

**Comment 1 for 2016 Amendments to the Clean Power Plan Compliance Effort (111dcompliance-ws) - 1st Workshop.**

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

**Comment 2 for 2016 Amendments to the Clean Power Plan Compliance Effort (111dcompliance-ws) - 1st Workshop.**

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

**Comment 3 for 2016 Amendments to the Clean Power Plan Compliance Effort (111dcompliance-ws) - 1st Workshop.**

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

Subject: Public Workshop on Potential 2016 Amendments to the Cap-and-Trade Regulation and Californi

Comment:

Attached are the comments of the California ISO.

Attachment: [www.arb.ca.gov/lists/com-attach/3-111dcompliance-ws-UzACZVY7BD5SMgVq.pdf](http://www.arb.ca.gov/lists/com-attach/3-111dcompliance-ws-UzACZVY7BD5SMgVq.pdf)

Original File Name: California ISO Comments\_Public Workshop on Cap and Trade and CPP.pdf

Date and Time Comment Was Submitted: 2015-10-19 13:13:09

No Duplicates.

**Comment 4 for 2016 Amendments to the Clean Power Plan Compliance Effort (111dcompliance-ws) - 1st Workshop.**

First Name: Tanya  
Last Name: DeRivi  
Email Address: tderivi@scppa.org  
Affiliation: SCPPA

Subject: SCPPA Comments on EPA Clean Power Plan Implementation  
Comment:

Attached are comments of the Southern California Public Power Authority on implementation of the federal Clean Power Plan.

Attachment: [www.arb.ca.gov/lists/com-attach/4-111dcompliance-ws-UiEAZVAhVnVVMlcl.pdf](http://www.arb.ca.gov/lists/com-attach/4-111dcompliance-ws-UiEAZVAhVnVVMlcl.pdf)

Original File Name: SCPPA Comments for ARB Clean Power Plan Design.pdf

Date and Time Comment Was Submitted: 2015-10-19 14:28:51

No Duplicates.

**Comment 5 for 2016 Amendments to the Clean Power Plan Compliance Effort (111dcompliance-ws) - 1st Workshop.**

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

Subject: Oct 2 Workshop on EPA Clean Power Plan  
Comment:

Attached are comments filed on behalf of San Diego Gas and Electric.

Attachment: [www.arb.ca.gov/lists/com-attach/6-111dcompliance-ws-UiEBY1UzUWcEXQVm.pdf](http://www.arb.ca.gov/lists/com-attach/6-111dcompliance-ws-UiEBY1UzUWcEXQVm.pdf)

Original File Name: SDGE Comments\_ARB Oct 2 Workshop on EPA Clean Power Plan.pdf

Date and Time Comment Was Submitted: 2015-10-19 16:31:25

No Duplicates.

**Comment 6 for 2016 Amendments to the Clean Power Plan Compliance Effort (111dcompliance-ws) - 1st Workshop.**

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

Subject: Calpine Comments on Section 111(d) Compliance and Cap-and-Trade Regulation  
Comment:

Please find attached the comments of Calpine Corporation on the California Air Resources Board's workshop regarding the Clean Power Plan compliance and accompanying discussion paper.

Attachment: [www.arb.ca.gov/lists/com-attach/7-111dcompliance-ws-UTJUMwBtUnFQPwRq.pdf](http://www.arb.ca.gov/lists/com-attach/7-111dcompliance-ws-UTJUMwBtUnFQPwRq.pdf)

Original File Name: Calpine Comments on Section 111(d) Compliance and Cap-and-Trade Amendments.pdf

Date and Time Comment Was Submitted: 2015-10-19 16:34:01

No Duplicates.

**Comment 7 for 2016 Amendments to the Clean Power Plan Compliance Effort (111dcompliance-ws) - 1st Workshop.**

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

Subject: LADWP's Comments on CARB CPP Discussion Paper  
Comment:

Attached are LADWP's comments on CARB's Clean Power Plan Compliance Discussion Paper.

Attachment: [www.arb.ca.gov/lists/com-attach/8-111dcompliance-ws-AGxXMANmWHwKfAhX.pdf](http://www.arb.ca.gov/lists/com-attach/8-111dcompliance-ws-AGxXMANmWHwKfAhX.pdf)

Original File Name: LADWP Comments to CARB on CPP Discussion Paper.pdf

Date and Time Comment Was Submitted: 2015-10-19 16:39:14

No Duplicates.

**Comment 8 for 2016 Amendments to the Clean Power Plan Compliance Effort (111dcompliance-ws) - 1st Workshop.**

First Name: Clare  
Last Name: Breidenich  
Email Address: cbreidenich@aciem.us  
Affiliation: WPTF

Subject: WPTF Comments on 2016 Cap and Trade Amendments and Clean Power Plan Compliance

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/9-111dcompliance-ws-ATBRZwcrUTBXYVN+.pdf](http://www.arb.ca.gov/lists/com-attach/9-111dcompliance-ws-ATBRZwcrUTBXYVN+.pdf)

Original File Name: 10-20-15 WPTF Comments to CARB on possible Cap and Trade Amendments and ....pdf

Date and Time Comment Was Submitted: 2015-10-21 09:11:45

No Duplicates.



**Comment 9 for 2016 Amendments to the Clean Power Plan Compliance Effort (111dcompliance-ws) - 1st Workshop.**

First Name: Susie  
Last Name: Berlin  
Email Address: berlin@susieberlinlaw.com  
Affiliation: NCPA

Subject: Comments re CARB Clean Power Plan Compliance Discussion Paper  
Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/10-111dcompliance-ws-VTsHYgd2VGZXDIAz.pdf](http://www.arb.ca.gov/lists/com-attach/10-111dcompliance-ws-VTsHYgd2VGZXDIAz.pdf)

Original File Name: NCPA commentsClean Power Plan White Paper.pdf

Date and Time Comment Was Submitted: 2015-10-27 08:11:25

No Duplicates.

**Comment 10 for 2016 Amendments to the Clean Power Plan Compliance Effort (111dcompliance-ws) - 1st Workshop.**

First Name: Amber

Last Name: Blixt

Email Address: Amber@iepa.com

Affiliation: Independent Energy Producers Association

Subject: IEP Comments on CARB's Clean Power Plan Compliance Discussion Paper

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/11-111dcompliance-ws-BWxQM1MiV1sCZwJt.pdf](http://www.arb.ca.gov/lists/com-attach/11-111dcompliance-ws-BWxQM1MiV1sCZwJt.pdf)

Original File Name: IEP comments on CARB Clean Power Plan Discussion Paper.pdf

Date and Time Comment Was Submitted: 2015-10-27 08:14:57

No Duplicates.

**Comment 11 for 2016 Amendments to the Clean Power Plan Compliance Effort (111dcompliance-ws) - 1st Workshop.**

First Name: Adam

Last Name: Smith

Email Address: Adam.Smith@sce.com

Affiliation:

Subject: JUG Guiding Principles on Clean Power Plan Implementation

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/12-111dcompliance-ws-VT9XJFUzVFgEYQBw.pdf](http://www.arb.ca.gov/lists/com-attach/12-111dcompliance-ws-VT9XJFUzVFgEYQBw.pdf)

Original File Name: JUG CPP Guiding Principles.pdf

Date and Time Comment Was Submitted: 2015-10-27 08:21:31

No Duplicates.

**Comment 12 for 2016 Amendments to the Clean Power Plan Compliance Effort (111dcompliance-ws) - 1st Workshop.**

First Name: Mark C.

Last Name: Krausse

Email Address: mark.krausse@pge.com

Affiliation: PG&E

Subject: Re: PG&E's Comments on the Clean Power Plan Compliance Discussion Paper  
Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/13-111dcompliance-ws-VycBYAFIAAxSNwBv.pdf](http://www.arb.ca.gov/lists/com-attach/13-111dcompliance-ws-VycBYAFIAAxSNwBv.pdf)

Original File Name: PGE Comments on ARB CPP Discussion Paper.pdf

Date and Time Comment Was Submitted: 2015-10-27 10:00:44

No Duplicates.

**Comment 13 for 2016 Amendments to the Clean Power Plan Compliance Effort (111dcompliance-ws) - 1st Workshop.**

First Name: Karen  
Last Name: Terranova  
Email Address: kt@a-klaw.com  
Affiliation: EPUC

Subject: Clean Power Plan Discussion Paper - EPUC Comments  
Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/14-111dcompliance-ws-AmdcKgF1WGgEXQVm.pdf](http://www.arb.ca.gov/lists/com-attach/14-111dcompliance-ws-AmdcKgF1WGgEXQVm.pdf)

Original File Name: EPUC Comments EPA Proposed Rule 11 13 15.pdf

Date and Time Comment Was Submitted: 2015-11-20 09:28:56

No Duplicates.

## **Comment 14 for 2016 Amendments to the Clean Power Plan Compliance Effort (111dcompliance-ws) - 1st Workshop.**

First Name: David  
Last Name: Schonbrunn  
Email Address: David@Schonbrunn.org  
Affiliation: TRANSDEF

Subject: Comments on the Clean Power Plan Discussion Paper  
Comment:

After reviewing the Clean Power Plan Compliance Discussion Paper, we offer the following comments:

While our organization has long been involved in ARB climate change processes and generally supports ARB's efforts to reduce GHGs, we have never been supporters of Cap and Trade. We continue to be concerned about the abstruseness of the regulatory structure--no one besides the lawyers involved really understands it--as well as its potential to be gamed. We were strong advocates of a carbon tax in our comments on the first Scoping Plan, and continue to see its superiority, especially after its real-world success in British Columbia.

We suggest that a carbon tax be adopted as the backstop mechanism for the Clean Power Plan. It would not be triggered unless a massive policy failure, such as widespread gaming, occurred or there is a failure of nerve by either the Legislature or the Board. A carbon tax in the backstop position would act as a strong deterrent to gaming or backsliding, because of its unquestioned effectiveness.

BTW, we found the following sentence impossible to understand: "For California, U.S. EPA calculated a final statewide mass goal in the 2030-31 period of 96.8 million short tons of CO<sub>2</sub> (e.g., 48.4 million short tons, approximately, in 2030)." It is entirely non-obvious why half the mass goal is stated in parentheses. Please either clarify or correct the text.

To further inform stakeholders, it would be useful to calculate the actual emissions reduction percentage for CA EGUs, using the EPA mass goals.

Thank you,

David Schonbrunn

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-12-03 14:54:03

No Duplicates.

**There are no comments posted to 2016 Amendments to the Clean Power Plan Compliance Effort (111dcompliance-ws) that were presented during the Workshop at this time.**