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

First Name: Justin
Last Name: Rathke
Email Address: jrathke@capstoneturbine.com
Affiliation:

Subject: Capstone Turbine Corp Comments on Sept 9 CHP Workshop
Comment:

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Capstone Turbine Corp appreciates the opportunity to submit these
comments on the ARB CHP workshop held on September 9.  Please
direct any questions to Justin Rathke, 202-446-7347,
jrathke@capstoneturbine.com.
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Attachment: www.arb.ca.gov/lists/sept-9-chp-ws/2-capstone_comments_on_sept_9_arb_chp_workshop.pdf

Original File Name: Capstone Comments on Sept 9 ARB CHP Workshop.pdf

Date and Time Comment Was Submitted: 2009-10-02 12:31:35

No Duplicates.

Comment 2 for Cap & Trade Public Meeting (sept-9-chp-ws) - 1st Workshop.

First Name: Jackie
Last Name: Kepke
Email Address: jkepke@ch2m.com
Affiliation: CA Wastewater Climate Change Group

Subject: CWCCG Comments on CHP in a Cap and Trade Program
Comment:

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Attached please find comments from the California Wastewater
Climate Change Group on Combined Heat and Power in a California
Cap-and-Trade Program.
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Attachment: www.arb.ca.gov/lists/sept-9-chp-ws/3-cwccg_chpwshopcomment_final.zip

Original File Name: CWCCG_CHPWshopComment_final.zip

Date and Time Comment Was Submitted: 2009-10-02 13:39:15

No Duplicates.

Comment 3 for Cap & Trade Public Meeting (sept-9-chp-ws) - 1st Workshop.

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

Subject: IEP's Comments on CHP and Cap-and-Trade
Comment:

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IEP's Comments on CHP and Cap-and-Trade
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Attachment: www.arb.ca.gov/lists/sept-9-chp-ws/4-comments_of_iep_on_carbs_chp_and_ct_workshop_convened_9-9-09__final_.doc

Original File Name: Comments of IEP on CARBs CHP and CT workshop convened 9-9-09 (Final).doc

Date and Time Comment Was Submitted: 2009-10-02 14:07:17

No Duplicates.

Comment 4 for Cap & Trade Public Meeting (sept-9-chp-ws) - 1st Workshop.

First Name: William
Last Name: Westerfield
Email Address: wwester@smud.org
Affiliation: Sacramento Municipal Utility District

Subject: SMUD Comments on CHP in California Cap and Trade Program
Comment:

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Attached please find SMUD's Comments on Combined Heat and Power
(CHP) in a California Cap-and-Trade Program.
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Attachment: www.arb.ca.gov/lists/sept-9-chp-ws/5-smud_comments_on_chp_in_cap_and_trade_program.pdf

Original File Name: SMUD Comments on CHP in Cap and Trade Program.pdf

Date and Time Comment Was Submitted: 2009-10-02 14:27:30

No Duplicates.

Comment 5 for Cap & Trade Public Meeting (sept-9-chp-ws) - 1st Workshop.

First Name: Bill
Last Name: Buchan
Email Address: buchan@mktpotential.com
Affiliation:

Subject: CHP a GHG Benefit
Comment:

GPI is glad to see that ARB recognizes that CHP provides a greenhouse gas (GHG) benefit with efficient generation of power and steam. When many CHP facilities were built 20 years ago, government policies provided incentives to industry go beyond steam generation from a standard boiler and make a marginal additional investment into CHP to efficiently generate steam and power. Today, we are facing situation where that same level of coordinated policy from ARB/California is needed to encourage existing CHP to continue providing GHG benefits and to encourage new CHP to provide additional GHG benefits.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-10-02 15:47:30

No Duplicates.

Comment 6 for Cap & Trade Public Meeting (sept-9-chp-ws) - 1st Workshop.

First Name: Bill
Last Name: Buchan
Email Address: buchan@mktpotential.com
Affiliation:

Subject: But For CHP Option
Comment:

GPI applauds the “But For” CHP option currently under consideration by ARB. Under this option, the facility does not hold the allowances; allowances are the responsibility of the natural gas provider. This option reflects the thinking under which our facility and others invested in CHP. We could have satisfied our steam requirement with a simple boiler. We recognized the incentives CHP could provide with an additional marginal investment. If those incentives are not preserved, we could convert our back-up boiler to full-time operation and shut down our CHP. This decision, while economically responsible for our firm, would not benefit the state, as the state would ultimately see a loss of base-load power. The “But For” CHP option helps CHP facilities preserve the incentives that allows us to continue successful operation of CHP with power to the grid.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-10-02 15:49:04

No Duplicates.

Comment 7 for Cap & Trade Public Meeting (sept-9-chp-ws) - 1st Workshop.

First Name: Bill
Last Name: Buchan
Email Address: buchan@mktpotential.com
Affiliation:

Subject: Declining Allowances on CHP
Comment:

ARB is also considering other options where CHP facilities would hold allowances and be subject to a declining level of allowances over time. GPI believes that these options are not appropriate for CHP. In CHP operations, there are not many small changes a facility can make to reduce GHG. In short order, a facility will be faced with a major capital investment to replace the turbine, duct burners, HRSG, or all of the above. All very expensive investments. This would likely occur because a declining allowance is demanded, regardless of the size of that decline. Existing CHP will then have a choice as to whether to invest or shutdown. To avoid unnecessary shutdowns of CHP, ARB should choose the “But For” CHP option. Alternatively, ARB could choose a double-benchmark standard for CHP that would serve as the basis for allowances, adjusting the standard downward over time only when it is cost-effective retrofits are justified. This is how retrofit regulations have been implemented in California, and we would hope that ARB does not deviate from this approach for AB32.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-10-02 15:54:48

No Duplicates.

Comment 8 for Cap & Trade Public Meeting (sept-9-chp-ws) - 1st Workshop.

First Name: Bill
Last Name: Buchan
Email Address: buchan@mktpotential.com
Affiliation:

Subject: 51% Reduction in offsets on CHP
Comment:

ARB is considering rules that require that 51% reduction of GHG comes from onsite. 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. For this reason, GPI recommends that CHP be exempted from the 51% rule.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-10-02 15:56:43

No Duplicates.

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

First Name: Susie
Last Name: Berlin
Email Address: sberlin@mccarthylaw.com
Affiliation: Northern California Power Agency

Subject: NCPA Comments
Comment:

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Northern California Power Agency Comments on Sept 9, 2009 Workshop
on CHP in a Cap-and-Trade Program.
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Attachment: www.arb.ca.gov/lists/sept-9-chp-ws/10-comments_re_9-9-09_chp_workshop___10-2-09__.pdf

Original File Name: comments re 9-9-09 chp workshop _ 10-2-09_ .pdf

Date and Time Comment Was Submitted: 2009-10-02 15:56:50

No Duplicates.

Comment 10 for Cap & Trade Public Meeting (sept-9-chp-ws) - 1st Workshop.

First Name: Bill
Last Name: Buchan
Email Address: buchan@mktpotential.com
Affiliation:

Subject: Use of Auction Funds
Comment:

To successfully reduce GHG, new technology will be needed across all sectors, including CHP. We request that the funds generated through allowance auctions go back to industry R&D to allow new technologies to be developed. If this is not done, the auction costs suffice only to tax industry over GHG emissions, rather than a means of improving our climate.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-10-02 16:06:22

No Duplicates.

Comment 11 for Cap & Trade Public Meeting (sept-9-chp-ws) - 1st Workshop.

First Name: Beth
Last Name: Vaughan
Email Address: beth@beth411.com
Affiliation: California Cogeneration Council

Subject: California Cogeneration Council Comments re: CHP in a Cap and Trade Program
Comment:

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Please see attached.
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Attachment: www.arb.ca.gov/lists/sept-9-chp-ws/12-ccc_comments_to_carb_on_ghg_regulations_for_chp.doc

Original File Name: CCC Comments to CARB on GHG Regulations for CHP.doc

Date and Time Comment Was Submitted: 2009-10-02 16:08:38

No Duplicates.

Comment 12 for Cap & Trade Public Meeting (sept-9-chp-ws) - 1st Workshop.

First Name: Cathy
Last Name: Karlstad
Email Address: Cathy.Karlstad@sce.com
Affiliation: Southern California Edison Company

Subject: Southern California Edison's Comments on CHP and Cap-and-Trade
Comment:

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Attached please find Southern California Edison's comments on CHP
and cap-and-trade.
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Attachment: www.arb.ca.gov/lists/sept-9-chp-ws/14-sce_comments_on_chp_and_cap-and-trade.pdf

Original File Name: SCE Comments on CHP and Cap-and-Trade.pdf

Date and Time Comment Was Submitted: 2009-10-02 16:58:52

No Duplicates.

Comment 13 for Cap & Trade Public Meeting (sept-9-chp-ws) - 1st Workshop.

First Name: Josh
Last Name: Richman
Email Address: jrichman@bloomenergy.com
Affiliation:

Subject: Bloom Energy Comments Re: AB 32 - Combined Heat and Power (CHP)
Comment:

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Bloom Energy Comments Re: AB 32 - Combined Heat and Power (CHP)
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Attachment: www.arb.ca.gov/lists/sept-9-chp-ws/15-be_ab_32_chp_letter.pdf

Original File Name: BE AB 32 CHP Letter.pdf

Date and Time Comment Was Submitted: 2009-10-02 17:08:03

No Duplicates.

Comment 14 for Cap & Trade Public Meeting (sept-9-chp-ws) - 1st Workshop.

First Name: Norman
Last Name: Pedersen
Email Address: npedersen@hanmor.com
Affiliation: Southern California Public Power Author

Subject: SCPPA Comment on CHP and Cap-and-Trade
Comment:

Please find attached the Southern California Public Power Authority Comment on the September 9. 2009 Workshop Topic: Combined Heat and Power (CHP) and Cap-and-Trade.

Attachment: www.arb.ca.gov/lists/sept-9-chp-ws/16-300226001nap10020901.pdf

Original File Name: 300226001nap10020901.pdf

Date and Time Comment Was Submitted: 2009-10-02 19:01:47

No Duplicates.

Comment 15 for Cap & Trade Public Meeting (sept-9-chp-ws) - 1st Workshop.

First Name: Karen
Last Name: Terranova
Email Address: kt@a-klaw.com
Affiliation:

Subject: Cap-and-Trade and Reporting Regulations for CHP
Comment:

WSPA/EPUC/CAC Comments

Attachment: www.arb.ca.gov/lists/sept-9-chp-ws/17-wspa_epuc_cac_carb_comments2.pdf

Original File Name: WSPA EPUC CAC CARB Comments2.pdf

Date and Time Comment Was Submitted: 2009-10-05 12:44:32

No Duplicates.

There are no comments posted to Cap & Trade Public Meeting (sept-9-chp-ws) that were presented during the Workshop at this time.