Power Authority on the proposed changes to the Mandatory Reporting Regulation released for 45-day comment on September 4, 2013.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/16-ghg2013-BTZcalVkJTQHMwA2.pdf>'

Original File Name: 300226001lmm10171301 SCPPA comment to ARB on 090413 MRR changes.pdf

Date and Time Comment Was Submitted: 2013-10-17 13:36:46

No Duplicates.

**Comment 13 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 45 Day.**

First Name: Robert  
Last Name: Ehlers  
Email Address: robert.ehlers@valero.com  
Affiliation: Valero

Subject: Comment Letter on MRR Proposed Order

Comment:

In response to ARB's release of Proposed Amendments to the Regulation for Mandatory Reporting of Greenhouse Gas Emissions, please see the attached comment letter from Valero. A copy was also e-mailed to appropriate ARB staff. If you have any questions, feel free to contact me.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/17-ghg2013-AHYAZ1U4AjRRJVI9.pdf>'

Original File Name: Valero MRR cmt ltr 10-17-13.pdf

Date and Time Comment Was Submitted: 2013-10-17 14:17:55

No Duplicates.

**Comment 14 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 45 Day.**

First Name: Robert

Last Name: Ehlers

Email Address: robert.ehlers@valero.com

Affiliation: Valero

Subject: Valero incorporation of WSPA comments

Comment:

Valero submitted a comment letter separately. Attached is the WSPA letter that Valero incorporates by reference.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/18-ghg2013-BWNRPIY5UGJXPVIN.pdf>'

Original File Name: Final WSPA Comments on MRR Amendments.pdf

Date and Time Comment Was Submitted: 2013-10-17 15:12:53

No Duplicates.

**Comment 15 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 45 Day.**

First Name: Mary

Last Name: Wiencke

Email Address: Mary.Wiencke@PacifiCorp.com

Affiliation:

Subject: PacifiCorp Comments on Sept. 4 Proposed Amendments

Comment:

Please accept PacifiCorp's comments on the proposed amendments to the mandatory reporting rule.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/19-ghg2013-WipcO1U3VG5XNwhh.pdf>'

Original File Name: PacifiCorp Comments\_ARB Sept 4 Proposed Amendments.pdf

Date and Time Comment Was Submitted: 2013-10-17 15:46:25

No Duplicates.

**Comment 16 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 45 Day.**

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

**Comment 17 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 45 Day.**

First Name: Kara

Last Name: Roeder

Email Address: Roeder.kc@pg.com

Affiliation:

Subject: Amendments to The Regulation For Mandatory Reporting of Greenhouse Gas Emissions

Comment:

Please see attached comment.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/21-ghg2013-B3cGX1E3UFwKbwRr.pdf>'

Original File Name: P&G Comment - GHG Reporting Requirement.pdf

Date and Time Comment Was Submitted: 2013-10-18 11:45:31

No Duplicates.

**Comment 18 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 45 Day.**

First Name: Courtney

Last Name: Olive

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

Affiliation: Bonneville Power Administration

Subject: Comment of Bonneville Power Administration Regarding Proposed Changes to MRR of 9.4.13

Comment:

Attached please find Bonneville Power Administration's comments on the proposed changes to the MRR that were released on 9.4.13

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/22-ghg2013-VzRXPgdrU21XNFU7.pdf>'

Original File Name: Comment to CARB re 9.4.13 MRR changes (FINAL).pdf

Date and Time Comment Was Submitted: 2013-10-18 14:13:16

No Duplicates.

**Comment 19 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 45 Day.**

First Name: William  
Last Name: Westerfield  
Email Address: [wwester@smud.org](mailto:wwester@smud.org)  
Affiliation: Sacramento Municipal Utility District

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

Comment:

Attached please find the Sacramento Municipal Utility District's Comments to Proposed Amendments to the Cap-and-Trade Regulation and MRR. Because the comments are applicable to capandtrade13 and ghg2013, the attached document is uploaded to both comment logs.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/23-ghg2013-VztWNQRiAH4FMQAw.pdf>'

Original File Name: LEG-2013-0838-SMUD-Comments-Cap-and-Trade-MRR.pdf

Date and Time Comment Was Submitted: 2013-10-18 15:02:53

No Duplicates.

**Comment 20 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 45 Day.**

First Name: Justin

Last Name: Thompson

Email Address: [justin.thompson@aps.com](mailto:justin.thompson@aps.com)

Affiliation:

Subject: Comments on Amendments to Mandatory Reporting Regulation

Comment:

Please find comments on proposed amendments to the MRR in the attached word file. Thank you.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/24-ghg2013-VzRRNlMgVWQGX1Az.docx>'

Original File Name: CARB comments 102113.docx

Date and Time Comment Was Submitted: 2013-10-21 10:20:14

No Duplicates.

**Comment 21 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 45 Day.**

First Name: Cathy  
Last Name: Karlstad  
Email Address: [Cathy.Karlstad@sce.com](mailto:Cathy.Karlstad@sce.com)  
Affiliation: Southern California Edison Company

Subject: SCE Comments on Proposed Changes to the Mandatory Reporting Regulation  
Comment:

Attached are Southern California Edison Company's Comments on the Proposed 2013 Regulatory Changes to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/25-ghg2013-AXIGY1M3Aw8DZgZp.pdf>'

Original File Name: SCE Comments on Proposed 2013 Regulatory Changes to the Mandatory Reporting Regulation.pdf

Date and Time Comment Was Submitted: 2013-10-21 17:35:53

No Duplicates.

**Comment 22 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 45 Day.**

First Name: Robert  
Last Name: Ehlers  
Email Address: robert.ehlers@valero.com  
Affiliation: Valero

Subject: 'Atypical' refineries - Valero comment letter 2 on MRR Proposed Order  
Comment:

In addition to the comment letter that Valero submitted on October 17th in response to CARB's release of "Proposed Amendments to the Regulation for Mandatory Reporting of Greenhouse Gas Emissions," Valero would like to comment also on CARB's recently proposed criteria for categorizing some refineries as "atypical."

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/27-ghg2013-BnBSNVc6VGILf1M8.pdf>'

Original File Name: Valero MRR ltr atypical 10-22-13.pdf

Date and Time Comment Was Submitted: 2013-10-22 08:09:48

No Duplicates.

**Comment 23 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 45 Day.**

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

Subject: WSPA Comments on October 7, 2013 Refiner Workshop

Comment:

Please see attached WSPA Comments on October 7, 2013 Refiner Workshop.

Thank you.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/28-ghg2013-BXJRJFwtUWNSC1U2.pdf>'

Original File Name: WSPA Comments on October 7th, 2013 Refiner Workshop.pdf

Date and Time Comment Was Submitted: 2013-10-22 10:00:35

No Duplicates.

## **Comment 24 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 45 Day.**

First Name: Robert  
Last Name: Schlingman  
Email Address: robert.schlingman@united.com  
Affiliation: United Airlines, Inc.

Subject: United Airlines, Inc.'s Comments

Comment:

Attached and submitted via email to Mr. Richard Bode please find United Airlines, Inc. ("United") comments on the proposed Amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas emissions (Mandatory Reporting Regulation, or "MRR"), which are scheduled for adoption by ARB on October 24, 2013. As discussed in detail on the attachment, United's principal concern is the proposed MRR amendment in section 95104(e). This proposed new section would require operators of affected facilities to report whether an increase in toxic air contaminants ("TACs") or criteria pollutants may have occurred from its facility, and to specify the reasons for such potential increases. Rather than including this new section in the MRR, United respectfully suggests that ARB should omit this proposed section and instead refer to the emissions inventory information that the California Air Districts and U.S. EPA maintain. United appreciates the opportunity to comment on the proposed MRR amendments and urges consideration of our comments.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/30-ghg2013-VyJROQNrBCMEZ1I2.pdf>

Original File Name: United\_Airlines\_GHG\_MRR\_Comments.pdf

Date and Time Comment Was Submitted: 2013-10-22 11:39:31

No Duplicates.

**Comment 25 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 45 Day.**

First Name: Kyle

Last Name: Danish

Email Address: [kwd@vnf.com](mailto:kwd@vnf.com)

Affiliation: Van Ness Feldman, LLP, for AEPCO

Subject: AEPCO Comments on MRR Amendments

Comment:

Attached are AEPCO's comments on the Proposed Amendments to the MRR.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/31-ghg2013-UTBcPwFwAjIDalQL.pdf>'

Original File Name: AEPCO Comments on MRR Regulatory Amendments Oct 22 2013.pdf

Date and Time Comment Was Submitted: 2013-10-22 11:16:41

No Duplicates.

**Comment 26 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 45 Day.**

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

Subject: Powerex's Comments on Proposed MRR Amendments  
Comment:

Please see the attached comments letter. Thank you.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/32-ghg2013-VGZTZVRkBGQELwIz.pdf>'

Original File Name: 2013-10-22 Powerex Comments on Proposed MRR Amendments.PDF

Date and Time Comment Was Submitted: 2013-10-22 12:34:59

No Duplicates.

**Comment 27 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 45 Day.**

First Name: Elysia

Last Name: Treanor

Email Address: Elysia.Treanor@pgn.com

Affiliation: Portland General Electric Company

Subject: Comments of PGE on the Proposed Amendments to the Mandatory Reporting Regulation

Comment:

Portland General Electric Company appreciates the opportunity to provide comments to California Air Resources Board on the Proposed Amendments to the Mandatory Reporting Regulation. Our comments are attached and are directed at requirements specific to electric power entities.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/33-ghg2013-VDdUPQBsBzlXNFc5.pdf>'

Original File Name: Comments on CARB 2013 MRR Regulatory Changes.pdf

Date and Time Comment Was Submitted: 2013-10-22 13:34:32

No Duplicates.

**Comment 28 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 45 Day.**

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

Subject: IEP Comments to CARB re Amendments to the MRR

Comment:

Attached Please Find IEP Comments to CARB re Amendments to the Mandatory Reporting Regulation.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/35-ghg2013-B24BYIYnAAwCZ1U6.pdf>'

Original File Name: IEP Comments to CARB re MRR Amendments FILED.pdf

Date and Time Comment Was Submitted: 2013-10-22 17:23:13

No Duplicates.

**Comment 29 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 45 Day.**

First Name: Robert

Last Name: Lucas

Email Address: bob.lucas@calobby.com

Affiliation: CCEEB

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

Comment:

Thank you for the opportunity to comment. If you have any questions, please call me at 916-444-7337.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/36-ghg2013-UzBVPAdrUmwFZIU7.pdf>'

Original File Name: Comments on Proposed Amendments to the Regulation for Mandatory Reporting of GHG-45-day Draft Comment.pdf

Date and Time Comment Was Submitted: 2013-10-22 18:54:42

No Duplicates.

**Comment 30 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 45 Day.**

First Name: Clare  
Last Name: Breidenich  
Email Address: [cbreidenich@aciem.us](mailto:cbreidenich@aciem.us)  
Affiliation: Western Power Trading Forum

Subject: Supplemental Comments on MRR Amendments

Comment:

Please find attached supplemental comments of the Western Power Trading Forum on the 45 day proposed amendments 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/37-ghg2013-VmdSZFxwWDIWY1B9.pdf>'

Original File Name: 10-23-13 WPTF Supplemental on C&T- RPS Adjustment.pdf

Date and Time Comment Was Submitted: 2013-10-23 08:51:58

No Duplicates.

**Comment 31 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 45 Day.**

First Name: Susie  
Last Name: Berlin  
Email Address: [berlin@susieberlinlaw.com](mailto:berlin@susieberlinlaw.com)  
Affiliation: M-S-R Public Power Agency

Subject: Comments on Proposed Amendments

Comment:

Attached please find the M-S-R Public Power Agency (M-S-R) Comments on the Proposed Amendments to the Mandatory Reporting Regulation.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/38-ghg2013-UTwAK1QmA31QJFQL.pdf>'

Original File Name: M-S-R comments re 2013 MRR amendments (final).pdf

Date and Time Comment Was Submitted: 2013-10-23 08:38:39

No Duplicates.

**Comment 32 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 45 Day.**

First Name: Ann  
Last Name: Trowbridge  
Email Address: [atrowbridge@daycartermurphy.com](mailto:atrowbridge@daycartermurphy.com)  
Affiliation: Day Carter & Murphy LLP

Subject: Comments on Proposed Revisions to Cap on GHG Emissions and Reporting of GHG Emissions  
Comment:

Attached please find our Comments on Proposed Revisions to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms and the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions.

Thank you.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/39-ghg2013-UzBVPFY6BDoEZ1Q6.pdf>'

Original File Name: Comments on Proposed Revisions to Cap-and-Trade and GHG.pdf

Date and Time Comment Was Submitted: 2013-10-23 11:17:14

No Duplicates.

**Comment 33 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 45 Day.**

First Name: Dan

Last Name: Severson

Email Address: dbseverson@tid.org

Affiliation:

Subject: TID Comments on Mandatory Reporting Regulation

Comment:

Dear Clerk of the Board:

Turlock Irrigation District submits the attached comments on the September 4, 2013 Proposed Amendments to the Mandatory Reporting Regulation.

Sincerely,

Dan B. Severson  
Turlock Irrigation District

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/40-ghg2013-V2ZWY1BgWToEMAIx.pdf>'

Original File Name: 131023 TID Comments on 9.4 MRR (00193146).pdf

Date and Time Comment Was Submitted: 2013-10-23 11:20:07

No Duplicates.

**Comment 34 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 45 Day.**

First Name: Katy  
Last Name: Rosenberg  
Email Address: klr@a-klaw.com  
Affiliation: EPUC/CAC

Subject: GHG2013 Comments on the Mandatory Reporting Regulation

Comment:

EPUC/CAC Comments on the Mandatory Reporting Regulation attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/41-ghg2013-AGcAbl07WDIVY1Rl.zip>'

Original File Name: ghg2013 EPUC CAC Comments.zip

Date and Time Comment Was Submitted: 2013-10-23 11:42:26

No Duplicates.

**Comment 35 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 45 Day.**

First Name: Melinda  
Last Name: Hicks  
Email Address: mhicks@kernoil.com  
Affiliation: Kern Oil & Refining Co.

Subject: Kern Oil Comments on MRR Amendments

Comment:

Kern Oil appreciates the opportunity to provide comments.  
Please see attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/42-ghg2013-BW4BYgBzV2oAWVU6.pdf>'

Original File Name: Kern Oil MRR Comments 2013 Amendments 10-23-13.PDF

Date and Time Comment Was Submitted: 2013-10-23 11:53:06

No Duplicates.

**Comment 36 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 45 Day.**

First Name: John  
Last Name: Larrea  
Email Address: john@clf.com  
Affiliation: CA League of Food Processors

Subject: CLFP Comments on MRR 2013

Comment:

CLFP Comments on MRR 2013

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/43-ghg2013-WzgGbFcwU3AAWQhl.pdf>'

Original File Name: CLFP MRR Comments 2013.pdf

Date and Time Comment Was Submitted: 2013-10-23 11:55:26

No Duplicates.

**Comment 1 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013). (At Hearing)**

First Name: Cindy

Last Name: Parsons

Email Address: Non-web submitted comment

Affiliation: LADWP

Subject: Comments

Comment:

Please see attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/44-ghg2013-AGMHaFU6ADcGeQNc.pdf>

Original File Name: Cindy Parsons.pdf

Date and Time Comment Was Submitted: 2013-10-29 09:19:49

No Duplicates.

**Comment 2 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013). (At Hearing)**

First Name: Tamara  
Last Name: Rasberry  
Email Address: [trasberry@semprautilities.com](mailto:trasberry@semprautilities.com)  
Affiliation: Sempra utilities

Subject: comments

Comment:

Please see attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/45-ghg2013-BnJQN1wwVmQCdgZn.pdf>

Original File Name: Tamara Rasberry.pdf

Date and Time Comment Was Submitted: 2013-10-29 09:22:17

No Duplicates.

**Comment 3 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013). (At Hearing)**

First Name: Ellen

Last Name: Wolfe

Email Address: Non-web submitted comment

Affiliation: WPTF

Subject: Mandatory Reporting Comments

Comment:

Please see attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/47-ghg2013-Wj9TOQNuAjQKYIMM.pdf>

Original File Name: Ellen Wolfe.pdf

Date and Time Comment Was Submitted: 2013-10-29 14:02:27

No Duplicates.

**Comment 1 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 15-1.**

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

Subject: IEP's comments on CARB's 15-Day Revisions to the MRR

Comment:

Attached please find IEP's comments on CARB's 15-Day Revisions to the Mandatory Reporting Regulation.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/48-ghg2013-Bm9XNFAhVFhSN1U6.pdf>

Original File Name: IEP comments on CARB 15 Day MRR Language FINAL.pdf

Date and Time Comment Was Submitted: 2013-10-30 10:53:02

No Duplicates.

## **Comment 2 for Mandatory Reporting of Greenhouse Gas Emissions (ghg2013) - 15-1.**

First Name: Dave

Last Name: Duke

Email Address: duked@fosterfarms.com

Affiliation: Foster Farms

Subject: Comments on proposed changes to the mandatory reporting of greenhouse gas emissions

Comment:

We at Foster Farms have the following comments regarding the proposed changes to the regulation for the mandatory reporting of greenhouse gas emissions. Our comments are limited to certain new definitions appearing in the proposed regulation and are editorial in nature. The comments are intended to clarify the definitions and thereby facilitate compliance.

In Section 95102 we request the following changes to the definitions of "poultry deli products", "protein meal" and "whole chicken and chicken parts":

Revised the definition of "poultry deli product" as shown below to specifically include the term "franks", and to account for the transfers of these products to other facilities for additional processing (e.g., sending franks to a facility where they will be further processed to become corn dogs). We recommend the following wording:

(62) "Poultry deli product" means the products, including corn dogs, sausages, and franks, that contain a significant portion of pre-processed poultry, that are cooked and sold wholesale or retail, or transferred to other facilities.

Revise the definition of "protein meal" to "protein meal and fat" to specifically include all significant rendered products including poultry fat and feather meal. We recommend the following wording:

(65) "Protein meal and fat" means meal meal, feather meal and fat rendered products from poultry tissues including meat, viscera, bone, blood, and feathers.

Revise the definition of "whole chicken and chicken parts" to provide additional examples of parts and to account for transfers to other facilities for additional processing (e.g., sending wings to another facility for seasoning and cooking). We recommend the following wording:

(89) "Whole chicken and chicken parts" means the whole chicken or chicken parts (including breasts, wings, drums, and thighs) that are packaged for wholesale or retail, or transferred to other facilities.

We understand that these comments may be too late for consideration

in this revision to the regulation. We do note that there was a limited comment period for this regulatory change before it was heard by the Board. If the comments cannot be considered for the current regulatory change we then request that they be considered in the development of compliance guidance documents for this regulation. We would be pleased to discuss any questions or concerns you may have regarding these comments. Thank you for your consideration of our requests.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-11-11 13:52:01

No Duplicates.

**Comment 3 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 15-1.**

First Name: Laura

Last Name: Beane

Email Address: laura.beane@iberdrolaren.com

Affiliation: Iberdrola Renewables

Subject: Mandatory Reporting of Greenhouse Gas Emissions

Comment:

Attached please find Iberdrola Renewables' comments related to the proposed amendments to the California Mandatory Reporting of Greenhouse Gas Emissions regulation issued on October 28, 2013.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/50-ghg2013-Vj8BZVE1VXQGZAFz.pdf>

Original File Name: Iberdrola Renewables Comments - Cap and Trade Regulation November 2013.pdf

Date and Time Comment Was Submitted: 2013-11-14 12:52:06

No Duplicates.

**Comment 4 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 15-1.**

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

Subject: MRR revisions Nov 15 2013

Comment:

I appreciate your consideration of these attached comments as you finalize your amendments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/52-ghg2013-AXUHcwFhUWwDdgVk.pdf>

Original File Name: TransAlta Comments on MRR revisions Nov 15 2013.pdf

Date and Time Comment Was Submitted: 2013-11-14 13:59:35

No Duplicates.

**Comment 5 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 15-1.**

First Name: Melissa

Last Name: Poole

Email Address: [MelissaP@paramountfarming.com](mailto:MelissaP@paramountfarming.com)

Affiliation:

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

Comment:

Please find comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/53-ghg2013-AG0HYFM8VGNSNQZy.pdf>

Original File Name: Mandatory Reporting of GHG Emissions.pdf

Date and Time Comment Was Submitted: 2013-11-14 15:09:08

No Duplicates.

**Comment 6 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 15-1.**

First Name: Christene

Last Name: Klimek

Email Address: cklimek@nvenergy.com

Affiliation:

Subject: comment on MRR language

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/54-ghg2013-V2YGM1V1VzUBNgQ3.doc>

Original File Name: 131113\_NVE MRR ARB comments.doc

Date and Time Comment Was Submitted: 2013-11-15 10:28:45

No Duplicates.

**Comment 7 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 15-1.**

First Name: Clare  
Last Name: Breidenich  
Email Address: [cbreidenich@aciem.us](mailto:cbreidenich@aciem.us)  
Affiliation: Western Power Trading Forum

Subject: Comments on 15 day MRR changes

Comment:

Please find attached comments of the Western Power Trading Forum.

Thank you,  
Clare Breidenich  
WPTF GHG Committee Director

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/55-ghg2013-WmtTZFd7VjQGNVB9.pdf>

Original File Name: 11-15-13 WPTF on 15 day MRR final.pdf

Date and Time Comment Was Submitted: 2013-11-15 11:50:44

No Duplicates.

**Comment 8 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 15-1.**

First Name: Dan  
Last Name: Severson  
Email Address: dbseverson@TID.ORG  
Affiliation: Turlock Irrigation District ("TID")

Subject: Comments on September 4, 2013 Proposed Amendments to the Mandatory Reporting Regulation  
Comment:

Dear Clerk of the Board,

On behalf of Turlock Irrigation District ("TID"), please find attached our comments on the September 4, 2013 Proposed Amendments to the Mandatory Reporting Regulation.

We appreciate the opportunity to provide these comments.

Sincerely,

Dan B. Severson  
Turlock Irrigation District

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/56-ghg2013-Wi5SPVw5BAhR0lQm.pdf>

Original File Name: TID MRR Comments (15Nov2013) (00195983).pdf

Date and Time Comment Was Submitted: 2013-11-15 11:18:19

No Duplicates.

**Comment 9 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 15-1.**

First Name: Susie  
Last Name: Berlin  
Email Address: [berlin@susieberlinlaw.com](mailto:berlin@susieberlinlaw.com)  
Affiliation: M-S-R Public Power Agency

Subject: Comments on 15-Day Change

Comment:

Attached please find the comments on the M-S-R Public Power Agency on the 15-day changes to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions.

thank you

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/57-ghg2013-VDkFLgR2A31SJgRb.pdf>

Original File Name: M-S-R comments re 2013 MRR 15-day changes (final 11-15-13).pdf

Date and Time Comment Was Submitted: 2013-11-15 11:57:31

No Duplicates.

**Comment 10 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 15-1.**

First Name: Catherine  
Last Name: Reheis Boyd  
Email Address: cathy@wspa.org  
Affiliation: Western States Petroleum Association

Subject: Comments on 15-day Amendments to the Regulation for Mandatory Reporting of Greenhouse Gas

Comment:

Attached are the Western States Petroleum Association's Comments on ARB's 15-day Amendments to the Regulation for Mandatory Reporting of Greenhouse Gas Emissions.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/58-ghg2013-BWhdKQR3BzdSOwhl.pdf>

Original File Name: MRRcomments 11152013 FINAL.pdf

Date and Time Comment Was Submitted: 2013-11-15 12:02:23

No Duplicates.

**Comment 11 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 15-1.**

First Name: Steve  
Last Name: Huhman  
Email Address: Steven.Huhman@morganstanley.com  
Affiliation: Morgan Stanley

Subject: Proposed Amendments to the Regulation for Mandatory Reporting; Proposed 15-Day modification

Comment:

Attached please find comments of Morgan Stanley Capital Group Inc. on the 15-day modification proposals for the Mandatory Reporting Regulation.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/59-ghg2013-AWBVIVMwVFhRZIB1.docx>

Original File Name: ARB 15-day 11-12-13.docx

Date and Time Comment Was Submitted: 2013-11-15 12:33:15

No Duplicates.

**Comment 12 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 15-1.**

First Name: Lily

Last Name: Mitchell

Email Address: lmitchell@hanmor.com

Affiliation: Hanna and Morton for SCPPA

Subject: SCPPA comments on MRR 15-day changes

Comment:

Please find attached the comments of the Southern California Public Power Authority on the proposed changes to the Mandatory Reporting Regulation released for 15-day public comment on October 28, 2013.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/61-ghg2013-U2AHMV1sAmNWYgQy.pdf>

Original File Name: 300226001lmm11151301 SCPPA comment to ARB on 102813 MRR changes.pdf

Date and Time Comment Was Submitted: 2013-11-15 13:39:45

No Duplicates.

**Comment 13 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 15-1.**

First Name: Keith

Last Name: Adams

Email Address: [adamskb@airproducts.com](mailto:adamskb@airproducts.com)

Affiliation: Air Products and Chemicals

Subject: Air Products and Chemicals - Comments on proposed 15-Day Modifications of MRR

Comment:

Air Products and Chemicals - Comments on proposed 15-Day  
Modifications of MRR

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/62-ghg2013-AWBXOFMgBAhXIQl7.pdf>

Original File Name: Air Products Comments - 2013 MRR 15-day Changes.pdf

Date and Time Comment Was Submitted: 2013-11-15 14:08:35

No Duplicates.

**Comment 14 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 15-1.**

First Name: Ann  
Last Name: Trowbridge  
Email Address: [atrowbridge@daycartermurphy.com](mailto:atrowbridge@daycartermurphy.com)  
Affiliation: Day Carter & Murphy LLP

Subject: Comments on Proposed Revisions to the Regulation for Mandatory Reporting of GHG  
Comment:

Attached please find the Comments 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/63-ghg2013-B2RROFE9UmxQM1A+.pdf>

Original File Name: Comments of Inergy to Proposed Revisions.pdf

Date and Time Comment Was Submitted: 2013-11-15 14:37:36

No Duplicates.

**Comment 15 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 15-1.**

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

Subject: Comments on 15-Day Proposed Amendments

Comment:

Please find attached the comments of Calpine Corporation on the 15-Day Proposed Amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions. Thank you for the opportunity to submit these comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/64-ghg2013-UzAHbgdrUG4GZVU7.pdf>

Original File Name: Comments on the 15-Day Proposed Amendments to the Mandatory Reporting Rule.pdf

Date and Time Comment Was Submitted: 2013-11-15 14:50:47

No Duplicates.

**Comment 16 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 15-1.**

First Name: Courtney

Last Name: Olive

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

Affiliation: Bonneville Power Administration

Subject: BPA's 15-day comments on proposed MRR amendments

Comment:

Attached please find BPA's 15-day comments on proposed MRR amendments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/65-ghg2013-UGFSYVV5AzRVMIMq.pdf>

Original File Name: 15-day comment of BPA\_FINAL.pdf

Date and Time Comment Was Submitted: 2013-11-15 15:04:38

No Duplicates.

**Comment 17 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 15-1.**

First Name: Tamara

Last Name: Rasberry

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

Affiliation:

Subject: Sempra Utilities Comments on Modified Text of MRR

Comment:

Attached are comments from SDGE and SoCalGas.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/66-ghg2013-UyAA1UhBwtXNwZv.pdf>

Original File Name: SEu Final 15 Day Modification MRR comment letter 11152013.pdf

Date and Time Comment Was Submitted: 2013-11-15 15:23:35

No Duplicates.

**Comment 18 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 15-1.**

First Name: Cindy  
Last Name: Parsons  
Email Address: cindy.parsons@ladwp.com  
Affiliation: LADWP

Subject: LADWP Comments on 2013 MRR Amendments, 15-day changes  
Comment:

See attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/67-ghg2013-AGwBZgdiV3MLfQhX.pdf>

Original File Name: LADWP Comments on 2013 MRR Amendments, 15-day changes.pdf

Date and Time Comment Was Submitted: 2013-11-15 15:51:31

No Duplicates.

**Comment 19 for Mandatory Reporting of Greenhouse Gas Emissions  
(ghg2013) - 15-1.**

First Name: Nico  
Last Name: van Aelstyn  
Email Address: [nvanaelstyn@bdlaw.com](mailto:nvanaelstyn@bdlaw.com)  
Affiliation: Beveridge & Diamond, PC

Subject: Powerex Comments Proposed MRR 15-Day Modifications  
Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/68-ghg2013-VmRRZ1FhVjYKIVJj.pdf>

Original File Name: 2013-11-15 - Powerex Comments on Proposed MRR Amendments.pdf

Date and Time Comment Was Submitted: 2013-11-15 15:34:32

No Duplicates.