

## **Comment 1 for Cap & Trade Public Meeting (june5-reporting-ws) - 1st Workshop.**

First Name: Mary

Last Name: Benson

Email Address: marybenson@cox.net

Affiliation:

Subject: CAP & TRADE

Comment:

I do not support the passing of the CAP & Trade bill.  
Taxing the fuel industry will cause prices to rise for California  
citizens who are already struggling to make ends meet.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-06-26 15:55:02

No Duplicates.

## **Comment 2 for Cap & Trade Public Meeting (june5-reporting-ws) - 1st Workshop.**

First Name: Alanna

Last Name: Arroyo

Email Address: aarroyo@smud.org

Affiliation:

Subject: SMUD's Comments on Reporting and Verification Requirements for California's Cap-and-Trade  
Comment:

Resubmission of SMUD's Comments on Reporting & Verification for  
California's Cap-and-Trade Program submitted on June 26, 2009.

Attachment: [www.arb.ca.gov/lists/june5-reporting-ws/2-carb\\_smud\\_comments\\_on\\_reporting\\_\\_\\_verification.pdf](http://www.arb.ca.gov/lists/june5-reporting-ws/2-carb_smud_comments_on_reporting___verification.pdf)

Original File Name: CARB SMUD Comments on Reporting & Verification.pdf

Date and Time Comment Was Submitted: 2009-07-07 14:11:43

No Duplicates.

**Comment 3 for Cap & Trade Public Meeting (june5-reporting-ws) - 1st Workshop.**

First Name: Norman

Last Name: Pedersen

Email Address: npedersen@hanmor.com

Affiliation: Southern California Public Power Author

Subject: SCPPA Comment on Reporting and Verificaton in a Cap-and-Trade Program  
Comment:

Please find attached the Southern California Public Power Authority  
Comment on Reporting and Verification in a Cap-and-Trade Program

Attachment: [www.arb.ca.gov/lists/june5-reporting-ws/6-300226001nap07130901.pdf](http://www.arb.ca.gov/lists/june5-reporting-ws/6-300226001nap07130901.pdf)

Original File Name: 300226001nap07130901.pdf

Date and Time Comment Was Submitted: 2009-07-13 19:17:25

No Duplicates.

**Comment 4 for Cap & Trade Public Meeting (june5-reporting-ws) - 1st Workshop.**

First Name: John

Last Name: Busterud

Email Address: jwbb@pge.com

Affiliation: Pacific Gas and Electric Company

Subject: PG&E's Comments on Reporting & Verification

Comment:

Attached are Pacific Gas and Electric Company's Comments on the California Air Resources Board Workshop on Reporting and Verification in a Cap-and-Trade Program.

Attachment: [www.arb.ca.gov/lists/june5-reporting-ws/7-062609\\_ltr\\_to\\_kevin\\_kennedy\\_\\_reporting\\_and\\_verification\\_\\_00084453\\_.pdf](http://www.arb.ca.gov/lists/june5-reporting-ws/7-062609_ltr_to_kevin_kennedy__reporting_and_verification__00084453_.pdf)

Original File Name: 062609\_Ltr to Kevin Kennedy, Reporting and Verification (00084453).PDF

Date and Time Comment Was Submitted: 2009-07-14 13:40:53

No Duplicates.

## **Comment 5 for Cap & Trade Public Meeting (june5-reporting-ws) - 1st Workshop.**

First Name: Amit

Last Name: Pathak

Email Address: amitpath@socal.rr.com

Affiliation:

Subject: Verification Subcontracting

Comment:

Sir/Madam

If a small company with ARB accreditation wants to perform verification, what are ARB's requirement and how the small company needs to deal with conflict of interest (COI)?

The COI will be with Accredited Body or with ARB?

Thanks.

Amit

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-07-14 14:09:58

No Duplicates.

## Comment 6 for Cap & Trade Public Meeting (june5-reporting-ws) - 1st Workshop.

First Name: Mark

Last Name: Pawlicki

Email Address: mpawlicki@spi-ind.com

Affiliation: Sierra Pacific Industries

Subject: Comments on Cap and Trade Reporting and Verification

Comment:

To: Air Board

These are the comments of Sierra Pacific Industries (SPI) regarding the Reporting and Verification Requirements for California's Cap-and-Trade Program. Sierra Pacific is a large forest landowner in California and has a number of manufacturing facilities and biomass-fueled electric generation plants. The ARB's decisions on various elements of the cap and trade program under AB 32 could have a significant impact on our ability to operate our businesses in this state. We offer the following specific comments which we believe will result in a more efficient and effective cap and trade program.

General

As a major industrial forest landowner, SPI's forests sequester a significant amount of carbon from the atmosphere. Our forests are part of the five million metric ton net carbon sink that is outlined in the ARB's Climate Change Scoping Plan - the only sector that is actively improving the air in California. At the same time, our five operating biomass electric power plants are helping to offset the emissions that would have been produced by fossil-fuel plants.

These plants are carbon-neutral. That is, by using woody biomass for their fuel source they play a role in not only offsetting fossil fuel use, but also have a positive impact on air quality through avoided burning in the field. Studies have shown that the controlled combustion of wood in a power plant reduces criteria air pollutants by 60 to 99%. In addition, the thinning effect that occurs on forests which produces the raw material for our power plants reduces the threat of wildfires - further improving air quality.

In our view, the ARB should follow the approach of the Western Climate Initiative which does not require the reporting of emissions from biomass power plants. This does not mean that co-generation facilities aren't being counted. We will report the emissions from forest activities as part of our net carbon sequestration report that will be provided under protocols approved by the ARB. As carbon-neutral facilities, requiring these plants to report would in essence be double-reporting the same emissions.

Double-reporting of emissions would produce a disincentive toward more biomass energy development, and would adversely impact the state's renewable energy requirements.

## Liability for Offsets

As a forest landowner, we will be in a position to sell emission offsets to other manufacturing facilities or utilities. The forestry protocol has rigorous reporting and verification standards which assure the state that any forestry offset sold here will be real, verifiable, and long-term. The purchaser, on the other hand, may or may not be required to verify the offsets that are purchased. We feel it is important for the ARB to require the purchaser to be liable for the efficacy of the offsets that are purchased and reported to limit disputes between the state and the purchaser.

## Verification

The ARB has proposed that beginning in 2010 air emissions must be reported and verified by an independent third-party verifier that contracts with emitters. Independent verification of reported activities is a critical element of the program to assure that standards are being met. Verifiers would need to be approved by the ARB and have to clear a stringent conflict of interest screening and companies would not be allowed to use an individual verifier for more than six years.

We agree with this concept, and stress that individual companies should be allowed to draw from a pool of certified verifiers rather than being assigned specifically by the state. There will be firms who have particular expertise in certain industries with significant background in those businesses as well as the regulatory environment in which they operate. Since they will all be approved by the ARB, it only makes sense that the individual reporting companies are allowed to choose those that would operate in the most efficient manner.

## On-Site Fuel Usage

The ARB appears to want reporting done at the facilities for on-site use of fuels such as diesel, natural gas, and propane for processes (e.g. gas burners) and mobile equipment (e.g. forklifts).

However, we view this as double counting since the producers of these fuels are already accounting for them in their production reports. Reporting of these fuels should be assigned to the upstream producers and distributors to avoid double counting.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-07-14 14:13:22

No Duplicates.

## **Comment 7 for Cap & Trade Public Meeting (june5-reporting-ws) - 1st Workshop.**

First Name: Nancy

Last Name: Allred

Email Address: nancy.allred@sce.com

Affiliation: Southern California Edison

Subject: SCE Comments to CARB on Reporting and Verification 7-9-09

Comment:

Southern California Edison's Comments Attached

Attachment: [www.arb.ca.gov/lists/june5-reporting-ws/10-sce\\_comments\\_to\\_carb\\_on\\_reporting\\_and\\_verification\\_7-9-09.pdf](http://www.arb.ca.gov/lists/june5-reporting-ws/10-sce_comments_to_carb_on_reporting_and_verification_7-9-09.pdf)

Original File Name: SCE Comments to CARB on Reporting and Verification 7-9-09.pdf

Date and Time Comment Was Submitted: 2009-07-14 17:50:43

No Duplicates.



**Comment 8 for Cap & Trade Public Meeting (june5-reporting-ws) - 1st Workshop.**

First Name: Debran

Last Name: Jones Reed

Email Address: DXJones@sempra.com

Affiliation: Sempra Energy

Subject: Comments: Cap-and-Trade Rulemaking, Sempra

Comment:

Sempra Energy's Comments on Reporting & Verification Requirements  
Attached

Attachment: [www.arb.ca.gov/lists/june5-reporting-ws/11-se\\_cmts\\_reportg\\_verification\\_wrkshp\\_07\\_10\\_09.pdf](http://www.arb.ca.gov/lists/june5-reporting-ws/11-se_cmts_reportg_verification_wrkshp_07_10_09.pdf)

Original File Name: SE Cmts Reportg&Verification Wrkshp 07 10 09.pdf

Date and Time Comment Was Submitted: 2009-07-15 16:16:50

No Duplicates.

## **Comment 9 for Cap & Trade Public Meeting (june5-reporting-ws) - 1st Workshop.**

First Name: Greg

Last Name: Odegard

Email Address: godegard@terra-genpower.com

Affiliation: Terra-Gen Power

Subject: Terra-Gen Power's Comments on CARB's June 5, 2009 Workshop on GHG Reporting & Verification  
Comment:

Attached: Terra-Gen's Comments on the California Air Resources  
Board June 5, 2009 Workshop on GHG Reporting & Verification,  
Submitted June 24, 2009

Attachment: [www.arb.ca.gov/lists/june5-reporting-ws/12-terragercarb\\_ghg\\_letter.docx](http://www.arb.ca.gov/lists/june5-reporting-ws/12-terragercarb_ghg_letter.docx)

Original File Name: TerragenCARB GHG Letter.docx

Date and Time Comment Was Submitted: 2009-07-15 16:51:57

No Duplicates.

## **Comment 10 for Cap & Trade Public Meeting (june5-reporting-ws) - 1st Workshop.**

First Name: J. Brian

Last Name: Galley

Email Address: brian.galley@alcan.com

Affiliation: Pechiney Plastic Packaging, Inc.

Subject: Comments to CARB Proposed Threshold Reduction

Comment:

PPPI comments to CARB, June 5 Reporting and Verification meeting.

Attachment: [www.arb.ca.gov/lists/june5-reporting-ws/13-pppi\\_comments\\_to\\_carb.doc](http://www.arb.ca.gov/lists/june5-reporting-ws/13-pppi_comments_to_carb.doc)

Original File Name: PPPI Comments to CARB.doc

Date and Time Comment Was Submitted: 2009-07-16 12:12:33

No Duplicates.

**Comment 11 for Cap & Trade Public Meeting (june5-reporting-ws) - 1st Workshop.**

First Name: Cindy  
Last Name: Parsons  
Email Address: cindy.parsons@ladwp.com  
Affiliation: Los Angeles Department of Water & Power

Subject: LADWP Comments on Reporting and Verification workshop  
Comment:

Attached please find LADWP's comments on the June 5 workshop topic  
"Reporting and Verification in a Cap and Trade Program."

Attachment: [www.arb.ca.gov/lists/june5-reporting-ws/14-ladwp\\_ladwp\\_comments\\_on\\_june\\_5\\_reporting\\_\\_verification\\_workshop.pdf](http://www.arb.ca.gov/lists/june5-reporting-ws/14-ladwp_ladwp_comments_on_june_5_reporting__verification_workshop.pdf)

Original File Name: LADWP LADWP Comments on June 5 Reporting Verification workshop.pdf

Date and Time Comment Was Submitted: 2009-08-04 13:10:34

No Duplicates.

**There are no comments posted to Cap & Trade Public Meeting (june5-reporting-ws) that were presented during the Workshop at this time.**