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Dave Edwards
Chief, Greenhouse Gas and Toxic Emission Inventory Branch

Greg Harris
Chief, Emission Inventory and Economic Assessment Branch
California Air Resources Board
1001 "I" Street, Sacramento, CA 95814

RE: Pacific Gas and Electric Comments on Amendments to the AB617 Criteria and Toxics Reporting Regulation

Dear Mr. Edwards and Mr. Harris,

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to provide comments on the Air Resources Board's (ARB) Proposed Amendments to the AB617 "Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants" (CTR regulation), which was released on September 29, 2020.

PG&E supported the passage of AB 617, and ARB's adoption of the CTR in December 2018. PG&E is uniquely situated with facilities and services in the majority of California's air districts and continues to support uniform, efficient statewide reporting that enhances transparency and data accuracy. The proposed amendments contain many of the same changes and expansions to applicability that were proposed in the Discussion Draft earlier this year. PG&E's concerns with the amendments remain largely the same as well and the comments below reiterate these concerns and request they be addressed via 15-day publicly noticed changes or appropriate public guidance.

PG&E respectfully submits the following comments on the Proposed Amendments.

1. Petition for additional qualifying activities for abbreviated reporting

Section 93421 of the proposed regulation includes a provision for petitioning additional qualifying activities for abbreviated reporting. PG&E requests that the petitioning process allows for an opportunity to provide feedback from the petitioners, thereby allowing for transparency and uniform reporting across the state.

PG&E also requests that CARB explicitly outline the approval process for petitions to report additional qualifying activities for abbreviated reporting. PG&E recommends criteria that will be used to justify the approval of such a petition be clearly stated in the regulation. The Proposed Amendments do not currently state how petitions will be evaluated which makes it difficult to for entities to prepare petitions or even understand what may be eligible.

2. Reporting of emission unit control efficiencies

Section 93404(b) of the proposed regulation requires that the control efficiency of all emissions control devices be reported. PG&E requests that the regulation be updated to clarify that this reporting of control efficiencies is only required in situations where it is relied upon in order to estimate emissions from the emissions unit.

3. Electronic reporting system

Section 93403(c) indicates an alternative submittal methodology using a CARB administered electronic data system. PG&E seeks input from CARB on its timeline for availability of the electronic data system.

4. Reporting of Portable Diesel-Fueled Engines

Section 93404(b) requires the reporting of emissions from portable diesel-fueled engines above a rated 50 horsepower at GHG and/or Criteria facilities as defined in the proposed regulation, regardless of equipment ownership or permit status. The reporting of portable diesel-fired engines outside of the control of PG&E is overly burdensome and tracking the usage and location of these engines will be problematic. As such PG&E requests that CARB remove or reconsider this reporting obligation.

Additionally, PG&E would also like to note that the PERP program designates utilities as Providers of Essential Public Service (PEPS) and does not require the engines to be reported (PG&E is classified as a PEPS). Based on these record-keeping exemptions, there may not be enough records available to calculate actual emissions from PG&E-owned PERP equipment. For the reasons above PG&E recommends that portable equipment emissions not be included in the CTR for facility emissions reporting or, at the very least, ARB should include an exemption for PEPS in order to maintain consistency with the PERP program.

5. Cost of implementation

The Initial Statement of Reasons (ISOR) estimates an implementation cost per facility for the initial reporting year at \$560 to \$22,300 and annual reporting thereafter at \$300 to \$720. PG&E

believes that these cost values are understated. PG&E estimates that initial reporting would cost at least two to three times more than the values presented in the ISOR and that annual reporting, for the simplest of facilities, would roughly cost \$1,000 per facility thereafter.

Thank you for the opportunity to submit these comments on the proposed AB617 CTR Regulation. Please contact me if you have any questions or wish to discuss.

Sincerely,

/s/

Fariya Ali