

Comment 1 for Cap & Trade Public Meeting (cost-containment-ws) - 1st Workshop.

First Name: Elizabeth

Last Name: Hadley

Email Address: ehadley@reupower.com

Affiliation:

Subject: Cost Containment Comments from Modesto/Redding/Turlock

Comment:

Attached are comments on the June 22, 2010 "Cost Containment in a California Cap-&-Trade Program" workshop from the Modesto Irrigation District, Redding Electric Utility, and Turlock Irrigation District.

Attachment: www.arb.ca.gov/lists/cost-containment-ws/1-cost_containment_and_offsets_comments_reu_mid_tid.pdf

Original File Name: Cost Containment and Offsets comments REU_MID_TID.pdf

Date and Time Comment Was Submitted: 2010-07-09 09:54:10

No Duplicates.

Comment 2 for Cap & Trade Public Meeting (cost-containment-ws) - 1st Workshop.

First Name: Bill

Last Name: Buchan

Email Address: buchana@mktpotential.com

Affiliation: Graphic Packaging International, Inc.

Subject: Sequestration vs. Non-Sequestration Projects

Comment:

We are not sure why non-sequestration projects are undervalued (limited life time of ten years plus one renewal) versus sequestration projects (potentially unlimited lifetime). The reduction of carbon by sequestration or utilizing new approaches that do not generate GHG in the first place achieve the same environmental benefit. If anything, we as a society may wish to incentivize projects that do not generate GHG (replacing those that do) in order to move our state to a new green economy.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-07-12 10:19:05

No Duplicates.

Comment 3 for Cap & Trade Public Meeting (cost-containment-ws) - 1st Workshop.

First Name: Bill

Last Name: Buchan

Email Address: buchana@mktpotential.com

Affiliation: Graphic Packaging International, Inc.

Subject: Removing Limit for Offsets

Comment:

Nicholas pointed out that a well-functioning cap-and-trade system would include no limits of the use of offsets. GPI supports this position. Unfortunately, ARB is considering rules that require that 51% reduction of GHG comes from onsite, limiting the use of offsets under the cap and trade program. For CHP, this is a rule that drives facilities to consider only big capital investments they can make in the turbine, for example. It locks out CHP from inexpensive investments they could make to reduce GHG in other sectors and jurisdictions through offset projects. For this reason, GPI recommends that CHP be exempted from the 51% rule.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-07-12 10:30:16

No Duplicates.

Comment 4 for Cap & Trade Public Meeting (cost-containment-ws) - 1st Workshop.

First Name: Bill

Last Name: Buchan

Email Address: buchana@mktpotential.com

Affiliation: Graphic Packaging International, Inc.

Subject: No Hard Floor for Auction Price Allowances

Comment:

GPI asks that ARB consider not adopting a hard floor for the auction price of allowances. This only serves to lock in the cost of compliance for cap and trade for industry. With the declining cap, we suspect that the supply of allowances will be constrained, so the market will appropriately keep prices elevated. This in turn will cause facilities to mitigate GHG as part or all of their compliance under the cap. So if supply is restricted through the declining cap, there should be no need for a hard floor on the auction price of allowances.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-07-12 10:30:16

No Duplicates.

Comment 5 for Cap & Trade Public Meeting (cost-containment-ws) - 1st Workshop.

First Name: Bill

Last Name: Buchan

Email Address: buchana@mktpotential.com

Affiliation: Graphic Packaging International, Inc.

Subject: Hard Ceiling for Auction Price Allowances

Comment:

GPI recommends that ARB consider the use of hard price ceiling. While some interesting options were noted for soft price ceilings, we are concerned that they will have limited effect. Can ARB carry a large enough reserve to ensure that auction prices do not escalate so high as to cause facilities to go out of business and how will this reserve be replenished? Over time the cost of offset projects is likely to escalate as the inexpensive projects have already been conducted. The use of future vintage allowances seems to be a temporary stop-gap measure, passing the problem into the next compliance period. A hard ceiling will give industry assurance that it understands the maximum cost of compliance and can make future plans accordingly. A sense of price certainty is critical for industry to manage its way through cap and trade and AB32.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-07-12 10:30:16

No Duplicates.

Comment 6 for Cap & Trade Public Meeting (cost-containment-ws) - 1st Workshop.

First Name: Bill

Last Name: Buchan

Email Address: buchana@mktpotential.com

Affiliation: Graphic Packaging International, Inc.

Subject: Use of Allowance Reserve

Comment:

GPI thinks that the allowance reserve has merit, but only as a means of borrowing allowances. Not as a credible soft price ceiling. With this approach, covered entities could borrow against the reserve for offset projects in progress. This would ensure that the reserve is repopulated. It would also decouple the timing issues associated with performing an offset project and meeting a compliance obligation, so long as we end up at the same end point anyway. GPI does not think it is necessary to include interest payments associated with this borrowing; if that was done one would have to rectify carbon prices at the time of compliance versus the completion of offset project - more complicated than it needs to be. Other speakers at the workshop noted the advantage of short term borrowing for the reserve as well.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-07-12 10:30:16

No Duplicates.

Comment 7 for Cap & Trade Public Meeting (cost-containment-ws) - 1st Workshop.

First Name: Bill

Last Name: Buchan

Email Address: buchana@mktpotential.com

Affiliation: Graphic Packaging International, Inc.

Subject: Rewarding Efficient Facilities

Comment:

As ARB constructs the Cap and Trade program, GPI hopes that the program will reward facilities that are efficient and perform well under the cap with allowances. In this way, high performing facilities will receive allowance assets that can be sold to other covered entities. We think the receiving and tradability of allowances is a strong motivator for creating the cleanest facility one can have; and we hope ARB bears this in mind as it constructs the program and evaluates different options such as the allowance reserve.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-07-12 10:30:16

No Duplicates.

Comment 8 for Cap & Trade Public Meeting (cost-containment-ws) - 1st Workshop.

First Name: Tamara

Last Name: Raspberry

Email Address: trasberry@semprautilities.com

Affiliation: Sempra Energy Utilities

Subject: Cost Containment Workshop

Comment:

Please consider the comments submitted by Sempra Energy Utilities for the June 22 Workshop on Cap and Trade Cost-Containment.

Attachment: www.arb.ca.gov/lists/cost-containment-ws/8-seu_comments_arb_june_22_cost_containment_workshop_071210.pdf

Original File Name: SEu Comments_ARB June 22 Cost Containment Workshop 071210.pdf

Date and Time Comment Was Submitted: 2010-07-12 17:59:58

No Duplicates.

Comment 9 for Cap & Trade Public Meeting (cost-containment-ws) - 1st Workshop.

First Name: harvey

Last Name: eder

Email Address: harveyederpspc@yahoo.com

Affiliation: HE/PSPC Public Solar Power Coalition

Subject: Sub 2 The Story Of Cap And Trade-History of Derivatives 6- Min.-Solar

Comment:

see attachment

Attachment: www.arb.ca.gov/lists/cost-containment-ws/9-sub2_story_of_cap_and_trade-history_derivitives_solar.doc

Original File Name: Sub2 Story of Cap and Trade-History derivatives Solar.doc

Date and Time Comment Was Submitted: 2010-07-13 10:52:25

No Duplicates.

Comment 10 for Cap & Trade Public Meeting (cost-containment-ws) - 1st Workshop.

First Name: Rohan

Last Name: Ma

Email Address: rma@theccx.com

Affiliation: Chicago Climate Exchange (CCX)

Subject: CCX Input on Cost Containment in a California Cap-and-Trade Program

Comment:

Please find attached input from the Chicago Climate Exchange (CCX) regarding "Cost Containment in a California Cap-and-Trade Program."

Attachment: www.arb.ca.gov/lists/cost-containment-ws/10-ccx-carb-costcontainment_7-13-10_.pdf

Original File Name: CCX-CARB-CostContainment(7-13-10).pdf

Date and Time Comment Was Submitted: 2010-07-13 12:10:42

No Duplicates.

Comment 11 for Cap & Trade Public Meeting (cost-containment-ws) - 1st Workshop.

First Name: Dorothy
Last Name: Rothrock
Email Address: drothrock@cmta.net
Affiliation:

Subject: CMTA cost containment comments
Comment:

Attached find CMTA comments regarding cost containment.

Attachment: www.arb.ca.gov/lists/cost-containment-ws/11-cmta_cost_containment_comments_-_june_22_workshop.doc

Original File Name: CMTA Cost Containment Comments - June 22 workshop.doc

Date and Time Comment Was Submitted: 2010-07-13 13:26:03

No Duplicates.

Comment 12 for Cap & Trade Public Meeting (cost-containment-ws) - 1st Workshop.

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

Subject: Cost containment comments
Comment:

Dear ARB,

Please find attached comments regarding cost containment in the preliminary draft cap-and-trade regulation.

Many thanks for your consideration,

Todd Schatzki

Attachment: www.arb.ca.gov/lists/cost-containment-ws/12-schatzki__analysis_group_-_cost_containment_comments.pdf

Original File Name: Schatzki _Analysis Group_ - Cost Containment Comments.pdf

Date and Time Comment Was Submitted: 2010-07-13 13:24:33

No Duplicates.

Comment 13 for Cap & Trade Public Meeting (cost-containment-ws) - 1st Workshop.

First Name: Todd

Last Name: Schatzki

Email Address: tschatzki@analysisgroup.com

Affiliation:

Subject: Attachment to cost containment comments

Comment:

Dear ARB,

Please find attached an attachment to previously submitted comments on cost containment.

Thank you for your consideration,

Todd Schatzki

Attachment: www.arb.ca.gov/lists/cost-containment-ws/13-schatzki_stavins_--_next_steps_ii.pdf

Original File Name: Schatzki Stavins -- Next Steps II.pdf

Date and Time Comment Was Submitted: 2010-07-13 13:29:45

No Duplicates.

Comment 14 for Cap & Trade Public Meeting (cost-containment-ws) - 1st Workshop.

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

Subject: IEP's Comments on CARB's Cost Containment Workshop
Comment:

Attached are IEP's Comments on CARB's Cost Containment Workshop
(convened, June 22, 2010).

Attachment: [www.arb.ca.gov/lists/cost-containment-ws/14-
iep_comments_to_carb_re_cost_containment_options--final--7_13_10.doc](http://www.arb.ca.gov/lists/cost-containment-ws/14-iep_comments_to_carb_re_cost_containment_options--final--7_13_10.doc)

Original File Name: IEP Comments To CARB RE Cost Containment Options--Final--
7_13_10.doc

Date and Time Comment Was Submitted: 2010-07-13 14:02:28

No Duplicates.

Comment 15 for Cap & Trade Public Meeting (cost-containment-ws) - 1st Workshop.

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

Subject: WSPA Comments on Cost Containment – June 22, 2010 Public Meeting
Comment:

Please see attached WSPA Comments on Cost Containment – June 22, 2010 Public Meeting. Thank you.

Attachment: www.arb.ca.gov/lists/cost-containment-ws/15-wspa_comments_on_cost_containment_-_june_22nd_meeting__2_.pdf

Original File Name: WSPA Comments on Cost Containment - June 22nd meeting (2).pdf

Date and Time Comment Was Submitted: 2010-07-13 14:14:17

No Duplicates.

Comment 16 for Cap & Trade Public Meeting (cost-containment-ws) - 1st Workshop.

First Name: Chris

Last Name: Kelly

Email Address: ckelly@infoasis.com

Affiliation: The Conservation Fund

Subject: Comments on June 22, 2010 Public Workshop

Comment:

Thank you for the opportunity to comment on ARB's June 22, 2010 public workshop.

Attachment: www.arb.ca.gov/lists/cost-containment-ws/16-arb_offset_comment_letter__7.13.10_.pdf

Original File Name: ARB offset comment letter (7.13.10).pdf

Date and Time Comment Was Submitted: 2010-07-13 14:40:02

No Duplicates.

Comment 17 for Cap & Trade Public Meeting (cost-containment-ws) - 1st Workshop.

First Name: Steven

Last Name: Smith

Email Address: Steven.B.Smith@Saint-Gobain.com

Affiliation:

Subject: CARB Cost Containment & Offsets

Comment:

Attached are our comments on Trade Cost Containment and Offsets.

Attachment: www.arb.ca.gov/lists/cost-containment-ws/17-carb_letter_-_trade_cost___offset_options.pdf

Original File Name: CARB Letter - Trade Cost & Offset Options.pdf

Date and Time Comment Was Submitted: 2010-07-13 14:49:24

No Duplicates.

Comment 18 for Cap & Trade Public Meeting (cost-containment-ws) - 1st Workshop.

First Name: Kyle

Last Name: Boudreaux

Email Address: kyle.boudreaux@fpl.com

Affiliation:

Subject: GHG Cost Containment workshop

Comment:

Attacahed are the comments of NextEra Energy in response to the June 22, 2010 workshop on Cost Containment

Attachment: www.arb.ca.gov/lists/cost-containment-ws/18-2010_07_13_nextera_cost_containment_workshop_comments_june_2010.pdf

Original File Name: 2010_07_13 NextEra cost containment workshop comments June 2010.pdf

Date and Time Comment Was Submitted: 2010-07-13 15:07:27

No Duplicates.

Comment 19 for Cap & Trade Public Meeting (cost-containment-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 the Air Resources Board's June 22, 2010 Workshops

Comment:

Attached are PG&E's comments.

Attachment: www.arb.ca.gov/lists/cost-containment-ws/19-clean_00102549.pdf

Original File Name: clean_00102549.pdf

Date and Time Comment Was Submitted: 2010-07-13 15:29:44

No Duplicates.

Comment 20 for Cap & Trade Public Meeting (cost-containment-ws) - 1st Workshop.

First Name: Katie

Last Name: Sullivan

Email Address: sullivan@ieta.org

Affiliation:

Subject: IETA Comments on Cost-Containment Mechanisms

Comment:

Attached, please find comments, prepared by the International Emissions Trading Association (IETA), in response to the 22 June Workshop on Cost-Containment in California's Cap & Trade Program.

Attachment: www.arb.ca.gov/lists/cost-containment-ws/20-ieta_comments_carb_costcontainment__13_july_2010.pdf

Original File Name: IETA Comments_CARB CostContainment_ 13 July 2010.pdf

Date and Time Comment Was Submitted: 2010-07-13 15:38:08

No Duplicates.

Comment 21 for Cap & Trade Public Meeting (cost-containment-ws) - 1st Workshop.

First Name: John

Last Name: Larrea

Email Address: john@clfp.com

Affiliation: California League of Food Processors

Subject: Comments on June 22 Workshop on Cost Containment and Offsets

Comment:

Thank you for the opportunity to comment on these important issues to the food processing industry

Attachment: www.arb.ca.gov/lists/cost-containment-ws/21-july_13_2010_clfp_comments_re_cost_containment_and_offsets.pdf

Original File Name: July 13 2010 CLFP COMMENTS RE Cost containment and Offsets.pdf

Date and Time Comment Was Submitted: 2010-07-13 15:59:08

No Duplicates.

Comment 22 for Cap & Trade Public Meeting (cost-containment-ws) - 1st Workshop.

First Name: Brenda

Last Name: Coleman

Email Address: brenda.coleman@calchamber.com

Affiliation:

Subject: Cap-and-Trade Cost Containment Workshop 06.23.10

Comment:

Please see attached comments.

Attachment: www.arb.ca.gov/lists/cost-containment-ws/22-calchamber_cap-and-trade_-_cost_containment_-_offset_workshop_6232010.pdf

Original File Name: CalChamber Cap-and-Trade - Cost Containment - Offset Workshop 6232010.pdf

Date and Time Comment Was Submitted: 2010-07-13 15:41:52

No Duplicates.

Comment 23 for Cap & Trade Public Meeting (cost-containment-ws) - 1st Workshop.

First Name: Diana

Last Name: Lee

Email Address: diana.lee@cpuc.ca.gov

Affiliation: Division of Ratepayer Advocates

Subject: Division of Ratepayer Advocates Comments on cost containment

Comment:

Attached are the comments of DRA on cost containment measures within ARB's proposed cap and trade program.

Attachment: www.arb.ca.gov/lists/cost-containment-ws/23-dra_7-13-2010_comments_on_cost_containment_and_offsets.doc

Original File Name: DRA 7-13-2010 Comments on cost containment and offsets.DOC

Date and Time Comment Was Submitted: 2010-07-13 16:33:04

No Duplicates.

Comment 24 for Cap & Trade Public Meeting (cost-containment-ws) - 1st Workshop.

First Name: Kristin
Last Name: Eberhard
Email Address: keberhard@nrdc.org
Affiliation: NRDC

Subject: Coalition letter re cost containment
Comment:

Please accept the attached comments.

Attachment: www.arb.ca.gov/lists/cost-containment-ws/25-2010-7-13_coalition_letter_re_cost_containment.pdf

Original File Name: 2010-7-13_Coalition Letter re Cost Containment.pdf

Date and Time Comment Was Submitted: 2010-07-13 17:32:54

No Duplicates.

Comment 25 for Cap & Trade Public Meeting (cost-containment-ws) - 1st Workshop.

First Name: James

Last Name: Fine

Email Address: jfine@environmentaldefensefund.org

Affiliation:

Subject: EDF Cost Containment Comments

Comment:

This attached PDF is printed on EDF's letterhead; the prior submission wasn't.

Thank you!

Jamie Fine

Attachment: www.arb.ca.gov/lists/cost-containment-ws/27-ab32costcontainment.edfcomments.pdf

Original File Name: AB32costcontainment.EDFComments.pdf

Date and Time Comment Was Submitted: 2010-07-13 18:00:33

No Duplicates.

Comment 26 for Cap & Trade Public Meeting (cost-containment-ws) - 1st Workshop.

First Name: Clare

Last Name: Breidenich

Email Address: clare@wptf.org

Affiliation: Western Power Trading Forum

Subject: Cost-Containment

Comment:

Attachment

Attachment: www.arb.ca.gov/lists/cost-containment-ws/28-7-13-10_wptf_comments_on_cost-containment.pdf

Original File Name: 7-13-10 WPTF Comments on Cost-Containment.pdf

Date and Time Comment Was Submitted: 2010-07-13 18:09:13

No Duplicates.

Comment 27 for Cap & Trade Public Meeting (cost-containment-ws) - 1st Workshop.

First Name: Emily

Last Name: Rooney

Email Address: emily@agcouncil.org

Affiliation: Agricultural Council of CA

Subject: Comments re: Cost Containment & Offsets

Comment:

Please find comments attached.

Attachment: www.arb.ca.gov/lists/cost-containment-ws/29-ab_32_june_22_workshop_comments_cost_containment_and_offsets.zip

Original File Name: AB 32 June 22 workshop comments cost containment and offsets.zip

Date and Time Comment Was Submitted: 2010-07-13 18:10:07

No Duplicates.

Comment 28 for Cap & Trade Public Meeting (cost-containment-ws) - 1st Workshop.

First Name: Cathy

Last Name: Karlstad

Email Address: Cathy.Karlstad@sce.com

Affiliation: Southern California Edison

Subject: SCE Comments on Cost Containment Options and Offsets and Linkage
Comment:

Attached please find SCE's comments.

Attachment: www.arb.ca.gov/lists/cost-containment-ws/30-sce_comments_on_cost_containment_options_and_offsets_and_linkage.pdf

Original File Name: SCE Comments on Cost Containment Options and Offsets and Linkage.pdf

Date and Time Comment Was Submitted: 2010-07-13 18:12:25

No Duplicates.

Comment 29 for Cap & Trade Public Meeting (cost-containment-ws) - 1st Workshop.

First Name: Lily

Last Name: Mitchell

Email Address: l Mitchell@hanmor.com

Affiliation: SCPPA

Subject: SCPPA comments on cost containment

Comment:

Please find attached the comments of the Southern California Public Power Authority on the cost containment workshop held on the morning of June 22, 2010.

Attachment: www.arb.ca.gov/lists/cost-containment-ws/31-300226001lmm07131001_workshop_622_cost_containment.pdf

Original File Name: 300226001lmm07131001 workshop 622 cost containment.pdf

Date and Time Comment Was Submitted: 2010-07-13 18:56:01

No Duplicates.

Comment 30 for Cap & Trade Public Meeting (cost-containment-ws) - 1st Workshop.

First Name: Kyle

Last Name: Danish

Email Address: kwd@vnf.com

Affiliation: Van Ness Feldman

Subject: Coalition for Emission Reduction Projects (CERP) comments on cost containment
Comment:

Attached.

Attachment: www.arb.ca.gov/lists/cost-containment-ws/32-cerp--comments_on_arb_6.22.2010_cost_containment_presentation.pdf

Original File Name: CERP--Comments on ARB 6.22.2010 cost containment presentation.pdf

Date and Time Comment Was Submitted: 2010-07-13 21:57:33

No Duplicates.

Comment 31 for Cap & Trade Public Meeting (cost-containment-ws) - 1st Workshop.

First Name: Erin

Last Name: Rogers

Email Address: ombcomm@arb.ca.gov

Affiliation: health, labor, business, enviro coalitio

Subject: offset limit

Comment:

See attached comments on proposed changes to the offset limit.

Attachment: www.arb.ca.gov/lists/cost-containment-ws/33-response_to_june_22_offsets_proposal_7-13-10.pdf

Original File Name: Response to June 22 offsets proposal 7-13-10.pdf

Date and Time Comment Was Submitted: 2010-07-14 10:03:04

No Duplicates.

Comment 32 for Cap & Trade Public Meeting (cost-containment-ws) - 1st Workshop.

First Name: Casey

Last Name: Creamer

Email Address: ombcomm@arb.ca.gov

Affiliation:

Subject: WAPA's comment

Comment:

See attachment.

Attachment: www.arb.ca.gov/lists/cost-containment-ws/34-ccgga.wapa_cost_containment_comments.pdf

Original File Name: CCGGA.WAPA Cost Containment Comments.pdf

Date and Time Comment Was Submitted: 2010-07-20 14:22:21

No Duplicates.

Comment 33 for Cap & Trade Public Meeting (cost-containment-ws) - 1st Workshop.

First Name: Stephen

Last Name: Burns

Email Address: ombcomm@arb.ca.gov

Affiliation: Chevron Corporation

Subject: Chevron Comments on June 22 Cost Containment Workshop

Comment:

See attachment.

Attachment: www.arb.ca.gov/lists/cost-containment-ws/35-chevron_cost_containment_workshop_comments.pdf

Original File Name: Chevron Cost Containment Workshop Comments.pdf

Date and Time Comment Was Submitted: 2010-07-23 12:41:22

No Duplicates.

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