

**Comment 1 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-  
ws) - 1st Workshop.**

First Name: John

Last Name: Onderdonk

Email Address: john.onderdonk@caltech.edu

Affiliation: Caltech

Subject: Caltech Comment - July 18, 2013 CARB Workshop - University Allocation  
Comment:

Please see the attached document

Attachment: [www.arb.ca.gov/lists/com-attach/1-cap-trade-draft-ws-BmUGYQFsAiUDYARn.pdf](http://www.arb.ca.gov/lists/com-attach/1-cap-trade-draft-ws-BmUGYQFsAiUDYARn.pdf)

Original File Name: Caltech Comment\_CARB Workshop 07.18.13.pdf

Date and Time Comment Was Submitted: 2013-07-24 09:06:39

No Duplicates.

## **Comment 2 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-drafts) - 1st Workshop.**

First Name: Charles

Last Name: Waitman

Email Address: cgwaitman@sbcglobal.net

Affiliation: Versa Engineering and Technology

Subject: 95923 Cap-and-Trade Contractors

Comment:

1. Please clarify if 95923 (1) (a) (A) and (B) are linked with and (ie both A and B required, or (ie either A or B required), or and/or.
2. The word "information" is overly broad. Receiving, for example, advertising or shareholder notices from market participants could be interpreted as "information." I would suggest replacing "information" with "information, not available to the public and specifically indicative of compliance obligations and account balances, while providing services on cap and trade compliance ..."
3. Please clarify if "contractor" refers to the individuals specifically involved in 95923 (1) (a) (A/B) or the companies employing such individuals to provide services to entities such as registered participants.
4. Please clarify section 95923 (c) which refers to 95923 (d) which does not exist.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-07-30 15:51:13

No Duplicates.

**Comment 3 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-  
ws) - 1st Workshop.**

First Name: Mitch  
Last Name: Mitchell  
Email Address: dxjones@semprautilities.com  
Affiliation: Sempra Energy utilities

Subject: Modifications to Article 5: California Cap on Greenhouse Gas Emissions...  
Comment:

Attached are comments from the Sempra Energy utilities re  
California Cap on Greenhouse Gas Emissions and Market-based  
Compliance Mechanisms.

Attachment: [www.arb.ca.gov/lists/com-attach/3-cap-trade-draft-ws-VyRRMlcjV1tVMFc4.pdf](http://www.arb.ca.gov/lists/com-attach/3-cap-trade-draft-ws-VyRRMlcjV1tVMFc4.pdf)

Original File Name: SEu commts-AB32 Cap on GHG, Mkt Mechs.7.31.13f.pdf

Date and Time Comment Was Submitted: 2013-07-31 14:25:15

No Duplicates.

**Comment 4 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-  
ws) - 1st Workshop.**

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

Subject: Comments on Discussion Draft of Cap-and-Trade Amendments  
Comment:

See uploaded file.

Attachment: [www.arb.ca.gov/lists/com-attach/4-cap-trade-draft-ws-VDUCdlc0VloBZFMy.doc](http://www.arb.ca.gov/lists/com-attach/4-cap-trade-draft-ws-VDUCdlc0VloBZFMy.doc)

Original File Name: ARB Cap-and-trade comments 8-2-13.doc

Date and Time Comment Was Submitted: 2013-08-01 11:53:08

No Duplicates.

**Comment 5 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-  
ws) - 1st Workshop.**

First Name: Harold

Last Name: Buchanan

Email Address: harold@ce2capital.com

Affiliation:

Subject: CE2 Carbon Capital Comments on Proposed Amendments to the Cap-and-Trade Program  
Comment:

Please see the attached document

Attachment: [www.arb.ca.gov/lists/com-attach/5-cap-trade-draft-ws-AmNWIIxVVkAagBl.pdf](http://www.arb.ca.gov/lists/com-attach/5-cap-trade-draft-ws-AmNWIIxVVkAagBl.pdf)

Original File Name: ARB Letter 8-1-31.pdf

Date and Time Comment Was Submitted: 2013-08-01 12:04:54

No Duplicates.

**Comment 6 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-drafts) - 1st Workshop.**

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

**Comment 7 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-  
ws) - 1st Workshop.**

First Name: Ann L.

Last Name: Trowbridge

Email Address: atrowbridge@daycartermurphy.com

Affiliation: CCDC

Subject: California Clean DG Coalition Comments on July 18 Workshop

Comment:

Attached please find California Clean DG Coalition Comments on July  
18 Workshop Regarding Proposed Changes to the California Greenhouse  
Gas Cap-and-Trade Regulation

Attachment: [www.arb.ca.gov/lists/com-attach/7-cap-trade-draft-ws-BmVUMVM2WWkLUIU2.pdf](http://www.arb.ca.gov/lists/com-attach/7-cap-trade-draft-ws-BmVUMVM2WWkLUIU2.pdf)

Original File Name: CCDC Comments on July 18 Workshop.pdf

Date and Time Comment Was Submitted: 2013-08-01 14:24:02

No Duplicates.

## **Comment 8 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft- ws) - 1st Workshop.**

First Name: Roger

Last Name: Hoffdahl

Email Address: roger.hoffdahl@ingredion.com

Affiliation: Ingredion Incorporated, Stockton Plant

Subject: Cap & Trade Program Amendments - Comment Letter

Comment:

Please use this attachment for our comment submittal. This is a clean copy, previous submission had a word edit feature on that affected minor formatting (content of the letter is the same). Sorry for any confusion. Thanks

Attachment: [www.arb.ca.gov/lists/com-attach/8-cap-trade-draft-ws-VzEAbwFuU2EFb1AP.pdf](http://www.arb.ca.gov/lists/com-attach/8-cap-trade-draft-ws-VzEAbwFuU2EFb1AP.pdf)

Original File Name: Final ARB Comment Letter.pdf

Date and Time Comment Was Submitted: 2013-08-01 14:49:35

No Duplicates.



**Comment 9 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-  
ws) - 1st Workshop.**

First Name: Jay  
Last Name: McKeeman  
Email Address: jaymck@cioma.com  
Affiliation: CIOMA/CSSARA

Subject: Comments on impacts and needed changes of AB 32 fuel regulations  
Comment:

Our Association comments are attached.

Attachment: [www.arb.ca.gov/lists/com-attach/9-cap-trade-draft-ws-UDYHaF0yUGIEbghX.pdf](http://www.arb.ca.gov/lists/com-attach/9-cap-trade-draft-ws-UDYHaF0yUGIEbghX.pdf)

Original File Name: Final CIOMA MMR Comment Letter 8-1-13.pdf

Date and Time Comment Was Submitted: 2013-08-01 15:26:08

No Duplicates.

**Comment 10 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-ws) - 1st Workshop.**

First Name: Emily  
Last Name: Rooney  
Email Address: emily@agcouncil.org  
Affiliation: Agricultural Council of California

Subject: Comments for Draft Regulation  
Comment:

Please find my comments (along with the comment form) attached.

Attachment: [www.arb.ca.gov/lists/com-attach/10-cap-trade-draft-ws-BWFWIIMzUGUEdlUK.pdf](http://www.arb.ca.gov/lists/com-attach/10-cap-trade-draft-ws-BWFWIIMzUGUEdlUK.pdf)

Original File Name: Draft Update + Comment Form.pdf

Date and Time Comment Was Submitted: 2013-08-01 19:37:41

No Duplicates.

**Comment 11 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-ws) - 1st Workshop.**

First Name: Angus

Last Name: Crane

Email Address: [acrane@naima.org](mailto:acrane@naima.org)

Affiliation: NAIMA

Subject: NAIMA's Comments on CARB's Public Workshop to Discuss Proposed Amendments to the California Comment:

NAIMA's Comments on CARB's Public Workshop to Discuss Proposed  
Amendments to the California Cap-and-Trade Program - July 18, 2013;  
and Discussion Draft July 2013

Attachment: [www.arb.ca.gov/lists/com-attach/11-cap-trade-draft-ws-VSdUMwdIUzMCMAUw.doc](http://www.arb.ca.gov/lists/com-attach/11-cap-trade-draft-ws-VSdUMwdIUzMCMAUw.doc)

Original File Name: RAC3456.doc

Date and Time Comment Was Submitted: 2013-08-02 05:49:59

No Duplicates.

## **Comment 12 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-ws) - 1st Workshop.**

First Name: Todd  
Last Name: Schatzki  
Email Address: tschatzki@analysisgroup.com  
Affiliation:

Subject: Cap and Trade Amendments  
Comment:

Dear ARB,

We appreciate the opportunity to provide ARB with these comments and a supporting paper in its on-going consideration of rules for its cap-and-trade program,

Best,

Rob Stavins and Todd Schatzki

Attachment: [www.arb.ca.gov/lists/com-attach/12-cap-trade-draft-ws-VyRVMAduBDYFdwhy.zip](http://www.arb.ca.gov/lists/com-attach/12-cap-trade-draft-ws-VyRVMAduBDYFdwhy.zip)

Original File Name: Schatzki Stavins Comment and Paper to ARB August 2 2013.zip

Date and Time Comment Was Submitted: 2013-08-02 05:51:52

No Duplicates.

## **Comment 13 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft- ws) - 1st Workshop.**

First Name: Margaret

Last Name: Miller

Email Address: margaret.miller@brookfieldrenewable.com

Affiliation:

Subject: Brookfield Comments CARB Aug 2 2013

Comment:

Please find attached Brookfield's comments to the California Air Resource Board on Proposed Changes the California Greenhouse Gas Cap-and-Trade Regulation.

Submitted on behalf of Margaret Miller, Director of Western Regulatory Affairs, Brookfield Renewable Energy Group.

Attachment: [www.arb.ca.gov/lists/com-attach/13-cap-trade-draft-ws-AmBcKFM9WWVXOgZg.docx](http://www.arb.ca.gov/lists/com-attach/13-cap-trade-draft-ws-AmBcKFM9WWVXOgZg.docx)

Original File Name: Brookfield CARB Comments Aug 2 2013.docx

Date and Time Comment Was Submitted: 2013-08-02 07:42:09

No Duplicates.

**Comment 14 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-ws) - 1st Workshop.**

First Name: Nathan

Last Name: Voegeli

Email Address: nvoegeli@yuroktribe.nsn.us

Affiliation: Yurok Tribe

Subject: Tribal comments to Cap and Trade regulatory amendments

Comment:

Please see attached comment letter.

Attachment: [www.arb.ca.gov/lists/com-attach/14-cap-trade-draft-ws-VztXNFUGUnVVNgZ0.pdf](http://www.arb.ca.gov/lists/com-attach/14-cap-trade-draft-ws-VztXNFUGUnVVNgZ0.pdf)

Original File Name: Letter re Cap and Trade Regulatory Revisions 2013\_v2.pdf

Date and Time Comment Was Submitted: 2013-08-02 10:11:47

No Duplicates.

**Comment 15 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-ws) - 1st Workshop.**

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

Subject: WSPA Comments on ARB "Discussion Draft" on the AB32 Mandatory Reporting Regulation  
Comment:

Please see attached WSPA Comments on ARB "Discussion Draft" on the AB32 Mandatory Reporting Regulation.

Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/15-cap-trade-draft-ws-AHcAdQZ3V2UGXwVm.pdf](http://www.arb.ca.gov/lists/com-attach/15-cap-trade-draft-ws-AHcAdQZ3V2UGXwVm.pdf)

Original File Name: WSPA Comments on ARB Discussion Draft on AB32 Mandatory Reporting Reg..pdf

Date and Time Comment Was Submitted: 2013-08-02 10:17:06

No Duplicates.

**Comment 16 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-ws) - 1st Workshop.**

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

Subject: WSPA Comments on July 2013 Discussion Draft Proposed Amendments to Cap and Trade Regulation  
Comment:

Please see attached WSPA Comments on July 2013 Discussion Draft  
Proposed Amendments to Cap and Trade Regulation.

Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/16-cap-trade-draft-ws-BnFUIVYnUWMLUIU2.pdf](http://www.arb.ca.gov/lists/com-attach/16-cap-trade-draft-ws-BnFUIVYnUWMLUIU2.pdf)

Original File Name: WSPA Comments on July 13 Discussion Draft Proposed Ammendments to C&T Reg.pdf

Date and Time Comment Was Submitted: 2013-08-02 10:32:53

No Duplicates.



**Comment 17 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-ws) - 1st Workshop.**

First Name: Andrew

Last Name: Ulmer

Email Address: aulmer@caiso.com

Affiliation: California ISO

Subject: GHG cap and trade and mandatory reporting regulations

Comment:

Attached please find comments of the California ISO on proposed amendments to California's greenhouse gas cap-and-trade regulation and mandatory greenhouse gas reporting regulation.

Attachment: [www.arb.ca.gov/lists/com-attach/18-cap-trade-draft-ws-U2FTZQMzVjcGLVVl.pdf](http://www.arb.ca.gov/lists/com-attach/18-cap-trade-draft-ws-U2FTZQMzVjcGLVVl.pdf)

Original File Name: 2012-08-02\_CARB\_Comments\_ProposedAmendmentsGHGReg.pdf

Date and Time Comment Was Submitted: 2013-08-02 11:09:43

No Duplicates.

**Comment 18 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-  
ws) - 1st Workshop.**

First Name: Gail  
Last Name: Welch  
Email Address: gwelch@qualcomm.com  
Affiliation: Qualcomm Inc

Subject: Comments from 9/18/13 Workshop on Draft Proposed Amendments to the Cap and Trade Program  
Comment:

Attached are Qualcomm's comments with regard to the subject  
workshop and discussion of the "But For" CHP Facilities.

Attachment: [www.arb.ca.gov/lists/com-attach/19-cap-trade-draft-ws-VidcL1U1V2gDZgdo.pdf](http://www.arb.ca.gov/lists/com-attach/19-cap-trade-draft-ws-VidcL1U1V2gDZgdo.pdf)

Original File Name: Qualcomm Comments\_2Aug2013.pdf

Date and Time Comment Was Submitted: 2013-08-02 11:39:28

No Duplicates.

**Comment 19 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-  
ws) - 1st Workshop.**

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

**Comment 20 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-  
ws) - 1st Workshop.**

First Name: Todd

Last Name: Jones

Email Address: todd@resource-solutions.org

Affiliation: Center for Resource Solutions

Subject: CRS Comments on July 2013 Discussion Draft of the California Cap-and-Trade Regulation  
Comment:

Comments of Center for Resource Solutions (CRS) on the July 2013 Discussion Draft of the California Cap-and-Trade regulation, presented at the July 18, 2012 Public Workshop to Discuss Proposed Amendments to the California Cap-and-Trade Program, are contained in the attached letter. Thank you for your consideration and please call with any questions.

Todd Jones

Center for Resource Solutions

Attachment: [www.arb.ca.gov/lists/com-attach/21-cap-trade-draft-ws-VzRSJlclUmIGb1A9.pdf](http://www.arb.ca.gov/lists/com-attach/21-cap-trade-draft-ws-VzRSJlclUmIGb1A9.pdf)

Original File Name: CRScommentstoARBonJuly2013draftC&Treg\_8-2-2013.pdf

Date and Time Comment Was Submitted: 2013-08-02 12:11:28

No Duplicates.

**Comment 21 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-  
ws) - 1st Workshop.**

First Name: John  
Last Name: Leslie  
Email Address: jleslie@mckennalong.com  
Affiliation: Attorney for Shell Energy North America

Subject: Joint Comments of Shell Energy and Shell Oil Products US  
Comment:

To: Air Resources Board (Climate Change Program Evaluation  
Branch):

In accordance with the schedule established at the July 18, 2013  
workshop, Shell Energy North America (US) L.P. and Shell Oil  
Products US submit the attached Joint Comments on the July 2013  
"Discussion Draft" of Proposed Amendments to the ARB's Cap and  
Trade Regulations.

If you have any questions regarding the attached submission, please  
do not hesitate to contact the undersigned or Marcie Milner of  
Shell Energy.

Respectfully submitted,

John W. Leslie  
Attorney for Shell Energy North America (US), L.P.  
and on behalf of Shell Oil Products US

John W. Leslie  
Partner  
McKenna Long & Aldridge LLP  
600 West Broadway, Suite 2600  
San Diego, CA 92101-3391  
Direct: (619) 699-2536  
Facsimile: (619) 699-2536  
Email: jleslie@mckennalong.com

Attachment: [www.arb.ca.gov/lists/com-attach/22-cap-trade-draft-ws-VzRSOWFtAjsxWNQRq.pdf](http://www.arb.ca.gov/lists/com-attach/22-cap-trade-draft-ws-VzRSOWFtAjsxWNQRq.pdf)

Original File Name: Comments to Proposed Changes to the Cap and Trade Regulations (8-2-13).pdf

Date and Time Comment Was Submitted: 2013-08-02 12:13:15

No Duplicates.

**Comment 22 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-ws) - 1st Workshop.**

First Name: David  
Last Name: Huard  
Email Address: dhuard@manatt.com  
Affiliation: Manatt, Phelps & Phillips

Subject: Panoche Energy Center Discussion Draft Comments  
Comment:

Attached is a single document containing the combined Panoche Energy Center July Discussion Draft comments and accompanying CARB Comment Forms

Attachment: [www.arb.ca.gov/lists/com-attach/23-cap-trade-draft-ws-USFVNgdIWFRSNwF1.pdf](http://www.arb.ca.gov/lists/com-attach/23-cap-trade-draft-ws-USFVNgdIWFRSNwF1.pdf)

Original File Name: PEC CT July 2013 Discussion Draft Comments.pdf

Date and Time Comment Was Submitted: 2013-08-02 12:03:02

No Duplicates.

**Comment 23 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-ws) - 1st Workshop.**

First Name: Charles

Last Name: White

Email Address: cwhite1@wm.com

Affiliation: Waste Management

Subject: WM Comments: Proposed Regulation Amendments to Cap & Trade Regulations - Legacy Contracts  
Comment:

Please see the attached letter and comments form regarding 2013 proposed regulation amendments to cap and trade regulations as pertains to Legacy Contracts.

Attachment: [www.arb.ca.gov/lists/com-attach/24-cap-trade-draft-ws-BnEFbgFfBDkGb1cl.zip](http://www.arb.ca.gov/lists/com-attach/24-cap-trade-draft-ws-BnEFbgFfBDkGb1cl.zip)

Original File Name: WM Norwalk\_Legacy Comments\_8\_2\_13.zip

Date and Time Comment Was Submitted: 2013-08-02 11:57:36

No Duplicates.

**Comment 24 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-ws) - 1st Workshop.**

First Name: Chris

Last Name: Chandler

Email Address: Chris.R.Chandler@p66.com

Affiliation:

Subject: Phillips 66 Comments regarding Potential amendments to California's Cap and Trade Regulation  
Comment:

Submitted on behalf of Phillips 66. If you have any questions or comments, please contact us at (310) 952-6002.

Attachment: [www.arb.ca.gov/lists/com-attach/25-cap-trade-draft-ws-BnZWZlBnVVkHYgRr.pdf](http://www.arb.ca.gov/lists/com-attach/25-cap-trade-draft-ws-BnZWZlBnVVkHYgRr.pdf)

Original File Name: P66 Comments on Cap and Trade July 18 2013.pdf

Date and Time Comment Was Submitted: 2013-08-02 12:35:08

No Duplicates.



**Comment 25 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-  
ws) - 1st Workshop.**

First Name: Ralph  
Last Name: Moran  
Email Address: moranrj1@bp.com  
Affiliation: BP America, Inc

Subject: BP America Comments on Cap and Trade Proposed Regulatory Amendments  
Comment:

BP America, Inc

Attachment: [www.arb.ca.gov/lists/com-attach/26-cap-trade-draft-ws-VjRXIQNdUWFXPgZr.pdf](http://www.arb.ca.gov/lists/com-attach/26-cap-trade-draft-ws-VjRXIQNdUWFXPgZr.pdf)

Original File Name: BP comment ltr on CARB cap and trade reg amendments 8 13.pdf

Date and Time Comment Was Submitted: 2013-08-02 12:59:24

No Duplicates.

## **Comment 26 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-ws) - 1st Workshop.**

First Name: Tim

Last Name: Haines

Email Address: thaines@swc.org

Affiliation:

Subject: Comments on Amendment to Cap-and-Trade Program

Comment:

SWC's comments re: discuss the proposed amendments to the Cap-and-Trade Program and Received input from stakeholders on proposed regulatory update.

Attachment: [www.arb.ca.gov/lists/com-attach/27-cap-trade-draft-ws-AHNRIFc1VFhQNQRr.pdf](http://www.arb.ca.gov/lists/com-attach/27-cap-trade-draft-ws-AHNRIFc1VFhQNQRr.pdf)

Original File Name: SWC Comments re Cap-N-Trade Amendment 8-2-13.pdf

Date and Time Comment Was Submitted: 2013-08-02 13:06:34

No Duplicates.

**Comment 27 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-  
ws) - 1st Workshop.**

First Name: Jerry

Last Name: Bloom

Email Address: Jbloom@winston.com

Affiliation: Attorney for OLS Energy Chino, LLC

Subject: Comments of OLS Energy Chino, LLC on Proposed Amendments to Cap & Trade Regulation  
Comment:

Please find attached the comments of OLS Energy Chino, LLC on the  
proposed amendments to the California Cap-and-Trade Regulation  
currently under consideration by the California Air Resources  
Board.

Attachment: [www.arb.ca.gov/lists/com-attach/28-cap-trade-draft-ws-VjlWPAFzUV0LbgFp.pdf](http://www.arb.ca.gov/lists/com-attach/28-cap-trade-draft-ws-VjlWPAFzUV0LbgFp.pdf)

Original File Name: OLS\_Chino\_Comments\_on\_Carb\_Proposed\_Amendment\_to\_Cap\_&\_Trade\_Aug 2.pdf

Date and Time Comment Was Submitted: 2013-08-02 13:18:58

No Duplicates.

## **Comment 28 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-ws) - 1st Workshop.**

First Name: Debbie

Last Name: Reed

Email Address: [dreed@drdassociates.org](mailto:dreed@drdassociates.org)

Affiliation: C-AGG

Subject: C-AGG Comments on Proposed Amendments to the Cap-and-Trade Program  
Comment:

Please find attached suggested changes as developed and submitted  
on behalf of the Coalition on Agricultural Greenhouse Gases  
(C-AGG).

Attachment: [www.arb.ca.gov/lists/com-attach/29-cap-trade-draft-ws-UDMCKVAwUmZXNgZZ.pdf](http://www.arb.ca.gov/lists/com-attach/29-cap-trade-draft-ws-UDMCKVAwUmZXNgZZ.pdf)

Original File Name: C-AGG Language CA CT Regs.pdf

Date and Time Comment Was Submitted: 2013-08-02 13:32:30

No Duplicates.

## **Comment 29 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft- ws) - 1st Workshop.**

First Name: Danny  
Last Name: Cullenward  
Email Address: dcullenward@stanford.edu  
Affiliation:

Subject: Resource Shuffling  
Comment:

August 2, 2013

Dr. Steven Cliff  
Chief, Climate Change Programs Evaluation Branch  
California Air Resources Board

Re: Proposed Amendments to the California Cap-and-Trade Program  
(July 18, 2013 Discussion Draft)

Dear Dr. Cliff,

We write to raise serious concerns regarding the Board's proposed amendments to the rules on resource shuffling in §§ 95802(a)(252) and 95852(b)(2) of the July 18 discussion draft. Please find our detailed comments in the attached Stanford Law School working paper.

In brief, we believe that the proposal, if adopted, would violate the Board's obligation under California Health & Safety Code § 38562(b)(8) to minimize leakage. As a number of studies have recently shown, a strong rule on resource shuffling is required to avoid substantial leakage in the electricity sector. Yet several of the proposed safe harbor provisions are so broad that almost any electricity sector transaction could be structured to fit within them, effectively negating the prohibition on resource shuffling.

We are also specifically concerned with the exemptions for out-of-state coal power contracts. The discussion draft proposal unambiguously exempts divestment of these contracts from the ban on resource shuffling, without a corresponding requirement that underlying facilities retire or otherwise reduce their emissions. Our calculations show that the associated leakage risks constitute between 47% and 197% of the cumulative mitigation expected under the cap-and-trade market through 2020, depending on the success of complimentary policies and the use of the allowance price containment reserve. Simply put, the potential for leakage at this scale threatens to undermine the integrity of the carbon market, and cannot be reconciled with the statutory requirement to minimize leakage.

In addition to documenting our concerns in detail, we also provide a fully developed alternative policy structure that implements a new, market-based mechanism. Our proposal would greatly reduce the potential for leakage related to resource shuffling while permitting covered entities to engage in a range of transactions that would have been impossible under the current regulations.

We urge the Board to consider the significant implications of a weak rule on resource shuffling and modify its approach to fully address the leakage concerns we identify. Thank you for your consideration.

Respectfully,

Danny Cullenward and David Weiskopf

Attachment: [www.arb.ca.gov/lists/com-attach/30-cap-trade-draft-ws-WihdPgNxWGRXJFMh.pdf](http://www.arb.ca.gov/lists/com-attach/30-cap-trade-draft-ws-WihdPgNxWGRXJFMh.pdf)

Original File Name: Resource Shuffling - Cullenward and Weiskopf.pdf

Date and Time Comment Was Submitted: 2013-08-02 13:39:22

No Duplicates.

**Comment 30 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-ws) - 1st Workshop.**

First Name: Nicholas

Last Name: Martin

Email Address: nmartin@winrock.org

Affiliation: American Carbon Registry

Subject: ACR comments on July 2013 discussion draft regulatory amendments

Comment:

Thank you for this opportunity to comment on the July 2013 discussion draft Proposed Amendments to the California Cap-and-Trade Program. Please find our comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/31-cap-trade-draft-ws-AmMHYlAjUl4Kbwhn.pdf](http://www.arb.ca.gov/lists/com-attach/31-cap-trade-draft-ws-AmMHYlAjUl4Kbwhn.pdf)

Original File Name: ACR comments on ARB July 2013 Discussion Draft.pdf

Date and Time Comment Was Submitted: 2013-08-02 13:50:46

No Duplicates.

**Comment 31 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-ws) - 1st Workshop.**

First Name: Ann L.

Last Name: Trowbridge

Email Address: atrowbridge@daycartermurphy.com

Affiliation: Inergy West Coast LLC

Subject: Inergy West Coast LLC Comments on July 18 Workshop

Comment:

Attached please find Inergy West Coast LLC Comments on July 18 Workshop Regarding Proposed Changes to the California Greenhouse Gas Cap-and-Trade Regulation

Attachment: [www.arb.ca.gov/lists/com-attach/32-cap-trade-draft-ws-Vz5dNVQwWXgBYFcu.pdf](http://www.arb.ca.gov/lists/com-attach/32-cap-trade-draft-ws-Vz5dNVQwWXgBYFcu.pdf)

Original File Name: Inergy Comments on July 18 Workshop.pdf

Date and Time Comment Was Submitted: 2013-08-02 14:11:15

No Duplicates.



**Comment 32 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-  
ws) - 1st Workshop.**

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

Subject: Public Workshop to Discuss Proposed Amendments to the California Cap-and-Trade Program  
Comment:

LACSD comment letter re: Public Workshop to Discuss Proposed  
Amendments to the California Cap-and-Trade Program.

Attachment: [www.arb.ca.gov/lists/com-attach/33-cap-trade-draft-ws-UTUBaFw+AmFQbgQ0.pdf](http://www.arb.ca.gov/lists/com-attach/33-cap-trade-draft-ws-UTUBaFw+AmFQbgQ0.pdf)

Original File Name: DOC080213-001.pdf

Date and Time Comment Was Submitted: 2013-08-02 14:22:34

No Duplicates.

## **Comment 33 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-ws) - 1st Workshop.**

First Name: Beth

Last Name: Vaughan

Email Address: beth@beth411.com

Affiliation: California Cogeneration Council

Subject: CCC Comments on July 2013 proposed amendments to the cap-and-trade regulation  
Comment:

Please see the attached letter.

Attachment: [www.arb.ca.gov/lists/com-attach/34-cap-trade-draft-ws-Bz9Uf1RnAH5WYQMw.pdf](http://www.arb.ca.gov/lists/com-attach/34-cap-trade-draft-ws-Bz9Uf1RnAH5WYQMw.pdf)

Original File Name: 8-2-13\_CCC\_Comments\_Legacy Contracts Proposed Amendments.pdf

Date and Time Comment Was Submitted: 2013-08-02 14:37:24

No Duplicates.

**Comment 34 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-  
ws) - 1st Workshop.**

First Name: Carl

Last Name: Fink

Email Address: CMFINK@Blueplanetlaw.com

Affiliation: Capital Power Energy Marketing (US) INC

Subject: Comments of CPEMUS on proposed amendments to Cap and Trade Regulations- July 2013

Comment:

Comments of CPEMUS on proposed amendments to Cap and Trade  
Regulations- July 2013 attached.

Attachment: [www.arb.ca.gov/lists/com-attach/35-cap-trade-draft-ws-AmFcNVc7VWsDYFI8.pdf](http://www.arb.ca.gov/lists/com-attach/35-cap-trade-draft-ws-AmFcNVc7VWsDYFI8.pdf)

Original File Name: Comments of CP Energy Marketing on proposed ARB regulatory changes (July 2013).pdf

Date and Time Comment Was Submitted: 2013-08-02 14:40:45

No Duplicates.

**Comment 35 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-ws) - 1st Workshop.**

First Name: Amber

Last Name: Riesenhuber

Email Address: amber@iepa.com

Affiliation: IEP

Subject: IEP's Comments on C & T Discussion Draft

Comment:

IEP's Comments on C & T Discussion Draft

Attachment: [www.arb.ca.gov/lists/com-attach/36-cap-trade-draft-ws-UjtUN10sV1sEYQFu.pdf](http://www.arb.ca.gov/lists/com-attach/36-cap-trade-draft-ws-UjtUN10sV1sEYQFu.pdf)

Original File Name: IEP Comments on CARB C+T Discussion Draft FILED.pdf

Date and Time Comment Was Submitted: 2013-08-02 14:46:43

No Duplicates.

## **Comment 36 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-ws) - 1st Workshop.**

First Name: Shelly  
Last Name: Sullivan  
Email Address: ssullivan@onemain.com  
Affiliation: AB 32 Implementation Group

Subject: AB 32 IG Comments Regarding CARB's Cap-and- Trade Proposed Amendments  
Comment:

Good Afternoon:

Attached please find comments from the AB 32 Implementation Group regarding CARB's proposed amendments to the cap-and-trade program.

Should you have any questions or need anything further please feel free to contact Shelly Sullivan at 916 858-8686.

Attachment: [www.arb.ca.gov/lists/com-attach/37-cap-trade-draft-ws-UTJROFE9AD4DYFA+.pdf](http://www.arb.ca.gov/lists/com-attach/37-cap-trade-draft-ws-UTJROFE9AD4DYFA+.pdf)

Original File Name: Comments Proposed Amends to CT Reg\_8\_2.pdf

Date and Time Comment Was Submitted: 2013-08-02 14:46:14

No Duplicates.

**Comment 37 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-ws) - 1st Workshop.**

First Name: Nancy

Last Name: Allred

Email Address: nancy.allred@sce.com

Affiliation: Southern California Edison Company

Subject: SCE Comments on Proposed Amendments Discussion Draft

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/38-cap-trade-draft-ws-BjRXYVRkWDgGLVVl.pdf](http://www.arb.ca.gov/lists/com-attach/38-cap-trade-draft-ws-BjRXYVRkWDgGLVVl.pdf)

Original File Name: 2013-08-02 Comments to CARB on Proposed Amendments Discussion Draft.pdf

Date and Time Comment Was Submitted: 2013-08-02 14:47:47

No Duplicates.

**Comment 38 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-  
ws) - 1st Workshop.**

First Name: Kyle

Last Name: Boudreaux

Email Address: kyle.boudreaux@fpl.com

Affiliation:

Subject: NextEra Energy's Comments on July 18 Workshop

Comment:

These comments are submitted by NextEra Energy based on the 2013  
discussion draft and July 18 workshop

Attachment: [www.arb.ca.gov/lists/com-attach/39-cap-trade-draft-ws-BWsAYwF4UXYDYFMh.docx](http://www.arb.ca.gov/lists/com-attach/39-cap-trade-draft-ws-BWsAYwF4UXYDYFMh.docx)

Original File Name: NextEra Energy Resources Comments on the California Air Resources Board.docx

Date and Time Comment Was Submitted: 2013-08-02 14:57:20

No Duplicates.

**Comment 39 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-ws) - 1st Workshop.**

First Name: Keith

Last Name: Casto

Email Address: kcasto@carbonvp.com

Affiliation: Carbon Venture Partners for CalAg, LLC

Subject: CalAg Comments on Rule Amendments

Comment:

CalAg is commenting on issues related to the Rice Cultivation Protocol and associated offset rules.

Attachment: [www.arb.ca.gov/lists/com-attach/41-cap-trade-draft-ws-BmUCZQBzWGkHbgJs.pdf](http://www.arb.ca.gov/lists/com-attach/41-cap-trade-draft-ws-BmUCZQBzWGkHbgJs.pdf)

Original File Name: CarbonVP\_Comments to ARB CandT 08022013.pdf

Date and Time Comment Was Submitted: 2013-08-02 15:03:32

No Duplicates.



**Comment 40 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-  
ws) - 1st Workshop.**

First Name: Joseph  
Last Name: Seymour  
Email Address: jseymour@ttcorp.com  
Affiliation: Renewable Energy Markets Association

Subject: REMA comments on ARB Discussion Draft  
Comment:

See attached for the submission form and related comments from the  
Renewable Energy Markets Association (REMA) on ARB's Cap and Trade  
Discussion Draft.

Attachment: [www.arb.ca.gov/lists/com-attach/42-cap-trade-draft-ws-AXNVNIY6AjAHXIMw.pdf](http://www.arb.ca.gov/lists/com-attach/42-cap-trade-draft-ws-AXNVNIY6AjAHXIMw.pdf)

Original File Name: REMA\_commentform\_Discussion\_Draft.pdf

Date and Time Comment Was Submitted: 2013-08-02 14:57:24

No Duplicates.

**Comment 41 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-ws) - 1st Workshop.**

First Name: Victoria

Last Name: Evans

Email Address: vevans@carbonvp.com

Affiliation: Carbon Venture Partners

Subject: Comments on Rule Amendments

Comment:

CVP is commenting on several sections and issues in the proposed amendments to the rules.

Attachment: [www.arb.ca.gov/lists/com-attach/43-cap-trade-draft-ws-B2QHYP0uVmcCa1U7.pdf](http://www.arb.ca.gov/lists/com-attach/43-cap-trade-draft-ws-B2QHYP0uVmcCa1U7.pdf)

Original File Name: CarbonVP\_Comments to ARB CandT 08022013.pdf

Date and Time Comment Was Submitted: 2013-08-02 15:03:32

No Duplicates.

**Comment 42 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-ws) - 1st Workshop.**

First Name: Charles

Last Name: Purshouse

Email Address: charles.purshouse@camcocleanenergy.com

Affiliation:

Subject: CODA Response to Proposed Regulatory Amendments

Comment:

Please find our response attached

Attachment: [www.arb.ca.gov/lists/com-attach/44-cap-trade-draft-ws-UDMGb1A1VmQGxwFz.pdf](http://www.arb.ca.gov/lists/com-attach/44-cap-trade-draft-ws-UDMGb1A1VmQGxwFz.pdf)

Original File Name: CODA Response to July 2013 Reg Amendments.pdf

Date and Time Comment Was Submitted: 2013-08-02 15:33:22

No Duplicates.

**Comment 43 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-  
ws) - 1st Workshop.**

First Name: Robert

Last Name: Lucas

Email Address: bob.lucas@calobby.com

Affiliation: CCEEB

Subject: Comments re Proposed Amendments to Cap-and-Trade Program

Comment:

Attached are CCEEB comments.

Attachment: [www.arb.ca.gov/lists/com-attach/45-cap-trade-draft-ws-UTIFbANvWGZRMgBu.pdf](http://www.arb.ca.gov/lists/com-attach/45-cap-trade-draft-ws-UTIFbANvWGZRMgBu.pdf)

Original File Name: Comments re Proposed Amendments to Cap-and-Trade.pdf

Date and Time Comment Was Submitted: 2013-08-02 15:44:56

No Duplicates.

**Comment 44 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-  
ws) - 1st Workshop.**

First Name: Thomas

Last Name: Corr

Email Address: thomaspcorr@gmail.com

Affiliation: Noble Americas Energy Solutions LLC

Subject: Comments on RPS Adjustment

Comment:

Comments of Noble Americas Energy Solutions on the RPS Adjustment

Attachment: [www.arb.ca.gov/lists/com-attach/46-cap-trade-draft-ws-WzVQOVEyUW4AY1AP.pdf](http://www.arb.ca.gov/lists/com-attach/46-cap-trade-draft-ws-WzVQOVEyUW4AY1AP.pdf)

Original File Name: Noble Solutions COMMENTS to CARB on RPS Adjustment 2aug2013 Final.pdf

Date and Time Comment Was Submitted: 2013-08-02 15:53:00

No Duplicates.

**Comment 45 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-  
ws) - 1st Workshop.**

First Name: Clare  
Last Name: Breidenich  
Email Address: cbreidenich@aciem.us  
Affiliation: Western Power Trading Forum

Subject: WPTF Comments on Discussion Draft  
Comment:

To Whom it May Concern;

Please find attached comments of the Western Power Trading Forum on the Discussion Draft Proposed Changes to the Cap and Trade Regulation.

I would greatly appreciate it if you would confirm receipt.

Thank you,  
Clare Breidenich  
WPTF GHG Committee Director  
1.206.697.4946

Attachment: [www.arb.ca.gov/lists/com-attach/47-cap-trade-draft-ws-UWlRelBjWCYLPAQ3.pdf](http://www.arb.ca.gov/lists/com-attach/47-cap-trade-draft-ws-UWlRelBjWCYLPAQ3.pdf)

Original File Name: 8-2-13 Final WPTF comments on Discussion Draft changes to C&T Regulation.pdf

Date and Time Comment Was Submitted: 2013-08-02 16:03:07

No Duplicates.

**Comment 46 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-ws) - 1st Workshop.**

First Name: Dan

Last Name: Severson, TID

Email Address: dbseverson@tid.org

Affiliation:

Subject: Turlock Irrigation District's Comments on 7-18 Discussion Draft Cap-and-Trade Regulation  
Comment:

Dear Dr. Steve Cliff,

Please find attached Turlock Irrigation District's Comments on the July 18th Public Workshop to Discuss Proposed Amendments to the California Cap-and-Trade Program. Thank you.

Kind regards,

Dan B. Severson  
Turlock Irrigation District

Attachment: [www.arb.ca.gov/lists/com-attach/48-cap-trade-draft-ws-WmsGMwAxUzgFMwAy.pdf](http://www.arb.ca.gov/lists/com-attach/48-cap-trade-draft-ws-WmsGMwAxUzgFMwAy.pdf)

Original File Name: 130802\_TID Comments on 7.18 ARB CNT Regs (00170197).PDF

Date and Time Comment Was Submitted: 2013-08-02 15:58:07

No Duplicates.

**Comment 47 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-ws) - 1st Workshop.**

First Name: Gary  
Last Name: Grimes  
Email Address: GGrimes@ppcla.com  
Affiliation: Alon USA

Subject: Alon Discussion Draft Comments  
Comment:

Please find attached a combined document containing both Alon's comment letter and the amendment request form.

Attachment: [www.arb.ca.gov/lists/com-attach/49-cap-trade-draft-ws-UzJSOFwyBTgAWVMw.pdf](http://www.arb.ca.gov/lists/com-attach/49-cap-trade-draft-ws-UzJSOFwyBTgAWVMw.pdf)

Original File Name: Alon CT July 2013 Discussion Draft Comments.pdf

Date and Time Comment Was Submitted: 2013-08-02 16:11:18

No Duplicates.



**Comment 48 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-ws) - 1st Workshop.**

First Name: Susie

Last Name: Berlin

Email Address: berlin@susieberlinlaw.com

Affiliation: Northern California Power Agency (NCPA)

Subject: NCPA Comments on Discussion Draft

Comment:

Attached please find the Northern California Power Agency (NCPA) comments on the July 15 Discussion Draft.

Attachment: [www.arb.ca.gov/lists/com-attach/50-cap-trade-draft-ws-VDpSN1MiAzEKU1Az.pdf](http://www.arb.ca.gov/lists/com-attach/50-cap-trade-draft-ws-VDpSN1MiAzEKU1Az.pdf)

Original File Name: NCPA comments re 7-15-13 discussion draft (final 8-2-13).pdf

Date and Time Comment Was Submitted: 2013-08-02 16:16:11

No Duplicates.

**Comment 49 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-  
ws) - 1st Workshop.**

First Name: Mark

Last Name: Sedlacek

Email Address: mark.sedlacek@ladwp.com

Affiliation:

Subject: LADWP Comments - CARB GHG Cap and Trade Regulation

Comment:

Attached are LADWP's comments on the proposed changes to the California Greenhouse Gas Cap-and-Trade regulation released on July 15, 2013 and presented at a public workshop on July 18, 2013.

Attachment: [www.arb.ca.gov/lists/com-attach/51-cap-trade-draft-ws-BmpQNwZjUXUEcgNc.pdf](http://www.arb.ca.gov/lists/com-attach/51-cap-trade-draft-ws-BmpQNwZjUXUEcgNc.pdf)

Original File Name: LADWP Comments on Cap and Trade Regulation 8-2-13.pdf

Date and Time Comment Was Submitted: 2013-08-02 16:18:07

No Duplicates.

**Comment 50 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-  
ws) - 1st Workshop.**

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

**Comment 51 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-ws) - 1st Workshop.**

First Name: Katy

Last Name: Wilson

Email Address: kmwilson@semprausgp.com

Affiliation: Sempra Generation

Subject: Comments on Proposed Amendments to the California Cap-and-Trade Program Regulations  
Comment:

Attached are the comments of Sempra Generation regarding the  
Proposed Amendments to the California Cap-and-Trade Program  
Regulations.

Attachment: [www.arb.ca.gov/lists/com-attach/53-cap-trade-draft-ws-WjlcNVQ4UW9VNgFv.pdf](http://www.arb.ca.gov/lists/com-attach/53-cap-trade-draft-ws-WjlcNVQ4UW9VNgFv.pdf)

Original File Name: Comments of Sempra Generation.pdf

Date and Time Comment Was Submitted: 2013-08-02 16:21:15

No Duplicates.

**Comment 52 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-ws) - 1st Workshop.**

First Name: Paul  
Last Name: Shepard, WFE  
Email Address: p.shepard@dgc-us.com  
Affiliation:

Subject: Wildflower Comments on July 18, 2013 Draft of Cap-and-trade Regulatory Amendments  
Comment:

Dear Dr. Steve Cliff,

Please find attached a copy of Wildflower Energy, LP Comments on the July 18, 2013 Discussion Draft of Cap-and-trade Regulatory Amendments. Thank you.

Sincerely,

Paul Shepard  
Asset Manager, Wildflower Energy, LP

Attachment: [www.arb.ca.gov/lists/com-attach/54-cap-trade-draft-ws-VGYANIFhVTWYFNR.pdf](http://www.arb.ca.gov/lists/com-attach/54-cap-trade-draft-ws-VGYANIFhVTWYFNR.pdf)

Original File Name: 20130802 WFE Comment Letter on 7 13 ARB CNT Regs.pdf

Date and Time Comment Was Submitted: 2013-08-02 16:19:46

No Duplicates.

**Comment 53 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-ws) - 1st Workshop.**

First Name: Leonard

Last Name: Pettis

Email Address: lpettis@calstate.edu

Affiliation: California State Univesity

Subject: cap-trade-draft-ws

Comment:

CSU reply comments attached

Attachment: [www.arb.ca.gov/lists/com-attach/55-cap-trade-draft-ws-AGEBdQdkBQkFZAVt.doc](http://www.arb.ca.gov/lists/com-attach/55-cap-trade-draft-ws-AGEBdQdkBQkFZAVt.doc)

Original File Name: ARB GHG Regulation CSU Reply 08 02 2013.doc

Date and Time Comment Was Submitted: 2013-08-02 16:29:54

No Duplicates.

**Comment 54 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-ws) - 1st Workshop.**

First Name: Bill

Last Name: Buchan

Email Address: buchana@mktpotential.com

Affiliation: Cardinal Cogen, Inc.

Subject: Provide True-Up for Legacy Contract Allowances

Comment:

Legacy contract allowances for 2013 and 2014 are proposed to be calculated based on 2012 data without a true-up. True-up with actual data is proposed in other parts of the regulation where direct allowances are provided, and the same true-up protocol should apply to legacy allowances as well. For a number of reasons, 2012 data may have little relevance to actual output in 2013 and 2014. In the interest of fairness to legacy contract parties, please provide a true-up for the allowance calculations in 95894(c) and (d).

Attachment: [www.arb.ca.gov/lists/com-attach/56-cap-trade-draft-ws-UzJdKQBjAg5SZgEx.docx](http://www.arb.ca.gov/lists/com-attach/56-cap-trade-draft-ws-UzJdKQBjAg5SZgEx.docx)

Original File Name: ARB 2013 cap and trade comment - Legacy allowance true-up.docx

Date and Time Comment Was Submitted: 2013-08-02 16:39:54

No Duplicates.

**Comment 55 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-  
ws) - 1st Workshop.**

First Name: Charles  
Last Name: Mason  
Email Address: Bambuzlr@uwyo.edu  
Affiliation: Univ. of Wyoming

Subject: Comments on gifting AB32 allowances to refineries  
Comment:

Please see attached letter.

Sincerely,

Charles F. Mason  
True Chair in Petroleum and Natural Gas Economics  
Department of Economics and Finance  
University of Wyoming

Attachment: [www.arb.ca.gov/lists/com-attach/57-cap-trade-draft-ws-B2pTNFEjUGxVPVcI.pdf](http://www.arb.ca.gov/lists/com-attach/57-cap-trade-draft-ws-B2pTNFEjUGxVPVcI.pdf)

Original File Name: Mason letter to CARB August 2.pdf

Date and Time Comment Was Submitted: 2013-08-02 16:48:27

No Duplicates.



## **Comment 56 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-ws) - 1st Workshop.**

First Name: Bill

Last Name: Buchan

Email Address: buchana@mktpotential.com

Affiliation: Cardinal Cogen, Inc.

Subject: Sunset on Legacy Allowance Provision

Comment:

Legacy contract allowances are proposed for 2013 and 2014, but not beyond even though many legacy contract extend well beyond 2014. While we understand that ARB would like to continue to encourage negotiating as a means of settling legacy contracts, the negotiating position for involved parties will not change (with possible exception of those involving universities who are covered entities). For Cardinal Cogen, our contract host is not a covered entity, so the negotiating position will be no different now than it will be in 2014. Expecting a renegotiation between now and then is not realistic, as our contract host has no reason to accept additional fees for greenhouse gases. We ask that the ARB reconsider the limitation on legacy allowances with the realization that ARB will be supporting CHP as enumerated in state policy knowing we had no way of foreseeing greenhouse gas costs at the time the contract was entered into.

Attachment: [www.arb.ca.gov/lists/com-attach/58-cap-trade-draft-ws-VjdTJ1U2UI4BNQEx.docx](http://www.arb.ca.gov/lists/com-attach/58-cap-trade-draft-ws-VjdTJ1U2UI4BNQEx.docx)

Original File Name: ARB 2013 cap and trade comment - Legacy allowance sunset.docx

Date and Time Comment Was Submitted: 2013-08-02 16:49:53

No Duplicates.

**Comment 57 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-  
ws) - 1st Workshop.**

First Name: Susie

Last Name: Berlin

Email Address: berlin@susieberlinlaw.com

Affiliation: M-S-R Public Power Agency

Subject: M-S-R Comments on Discussion Draft

Comment:

attached please find comments from the M-S-R Public Power Agency on  
the July 15 Discussion Draft of proposed changes to the  
Cap-and-Trade Program Regulation.

Attachment: [www.arb.ca.gov/lists/com-attach/59-cap-trade-draft-ws-AG1Rel0vVykJcVQL.pdf](http://www.arb.ca.gov/lists/com-attach/59-cap-trade-draft-ws-AG1Rel0vVykJcVQL.pdf)

Original File Name: M-S-R comments re 7-15-13 discussion draft of proposed changes (final 8-2-13).pdf

Date and Time Comment Was Submitted: 2013-08-02 16:53:36

No Duplicates.

**Comment 58 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-  
ws) - 1st Workshop.**

First Name: Bill

Last Name: Buchan

Email Address: buchana@mktpotential.com

Affiliation: Cardinal Cogen, Inc.

Subject: Legacy Allowance for 1st Compliance Period

Comment:

Legacy contract allowances are proposed to receive 2015 vintage allowances for the 2013-14 compliance period. Asking our 3rd party CHP to float the cost of compliance before receiving state compensation is a real and unnecessary cost to our facility. These allowances should be allowed for use in settling the 2013-14 compliance requirements. Unfortunately, the draft regulation under 95856 (h)(1)(c) and (2)(c) do not yet allow this.

Attachment: [www.arb.ca.gov/lists/com-attach/60-cap-trade-draft-ws-VjdcKFY1UV1RZVJi.docx](http://www.arb.ca.gov/lists/com-attach/60-cap-trade-draft-ws-VjdcKFY1UV1RZVJi.docx)

Original File Name: ARB 2013 cap and trade comment - Legacy allowance for first compliance period.docx

Date and Time Comment Was Submitted: 2013-08-02 16:52:35

No Duplicates.

**Comment 59 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-ws) - 1st Workshop.**

First Name: Keith

Last Name: Casto

Email Address: kcasto@carbonvp.com

Affiliation: Carbon Venture Partners, LLC

Subject: Correct file of comments on Cap & Trade Rule amendments is attached.

Comment:

This is the correct set of comments prepared by CVP for CalAg.

Attachment: [www.arb.ca.gov/lists/com-attach/61-cap-trade-draft-ws-VTYHYAFsWGoAYQBf.pdf](http://www.arb.ca.gov/lists/com-attach/61-cap-trade-draft-ws-VTYHYAFsWGoAYQBf.pdf)

Original File Name: CalAg\_Comments to ARB CandT 08022013.pdf

Date and Time Comment Was Submitted: 2013-08-02 16:53:40

No Duplicates.

## **Comment 60 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft- ws) - 1st Workshop.**

First Name: Bill

Last Name: Buchan

Email Address: buchana@mktpotential.com

Affiliation: Cardinal Cogen, Inc.

Subject: Reduce Naming Of Personnel in Registration

Comment:

It is overly burdensome with no clear value to specify all management personnel during registration even if some personnel have no involvement in cap and trade. This requirement is particularly excessive for large global organizations where the list of management personnel is extensive. Directors, officers, and persons controlling the voting rights of a large global entities are unlikely to have direct knowledge of cap and trade issues for a California subsidiary. New VAE language requests identification of corporate associations making extensive personnel requests from covered entities unnecessary.

Attachment: [www.arb.ca.gov/lists/com-attach/62-cap-trade-draft-ws-AGFXIwFiWFQFMVdn.docx](http://www.arb.ca.gov/lists/com-attach/62-cap-trade-draft-ws-AGFXIwFiWFQFMVdn.docx)

Original File Name: ARB 2013 cap and trade comment - reduce naming personnel.docx

Date and Time Comment Was Submitted: 2013-08-02 16:57:14

No Duplicates.

## **Comment 61 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft- ws) - 1st Workshop.**

First Name: Bill

Last Name: Buchan

Email Address: buchana@mktpotential.com

Affiliation: Cardinal Cogen, Inc.

Subject: Verification Timeline

Comment:

In the ARB July 18 workshop presentation, ARB proposed to move up the deadline for annual verification by two weeks. This would provide a hardship for all 600 covered entities in the state. In the past few years our facility has completed verification right before the deadline, as our verifier works with all their covered entities to meet the September 1 deadline. Shortening the verification period by two weeks is not a feasible solution for us.

Attachment: [www.arb.ca.gov/lists/com-attach/63-cap-trade-draft-ws-UTABdVMwV1sLP1Rk.docx](http://www.arb.ca.gov/lists/com-attach/63-cap-trade-draft-ws-UTABdVMwV1sLP1Rk.docx)

Original File Name: ARB 2013 cap and trade comment - verification timeline.docx

Date and Time Comment Was Submitted: 2013-08-02 17:00:33

No Duplicates.

## **Comment 62 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft- ws) - 1st Workshop.**

First Name: Bill

Last Name: Buchan

Email Address: buchana@mktpotential.com

Affiliation: Cardinal Cogen, Inc.

Subject: Limit Corporate Associations

Comment:

The draft requirements for corporate associations, direct associations, and indirect associations is overly burdensome to large, global entities and provides no real value to ARB. Large, global entities can have thousands of business units and subsidiaries across the globe, many of which will have no business in California or with the state's cap and trade system. Providing this information is difficult to amass for such organizations and provides no beneficial, actionable data to ARB. Direct associations ought to be limited to other covered entities in California. Indirect associations ought to be limited to entities with operations in California or can participate in financial investment transactions in California's cap and trade system. New VAE language requests identification of corporate associations making extensive listing of corporate, direct or indirect associations from covered entities unnecessary.

Attachment: [www.arb.ca.gov/lists/com-attach/64-cap-trade-draft-ws-VTRRJV0+U18KPgAw.docx](http://www.arb.ca.gov/lists/com-attach/64-cap-trade-draft-ws-VTRRJV0+U18KPgAw.docx)

Original File Name: ARB 2013 cap and trade comment - corporate associations.docx

Date and Time Comment Was Submitted: 2013-08-02 17:02:28

No Duplicates.

**Comment 63 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-ws) - 1st Workshop.**

First Name: Nicholas  
Last Name: van Aelstyn  
Email Address: nvanaelstyn@bdlaw.com  
Affiliation:

Subject: Powerx's Comments on ARB's July Discussion Draft  
Comment:

Please see attached document.

Attachment: [www.arb.ca.gov/lists/com-attach/65-cap-trade-draft-ws-VWcANIV1B2cLIAU1.pdf](http://www.arb.ca.gov/lists/com-attach/65-cap-trade-draft-ws-VWcANIV1B2cLIAU1.pdf)

Original File Name: 2013-08-02 CTR - Powerex Comments on Cap-and-Trade Discussion Draft.pdf

Date and Time Comment Was Submitted: 2013-08-02 16:23:35

No Duplicates.



**Comment 64 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-  
ws) - 1st Workshop.**

First Name: Bill

Last Name: Buchan

Email Address: buchana@mktpotential.com

Affiliation: Graphic Packaging International, Inc.

Subject: Use of Current Year Allowance for Prior Year Compliance

Comment:

Graphic Packaging International supports the ARBs proposed change under 95856 (h)(1)(c) and (2)(c) to allow current year vintage allowances up to the true-up amount for prior year compliance for facilities with leakage risk as identified in Table 9-1 of section 95891(b). We ask that ARB consider enhancing this provision by removing the true-up amount limitation. Allowing facilities to use current year vintage for prior year compliance can provide a strong cost containment benefit to EITE facilities. Facilities could now delay purchases of allowances if they thought future prices of allowances would be cheaper. As a facility with leakage risk, we see our proposed change as a significant means for cost - containment of cap and trade costs, a very important consideration for all EITE facilities.

Attachment: [www.arb.ca.gov/lists/com-attach/66-cap-trade-draft-ws-UjMHcwFiBwsCNgU1.docx](http://www.arb.ca.gov/lists/com-attach/66-cap-trade-draft-ws-UjMHcwFiBwsCNgU1.docx)

Original File Name: ARB 2013 cap and trade comment - Current year allowance for prior year compliance.docx

Date and Time Comment Was Submitted: 2013-08-02 17:11:43

No Duplicates.

**Comment 65 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-ws) - 1st Workshop.**

First Name: Kassandra

Last Name: Gough

Email Address: Kassandra.Gough@calpine.com

Affiliation: Calpine Corporation

Subject: Comments on Draft Amendments to Cap-and-Trade Regulation

Comment:

Please review the attached comments on the California Air Resources Board's discussion draft of proposed amendments to the Cap-and-Trade Regulation.

Attachment: [www.arb.ca.gov/lists/com-attach/67-cap-trade-draft-ws-VmQCNFBgWDhWfQQ0.pdf](http://www.arb.ca.gov/lists/com-attach/67-cap-trade-draft-ws-VmQCNFBgWDhWfQQ0.pdf)

Original File Name: 2013-08-02 Comments re Discussion Draft Amendments Cap-and-Trade.pdf

Date and Time Comment Was Submitted: 2013-08-02 17:14:06

No Duplicates.

**Comment 66 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-  
ws) - 1st Workshop.**

First Name: Norman

Last Name: Pedersen

Email Address: npedersen@hanmor.com

Affiliation: SCPPA for Magnolia Power Project

Subject: Comments

Comment:

Please find attached the Southern California Public Power Authority  
Comments of Behalf of Magnolia Power Project Participants on  
Proposed Changes to Cap and Trade Regulation Released on July 15,  
2013.

Attachment: [www.arb.ca.gov/lists/com-attach/68-cap-trade-draft-ws-WmlQZgc2VzZQZFRi.pdf](http://www.arb.ca.gov/lists/com-attach/68-cap-trade-draft-ws-WmlQZgc2VzZQZFRi.pdf)

Original File Name: 300226008lmm08021302 Magnolia comments to ARB on 071513 Cap and Trade  
changes.pdf

Date and Time Comment Was Submitted: 2013-08-02 17:29:13

No Duplicates.

**Comment 67 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-  
ws) - 1st Workshop.**

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

Subject: Comments on the Proposed Amendments to Cap and Trade  
Comment:

Chevron's comments on the Proposed Amendments to Cap and Trade are  
attached.

Attachment: [www.arb.ca.gov/lists/com-attach/69-cap-trade-draft-ws-UzBdM1A0UHUDd1U6.pdf](http://www.arb.ca.gov/lists/com-attach/69-cap-trade-draft-ws-UzBdM1A0UHUDd1U6.pdf)

Original File Name: Chevron Comments Proposed Amendments to Cap and Trade FINAL August\_2\_2013.pdf

Date and Time Comment Was Submitted: 2013-08-02 17:44:04

No Duplicates.

**Comment 68 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-ws) - 1st Workshop.**

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

Subject: PG&E Comments on Draft Cap-and-Trade Amendments  
Comment:

PG&E Comments on Draft Cap-and-Trade Amendments

Attachment: [www.arb.ca.gov/lists/com-attach/70-cap-trade-draft-ws-UiJXNgRaAzUBWAhr.pdf](http://www.arb.ca.gov/lists/com-attach/70-cap-trade-draft-ws-UiJXNgRaAzUBWAhr.pdf)

Original File Name: PG&E Comments on Draft Cap-and-Trade Amendments.pdf

Date and Time Comment Was Submitted: 2013-08-02 17:55:50

No Duplicates.

**Comment 69 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-  
ws) - 1st Workshop.**

First Name: Claire  
Last Name: Halbrook  
Email Address: cehu@pge.com  
Affiliation: Gas Utility Group

Subject: Gas Utility Group Comments on Draft Cap-and-Trade Amendments  
Comment:

Gas Utility Group Comments on Draft Cap-and-Trade Amendments

Attachment: [www.arb.ca.gov/lists/com-attach/72-cap-trade-draft-ws-WzxVMlclAw9VJlAk.pdf](http://www.arb.ca.gov/lists/com-attach/72-cap-trade-draft-ws-WzxVMlclAw9VJlAk.pdf)

Original File Name: Gas Utility Comments On Draft Cap and Trade Amendments.pdf

Date and Time Comment Was Submitted: 2013-08-02 18:18:41

No Duplicates.

**Comment 70 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-ws) - 1st Workshop.**

First Name: Peter

Last Name: Weiner

Email Address: peterweiner@paulhastings.com

Affiliation:

Subject: Comments on CARB's July 2013 Draft Amendments to Cap-and-Trade Regulation

Comment:

Please see attached comment letter.

Attachment: [www.arb.ca.gov/lists/com-attach/73-cap-trade-draft-ws-VydcMI0DAjICZVQk.pdf](http://www.arb.ca.gov/lists/com-attach/73-cap-trade-draft-ws-VydcMI0DAjICZVQk.pdf)

Original File Name: PH Cap-and-Trade Amend. Comment Ltr. (8.2.13).pdf

Date and Time Comment Was Submitted: 2013-08-02 19:01:04

No Duplicates.

**Comment 71 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-  
ws) - 1st Workshop.**

First Name: Peter

Last Name: Weiner

Email Address: peterweiner@paulhastings.com

Affiliation:

Subject: Concentrated Solar Power Alliance Comments Re CARB's Cap-and-Trade Amendments  
Comment:

Please see attached comment letter.

Attachment: [www.arb.ca.gov/lists/com-attach/74-cap-trade-draft-ws-VTZROFE+UWFFVNgdp.pdf](http://www.arb.ca.gov/lists/com-attach/74-cap-trade-draft-ws-VTZROFE+UWFFVNgdp.pdf)

Original File Name: Concentrated Solar Power Alliance Cap-and-Trade Cmt. Ltr. (7.17.13).pdf

Date and Time Comment Was Submitted: 2013-08-02 19:04:20

No Duplicates.



**Comment 72 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-ws) - 1st Workshop.**

First Name: Norman

Last Name: Pedersen

Email Address: npedersen@hanmor.com

Affiliation: Southern California Public Power Authori

Subject: Comments

Comment:

Please find attached teh Southern California Public Power Authority  
Comment on Porposed Changes to Cap and Trade Regulation Released on  
July 15, 2013

Attachment: [www.arb.ca.gov/lists/com-attach/75-cap-trade-draft-ws-WmldawMyA2IEMFVj.pdf](http://www.arb.ca.gov/lists/com-attach/75-cap-trade-draft-ws-WmldawMyA2IEMFVj.pdf)

Original File Name: 300226001lmm08021301 SCPPA comment to ARB on 071513 cap and trade revisions.pdf

Date and Time Comment Was Submitted: 2013-08-02 19:47:16

No Duplicates.

**Comment 73 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-ws) - 1st Workshop.**

First Name: Timothy

Last Name: Tutt

Email Address: ttutt@smud.org

Affiliation: Sacramento Municipal Utility District

Subject: 2013 Cap And Trade Update Discussion Draft

Comment:

Please find attached comments from the Sacramento Municipal Utility District regarding the Discussion Draft of July 2013 Modifications to the Cap and Trade Regulations.

Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/76-cap-trade-draft-ws-VCdTOAF1ADcBWFc0.pdf](http://www.arb.ca.gov/lists/com-attach/76-cap-trade-draft-ws-VCdTOAF1ADcBWFc0.pdf)

Original File Name: SMUD commentsJuly2013DiscussionDraft.pdf

Date and Time Comment Was Submitted: 2013-08-02 21:13:33

No Duplicates.

**Comment 74 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-ws) - 1st Workshop.**

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

Subject: PG&E Regulation Change Forms  
Comment:

PG&E Regulation Change Forms

Attachment: [www.arb.ca.gov/lists/com-attach/79-cap-trade-draft-ws-UyNcPQdZU2UGcgRh.zip](http://www.arb.ca.gov/lists/com-attach/79-cap-trade-draft-ws-UyNcPQdZU2UGcgRh.zip)

Original File Name: PG&ERegChangeForms.zip

Date and Time Comment Was Submitted: 2013-08-05 11:59:21

No Duplicates.

**Comment 75 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-ws) - 1st Workshop.**

First Name: Dirk

Last Name: Forrister

Email Address: ombcomm@arb.ca.gov

Affiliation: IETA

Subject: IETA COMMENTS ON CALIFORNIA AIR RESOURCES BOARD'S PROPOSED CAP-AND-TRADE AMENDMENTS

Comment:

See attachment.

Attachment: [www.arb.ca.gov/lists/com-attach/80-cap-trade-draft-ws-UzpQM1QhVGYDWglq.pdf](http://www.arb.ca.gov/lists/com-attach/80-cap-trade-draft-ws-UzpQM1QhVGYDWglq.pdf)

Original File Name: IETA Comments on ARBs 18 July 2013 Workshop\_2August2013.pdf

Date and Time Comment Was Submitted: 2013-08-06 10:05:46

No Duplicates.

**Comment 76 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-  
ws) - 1st Workshop.**

First Name: Mark

Last Name: Krausse

Email Address: ombcomm@arb.ca.gov

Affiliation: PG&E

Subject: Re: Pacific Gas and Electric Company's Comments on the Air Resources Board Workshop  
Comment:

See attachment

Attachment: [www.arb.ca.gov/lists/com-attach/81-cap-trade-draft-ws-USFVNFw4UFxRNAdo.pdf](http://www.arb.ca.gov/lists/com-attach/81-cap-trade-draft-ws-USFVNFw4UFxRNAdo.pdf)

Original File Name: PGE Comments on Draft Cap-and-Trade Amendments.pdf

Date and Time Comment Was Submitted: 2013-08-06 10:09:34

No Duplicates.

**Comment 77 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-  
ws) - 1st Workshop.**

First Name: Timothy  
Last Name: O'Connor  
Email Address: ombcomm@arb.ca.gov  
Affiliation: EDF

Subject: Subject: Environmental Defense Fund comments on the July 18, 2013 Workshop Regarding  
Comment:

See attachment.

Attachment: [www.arb.ca.gov/lists/com-attach/82-cap-trade-draft-ws-Wz4HZVcwUl4GY1c2.pdf](http://www.arb.ca.gov/lists/com-attach/82-cap-trade-draft-ws-Wz4HZVcwUl4GY1c2.pdf)

Original File Name: EDF Cap and Trade Amendment Letter - Aug 2 2013 - FINAL.pdf

Date and Time Comment Was Submitted: 2013-08-06 10:12:52

No Duplicates.

**Comment 78 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-ws) - 1st Workshop.**

First Name: Braydon  
Last Name: Boulanger  
Email Address: ombcomm@arb.ca.gov  
Affiliation: TransAlta

Subject: RE: July 18, 2013 Workshop  
Comment:

See attachment.

Attachment: [www.arb.ca.gov/lists/com-attach/83-cap-trade-draft-ws-Wy8HcwnWGUGcwlo.docx](http://www.arb.ca.gov/lists/com-attach/83-cap-trade-draft-ws-Wy8HcwnWGUGcwlo.docx)

Original File Name: TransAlta Comments of Cap and Trade Draft - August 2 2013.docx

Date and Time Comment Was Submitted: 2013-08-07 07:32:36

No Duplicates.

**Comment 79 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-ws) - 1st Workshop.**

First Name: Alex

Last Name: Jackson

Email Address: ombcomm@arb.ca.gov

Affiliation: NRDC

Subject: Comments on the July 18 Workshop on Cap and Trade  
Comment:

see attachment

Attachment: [www.arb.ca.gov/lists/com-attach/84-cap-trade-draft-ws-VzIRJQdiVGQAWQBj.pdf](http://www.arb.ca.gov/lists/com-attach/84-cap-trade-draft-ws-VzIRJQdiVGQAWQBj.pdf)

Original File Name: NRDC Comments on 07 18 CT Amendments Workshop.pdf

Date and Time Comment Was Submitted: 2013-08-09 12:43:31

No Duplicates.



**Comment 80 for Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-  
ws) - 1st Workshop.**

First Name: Jean-Philippe

Last Name: Brisson

Email Address: ombcomm@arb.ca.gov

Affiliation: Chevron

Subject: Comments on the Draft Proposed Amendments to Cap and Trade  
Comment:

See attachment

Attachment: [www.arb.ca.gov/lists/com-attach/85-cap-trade-draft-ws-VTZXOVA0UHVRJVC4.pdf](http://www.arb.ca.gov/lists/com-attach/85-cap-trade-draft-ws-VTZXOVA0UHVRJVC4.pdf)

Original File Name: Chevron Comments Proposed Amendments to Cap and Trade FINAL August\_2\_2013.pdf

Date and Time Comment Was Submitted: 2013-08-09 12:43:31

No Duplicates.

**There are no comments posted to Proposed Amendments to the Cap-and-Trade Program (cap-trade-draft-ws) that were presented during the Workshop at this time.**