



City of Anaheim
PUBLIC UTILITIES DEPARTMENT
Finance & Energy Resources

March 6, 2026

California Air Resources Board
1001 "I" Street
Sacramento, California 95814

RE: Anaheim Public Utilities Comments on Mandatory Reporting 45-Day Language

Anaheim Public Utilities ("APU") appreciates the opportunity to offer public comment on the 45-day proposal of the Mandatory Reporting of Greenhouse Gas Emissions ("MRR") regulations. APU is a publicly owned utility providing reliable electric and water services to its customers since 1879, powering the City of Anaheim as it became an international destination to live, work, and visit.

As a member of the Southern California Public Power Authority ("SCPPA"), California Municipal Utilities Association ("CMUA"), and Joint Utility Group ("JUG"), APU has closely collaborated in the development of comments submitted to the California Air Resources Board ("CARB"). SCPPA and CMUA represent publicly-owned utilities ("POUs") in Southern California and statewide, respectively, while the JUG is a collaboration of electric utilities that serve California ratepayers. APU supports the comments submitted by SCPPA, CMUA, and JUG, and offers the following comments in addition to those submitted by these organizations for CARB staff consideration when determining its 15-day package:

Section 95111(a)(12)(A)(2)(i) – CARB has proposed eliminating an Electric Distribution Utility's ("EDU") ability to use a resource-specific emissions factor ("EF") calculated using known emissions and generation data for in-state electric generation resources reported as CAISO Sales. According to the Initial Statement of Reasons ("ISOR"), CARB is confident that it can calculate the appropriate EFs for all in-state generation resources and that this proposed change is a formality and consolidation of current language.

Using a CARB-provided EF for in-state resources may make MRR reporting, verification, and subsequent CARB quality assurance checks simpler for verifiers and CARB staff. However, it seems not all situations necessitating the use of a resource-specific EF for reporting CAISO Sales associated with in-state generation resources are being considered. One example specific to APU, and likely other EDUs, involves the CAISO Sales emissions from APU's in-territory natural gas facility, for which APU is the operator and MRR reporter. This facility's emissions are reported and verified annually alongside APU's Electric Power Entity ("EPE") reporting. Because of this, APU has historically used the MRR verified emissions and generation values for this facility to calculate a resource-specific EF that more accurately reflects emissions associated with CAISO Sales from this resource. Whereas the alternative would be for CARB to use the most recent data available to them, which would be derived from the previous year's reported data or other sources.

Indeed, there are situations where a CARB-provided EF can be advantageous for CARB, as well as the reporting EDU, in determining emissions associated with CAISO Sales. There are also situations when better, more accurate data is available for use in determining EDU emissions associated with CAISO Sales, while simultaneously streamlining the regulation and reducing the verification burden for verifiers and CARB staff. APU requests that EDUs be allowed to use a resource-specific EF for reporting CAISO Sales when the EDU also acts as the reporting entity for a facility under MRR.

Respectfully Submitted,



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