

**Comment 1 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Erin

Last Name: Grizard

Email Address: erin.grizard@bloomenergy.com

Affiliation:

Subject: Bloom Energy letter to ARB

Comment:

Letter attached

Attachment: [www.arb.ca.gov/lists/com-attach/1-ct-amendments-ws-AjMGNgMzVDcEMAQx.pdf](http://www.arb.ca.gov/lists/com-attach/1-ct-amendments-ws-AjMGNgMzVDcEMAQx.pdf)

Original File Name: 161025\_Bloom letter to Corey vF.pdf

Date and Time Comment Was Submitted: 2016-10-25 14:52:10

No Duplicates.

**Comment 2 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Bob

Last Name: Houston

Email Address: bob@houstonmagnani.com

Affiliation:

Subject: CSCME talking points

Comment:

Talking points attached

Attachment: [www.arb.ca.gov/lists/com-attach/2-ct-amendments-ws-AGZcM1wzVWdWPAIW.docx](http://www.arb.ca.gov/lists/com-attach/2-ct-amendments-ws-AGZcM1wzVWdWPAIW.docx)

Original File Name: FINAL -- as presented -- 10-21-16 Draft Talking Points for CARB Workshop.DOCX

Date and Time Comment Was Submitted: 2016-10-25 15:17:00

No Duplicates.

**Comment 3 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Francois

Last Name: Screve

Email Address: fscreve@deltawayenergy.com

Affiliation: Deltaway Energy

Subject: WTE exemption from the GHG cap to 2017

Comment:

We are kindly requesting that the Air Resources Board keep the proposed language that extends the exemption from the GHG cap to 2017 for Waste-to-Energy (WTE). The WTE plants provides a service to the community and a large portion of its fuel is made of biomass and other renewable waste materials.

Best regards,

Francois Screve

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-10-25 17:55:34

No Duplicates.

**Comment 4 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Todd

Last Name: Jones

Email Address: todd.jones@resource-solutions.org

Affiliation: Center for Resource Solutions (CRS)

Subject: Comments of Center for Resource Solutions (CRS) in response to Oct 21, 2016 workshop  
Comment:

Please find the comments of Center for Resource Solutions (CRS) regarding potential 2016 amendments to the Cap-and-Trade Regulation discussed at the Workshop held on October 21, 2016 attached.

Attachment: [www.arb.ca.gov/lists/com-attach/4-ct-amendments-ws-VjVWlMhAjIAaQNu.pdf](http://www.arb.ca.gov/lists/com-attach/4-ct-amendments-ws-VjVWlMhAjIAaQNu.pdf)

Original File Name: CRScommentonOct21workshop\_11-4-2016.pdf

Date and Time Comment Was Submitted: 2016-10-27 10:51:28

No Duplicates.

## Comment 5 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.

First Name: Brett

Last Name: Byers

Email Address: [brettbyers@millionacrepledge.org](mailto:brettbyers@millionacrepledge.org)

Affiliation: Million Acre Pledge

Subject: maintaining authority to add tropical forest offset credits

Comment:

I have been told that certain members of the California legislature may be considering amendments to the California CO2 cap-and-trade program to bar the use of some or all offsets that are outside of California. My understanding is that the objection to use of such credits is that they allow additional pollution in California but with the offset likely being far away from California.

I would urge the California legislature (and the board members and staff of the ARB and California EP, and other California government officials) to resist a removal of such offsets for several reasons.

First, I note that carbon dioxide pollution knows no boundaries and defuses through the world atmosphere and causing global warming worldwide. As such, the effect of CO2 emissions anywhere in the world have the same negative impact on California.

Second, I note that fossil fuel use reduction AND tropical forest conservation (to be encouraged by CA cap and trade tropical forest offsets as soon as 2018) are both likely needed to avoid 2 degrees C of warming. Also, most of the carbon on the surface of the earth is in tropical forest, so that offsets for this sector must be outside of California to address carbon sequestration by nature in a significant way. See: R.A. Houghton, Brett Byers and Alexander A. Nassikas, "A role for tropical forest in stabilizing atmospheric CO2," *Nature Climate Change* 5, 1022-1023 (2015), doi: 10.1038/nclimate2869 (published online November 25, 2015). <http://www.nature.com/nclimate/journal/v5/n12/full/nclimate2869.html>

Third, I note that California's inclusion of tropical forest offsets by 2018 would be key as a role model to motivate other jurisdictions to include tropical forest offsets on their cap-and-trade markets or in relationship to carbon tax programs (as a potential use of tax revenue).

Fourth, I note tropical forest offsets (which may be included on the CA cap-and-trade market as soon as 2018) and conservation has a double impact on California. Not only does tropical forest CO2 emissions impact California CO2 levels because of worldwide diffusion of CO2, but loss of tropical forest (especially in the Americas where the CA cap-and-trade program seems likely to be focused) causes drought in California.

Please see these information sources regarding the link between tropical deforestation and drought in California:

1. David Medvigy et al, "Simulated Changes in Northwest U.S. Climate in Response to Amazon Deforestation" *Journal of Climate*, November 2013. DOI: <http://dx.doi.org/10.1175/JCLI-D-12-00775.1>  
<http://journals.ametsoc.org/doi/abs/10.1175/JCLI-D-12-00775.1>  
<http://www.princeton.edu/main/news/archive/S38/31/66M12/index.xml?section=topstories>

2. Deborah Lawrence and Karen Vandecar, "Effects of tropical deforestation on climate and agriculture", Nature Climate Change 5, 27-36 (2015), December 18, 2014 (online), doi:10.1038/nclimate2430 <http://www.nature.com/nclimate/journal/v5/n1/full/nclimate2430.html>

3. Mike Bettwy, Goddard Space Flight Center, NASA, "Tropical Deforestation Affects Rainfall in the U.S. and Around the Globe", September 13, 2005.  
[http://www.nasa.gov/centers/goddard/news/topstory/2005/deforest\\_rainfall.html](http://www.nasa.gov/centers/goddard/news/topstory/2005/deforest_rainfall.html)  
<http://pratt.duke.edu/about/news/tropical-deforestation-affects-rainfall-us-and-around-globe>  
(underlying article published in the April 2005 issue of the Journal of Hydrometeorology - Roni Avissar was the lead author of the study: <http://journals.ametsoc.org/doi/abs/10.1175/JHM406.1> )

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-10-27 17:10:47

No Duplicates.

**Comment 6 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

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

Subject: EIM GHG attribution; CAISO expansion  
Comment:

Please find comments from Michael Wara and Danny Cullenward in the attached PDF.

Attachment: [www.arb.ca.gov/lists/com-attach/6-ct-amendments-ws-UGIFM1VIVzICKQEw.pdf](http://www.arb.ca.gov/lists/com-attach/6-ct-amendments-ws-UGIFM1VIVzICKQEw.pdf)

Original File Name: 2016-10-27 CAISO & CARB - Wara & Cullenward.pdf

Date and Time Comment Was Submitted: 2016-10-27 17:50:11

No Duplicates.

**Comment 7 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Kallie  
Last Name: Wells  
Email Address: kwells@resero.com  
Affiliation:

Subject: Comments on Cap-and-Trade workshop  
Comment:

Please find VEA's comments on the recent Cap-and-Trade Regulation Amendments Workshop attached.

Thanks.

Attachment: [www.arb.ca.gov/lists/com-attach/7-ct-amendments-ws-Wy0FZgBgUFxXMLAx.pdf](http://www.arb.ca.gov/lists/com-attach/7-ct-amendments-ws-Wy0FZgBgUFxXMLAx.pdf)

Original File Name: VEA CARB GHG Comments 11-4-16 - final.pdf

Date and Time Comment Was Submitted: 2016-11-03 12:48:11

No Duplicates.



**Comment 8 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: John

Last Name: Leslie

Email Address: john.leslie@dentons.com

Affiliation: Attorney for Shell Energy North America

Subject: Comments of Shell Energy on Potential Amendments to the Cap and Trade Regulation  
Comment:

Attached are the Comments of Shell Energy on Potential Amendments to the Cap and Trade Regulation.

Attachment: [www.arb.ca.gov/lists/com-attach/8-ct-amendments-ws-UzAHbgdrBzlVNgdp.pdf](http://www.arb.ca.gov/lists/com-attach/8-ct-amendments-ws-UzAHbgdrBzlVNgdp.pdf)

Original File Name: Comments of Shell Energy on Potential Amendments to the Cap and Trade Regulation.pdf

Date and Time Comment Was Submitted: 2016-11-03 13:40:55

No Duplicates.

**Comment 9 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Anna

Last Name: Upicksoun

Email Address: aupicksoun@ahtna.net

Affiliation:

Subject: Cap-and-trade regulation amendments workshop

Comment:

Attached, please find the comments of Michelle Anderson, President, on behalf of Ahtna, Incorporated.

Attachment: [www.arb.ca.gov/lists/com-attach/9-ct-amendments-ws-UzIHAVEkAD0HYFUK.pdf](http://www.arb.ca.gov/lists/com-attach/9-ct-amendments-ws-UzIHAVEkAD0HYFUK.pdf)

Original File Name: Ahtna Comment Ltr on ARB Oct. 21 Workshop re C&T Regulation (Draft 2016-11-03) SIGNED.pdf

Date and Time Comment Was Submitted: 2016-11-03 18:08:19

No Duplicates.

## **Comment 10 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: GRAY

Last Name: TAYLOR

Email Address: GTAYLOR@THECLIMATESOLUTIONSGROUP.COM

Affiliation:

Subject: CAP-AND TRADE REGULATIONS AMENDMENTS

Comment:

COMMENTS OF THE CLIMATE SOLUTIONS GROUP LIMITED  
ON  
CALIFORNIA CAP-AND-TRADE REGULATION AMENDMENTS

The Climate Solutions Group Limited (CSG) is engaged in the business of bringing capital to bear on activities that fight climate change using the mechanisms created by the cap and trade (C and T) laws of California, Quebec and now Ontario as well as the offset creation and trading opportunities created in the Provinces of Alberta and British Columbia. We hope to expand our operations to other jurisdictions as similar systems and opportunities are adopted/created.

Some of the principals of CSG have deep experience with emissions trading in international markets, the existing WCI markets, the Alberta and British Columbia markets and voluntary offset markets. As such, we appreciate the consultation undertaken by the California Air Resources Board (ARB) with respect to the existing California C and T system.

Our experience and analysis leads us to the conclusion that:

Offsets are an essential part of a C and T system and that the creation and expanded use of offsets should be fostered by ARB.

Offsets reach outside the covered sectors to find low cost greenhouse gas (ghg) emission reductions that reduce the cost of compliance for covered sectors and provide opportunities for participation in the fight against climate change to economic and other sectors (like forestry, agriculture, ranching and other animal husbandry and chemical and organic waste management that otherwise find participation challenging. Offset creation and use engages with business training and capacities throughout the economy and directs creative initiatives using those skills and resources into enterprises that are intended to be profitable and which are directed specifically to ghg emission reduction activities.

We strongly support the continuation of at least the current permitted use and ability to create offsets but also the expansion of the limit on emissions that can be covered with offsets to 20% or more (from the current 8%) and of the number of science-based and environmentally robust protocols for offset creation, for example ,to be more in with Alberta where over 30 protocols are available.

We would be pleased to expand on our views and our role in introducing capital into the C and T markets, particularly into offset creation and use.

Thank you for the opportunity to be heard.

Yours sincerely,

Gray Taylor, General Counsel and Principal

Attachment: [www.arb.ca.gov/lists/com-attach/10-ct-amendments-ws-VDdXIIIM1VVkDZFUn.docx](http://www.arb.ca.gov/lists/com-attach/10-ct-amendments-ws-VDdXIIIM1VVkDZFUn.docx)

Original File Name: CSG ARB Comments 20161104 GT.docx

Date and Time Comment Was Submitted: 2016-11-04 09:05:39

No Duplicates.

**Comment 11 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Chris

Last Name: Busch

Email Address: [chrisb@energyinnovation.org](mailto:chrisb@energyinnovation.org)

Affiliation: Energy Innovation: Policy and Technology

Subject: Comments on Oct. 21 workshop

Comment:

Please find attached our comment letter.

Many thanks

Attachment: [www.arb.ca.gov/lists/com-attach/11-ct-amendments-ws-AWRUPFI2WXgHZlcu.pdf](http://www.arb.ca.gov/lists/com-attach/11-ct-amendments-ws-AWRUPFI2WXgHZlcu.pdf)

Original File Name: Energy Innovation comment on Oct 21 workshop (20161104).pdf

Date and Time Comment Was Submitted: 2016-11-04 09:42:30

No Duplicates.

**Comment 12 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Kelsey  
Last Name: Gowans  
Email Address: kelsey.gowans@mid.org  
Affiliation: Modesto Irrigation District

Subject: Modesto Irrigation District's Comments from the October 21, 2016 Mandatory GHG Reporting a Comment:

Please see attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/12-ct-amendments-ws-BWpSNwdyV1tXYwMy.pdf](http://www.arb.ca.gov/lists/com-attach/12-ct-amendments-ws-BWpSNwdyV1tXYwMy.pdf)

Original File Name: Oct 21 2016 CARB Workshop MID Comments.pdf

Date and Time Comment Was Submitted: 2016-11-04 10:24:38

No Duplicates.

**Comment 13 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Jonathan

Last Name: Stack

Email Address: jonathan.stack@agas.com

Affiliation: A-GAS Americas

Subject: A-Gas Comments on ARB's October 21 Cap and Trade Regulations Amendments Workshop  
Comment:

Please see file attached

Attachment: [www.arb.ca.gov/lists/com-attach/13-ct-amendments-ws-AWBddlW6AjAFcABf.pdf](http://www.arb.ca.gov/lists/com-attach/13-ct-amendments-ws-AWBddlW6AjAFcABf.pdf)

Original File Name: A-Gas Comments to October 21 ARB Cap and Trade Amendments Workshop.pdf

Date and Time Comment Was Submitted: 2016-11-04 10:35:00

No Duplicates.

**Comment 14 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Elizabeth  
Last Name: Hadley  
Email Address: ehadley@reupower.com  
Affiliation: Redding Electric Utility

Subject: REU comments re: Staff Allowance Allocation Proposal to EDUs  
Comment:

Attached please find comments from Redding Electric Utility on the "Cap-and-Trade Regulation Post-2020 Allocation to Electrical Distribution Utilities Informal Staff Proposal".

Attachment: [www.arb.ca.gov/lists/com-attach/14-ct-amendments-ws-VyUBYIAkVFgBZAdo.pdf](http://www.arb.ca.gov/lists/com-attach/14-ct-amendments-ws-VyUBYIAkVFgBZAdo.pdf)

Original File Name: REU Comments on Post 2020 Allowance Allocation (11-4-16 FINAL).pdf

Date and Time Comment Was Submitted: 2016-11-04 10:37:57

No Duplicates.



**Comment 15 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Lynn  
Last Name: Bragg  
Email Address: lbragg@gpi.org  
Affiliation: Glass Packaging Institute

Subject: Comments to the Cap-and-Trade Regulation Industry Assistance Informal Staff Proposal  
Comment:

The Glass Packaging Institute (GPI) provides the attached comments to the October 14, 2016 ARB issued Cap-and-Trade Regulation Industry Assistance Factor Calculation Informal Staff Proposal.

Thank you,

Lynn

Lynn Bragg  
President  
Glass Packaging Institute (GPI)  
1220 N. Fillmore Street, Suite 400  
Arlington, VA 22201  
703-684-6359  
lbragg@gpi.org

Attachment: [www.arb.ca.gov/lists/com-attach/15-ct-amendments-ws-UDcBawNjAyMCdwFe.doc](http://www.arb.ca.gov/lists/com-attach/15-ct-amendments-ws-UDcBawNjAyMCdwFe.doc)

Original File Name: Glass Packaging Institute (GPI) - Letter to CARB November 4th 2016.doc

Date and Time Comment Was Submitted: 2016-11-04 10:43:01

No Duplicates.

**Comment 16 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Badia  
Last Name: Harrell  
Email Address: bharrell@cityofpasadena.net  
Affiliation:

Subject: Comments for Pasadena Water and Power in response to Oct. 21, 2016 Workshop  
Comment:

For your consideration, attached, please find Pasadena Water and Power (PWP) comments regarding the proposed amendments to the Cap-and-Trade Regulation in response to the October 21, 2016 Workshop.

Attachment: [www.arb.ca.gov/lists/com-attach/16-ct-amendments-ws-W2oGMVxwUTJXZVB9.pdf](http://www.arb.ca.gov/lists/com-attach/16-ct-amendments-ws-W2oGMVxwUTJXZVB9.pdf)

Original File Name: 11-04-2016 Pasadena Water and Power Comments for ARB Mandatory Reporting and Cap-and-Trade Workshop.pdf

Date and Time Comment Was Submitted: 2016-11-04 11:19:46

No Duplicates.

**Comment 17 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Anthony  
Last Name: Mallott  
Email Address: brian.kleinhenz@sealaska.com  
Affiliation: Sealaska Corporation

Subject: Sealaska comment  
Comment:

Please reference the attached letter:  
Sealaska Letter to California Air Resources Board 11.4.16.pdf

Attachment: [www.arb.ca.gov/lists/com-attach/17-ct-amendments-ws-VCCcYQBgUm1XMABz.pdf](http://www.arb.ca.gov/lists/com-attach/17-ct-amendments-ws-VCCcYQBgUm1XMABz.pdf)

Original File Name: Sealaska Letter to California Air Resources Board 11.4.16.pdf

Date and Time Comment Was Submitted: 2016-11-04 11:16:58

No Duplicates.

**Comment 18 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Brett  
Last Name: Guge  
Email Address: [brett.guge@californiasteel.com](mailto:brett.guge@californiasteel.com)  
Affiliation: California Steel Industries, Inc.

Subject: California Steel Industries, Inc. Letter to ARB  
Comment:

Letter attached.

Attachment: [www.arb.ca.gov/lists/com-attach/18-ct-amendments-ws-UTJRJAZuVVkLbAJw.pdf](http://www.arb.ca.gov/lists/com-attach/18-ct-amendments-ws-UTJRJAZuVVkLbAJw.pdf)

Original File Name: CSI ARB filing on post 2020 110416.pdf

Date and Time Comment Was Submitted: 2016-11-04 11:52:56

No Duplicates.

**Comment 19 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Michael  
Last Name: Van Brunt  
Email Address: mvanbrunt@covanta.com  
Affiliation: Covanta

Subject: Covanta comments on October 24th Cap and Trade workshop  
Comment:

Please see attached comments from Covanta.

Attachment: [www.arb.ca.gov/lists/com-attach/20-ct-amendments-ws-AjAHMVdnWTwELwU0.pdf](http://www.arb.ca.gov/lists/com-attach/20-ct-amendments-ws-AjAHMVdnWTwELwU0.pdf)

Original File Name: 2016-11 Covanta Comments on Oct 21 Cap Trade workshop.pdf

Date and Time Comment Was Submitted: 2016-11-04 11:56:17

No Duplicates.

## **Comment 20 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Peter

Last Name: Weiner

Email Address: peterweiner@paulhastings.com

Affiliation: Crockett Cogeneration LLC

Subject: Cap-and-Trade Regulation Amendments

Comment:

The following comments are not specific to the subject of the recent Workshop, but are pertinent to the proposed Amendments as a whole. For the reasons expressed below, we were not notified in the August 2 Public Notice of certain proposed Amendments, and only recently became aware of them. In any event, we ask that you accept these comments for the record.

COMMENTS BY CROCKETT COGENERATION, LLC ON PROPOSED AMENDMENTS TO THE CALIFORNIA CAP ON GREENHOUSE GAS EMISSIONS AND MARKET-BASED COMPLIANCE MECHANISMS REGULATION

Background: Legacy Contracts and the Proposed Amendments

When the AB 32 Cap and Trade Program was first implemented, the Board provided allowances to IOUs and various other covered entities, subject to a declining cap. It became apparent that some "legacy contracts" (now defined in 17 CCR Section 95802 (203)) were not covered by the Board's original allocation of allowances, and that there were inequities with regard to legacy contract treatment. Legacy contract holders appeared before the Board to plead their case, and the Board directed staff to consider and act upon these concerns. Accordingly, the staff proposed in 2013 and the Board in 2014 adopted provisions to assist these legacy contract holders.

Legacy contract holders with IOU or industrial counterparties lent themselves to a solution in which allowances were transferred from one party to another. However, for legacy contracts without an industrial counterparty—with several diverse and unique examples—it became necessary to allocate allowances based on previous emissions. The Board chose 2012 as that reference year. The Board also conditioned allowances on proof that the legacy contract holders continue to try to get their counterparties to absorb the cost of allowances. In some cases this proved possible, in other cases it proved impossible.

In 2014 the Board decided that for legacy contracts with an industrial counterparty, transition assistance would be provided for the life of the contract (17 CCR Section 95870(g)(2)). However, for those without an industrial counterparty, the Board limited transition assistance to the end of the second compliance period (Id., subdivision (g)(1)).

At the time of its decision the Board understood that there was only one such legacy contract without an industrial counterparty that was covered by the regulation, Crockett Cogeneration, that extended beyond 2017 (Crockett extends until 2026). The Board urged Crockett to continue to negotiate with its counterparty, C&H Sugar, and to return to the Board later if it could not do so. No promises were made to extend the transition assistance period, but the door remained open for conversation.

On August 2, 2016, the Board issued its NOTICE OF PUBLIC HEARING to consider proposed amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulation (hereinafter "Public Notice"). The 27 page summary of proposed amendments mentions legacy contracts only once (page 10), and does not discuss the Board's proposal to delete all provisions of the Regulation that pertain to legacy contracts without an industrial counterparty.

Although we understand the Board's position that its deletion of these provisions did not need to be noticed because the program in the current regulation sunsets after the second compliance period (2017), we believe that the Administrative Procedure Act calls for that type of notice when an entire program is being deleted from the regulation entirely. As an example, had the Public Notice set forth the planned deletion of the program, Crockett Cogeneration would have been on notice that if it wanted to argue for an extension of transition assistance into the third compliance period, it would need to ask also that these provisions be amended rather than deleted. (The referenced deletions occur in the definition section, 95802, section 95870, and section 95894, among others.)

#### Crockett Cogeneration

Crockett Cogeneration provides steam (heat) to C&H Sugar. C&H Sugar uses the steam provided by Crockett Cogeneration to first produce all the electrical energy required for operation of the refinery and secondly to supply all the thermal processes required to refine sugar and produce its products. The steam sales contract does not provide for any pass-through for the type of costs created by the Cap and Trade Regulation. C&H, were it to have emissions of its own, would readily qualify as an energy-intensive trade-exposed (EITE) industrial entity covered under the Cap & Trade program. It is the only cane sugar refiner west of the Mississippi, and competes nationally and internationally based on price. As a result, C&H has been unwilling to shoulder any of the load of GHG allowance costs, including the cost of joining the system and reporting.

Crockett Cogeneration is equitably as entitled to transition assistance as any other legacy contract generator that is provided that assistance for the life of its contract. Given Crockett's inability to re-negotiate its contract with its nonindustrial counter-party, we ask the Board's consideration of the fairness of extending transition assistance for the life of Crockett's contract (2026), subject to all of the same conditions that have been heretofore required for such assistance.

Thank you for your consideration,  
Peter Weiner

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-11-04 12:42:02

No Duplicates.

**Comment 21 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Jeffrey  
Last Name: Fort  
Email Address: jeffrey.fort@dentons.com  
Affiliation: Dentons US LLP

Subject: Comment on CARB's Cap and Trade Regulation Amendments Workshop  
Comment:

COMMENTS ON CALIFORNIA AIR RESOURCES BOARD'S  
CAP-AND-TRADE REGULATION AMENDMENTS WORKSHOP

Attachment: [www.arb.ca.gov/lists/com-attach/22-ct-amendments-ws-AGNUPQFtAz0CYQZo.pdf](http://www.arb.ca.gov/lists/com-attach/22-ct-amendments-ws-AGNUPQFtAz0CYQZo.pdf)

Original File Name: Comments.pdf

Date and Time Comment Was Submitted: 2016-11-04 12:52:30

No Duplicates.



**Comment 22 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Jodean  
Last Name: Giese  
Email Address: jodean.giese@ladwp.com  
Affiliation: LADWP

Subject: LADWP Comments on Proposed Cap & Trade Amendments  
Comment:

Please see attached comment letter. Thanks.

Attachment: [www.arb.ca.gov/lists/com-attach/23-ct-amendments-ws-Wmtca1R4BWIGLQEw.pdf](http://www.arb.ca.gov/lists/com-attach/23-ct-amendments-ws-Wmtca1R4BWIGLQEw.pdf)

Original File Name: 11-4-16 LADWP Comments on ARB Proposed Amendments to Cap-and-Trade Regulation.pdf

Date and Time Comment Was Submitted: 2016-11-04 13:46:03

No Duplicates.

**Comment 23 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Adam  
Last Name: Smith  
Email Address: adam.smith@sce.com  
Affiliation:

Subject: SCE comments on the Cap-and-Trade Workshop  
Comment:

Please find attached our comments.

All the best,  
Adam

Attachment: [www.arb.ca.gov/lists/com-attach/24-ct-amendments-ws-WilQNVYyAw8GY1c4.pdf](http://www.arb.ca.gov/lists/com-attach/24-ct-amendments-ws-WilQNVYyAw8GY1c4.pdf)

Original File Name: SCE comments -CapAndTrade Workshop.pdf

Date and Time Comment Was Submitted: 2016-11-04 13:48:54

No Duplicates.

**Comment 24 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Adrianna

Last Name: Kripke

Email Address: akripke@semprautilities.com

Affiliation: San Diego Gas & Electric (SDG&E)

Subject: SDG&E Comments to October 21, 2016 Cap-and-Trade Workshop  
Comment:

Attached are comments from San Diego Gas & Electric Company regarding the October 21, 2016 Cap-and-Trade Workshop.

Attachment: [www.arb.ca.gov/lists/com-attach/25-ct-amendments-ws-UCMHZQRiWW8KIQMy.pdf](http://www.arb.ca.gov/lists/com-attach/25-ct-amendments-ws-UCMHZQRiWW8KIQMy.pdf)

Original File Name: SDGE-10-21-ARB workshop-comment-letter 11.4.16.pdf

Date and Time Comment Was Submitted: 2016-11-04 13:54:59

No Duplicates.

**Comment 25 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Dwayne

Last Name: Phillips

Email Address: dwayne.phillips@airliquide.com

Affiliation: Air Liquide Large Industries U.S. LP

Subject: California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms  
Comment:

Please find Air Liquide's comment letter attached.

Attachment: [www.arb.ca.gov/lists/com-attach/27-ct-amendments-ws-UTAHaFMgVVIRO1Q9.pdf](http://www.arb.ca.gov/lists/com-attach/27-ct-amendments-ws-UTAHaFMgVVIRO1Q9.pdf)

Original File Name: Air Liquide Comment Letter to CARB 110416.pdf

Date and Time Comment Was Submitted: 2016-11-04 13:34:49

No Duplicates.

**Comment 26 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: John

Last Name: Bloom

Email Address: laura@houstonmagnani.com

Affiliation: CSCME

Subject: Comments on 10/21/16 Public Workshop on Amendments to Cap and Trade  
Comment:

Please accept the attached comments in regards to the October 21, 2016 workshop on amendments to the cap and trade regulation and the post-2020 industry assistance factor informal proposal.

Attachment: [www.arb.ca.gov/lists/com-attach/28-ct-amendments-ws-VWRXYAMvVTIHLAc2.pdf](http://www.arb.ca.gov/lists/com-attach/28-ct-amendments-ws-VWRXYAMvVTIHLAc2.pdf)

Original File Name: 11-4-16 CSCME Comments on Oct 21 Workshop -2-.pdf

Date and Time Comment Was Submitted: 2016-11-04 14:02:36

No Duplicates.

**Comment 27 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Rachael  
Last Name: O'Brien  
Email Address: rachael@agcouncil.org  
Affiliation: Agricultural Council of California

Subject: Comments on ARB's October 21 Cap and Trade Regulations Amendments Workshop  
Comment:

Attached you will find comments from Ag Council and Dairy Institute in response to the October 21, 2016 workshop and the Informal Staff Proposal for the Industry Assistance Factor Calculation.

Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/29-ct-amendments-ws-VGYBN11tWD1SeQk4.pdf](http://www.arb.ca.gov/lists/com-attach/29-ct-amendments-ws-VGYBN11tWD1SeQk4.pdf)

Original File Name: 2016-11 Comments on on Potential Amendments to the Cap and Trade Regulation.pdf

Date and Time Comment Was Submitted: 2016-11-04 14:09:22

No Duplicates.

**Comment 28 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Kevin  
Last Name: Townsend  
Email Address: ktownsend@bluesource.com  
Affiliation: Blue Source, LLC

Subject: Blue Source comments  
Comment:

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

Attachment: [www.arb.ca.gov/lists/com-attach/30-ct-amendments-ws-WjldNFA8VGpVNgNt.pdf](http://www.arb.ca.gov/lists/com-attach/30-ct-amendments-ws-WjldNFA8VGpVNgNt.pdf)

Original File Name: Comment Letter\_Blue Source\_110416.pdf

Date and Time Comment Was Submitted: 2016-11-04 13:54:35

No Duplicates.

**Comment 29 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Tim

Last Name: Carmichael

Email Address: tcarmichael@semprautilities.com

Affiliation:

Subject: Final SCG Comments on C&T amendments Workshop held 10/21/16

Comment:

Please find our comments attached

Attachment: [www.arb.ca.gov/lists/com-attach/31-ct-amendments-ws-UmNRZgYqUTYDKFni.pdf](http://www.arb.ca.gov/lists/com-attach/31-ct-amendments-ws-UmNRZgYqUTYDKFni.pdf)

Original File Name: 11-4-16 FINAL SCG Comments CT Amendments Workshop.pdf

Date and Time Comment Was Submitted: 2016-11-04 14:15:43

No Duplicates.



**Comment 30 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Rock  
Last Name: Zierman  
Email Address: rock@cipa.org  
Affiliation:

Subject: CIPA Comments on Assistance Factors  
Comment:

Please find attached CIPA's comments.

Attachment: [www.arb.ca.gov/lists/com-attach/32-ct-amendments-ws-VDcBbljUWNWDwVm.pdf](http://www.arb.ca.gov/lists/com-attach/32-ct-amendments-ws-VDcBbljUWNWDwVm.pdf)

Original File Name: CIPA CT Assistance Facctor Comments 11-4-16.pdf

Date and Time Comment Was Submitted: 2016-11-04 14:26:18

No Duplicates.

**Comment 31 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Diana

Last Name: Lee

Email Address: [diana.lee@cpuc.ca.gov](mailto:diana.lee@cpuc.ca.gov)

Affiliation: CPUC/ORA

Subject: ORA Comments on 10.21.16 Cap-and-Trade Workshop  
Comment:

Please see ORA's attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/33-ct-amendments-ws-UT5dKVExUI4DZIM8.pdf](http://www.arb.ca.gov/lists/com-attach/33-ct-amendments-ws-UT5dKVExUI4DZIM8.pdf)

Original File Name: ORA Comments\_CARB\_WS\_ProposedAmendRegulation\_11.4.16 FINAL.pdf

Date and Time Comment Was Submitted: 2016-11-04 13:43:08

No Duplicates.

**Comment 32 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Mary  
Last Name: Wiencke  
Email Address: mary.wiencke@pacificorp.com  
Affiliation: PacifiCorp

Subject: PacifiCorp Comments on 11/4 Workshop  
Comment:

PacifiCorp Comments on 11/4 Workshop

Attachment: [www.arb.ca.gov/lists/com-attach/34-ct-amendments-ws-VSVWMQFjU2IRMQZv.pdf](http://www.arb.ca.gov/lists/com-attach/34-ct-amendments-ws-VSVWMQFjU2IRMQZv.pdf)

Original File Name: PacifiCorp\_ARB\_October 21 Workshop Comments\_FINAL.pdf

Date and Time Comment Was Submitted: 2016-11-04 14:34:23

No Duplicates.

## **Comment 33 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Timothy

Last Name: Brown

Email Address: tbrown@tradewater.us

Affiliation: Tradewater, LLC

Subject: Support of Carbon Offset Provisions of Cap-and-Trade Program

Comment:

Tradewater, LLC, strongly encourages the Air Resources Board to maintain the current 8% offset usage limit post-2020, and to continue to permit the reduction of greenhouse gasses through verifiable offset projects throughout the United States.

Tradewater is an offset project development firm based in Chicago. We have developed a program that collects and destroys chlorofluorocarbon refrigerants from California and across the United States. We have also just completed the first reporting period for a project that is preventing methane from being released into the atmosphere from an abandoned mine. Our staff have engaged in projects that have resulted in the destruction of approximately 1,000,000 tons of greenhouse gasses - all because of the California offset program.

The inclusion of offsets in the California program is essential to its success. California cannot avoid the devastating impacts of climate change if it acts alone. Carbon is a global pollutant and climate risk to California is not jurisdictionally constrained to reductions within the state. This means that California benefits even when offset projects lead to reductions in other parts of the United States. And it also means that California needs the rest of the country - and the world - to join its efforts in order to prevent the harms of global warming.

The offset provisions of the Cap-and-Trade program have stimulated innovation and investment that has removed over 24 million metric tons of CO<sub>2</sub>e in the form of emissions reductions and sequestration in the form of compliance offset credits since 2013. This is an important accomplishment that will only grow as the California program continues. Curtailing the use of offsets will dampen the investment in projects that are essential to addressing climate change.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-11-04 14:27:20

No Duplicates.

**Comment 34 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Sarah  
Last Name: Taheri  
Email Address: staheri@scppa.org  
Affiliation: Southern Calif. Public Power Authority

Subject: Southern California Public Power Authority Comments on 10/21 Cap-and-Trade Workshop  
Comment:

Please see attachment.

Attachment: [www.arb.ca.gov/lists/com-attach/36-ct-amendments-ws-BzYGMQQoVjEFLgIw.pdf](http://www.arb.ca.gov/lists/com-attach/36-ct-amendments-ws-BzYGMQQoVjEFLgIw.pdf)

Original File Name: 11-4-2016 SCPPA Comments for ARB 2016 Cap-and-Trade Amendments FINAL.pdf

Date and Time Comment Was Submitted: 2016-11-04 14:53:19

No Duplicates.

**Comment 35 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Melissa

Last Name: Poole

Email Address: melissa.poole@wonderful.com

Affiliation:

Subject: Wonderful Company Comments on Cap-and-Trade Regulation Amendments Workshop  
Comment:

The Wonderful Company, on behalf of Wonderful Pistachios and Almonds LLC, offers the attached comments to ARB in response to the October 21, 2016 Cap-and-Trade workshop.

Attachment: [www.arb.ca.gov/lists/com-attach/37-ct-amendments-ws-AmNXM1MNBGQLPwVa.docx](http://www.arb.ca.gov/lists/com-attach/37-ct-amendments-ws-AmNXM1MNBGQLPwVa.docx)

Original File Name: AB 32 Supplemental Comments 11.4.16.docx

Date and Time Comment Was Submitted: 2016-11-04 15:03:18

No Duplicates.

**Comment 36 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Nicholas

Last Name: Balistreri

Email Address: nick.balistreri@ucop.edu

Affiliation: University of California, Office of the

Subject: Support of UPSE Continued Transition Assistance

Comment:

Dear Board Members:

The University of California (UC) supports the California Air Resources Board's (CARB) staff proposal to continue to provide transition assistance through the annual allocation of allowances to universities and public sector entities. Under the proposal, universities would continue to receive an allocation based on an established baseline multiplied by the annual cap adjustment factor. This provision is an equitable solution, balancing monetary incentives to reduce emissions, while allowing for funds to be redirected toward greenhouse gas reduction efforts. In 2016 this provision saved UC almost \$9 million, which will allow it to spend the funds on projects that reduce greenhouse gas emissions on its campuses.

Sincerely,

Nicholas Balistreri

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-11-04 15:19:41

No Duplicates.

**Comment 37 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Nico

Last Name: van Aelstyn

Email Address: [nvanaelstyn@bdlaw.com](mailto:nvanaelstyn@bdlaw.com)

Affiliation: Beveridge & Diamond, PC

Subject: Powerex Corp. Comments on Oct. 21 Stakeholder Workshop

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/39-ct-amendments-ws-ViZVPFUjWW9WIgFk.pdf](http://www.arb.ca.gov/lists/com-attach/39-ct-amendments-ws-ViZVPFUjWW9WIgFk.pdf)

Original File Name: Powerex Comments on ARB October 21 Workshop Regarding GHG Acctng and EIM.PDF

Date and Time Comment Was Submitted: 2016-11-04 15:23:31

No Duplicates.



**Comment 38 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: John

Last Name: Larrea

Email Address: john@clfp.com

Affiliation: CA League of Food Processors

Subject: CLFP Comments to Oct 21st CARB Workshop

Comment:

CLFP comments attached

Attachment: [www.arb.ca.gov/lists/com-attach/40-ct-amendments-ws-BmUAalE2U3ABWAZl.pdf](http://www.arb.ca.gov/lists/com-attach/40-ct-amendments-ws-BmUAalE2U3ABWAZl.pdf)

Original File Name: CLFP comments Nov 4.pdf

Date and Time Comment Was Submitted: 2016-11-04 15:26:03

No Duplicates.

**Comment 39 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Keith

Last Name: Adams

Email Address: adamskb@airproducts.com

Affiliation: Air Products and Chemicals, Inc.

Subject: Comments on Proposed Amendments to Cap & Trade Program

Comment:

Comments on Proposed Amendments to Cap & Trade Program as presented in October 21st workshop.

Attachment: [www.arb.ca.gov/lists/com-attach/41-ct-amendments-ws-VjdRPI0uUV1XIQFz.pdf](http://www.arb.ca.gov/lists/com-attach/41-ct-amendments-ws-VjdRPI0uUV1XIQFz.pdf)

Original File Name: Air Products Comments - Proposed cap and trade regulation amendments - Nov 4 2016.pdf

Date and Time Comment Was Submitted: 2016-11-04 15:26:37

No Duplicates.

**Comment 40 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Sheldon

Last Name: Zakreski

Email Address: [szakreski@climatetrust.org](mailto:szakreski@climatetrust.org)

Affiliation:

Subject: comments on cap and trade regulation amendments workshop

Comment:

Thank you for the opportunity to comment on proposed cap and trade regulation amendments. Our attached comments focus on the post-2020 offset usage limit.

Attachment: [www.arb.ca.gov/lists/com-attach/42-ct-amendments-ws-BnJUMVMmUV0CZwRr.docx](http://www.arb.ca.gov/lists/com-attach/42-ct-amendments-ws-BnJUMVMmUV0CZwRr.docx)

Original File Name: TCT Comments on ARB Post 2020 Offset Proposal.docx

Date and Time Comment Was Submitted: 2016-11-04 15:35:59

No Duplicates.

**Comment 41 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Amber

Last Name: Blixt

Email Address: amber@iepa.com

Affiliation: IEP

Subject: IEP's comments on CARB Cap and Trade Workshop

Comment:

IEP's comments on CARB's October 21, 2016 Cap and Trade Workshop

Attachment: [www.arb.ca.gov/lists/com-attach/43-ct-amendments-ws-Bm8AY1EgVloLbgBv.pdf](http://www.arb.ca.gov/lists/com-attach/43-ct-amendments-ws-Bm8AY1EgVloLbgBv.pdf)

Original File Name: IEP Comments on CARB 10.21.16 Cap and Trade Workshop-FINAL.pdf

Date and Time Comment Was Submitted: 2016-11-04 15:45:21

No Duplicates.

**Comment 42 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: CC

Last Name: Song

Email Address: csong@mcecleanenergy.org

Affiliation: Marin Clean Energy

Subject: Resubmission of CCA Comments

Comment:

Please find the comments of CCAs attached to this message. Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/45-ct-amendments-ws-UGFTZFB8AmEENgAt.docx](http://www.arb.ca.gov/lists/com-attach/45-ct-amendments-ws-UGFTZFB8AmEENgAt.docx)

Original File Name: 11-04-2016 CalCCA Comments on Staff Workshop.docx

Date and Time Comment Was Submitted: 2016-11-04 15:48:26

No Duplicates.

**Comment 43 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Tom

Last Name: Vessels

Email Address: tvessels@vesselscoalgas.com

Affiliation: Vessels Coal Gas Inc.

Subject: Cap-and-Trade Regulation Amendments Workshop

Comment:

Vessels Coal Gas Inc supports Cap and Trade, and the offset program. pleas read our informational document to see how we think cap and trad can be improved.

Attachment: [www.arb.ca.gov/lists/com-attach/46-ct-amendments-ws-UjECZVQnV2ZXJVVk.docx](http://www.arb.ca.gov/lists/com-attach/46-ct-amendments-ws-UjECZVQnV2ZXJVVk.docx)

Original File Name: CARBT11.04.2016.docx

Date and Time Comment Was Submitted: 2016-11-04 15:47:31

No Duplicates.

**Comment 44 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Cory

Last Name: Anderson

Email Address: canderson@ussposco.com

Affiliation: USS-POSCO Industries

Subject: Comments of USS-POSCO Industries

Comment:

Comments of USS-POSCO Industries are attached. Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/47-ct-amendments-ws-UTJUPQdrBTsKaQNt.pdf](http://www.arb.ca.gov/lists/com-attach/47-ct-amendments-ws-UTJUPQdrBTsKaQNt.pdf)

Original File Name: Comments of USS-POSCO Industries - CT-Amendments-WS.pdf

Date and Time Comment Was Submitted: 2016-11-04 15:55:37

No Duplicates.

**Comment 45 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

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

Subject: Comments on October 21st workshop issues  
Comment:

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

Attachment: [www.arb.ca.gov/lists/com-attach/48-ct-amendments-ws-BjdSZQAsB2AGLQc2.pdf](http://www.arb.ca.gov/lists/com-attach/48-ct-amendments-ws-BjdSZQAsB2AGLQc2.pdf)

Original File Name: 11-4-16 WPTF to CARB .pdf

Date and Time Comment Was Submitted: 2016-11-04 15:59:11

No Duplicates.



## **Comment 46 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Evan

Last Name: Vessels

Email Address: evan.vessels@gmail.com

Affiliation: Vessels Coal Gas Inc.

Subject: Cap-and-Trade Regulation Amendments Workshop

Comment:

Greetings ARB Board and staff

The California cap and trade system is the best sector-wide cap and trade program in the world and it must succeed. I have always been concerned for the future of the ARB cap and trade system as well as some of its more critical components like the offset program, but this last webcast makes me afraid that it is more at risk than ever. This is unfortunate timing since although cap and trade is cited by many experts as the best way to fight climate change, it is still being threatened as a concept. It has been tried as a way to fight GHG emissions a number of times around the world with little success. The European cap and trade system, for example, was initially successful at limiting GHG emissions, but without a shrinking cap, the system has failed to reduce GHG emissions further. The Regional Greenhouse Gas Initiative (RGGI) has also been successful, but the program is specific to power plant emissions only. There are many voluntary carbon markets across numerous countries, but they have achieved very little. By contrast California Cap and Trade is an aggressive program that does not stagnate with its own successes. It provides incentives to capture and destroy fugitive emissions outside the direct purview of cap and trade. As old goals are achieved new goals are set by the falling cap. The incremental process, and highly scrutinized market mechanisms, gives industry the time and incentives to innovate and adjust without giving time to become complacent. California Cap and trade must survive not just for itself but for the world.

The world still regards cap and trade as an experiment. If California cancels its cap and trade program, cap and trade will be dismissed by critics as a valiant, but failed, effort. And it will set an international precedence that cap and trade does not work as a sector wide solution to climate change. Whether or not California feels responsible for setting an example to the world, the world is watching. And like it or not, California's decision on this matter will have global consequences. The consequences will naturally affect Americans eventually. Even if cap and trade isn't absolutely perfect it is effective and implementable. Developing a new program would take years, and then several more years working out the kinks. Cap and trade has been in place for over 4 years and that time has been used to identify weaknesses, and implement improvements. It is therefor my strong feelings that cap and trade be upheld, not curtailed or reduced.

In both the latest cap and trade workshop, and the cap and trade environmental impact assessment report, there was startlingly little discussion about climate change. The main topic of the impact assessment was co-benefits of cap and trade, or more specifically the prevalence of toxic air pollutants and particulate matter (criteria air pollutants) in disadvantaged communities. The only significance of climate change in the impact assessment, was in comparing the relationship GHGs have with criteria pollutants.

At no point during the impact assessment did the authors mention what the impact of climate change would be on disadvantaged communities. Climate change seems to be a low priority to the composers of this assessment. In fact the words "climate change" are only used 3 times in the impact assessment none of which were in the body of the report. Since AB 32 or The Global Warming Solutions Act was passed with the specific purpose of slowing global warming to a natural pattern; It would seem the assessment writers are either not fully aware of the specific intention of AB 32 or they are recommending changing the purpose of AB 32 to focus primarily on criteria pollutants.

Experience in renewable energy legislation has demonstrated that the more agendas a law or regulation attempted to fulfill, the less effective it is at fulfilling any of them. For cap and trade to work best it must have a single, clear and concise purpose. While opportunities for co-benefits should not be ignored they must never supplant the main purpose of cap and trade. Currently that purpose is fighting "Global Warming", increasingly referred to as "Climate Change". Detracting from that purpose to serve some other agenda, would be to betray the spirit of AB 32 as well as the people who fought to get it passed.

It is disturbing but not shocking to hear that there is a disproportionate volume of disadvantaged communities living near facilities that emit high volumes of criteria pollutants. Since these pollutants are highly controlled I believe there are better ways to track their volumes than to track GHG emissions and assume the criteria pollutants follow along. In fact on page 13 of the assessment the authors state that they obtained the criteria pollutant data from the monitoring and tracking mechanisms already in place to control criteria pollutants. This tracking system is known as CEIDARS. CEIDARS exists because of an EPA mandate to reduce criteria pollutants under the Clean Air Act, however if further reductions in criteria pollutants are necessary then aggressive action should be taken. A cap and trade program specifically designed for GHG's is an inappropriate mechanism for this. Criteria pollutants must be controlled and eliminated by their own program, unencumbered by tertiary concerns. Such programs already exist, and it is in these programs that are the best tools to further eliminate criteria pollutants can be found.

Offsets are constantly blamed for creating more emissions, or allowing emissions that otherwise would not have occurred. The creation of an offset requires immense amounts of data monitoring and redundant third party scrutiny which is itself scrutinized. This means that multiple third parties and then CARB itself has proven that all offsets are real and additional. So why then are offsets accused of doing the exact opposite?

The environmental assessment report advocates reducing or preferably eliminating offsets, and while having read the report several times it is still unsure for what reason. The 2 research findings presented are that most offsets are purchased by the highest emitters, and that the total tCO<sub>2</sub>e of GHG reductions achieved by offsets alone were 4 times greater than the target reductions for 2013. To the first point, it should come as no surprise that those with the highest emissions would be the most interested in buying offsets. Since allowances could have been purchased in place of these offsets, it is unclear how this fact correlates to increased emissions. The exact argument is never made in the assessment. The second damning fact is even more puzzling since it seems to suggest that offsets are, at least in this early stage of the program, achieving more emission reductions than the falling cap (12 million tCO<sub>2</sub>e of reductions from offsets in 2013). Why would someone concerned with climate change advocate eliminating 4/5th of the GHG reductions currently being achieved? If the concern is other than GHG reductions and climate change, then those concerns should be considered under the appropriate

regulatory framework(not AB 32).

The truth about offsets is that every offset purchased is 1tCO2e of GHG's removed from the atmosphere that would not have been removed if an allowance was purchased instead. The truth is offsets are the most powerful tool cap and trade has for fighting short lived climate pollutants. If anything offsets should be increased.

Climate change is an urgent and global problem that will likely effect underprivileged communities disproportionately. California being a coastal state is at an even greater risk then most to the adverse consequences of climate change. If there are problems with cap and trade or any of its components they should be improved, not eliminated or curtailed. It is paramount that the world see cap and trade succeed, a success that offsets are an integral part of. To succseed cap and trade must not only survive, but thrive. And to do so it must remain focused on GHG reductions and retain a strong offset program.

Evan Vessels  
Vessels Coal Gas Inc.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-11-04 16:08:33

No Duplicates.

**Comment 47 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Ken

Last Name: Nold

Email Address: krnold@tid.org

Affiliation:

Subject: TID Comments on Cap & Trade Workshop

Comment:

1st Workshop

Attachment: [www.arb.ca.gov/lists/com-attach/50-ct-amendments-ws-Wy9TPFw5AAxWM1Iz.pdf](http://www.arb.ca.gov/lists/com-attach/50-ct-amendments-ws-Wy9TPFw5AAxWM1Iz.pdf)

Original File Name: TID Cap-and-Trade Workshop Comments 11-1-2016.pdf

Date and Time Comment Was Submitted: 2016-11-04 16:08:40

No Duplicates.

**Comment 48 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Martin  
Last Name: Hopper  
Email Address: berlin@susieberlinlaw.com  
Affiliation: M-S-R Public Power Agency

Subject: M-S-R Workshop Comments  
Comment:

Attached please find the M-S-R comments on the October 21 Workshop.  
Please let us know if you have any questions.

Attachment: [www.arb.ca.gov/lists/com-attach/51-ct-amendments-ws-WzYAK1clBHpWIIQL.pdf](http://www.arb.ca.gov/lists/com-attach/51-ct-amendments-ws-WzYAK1clBHpWIIQL.pdf)

Original File Name: M-S-R comments re October 21 workshop (11-4-16).pdf

Date and Time Comment Was Submitted: 2016-11-04 16:09:51

No Duplicates.

**Comment 49 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Rebecca

Last Name: Hudson-Nunez

Email Address: Rebecca.HudsonNunez@swgas.com

Affiliation:

Subject: GUG Comments on Cap-and-Trade Regulation Amendments Workshop  
Comment:

Attached you will find the GUG comments on the Cap-and-Trade Regulation Amendments Workshop.

Attachment: [www.arb.ca.gov/lists/com-attach/52-ct-amendments-ws-VDMHdABmV1tSeVAP.pdf](http://www.arb.ca.gov/lists/com-attach/52-ct-amendments-ws-VDMHdABmV1tSeVAP.pdf)

Original File Name: GUG - 2016 Cap and Trade Amendments Workshop Comments\_Final.pdf

Date and Time Comment Was Submitted: 2016-11-04 16:16:34

No Duplicates.

**Comment 50 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: William

Last Name: Westerfield

Email Address: [william.westerfield@smud.org](mailto:william.westerfield@smud.org)

Affiliation: Sacramento Municipal Utility District

Subject: SMUD Comments on Proposed 2016 Cap-and-Trade Amendments

Comment:

SMUD Comments on Proposed 2016 Cap-and-Trade Amendments.

Attachment: [www.arb.ca.gov/lists/com-attach/53-ct-amendments-ws-UiFSOVcjBTICWwlq.pdf](http://www.arb.ca.gov/lists/com-attach/53-ct-amendments-ws-UiFSOVcjBTICWwlq.pdf)

Original File Name: SMUD Comments on Cap-And-Trade October 21 Workshop.pdf

Date and Time Comment Was Submitted: 2016-11-04 16:27:29

No Duplicates.

**Comment 51 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Nick  
Last Name: Facciola  
Email Address: [nick@OriginClimate.com](mailto:nick@OriginClimate.com)  
Affiliation: Origin Climate Inc.

Subject: The use of offsets under Cap-and-Trade  
Comment:

Please see the attached letter.

Attachment: [www.arb.ca.gov/lists/com-attach/54-ct-amendments-ws-W2IVY1ZmA2YDKwMy.pdf](http://www.arb.ca.gov/lists/com-attach/54-ct-amendments-ws-W2IVY1ZmA2YDKwMy.pdf)

Original File Name: 2016.11.4 Comments on Cap-and-Trade Workshop.pdf

Date and Time Comment Was Submitted: 2016-11-04 16:29:04

No Duplicates.



**Comment 52 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Barbara

Last Name: McBride

Email Address: barbara.mcbride@calpine.com

Affiliation: Calpine Corporation

Subject: Calpine Comments on October 21, 2016 Cap-and-Trade Workshop

Comment:

Please find attached the comments of Calpine Corporation on ARB's October 21, 2016 Cap-and-Trade Workshop regarding proposed amendments to the Cap-and-Trade Regulation and Mandatory Reporting Regulation. Thank you for the opportunity to submit these comments. Please contact me if you should have any questions about these comments.

Attachment: [www.arb.ca.gov/lists/com-attach/55-ct-amendments-ws-AGNUM1wxVXYFagBu.pdf](http://www.arb.ca.gov/lists/com-attach/55-ct-amendments-ws-AGNUM1wxVXYFagBu.pdf)

Original File Name: Calpine Comments on October 21 Cap-and-Trade Workshop.pdf

Date and Time Comment Was Submitted: 2016-11-04 16:29:36

No Duplicates.

**Comment 53 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Arjun  
Last Name: Patney  
Email Address: arjun.patney@winrock.org  
Affiliation:

Subject: Cap-and-Trade Regulation Amendments Workshop  
Comment:

Attached are comments from the American Carbon Registry. Thank you for the opportunity to provide input.

Regards,  
Arjun Patney  
Policy Director  
American Carbon Registry

Attachment: [www.arb.ca.gov/lists/com-attach/56-ct-amendments-ws-B2YCZ1QnBwsCaFUw.pdf](http://www.arb.ca.gov/lists/com-attach/56-ct-amendments-ws-B2YCZ1QnBwsCaFUw.pdf)

Original File Name: ACR letter to ARB on AB 197 FINAL.pdf

Date and Time Comment Was Submitted: 2016-11-04 16:36:21

No Duplicates.

**Comment 54 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Mark  
Last Name: Krausse  
Email Address: fxao@pge.com  
Affiliation:

Subject: PG&E Comments on the Cap-and-Trade Regulation Amendments Workshop  
Comment:

See attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/57-ct-amendments-ws-VyddPFMNUmRWDwRn.pdf](http://www.arb.ca.gov/lists/com-attach/57-ct-amendments-ws-VyddPFMNUmRWDwRn.pdf)

Original File Name: PG&E Comments - 2016 Oct 21 C-T Amendments Workshop.pdf

Date and Time Comment Was Submitted: 2016-11-04 16:00:18

No Duplicates.

## **Comment 55 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Josie

Last Name: Hickel

Email Address: josie.hickel@chugach.com

Affiliation:

Subject: Comments re: Cap & Trade Regulations, Proposed Carbon Offset Credit Limits  
Comment:

Josie Hickel  
Chugach Alaska Corporation  
3800 Centerpoint Drive, Suite 1200  
Anchorage, AK 99503

California Air Resources Board  
1001 I Street  
Sacramento, CA 95812

November 4, 2016

Re: Comments of Chugach Alaska Corporation on ARB's October 21  
Cap-and-Trade Regulation Workshop and the Proposal to Reduce the  
Offset Credit Usage Limit

Dear Air Resources Board Staff:

Thank you for giving us the opportunity to comment on the California Air Resources Board's (ARB) October 21st workshop presentation. We would like to address the portion of the workshop regarding AB 197 and Post-2020 Cap-and-Trade Program Design, and in particular ARB's proposal to lower the offset credit usage limit of 8%.

Chugach Alaska Corporation (Chugach), an Alaska Native Regional Corporation, was established in 1972 pursuant to the Alaska Native Claims Settlement Act of 1971. We represent more than 2,500 Alaska Native shareholders historically residing in the Chugach region. We have a deep commitment to preserving the cultural heritage of our shareholders, and our lands are at the very core of that heritage. Our landholdings include 5,000 miles of coastline that follow the southern tip of the Kenai Peninsula, on through the Kenai Fjords, Prince William Sound, and the Gulf of Alaska. Our lands are filled with timber, minerals and wildlife, which we manage for the benefit of our shareholders consistent with our cultural values.

We are guided by principles of subsistence use and historical preservation in utilizing our land. We are currently in the process of developing our own forest offset project, which we believe will provide economic opportunities within our communities, preserve our lands in a manner consistent with our values, and give us an opportunity to do our part in combatting a warming climate. The effects of climate change no doubt threaten traditional subsistence lifestyles that support many of our Native shareholders, and jeopardize the very resources that are at the heart of our cultural heritage. We are concerned with ARB's proposal to reduce the ability to use offset credits - a move that would bring into question the offset credit program and the many benefits it provides.

We applaud California's initiative in leading many of the efforts against a warming climate. ARB's efforts have paved a way to realizing a solution to a problem that transcends borders. The offset program is a vital part of this path forward, as it helps stabilize the costs of the Cap-and-Trade Program and ensures its

continued vitality as a mechanism to slow climate change. While the cost containment features of the offset program are among the most touted, the additional benefits are what resonate with Chugach. The offset program has provided us the capacity to assist in the fight against climate change in a manner that preserves our values and our resources, while providing economic opportunities to our Alaska Native shareholders. The program incentivizes participation across jurisdictions and peoples, helping to create a diverse and unified front to stem the tide of our warming climate. That is precisely what is needed to combat a problem that touches every area of the globe.

Hundreds of thousands of acres of healthy forests, managed under the program's protocols, make it indisputable that the program works. Millions of tons of carbon have been sequestered. These forests also help maintain essential wildlife habitats and preserve the balance of fragile ecosystems around the country. In addition, developing such a project in the Chugach region will help us preserve our ancient heritage, values and way of life.

We hear loud and clear the voices of those that have suffered as a result of the development of resources and industrialization. Our Native shareholders who maintain a subsistence way of living are under a persistent threat of their resources being depleted due to climate change, a problem that has also been exasperated at times by resource development. The offset program, however, far from aggravating these problems, provides a means to address them. Alleviating the impacts of climate change can only serve to protect the interests of every person the world over.

All of these benefits would be put in jeopardy if ARB were to continue with its proposal to reduce the offset credit usage limit. Cost stability would be diminished. Incentives to participate in the program would be reduced. The capacity of the program to activate a network of joined partners in the fight against climate change would be reduced. Chugach respectfully requests that ARB not reduce these benefits by reducing the offset credit usage limit.

Sincerely,

Josie Hickel  
SVP Energy & Resources  
Chugach Alaska Corporation

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-11-04 16:02:44

No Duplicates.

**Comment 56 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Susie  
Last Name: Berlin  
Email Address: berlin@susieberlinlaw.com  
Affiliation: Northern California Power Agency (NCPA)

Subject: Comments on October 21 Workshop  
Comment:

Attached please find the Northern California Power Agency (NCPA)  
Comments on the October 21 Workshop.

thank you

Attachment: [www.arb.ca.gov/lists/com-attach/59-ct-amendments-ws-VTZcNVc7WGZVNghm.pdf](http://www.arb.ca.gov/lists/com-attach/59-ct-amendments-ws-VTZcNVc7WGZVNghm.pdf)

Original File Name: comments re October 21 2016 workshop (final 11-4-16).pdf

Date and Time Comment Was Submitted: 2016-11-04 16:45:09

No Duplicates.

**Comment 57 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Kendra

Last Name: Daijogo

Email Address: Kendra\_Daijogo@GualcoGroup.com

Affiliation:

Subject: Cap-and-Trade Reg Amend Workshop: CA Council for Environmental and Economic Balance  
Comment:

Comments from the California Council for Environmental and Economic  
Balance re: ARB's Cap-and-Trade Regulation Amendments Workshop.

Attachment: [www.arb.ca.gov/lists/com-attach/60-ct-amendments-ws-Am9TJ1UmBQIQNwVr.pdf](http://www.arb.ca.gov/lists/com-attach/60-ct-amendments-ws-Am9TJ1UmBQIQNwVr.pdf)

Original File Name: MRR and CT Workshop - CCEEB Comments November 4 2016\_Final.pdf

Date and Time Comment Was Submitted: 2016-11-04 16:33:29

No Duplicates.

**Comment 58 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Justin  
Last Name: Wynne  
Email Address: wynne@braunlegal.com  
Affiliation: CMUA

Subject: California Municipal Utilities Association Comments on Cap-and-Trade Workshop  
Comment:

Please see attachment.

Attachment: [www.arb.ca.gov/lists/com-attach/61-ct-amendments-ws-BWZVPlcjWGoLUgZl.pdf](http://www.arb.ca.gov/lists/com-attach/61-ct-amendments-ws-BWZVPlcjWGoLUgZl.pdf)

Original File Name: CMUA Comments on MRR and Cap and Trade Workshop 11\_04\_16.pdf

Date and Time Comment Was Submitted: 2016-11-04 16:26:15

No Duplicates.



**Comment 59 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Katie  
Last Name: Sullivan  
Email Address: sullivan@ieta.org  
Affiliation: IETA

Subject: IETA Comments on Cap-and-Trade Amendments Workshop  
Comment:

Attached, please find IETA's comments on ARB's Cap and Trade Regulation Amendment Workshop, held on 21 October 2016.

We appreciate the opportunity to submit feedback.

Attachment: [www.arb.ca.gov/lists/com-attach/62-ct-amendments-ws-UzpTMF0oADIDWgZn.pdf](http://www.arb.ca.gov/lists/com-attach/62-ct-amendments-ws-UzpTMF0oADIDWgZn.pdf)

Original File Name: IETA ARB Comments\_CT Reg Amendments\_4Nov2016.pdf

Date and Time Comment Was Submitted: 2016-11-04 16:52:53

No Duplicates.

**Comment 60 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Michael

Last Name: Shaw

Email Address: Mshaw@cmta.net

Affiliation: CMTA

Subject: CMTA comments on Industry Assistance Factor Informal Staff Proposal  
Comment:

Attached are CMTA's comments on the Informal a Staff Proposal regarding Industry Assistance Factors changes under the Cap and Trade regulation.

Attachment: [www.arb.ca.gov/lists/com-attach/63-ct-amendments-ws-UjEAa1UgVmQGX1Q1.docx](http://www.arb.ca.gov/lists/com-attach/63-ct-amendments-ws-UjEAa1UgVmQGX1Q1.docx)

Original File Name: CMTA Assistance Factor Informal Staff Proposal Comments 11-4-2016.docx

Date and Time Comment Was Submitted: 2016-11-04 16:52:56

No Duplicates.

**Comment 61 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Brian

Last Name: Shillinglaw

Email Address: bshillinglaw@newforests-us.com

Affiliation: New Forests

Subject: Comments on Cap and Trade Workshop

Comment:

File attached.

Attachment: [www.arb.ca.gov/lists/com-attach/64-ct-amendments-ws-BWtQM10rBwsAYAVq.pdf](http://www.arb.ca.gov/lists/com-attach/64-ct-amendments-ws-BWtQM10rBwsAYAVq.pdf)

Original File Name: New Forests -CARB Comments 110416.pdf

Date and Time Comment Was Submitted: 2016-11-04 17:00:29

No Duplicates.

**Comment 62 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Shelly  
Last Name: Sullivan  
Email Address: [ssullivan@onemain.com](mailto:ssullivan@onemain.com)  
Affiliation: Climate Change Policy Coalition

Subject: 15-day Cap-and-Trade Regulation Amendments  
Comment:

Attached please find comments submitted on behalf of the Climate Change Policy Coalition regarding the cap-and-trade regulation amendments.

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

Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/65-ct-amendments-ws-BWYBZF0sVmYHXgJh.pdf](http://www.arb.ca.gov/lists/com-attach/65-ct-amendments-ws-BWYBZF0sVmYHXgJh.pdf)

Original File Name: CCPC\_C\_T\_15-Day Comments\_11\_16.pdf

Date and Time Comment Was Submitted: 2016-11-04 17:00:39

No Duplicates.

**Comment 63 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Ralph J.

Last Name: Moran

Email Address: Ralph.moran@bp.com

Affiliation: BP America

Subject: BP Comments on 10/21 Workshop

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/67-ct-amendments-ws-AGIGcFEPUGBVPABt.pdf](http://www.arb.ca.gov/lists/com-attach/67-ct-amendments-ws-AGIGcFEPUGBVPABt.pdf)

Original File Name: BP comments Post 2020 Concepts 11 16.pdf

Date and Time Comment Was Submitted: 2016-11-23 08:22:48

No Duplicates.

**Comment 64 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

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

Subject: WSPA Comments on ARB's informal draft concepts for AB 197 Implementation  
Comment:

See attached

Attachment: [www.arb.ca.gov/lists/com-attach/68-ct-amendments-ws-AHcAdVEgU2FSCwFi.docx](http://www.arb.ca.gov/lists/com-attach/68-ct-amendments-ws-AHcAdVEgU2FSCwFi.docx)

Original File Name: WSPA Comments on ARB October 21 Workshop 112216.docx

Date and Time Comment Was Submitted: 2016-11-30 07:51:15

No Duplicates.

**Comment 65 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: James  
Last Name: Hendry  
Email Address: JHendry@swater.org  
Affiliation: SF Public Utilities Commission

Subject: Cap and Trade Allocation -- Comments of San Francisco Public Utilities Commission  
Comment:

See attached

Attachment: [www.arb.ca.gov/lists/com-attach/69-ct-amendments-ws-VjUAZ1MiV1sHYAdp.pdf](http://www.arb.ca.gov/lists/com-attach/69-ct-amendments-ws-VjUAZ1MiV1sHYAdp.pdf)

Original File Name: Cap and Trade SFPUC Comments.pdf

Date and Time Comment Was Submitted: 2016-11-30 07:51:15

No Duplicates.

**Comment 66 for Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) - 1st Workshop.**

First Name: Adam  
Last Name: Smith  
Email Address: Adam.Smith@sce.com  
Affiliation: Joint Utility Group

Subject: Letter regarding CARB's proposed post-2020 allowance allocation methodology  
Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/70-ct-amendments-ws-UzISIVI0WVVQOgRh.pdf](http://www.arb.ca.gov/lists/com-attach/70-ct-amendments-ws-UzISIVI0WVVQOgRh.pdf)

Original File Name: JUG Letter on AA.pdf

Date and Time Comment Was Submitted: 2016-12-12 15:08:35

No Duplicates.



**There are no comments posted to Cap-and-Trade Regulation Amendments Workshop (ct-amendments-ws) that were presented during the Workshop at this time.**