Comment 1 for AB 32 Cost of Implementation Fee Regulation 2014 (feereg2014) - 45 Day.

First Name: Amber
Last Name: Blixt
Email Address: amber@iepa.com
Affiliation: IEP

Subject: IEP Comments on AB 32 Cost of Implementation Fee Amendments
Comment:

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Attached please find IEP's Comments on Amendments to the AB 32 Cost
of Implementation Fee Regulation.  Thank you.
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Attachment: 'www.arb.ca.gov/lists/com-attach/2-feereg2014-AWgGZVIjAAwKbwJt.pdf'

Original File Name: IEP Commnets on COI Fee Amendments FILED Aug 8 2014.pdf

Date and Time Comment Was Submitted: 2014-08-08 12:07:15

No Duplicates.

Comment 2 for AB 32 Cost of Implementation Fee Regulation 2014 (feereg2014) - 45 Day.

First Name: Diana
Last Name: Tang
Email Address: diana.tang@longbeach.gov
Affiliation: City of Long Beach

Subject: City of Long Beach Opposition to Proposed Changes to the COI Fee Regulation
Comment:

September 11, 2014

Ms. Mary Nichols, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: City of Long Beach Comments on Proposed Changes to the Cost of Implementation Fee Regulation

Dear Chairwoman Nichols:

On behalf of the City of Long Beach, I write to reiterate opposition to the California Air Resources Board's (CARB) proposed changes to the Cost of Implementation Fee Regulation, as they apply to waste-to-energy facilities. Long Beach had previously submitted a letter to express our concerns to this proposal during the unofficial comment period in June.

As demonstrated in the 2012 report entitled, CalRecycle Review of Waste-to-Energy and Avoided Landfill Methane Emissions, waste-to-energy facilities reduce greenhouse gas emissions, when compared to landfills. Waste-to-energy facilities also have the capacity to reduce municipal solid waste (MSW) volume by 90 percent, and produce baseload energy as a byproduct. In comparison, landfills do not have the capacity to reduce waste volume prior to burying the materials. Waste-to-energy facilities are essential to bridging the gap between traditional landfills and the next generation of MSW processors.

Amending the adopted COI Fee Regulation to capture waste-to-energy facilities disincentivizes the use of this technology. Though California has adopted an aggressive Cap and Trade Program to reduce greenhouse gas emissions to 1990 levels by 2020, State regulations still make landfills the economically preferable option. If waste-to-energy facilities are forced to pay additional fees that are not required of landfills, then the price discrepancy between these two MSW processing options will grow even larger. By 2018, it may be economically infeasible to operate the waste-to-energy facility in Long Beach.

Shutting down the waste-to-energy facility in Long Beach will negatively impact the goals of the State's Cap and Trade Program. Inevitably, greenhouse gas emissions will increase as landfilling

increases. Waste generated by over 500,000 residents and business in Long Beach, in addition to waste from various cities including Los Angeles, Culver City, Torrance, and Compton will instead go landfills where nearly 100 percent of the waste volume will be buried.

Long Beach does not view increased landfilling as a positive result. The City strongly prefers that State regulations treat landfills and waste-to-energy facilities equitably, or at least continue to provide allowances to waste-to-energy facilities consistently throughout the implementation of the Cap and Trade Program so that Long Beach can continue operating our waste-to-energy facility. It is essential for there to be an economically viable environment for this facility to operate in, so that it may continue to be a part of State discussions to help further reduce greenhouse gas emissions in California.

Given these reasons, the City of Long Beach opposes the proposed COI Fee Regulation amendments, as they apply to waste to energy facilities. Long Beach urges the Board to reject staff's amendments and keep this section of the regulations as is.

Sincerely,

Mayor Robert Garcia
City of Long Beach

cc: Members of the California Air Resource Board

Attachment: 'www.arb.ca.gov/lists/com-attach/3-feereg2014-Am4FbARrADRQCQBi.pdf'

Original File Name: Long Beach Comments_COI Fee Regulation_Opposition_9-11-14.pdf

Date and Time Comment Was Submitted: 2014-09-11 18:19:22

No Duplicates.

Comment 3 for AB 32 Cost of Implementation Fee Regulation 2014 (feereg2014) - 45 Day.

First Name: Matthew
Last Name: Plummer
Email Address: m3pu@pge.com
Affiliation: Pacific Gas and Electric Company

Subject: PG&E Comments on 45-Day Amendments to MRR and COI
Comment:

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to comment on the Air Resources Board's (ARB) proposed amendments to its Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (MRR) and the Cost of Implementation (COI) Fee Regulation.

Please contact me if you have any questions.

Attachment: 'www.arb.ca.gov/lists/com-attach/5-feereg2014-UCBQMQNdWW8CWwRn.pdf'

Original File Name: PG&E Comments on 45-Day Amendments to MRR and COI.pdf

Date and Time Comment Was Submitted: 2014-09-12 15:45:47

No Duplicates.

Comment 4 for AB 32 Cost of Implementation Fee Regulation 2014 (feereg2014) - 45 Day.

First Name: Ellie
Last Name: Booth
Email Address: ebooth@covanta.com
Affiliation:

Subject: Cost of Implementation Fee
Comment:

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Please accept Covanta's comments on the Cost of Implementation Fee
Regulation.
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Attachment: 'www.arb.ca.gov/lists/com-attach/6-feereg2014-AGFTJwNgVlpVNAJq.pdf'

Original File Name: ARB GHG fees Sept 2014.pdf

Date and Time Comment Was Submitted: 2014-09-15 08:36:52

No Duplicates.

Comment 5 for AB 32 Cost of Implementation Fee Regulation 2014 (feereg2014) - 45 Day.

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

Subject: Comment Letter re: Proposed Amendments to the AB32 Cost of Implementation Fee Regulation
Comment:

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This comment letter is from Frank Caponi of the Los Angeles County
Sanitation Districts.
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Attachment: 'www.arb.ca.gov/lists/com-attach/7-feereg2014-AGRUPQRmA2AGOQMy.pdf'

Original File Name: DOC091514.pdf

Date and Time Comment Was Submitted: 2014-09-15 11:06:12

No Duplicates.

Comment 6 for AB 32 Cost of Implementation Fee Regulation 2014 (feereg2014) - 45 Day.

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

Subject: WSPA COI MMR Comments
Comment:

Please see attached Western States Petroleum Association Comments on Proposed Changes to ARB Regulations: Mandatory Reporting Rule (MRR), Cost of Implementation Rule (COI), and Cap and Trade (C/T).

Attachment: 'www.arb.ca.gov/lists/com-attach/8-feereg2014-WyxXIlQlUWMCWwlq.pdf'

Original File Name: WSPA Comments on COI MMR.pdf

Date and Time Comment Was Submitted: 2014-09-15 14:15:40

No Duplicates.

Comment 7 for AB 32 Cost of Implementation Fee Regulation 2014 (feereg2014) - 45 Day.

First Name: Janet
Last Name: Bell
Email Address: jbell@mwdh2o.com
Affiliation: Metropolitan Water District

Subject: Comments on Proposed Amendments to Regulations for C&T, MRR, and COI Fee
Comment:

Attached is Metropolitan's comment letter.

Attachment: 'www.arb.ca.gov/lists/com-attach/15-capandtrade14-AGMBZgNwVmcAZVI9.pdf'

Original File Name: CARBcommentsltr_C&T_final_Jksign_Sept152014.pdf

Date and Time Comment Was Submitted: 2014-09-15 09:21:56

No Duplicates.

There are no comments posted to AB 32 Cost of Implementation Fee Regulation 2014 (feereg2014) that were presented during the Board Hearing at this time.

Comment 1 for AB 32 Cost of Implementation Fee Regulation 2014 (feereg2014) - 15-1.

First Name: Miles
Last Name: Heller
Email Address: miles.t.heller@tsocorp.com
Affiliation: Tesoro

Subject: Record Retention
Comment:

Tesoro appreciates the proposed changes in section 95204(i) to align the records retention provisions in the fee regulation with those in the MRR, but the proposed language change only corrected one of the inconsistencies. We ask that CARB strike the requirement to maintain the records in CA as this is inconsistent with the MRR regulations.

Recommendation: Strike the phrase in 95204 (I) "Records must be kept at a location within the State of California for five years."

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-10-17 07:09:43

No Duplicates.

Comment 2 for AB 32 Cost of Implementation Fee Regulation 2014 (feereg2014) - 15-1.

First Name: Gerald
Last Name: Secundy
Email Address: jerrys@cceeb.org
Affiliation:

Subject: CCEEB Comments
Comment:

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Please see attachment for comments from California Council for
Environmental and Economic Balance ("CCEEB").
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Attachment: www.arb.ca.gov/lists/com-attach/11-feereg2014-VDdSN1UxWW9XM1QL.pdf

Original File Name: CCEEB 15 Day Comments_10-17.pdf

Date and Time Comment Was Submitted: 2014-10-17 15:58:11

No Duplicates.

Comment 3 for AB 32 Cost of Implementation Fee Regulation 2014 (feereg2014) - 15-1.

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

Subject: WSPA Cap and Trade Letter
Comment:

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Please see attached WSPA Comments on Proposed 15-day changes to ARB
Cap and Trade, MRR and COI Fee Regulations, and Ozone Depleting
Offset Protocol. Thank you.
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Attachment: www.arb.ca.gov/lists/com-attach/13-feereg2014-UyQAdVAhWGoEXQFx.zip

Original File Name: WSPA Proposed 15 day Cap and Trade Letter.zip

Date and Time Comment Was Submitted: 2014-10-17 16:21:35

No Duplicates.