



CRS

center for
resource
solutions

June 25, 2012

Mr. David Edwards, PhD
Manager, Climate Change Reporting Section
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Comments from Center for Resource Solutions (CRS) on Discussion Draft *Potential Amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions*

Dear Mr. Edwards,

Thank you for your consideration of these comments by the Center for Resource Solutions (CRS) in response to proposed changes to California's Mandatory GHG Reporting Regulation (MRR) as specified in the Discussion Draft posted on May 29, 2012.

CRS submitted the following as a part of its September 27, 2011 comments on the Second 15-day Amendments to the Cap-and-Trade Regulation¹:

"In Section 95852(b)(4), language was added whereby firmed and shaped power used to comply with the RPS would receive an adjustment that effectively eliminated any compliance obligation for first deliverers. If CARB has determined that firmed and shaped power used to meet the RPS [Renewable Portfolio Standard] should have no compliance obligation, it is consistent to apply this to green pricing programs as well."

We'd like to reiterate, regarding Section 95111(b)(5) of the MRR, if CARB has determined that imports used to meet the RPS should have no compliance obligations, it is consistent to apply this to imports used for voluntary utility green pricing programs and direct access customers purchasing renewable energy. In order not to discourage customers that choose to go beyond the minimum level of renewable energy, pre-existing contracts that serve voluntary green pricing programs and direct access customers purchasing renewable energy in the state should be treated the same as contracts that serve the RPS.

Thank you for the consideration.

Sincerely,

Jennifer Martin
Executive Director

¹ A complete copy of CRS comments submitted for the Second 15-day Amendments to the Cap-and-Trade Regulation can be found at: http://www.resource-solutions.org/pub_pdfs/CRS%20Letter%20re%20Second%2015day%20modifications.pdf.