

## **Comment 1 for Cap-and-Trade Meeting to Discuss Emissions Leakage (july-30-leakage-ws) - 1st Workshop.**

First Name: Ronald  
Last Name: Criswell  
Email Address: rmc808@gmail.com  
Affiliation:

Subject: Emissions Leakage  
Comment:

Dear AB32 team,

After reading about leakage in regards to the AB32 Global Warming Solutions Act, I noticed that Hydrogen Production is in the Medium leakage category.

I would recommend placing Hydrogen Production in the High leakage category, due to the fact that a plant making Hydrogen or an industrial user consuming it could import it from out of state.

Also, there is likely to be additional Hydrogen transportation infrastructure in the future as Hydrogen fuel becomes more prevalent.

In order to prevent CO2 emission reductions in California from being completely offset by emission increases outside California due to leakage, shouldn't Hydrogen production be placed in the High leakage category?

Thanks for the opportunity to comment.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-08-12 11:49:07

No Duplicates.

**Comment 2 for Cap-and-Trade Meeting to Discuss Emissions Leakage (july-30-leakage-ws) - 1st Workshop.**

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

Subject: Leakage and Implementation of AB 32  
Comment:

Please see attached WSPA Leakage and Implementation of AB 32 Letter. Thank you.

Attachment: [www.arb.ca.gov/lists/july-30-leakage-ws/2-wspa\\_leakage\\_letter.pdf](http://www.arb.ca.gov/lists/july-30-leakage-ws/2-wspa_leakage_letter.pdf)

Original File Name: WSPA Leakage Letter.pdf

Date and Time Comment Was Submitted: 2012-08-13 10:11:50

No Duplicates.

**Comment 3 for Cap-and-Trade Meeting to Discuss Emissions Leakage (july-30-leakage-ws) - 1st Workshop.**

First Name: Tamara

Last Name: Raspberry

Email Address: [trasberry@semprautilities.com](mailto:trasberry@semprautilities.com)

Affiliation:

Subject: July 30 Leakage Comments from Sempra Utilities

Comment:

Attached are comments from Sempra Utilities.

Attachment: [www.arb.ca.gov/lists/july-30-leakage-ws/3-seu\\_commts\\_on\\_leakage-8\\_27\\_12.pdf](http://www.arb.ca.gov/lists/july-30-leakage-ws/3-seu_commts_on_leakage-8_27_12.pdf)

Original File Name: SEu Commts on leakage-8 27 12.pdf

Date and Time Comment Was Submitted: 2012-08-27 16:08:49

No Duplicates.

**Comment 4 for Cap-and-Trade Meeting to Discuss Emissions Leakage (july-30-leakage-ws) - 1st Workshop.**

First Name: Brent

Last Name: Rush

Email Address: [brent.rush@riotinto.com](mailto:brent.rush@riotinto.com)

Affiliation: Rio Tinto Minerals

Subject: Emissions Leakage Comments (Rio Tinto Minerals)

Comment:

Please find comments attached.

Attachment: [www.arb.ca.gov/lists/july-30-leakage-ws/6-riotintomineralscapandtradecomments082012.pdf](http://www.arb.ca.gov/lists/july-30-leakage-ws/6-riotintomineralscapandtradecomments082012.pdf)

Original File Name: RioTintoMineralsCapandTradeComments082012.pdf

Date and Time Comment Was Submitted: 2012-08-29 10:32:49

No Duplicates.

**Comment 5 for Cap-and-Trade Meeting to Discuss Emissions Leakage (july-30-leakage-ws) - 1st Workshop.**

First Name: Michael

Last Name: Gardner

Email Address: mgardner@gypsum.org

Affiliation: Gypsum Association

Subject: Comment on Cap-and-Trade Meeting to Discuss Emissions Leakage (july-30-leakage-ws)

Comment:

Please accept the attached comment on July-30-Leakage-WS from the Gypsum Association.

Attachment: [www.arb.ca.gov/lists/july-30-leakage-ws/7-august\\_29\\_leakage\\_comments\\_final.doc](http://www.arb.ca.gov/lists/july-30-leakage-ws/7-august_29_leakage_comments_final.doc)

Original File Name: August 29 LEAKAGE Comments FINAL.doc

Date and Time Comment Was Submitted: 2012-08-29 11:50:25

No Duplicates.

**Comment 6 for Cap-and-Trade Meeting to Discuss Emissions Leakage (july-30-leakage-ws) - 1st Workshop.**

First Name: Angus

Last Name: Crane

Email Address: [acrane@naima.org](mailto:acrane@naima.org)

Affiliation: NAIMA

Subject: NAIMA Comments on CARB's Cap and Trade Proposed Provisions Addressed at Leakage Workshop

Comment:

Please find attached NAIMA's comments on CARB's Cap-and-Trade Proposed Provisions Addressed at Emissions Leakage Workshop held on July 30, 2012.

Attachment: [www.arb.ca.gov/lists/july-30-leakage-ws/8-rac3349.pdf](http://www.arb.ca.gov/lists/july-30-leakage-ws/8-rac3349.pdf)

Original File Name: RAC3349.pdf

Date and Time Comment Was Submitted: 2012-08-30 07:25:39

No Duplicates.

**Comment 7 for Cap-and-Trade Meeting to Discuss Emissions Leakage (july-30-leakage-ws) - 1st Workshop.**

First Name: John

Last Name: Bloom

Email Address: houstgrp@pacbell.net

Affiliation: CSCME

Subject: Comments on CARB's Leakage Monitoring and Research Proposals

Comment:

Please see attached comments from the Coalition for Sustainable  
Cement Manufacturing & Environment (CSCME)

Attachment: [www.arb.ca.gov/lists/july-30-leakage-ws/9-carb\\_leakage\\_monitoring\\_and\\_research\\_proposals.pdf](http://www.arb.ca.gov/lists/july-30-leakage-ws/9-carb_leakage_monitoring_and_research_proposals.pdf)

Original File Name: CARB Leakage Monitoring and Research Proposals.pdf

Date and Time Comment Was Submitted: 2012-08-30 13:41:20

No Duplicates.

**Comment 8 for Cap-and-Trade Meeting to Discuss Emissions Leakage (july-30-leakage-ws) - 1st Workshop.**

First Name: Lynn

Last Name: Bragg

Email Address: lbragg@gpi.org

Affiliation: Glass Packaging Institute (GPI)

Subject: Glass Packaging Institute (GPI) - Comments for July 30, 2012 Cap & Trade Workshop  
Comment:

Please find the attached comments for the July 30th Cap and Trade Workshop.

Regards,

Lynn

Lynn Bragg

President

Glass Packaging Institute (GPI)

Attachment: [www.arb.ca.gov/lists/july-30-leakage-ws/10-gpi\\_comments\\_to\\_air\\_resources\\_board\\_\\_8-30-2012.pdf](http://www.arb.ca.gov/lists/july-30-leakage-ws/10-gpi_comments_to_air_resources_board__8-30-2012.pdf)

Original File Name: GPI Comments to Air Resources Board, 8-30-2012.pdf

Date and Time Comment Was Submitted: 2012-08-30 14:08:59

No Duplicates.



**Comment 9 for Cap-and-Trade Meeting to Discuss Emissions Leakage (july-30-leakage-ws) - 1st Workshop.**

First Name: Shelly

Last Name: Sullivan

Email Address: ssullivan@onemain.com

Affiliation: AB 32 Implementation Group

Subject: AB 32 IG Comments Regarding July Leakage Workshop

Comment:

Good Afternoon:

Attached please find comments for submission and consideration regarding the CARB Leakage Workshop held in July 2012.

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

Attachment: [www.arb.ca.gov/lists/july-30-leakage-ws/11-ig\\_leakage\\_ltr\\_8\\_2012.pdf](http://www.arb.ca.gov/lists/july-30-leakage-ws/11-ig_leakage_ltr_8_2012.pdf)

Original File Name: IG Leakage Ltr\_8\_2012.pdf

Date and Time Comment Was Submitted: 2012-08-30 14:21:17

No Duplicates.

## **Comment 10 for Cap-and-Trade Meeting to Discuss Emissions Leakage (july-30-leakage-ws) - 1st Workshop.**

First Name: Ed

Last Name: Pike

Email Address: pikeenergy@gmail.com

Affiliation:

Subject: reconsideration of oil production leakage classification

Comment:

Dear Mr. Cliff:

Thank you for the opportunity to submit comments on CARB's process for re-assessing industrial leakage potential under the cap and trade program. We recommend that you revise the oil production leakage designation from high to low due to several factors.

First, CARB has noted that oil extraction falls into the category of activities that "have to be located where the reserve is" (CARB Appendix K p26, Leakage Analysis). In addition, oil producers have invested many billions of dollars in fixed well, pump, field treatment, pipeline, and tankage facilities. Thus, oil production is a domestic captive supplier.

Furthermore, CARB greenhouse gas (GHG) allowances are unlikely to have any significant effect on production for two reasons. First, profit margins would not be significantly affected even if GHG allowance prices were to add a dollar or two per barrel to production costs. For instance, Midway-Sunset crude oil prices have tripled over the last decade. Second, production levels have been driven by reservoir depletion rather than margins even at historic high prices.

Thus, we recommend designating oil production as subject to low risk of leakage. Please see our attached detailed June 6, 2011 comments and feel free to contact me at ed@theicct.org or Chris Malins, ICCT fuels program lead, at chris@theicct.org with any questions.

Sincerely,  
Ed Pike, PE

Attachment: [www.arb.ca.gov/lists/july-30-leakage-ws/12-icct\\_comments\\_on\\_oil\\_production\\_leakage\\_re-assessment.pdf](http://www.arb.ca.gov/lists/july-30-leakage-ws/12-icct_comments_on_oil_production_leakage_re-assessment.pdf)

Original File Name: ICCT Comments on oil production leakage re-assessment.pdf

Date and Time Comment Was Submitted: 2012-08-30 16:13:09

No Duplicates.

**Comment 11 for Cap-and-Trade Meeting to Discuss Emissions Leakage (july-30-leakage-ws) - 1st Workshop.**

First Name: Wendy

Last Name: James

Email Address: wendy@betterworldgroup.com

Affiliation:

Subject: Cap & Trade Emissions Leakage Comments

Comment:

Comments attached.

Attachment: [www.arb.ca.gov/lists/july-30-leakage-ws/13-083012\\_gwac\\_comments\\_to\\_carb\\_on\\_leakage.pdf](http://www.arb.ca.gov/lists/july-30-leakage-ws/13-083012_gwac_comments_to_carb_on_leakage.pdf)

Original File Name: 083012 GWAC Comments to CARB on leakage.pdf

Date and Time Comment Was Submitted: 2012-08-30 16:40:52

No Duplicates.

**Comment 12 for Cap-and-Trade Meeting to Discuss Emissions Leakage (july-30-leakage-ws) - 1st Workshop.**

First Name: Keith

Last Name: Adams

Email Address: adamskb@airproducts.com

Affiliation: Air Products and Chemicals, Inc.

Subject: Cap and Trade Leakage Risk Reconsideration

Comment:

Cap and Trade Leakage Risk Reconsideration Comments - See Attachment

Attachment: [www.arb.ca.gov/lists/july-30-leakage-ws/14-air\\_products\\_comments\\_-\\_leakage\\_assistance\\_reconsideration\\_-\\_submittal.pdf](http://www.arb.ca.gov/lists/july-30-leakage-ws/14-air_products_comments_-_leakage_assistance_reconsideration_-_submittal.pdf)

Original File Name: Air Products Comments - Leakage Assistance Reconsideration - Submittal.pdf

Date and Time Comment Was Submitted: 2012-08-30 20:33:32

No Duplicates.

**Comment 13 for Cap-and-Trade Meeting to Discuss Emissions Leakage (july-30-leakage-ws) - 1st Workshop.**

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

Subject: WSPA Comments On Leakage Study  
Comment:

Please see attached Western States Petroleum Association Comments on Leakage Study.

Attachment: [www.arb.ca.gov/lists/july-30-leakage-ws/15-wspa\\_comments\\_on\\_leakage\\_study\\_final.zip](http://www.arb.ca.gov/lists/july-30-leakage-ws/15-wspa_comments_on_leakage_study_final.zip)

Original File Name: WSPA Comments on Leakage Study Final.zip

Date and Time Comment Was Submitted: 2012-08-31 14:01:31

No Duplicates.

**There are no comments posted to Cap-and-Trade Meeting to Discuss Emissions Leakage (july-30-leakage-ws) that were presented during the Workshop at this time.**