

## TransAlta Energy Marketing U.S. (TEMUS) (Denelle Peacey)

TransAlta Energy Marketing U.S. (TEMUS) appreciates the opportunity to submit comments on the California Air Resources Board's (CARB) Corporate Greenhouse Gas Reporting and Climate-Related Financial Risk Disclosure Initial Regulation as proposed on December 23 2025. TEMUS, a wholly owned subsidiary of TransAlta Corporation, is wholesale power marketer and an active market participant and electricity importer in the California electricity market.

TEMUS strongly supports the exemption in the draft regulation of business entities whose only activity within California consists of wholesale electricity transactions under §96071(b)(5). This section provides much needed clarity as to the status as covered entities of electricity importers into the CAISO.

As pointed out in previous comments, this exemption upholds the intention of the authors of the Climate Disclosure legislation since electricity importers are already covered entities under CARB's Mandatory Reporting of Greenhouse Gas Emissions regulation. Electricity imports are a vital component of the continued reliability of the CAISO for California consumers, and it is important that the regulation does not create a barrier to these energy flows as over the past five years (2024-2020) peak net imports have contributed a minimum of 20% to peak demand in California.



**TransAlta Energy Marketing U.S.**

913 Big Hanaford Road  
Centralia, WA, USA 98531  
T: +1 (360) 736-9901  
www.transalta.com

**Denelle Peacey, M.A (Economics), CFA  
Senior Regulatory Advisor**

Direct Line: 403-819-8524  
Email: Denelle\_Peacey@TransAlta.com

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**Attention: California Air Resources Board (CARB)**

**Re: TransAlta’s Comments on California Corporate Greenhouse Gas (GHG) Reporting and Climate Related Financial Risk Disclosure Programs**

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Yours truly,

**TRANSALTA USA INC.**

Denelle Peacey, MA (Economics), CFA  
Senior Regulatory Advisor

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<sup>1</sup> California Legislature 2023-24, [Senate Daily Journal 3058](#), (Jan. 30, 2024)

<sup>2</sup> <https://www.caiso.com/library/key-statistics>