



Fariya Ali 77 Beale Street, B29K
State Agency Relations San Francisco, CA 94105
(415) 973-8406
fariya.ali@pge.com

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David Edwards
Branch Chief
Greenhouse Gas and Toxic Emission Inventory Branch
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

Submitted electronically to ctr-report@arb.ca.gov

RE: Pacific Gas and Electric Comments in Response to the Air Resources Board's Preliminary Draft Amendments to the Regulation for the Reporting of Criteria Pollutants and Toxic Air Contaminants

Pacific Gas and Electric Company (PG&E) appreciates this opportunity to provide feedback in response to the Air Resources Board's (ARB) Preliminary Draft Amendments (2020 draft amendments) to the Regulation for the Reporting of Criteria Pollutants and Toxic Air Contaminants (CTR), as released in February 2020.

PG&E supported the passage of AB 617, and ARB's adoption of the CTR in December 2018. PG&E is uniquely situated with facilities and services in the majority of California's air districts and continues to support uniform, efficient statewide reporting that enhances transparency and data accuracy. The proposed changes in the February 2020 preliminary draft amendments contain many of the same changes and expansions to applicability that were proposed (but ultimately not adopted) in 2019. PG&E's concerns with the proposed changes remain largely the same as well and the comments below reiterate our points for further consideration and discussion in the 2020 amendment process.

Additional Applicability (Additional Applicability Facility) (§93401(a)(4))

In the 2020 draft amendments, Section §93401(a)(4) outlines additional applicability standards for this regulation that would capture all the district-permitted facilities that meet certain actual emissions and/or activity levels. ARB's proposed changes to §93401(a)(4) would significantly increase the number of emission sources in California subject to additional annual reporting under the CTR, primarily minor sources of air pollution emissions.

Under the proposed changes, any facility with a permit to operate from a local air district (and with 4 tons per year (TPY) of any criteria pollutant and/or 100 TPY of CO) will have to meet the CTR reporting requirements. The emissions thresholds proposed in Appendix A, Table A-3 for combustion of diesel are also currently drafted with very low activity level thresholds (for example, 5 hours of operation per year for Tier 4 engines). PG&E requests that ARB provide the scientific basis for setting these very low thresholds (4 TPY of criteria pollutants and Table A-3 thresholds). Under these criteria, most of PG&E's service centers would be included since they have permits for equipment such as emergency generators, gasoline dispensing stations, and paint booths. Current reporting to air districts for these permitted operations and equipment is minimal in comparison to the reporting requirements of the CTR. PG&E understands that the proposed changes would allow for certain sources to use abbreviated reporting; however this will still require a significant additional administrative burden for facilities, especially those that have many back-up generators. With the continuing need for Public Safety Power Shut-off (PSPS) events to minimize the risk of catastrophic wildfires, the demand for backup generation in the state has increased and many more entities could be pulled into the CTR regulation for limited use of such generators during wildfire season.

PG&E supports providing communities with greater clarity on sources of criteria pollutant and toxic emissions, but questions whether the sources that would be captured by the low activity threshold for diesel and natural gas combustion will provide any added value. PG&E recommends increasing the activity and criteria pollutant thresholds to higher levels until such time as thoroughly supported and vetted scientific research is available to demonstrate the benefit of including such minor sources, especially the ones which are mainly used for emergency purposes.

Reporting Emissions from Portable Equipment Used at Stationary Sources (§93404(c)(2)(c))

Section §93404(c)(2)(C) is a proposed new section to include emissions from portable equipment in facility emission reports. Subsection (C) states, "Emissions... from any diesel-powered portable engines or devices operated at a facility, regardless of equipment ownership or permit status, if the engine or device is operated on site at any time during three different calendar months..." PG&E is concerned that facility owners will be held responsible for reporting emissions from portable equipment they do not own or operate that are brought in by outside vendors and contractors. PG&E does not currently track location and usage of portable engines owned by other parties; and trying to obtain this information from numerous different companies with which PG&E contracts across its service territory would be an enormous additional cost and administrative burden.

Additionally, PG&E would also like to note that the PERP program designates utilities as Providers of Essential Public Service (PEPS) and does not require the engines to be reported (PG&E is classified as a PEPS). Based on these record-keeping exemptions, there may not be enough records available to calculate actual emissions from PG&E-owned PERP equipment. For the reasons above PG&E recommends that portable equipment emissions not be included in the

CTR for facility emissions reporting or, at the very least, ARB should include an exemption for PEPS in order to maintain consistency with the PERP program.

Use of best available data and methods (§93404(d))

Section (§93404(d)) requires the use of best available data and methods for emission calculations. This section needs significant clarification as to how emissions are to be calculated and whether facilities or air districts will be calculating the emissions. Without uniform emission calculation methods, there will be variability as to how actual emissions are calculated and compared to the regulation applicability thresholds – which is contrary to the intention of achieving statewide uniform reporting pursuant to AB 617.

Document retention and record keeping requirements (§93405(d))

ARB may require additional information and data from the owners and operators of a facility that qualifies for abbreviated reporting, due within 30 days of such a request. The facilities under abbreviated reporting would not be keeping track of such data and will have difficulty gathering the requested data and information within the 30-day timeframe. PG&E requests that the timeframe be extended to 120 days to allow the facilities to process the request and to gather additional data and information they were not required to track.

Emissions Reporting Phase-In Categories (Appendix A, Table A-1)

PG&E holds over 300 local air district permits and currently has a presence in 30 of the 35 local air districts in California. PG&E appreciates the difficulty in creating a uniform statewide emissions reporting program pursuant to AB617. For facilities in the additional applicability category, ARB has proposed a complex phase-in schedule. The first data year of reporting depends on which air district the facility is in and the process (equipment type) the facility is reporting for. Based on the matrix in Appendix A, Table A-1, the first data year of reporting could be as early as 2021 and as late as 2025. This complex phase-in schedule could make it difficult for a company like PG&E (that has a wide variety of emissions sources throughout the state) to develop a reporting compliance strategy. Rather than having three separate sector phase-in categories, PG&E recommends simplifying the timeline by only providing one range that lands in the middle of the proposed timeframes for all sectors (i.e. 2023 for Air District Group A and 2024 for Air District Group B).

Conclusion

PG&E appreciates the opportunity to provide feedback on the draft amendments to the CTR regulation. Thank you for considering PG&E's comments and please feel free to contact me if you have any questions or concerns.

Sincerely,

/s/

Fariya Ali