



California Council for Environmental and Economic Balance

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March 9, 2026

Rajinder Sahota
Deputy Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Comments regarding Proposed Amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions

Dear Ms. Sahota,

The California Council for Environmental and Economic Balance (CCEEB) appreciates the opportunity to provide comments to the California Air Resources Board (CARB) regarding the Proposed Amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (“MRR”). CCEEB is a coalition of business, labor, and public leaders that works together to advance strategies to achieve a sound economy and a healthy environment. Founded in 1973, CCEEB is a non-profit and non-partisan organization. CCEEB offers the following technical comments on behalf of it’s members.

Section 95113(n) – Additional Requirements for Reporting Biogenic Emissions from Processing or Coprocessing of Biomass-Derived Feedstocks

Comment: Include in proposed regulation Carbon-14 testing (ASTM D6866-22 Method B and/or ASTM D8473-22) as an approved method. Facilities already have Carbon-14 testing as an approved alternate method from CARB for coprocessing. Inclusion would simplify process for MRR by not needing to obtain approval for an alternative method.

Section 95114 – Hydrogen Production

Comment: We request that CARB include language similar to that included in Section 95113 that excludes process vents for which the concentration of CO₂, N₂O and CH₄ are determined to be below the thresholds in 40 CFR §98.253(j). We also request that CARB ensure the MRR allows for quantifying vent flows using measurement data, process knowledge, or engineering estimate as in 40 CFR §98.253(j) and has clear guidance on quantifying double counting emissions from process vents.

We also ask that CARB include a revision for section (e), regarding fuel and feedstock contents aligning with the EPA on the following to decrease reporting complexity:

- 40 CFR 98.164(b)(2): [https://www.ecfr.gov/current/title-40/part-98/subpart-P#p-98.164\(b\)\(2\)](https://www.ecfr.gov/current/title-40/part-98/subpart-P#p-98.164(b)(2)) and [https://www.ecfr.gov/current/title-40/part-98/subpart-P#p-98.164\(b\)\(5\)\(xix\)](https://www.ecfr.gov/current/title-40/part-98/subpart-P#p-98.164(b)(5)(xix))
 - See EPA Preamble : [2024-07413.pdf](#) (Page 31838, “Revisions To Streamline and Improve Implementation for Subpart P”)
 - Allows for hydrogen producers to use product specification annually for gaseous feedstocks with carbon content ≤20 ppmw or liquid feedstocks with carbon content ≤ 0.00006 kg carbon per gallon of liquid fuel or feedstock. Also allows for use of modifications of methods for sampling/analysis for carbon content if relevant compounds cannot be detected, not technically feasible, or use of method is unsafe.

Section 95121 – Suppliers of Transportation Fuels

Comment: CCEEB requests that CARB include in 95121(b)(2), as it proposes in 95122(b)(9), ability for fuel supplier to report Liquefied Petroleum Gas (LPG) emissions using default LPG factor rather than LPG components. The existing requirement is often burdensome for suppliers to implement and provides little to no additional precision in emissions reporting.

Also, CCEEB strongly urges CARB to remove new section 95121(d)(10), which proposes to require the volume of biomass-derived fuel associated with each unique combination of Low Carbon Fuel Standard (LCFS) pathway code, fuel type, and point of regulation. Current reporting already defines point of regulation and ensures protection against double counting. MRR should not include LCFS data as the two regulations are separate. Pathways associated with biomass-derived fuels are already reported as part of the quarterly and annual LCFS reports. Fuel pathway codes are fully reconciled with counterparties or subject to third party verification (depending on the transaction type). Removing this impractical requirement to provide CARB with duplicative data from a separate regulation will eliminate an unnecessary administrative burden for reporting entities.

Section 95127 – Importers of Hydrogen and Producers of Hydrogen Utilizing Electricity

Comment: CCEB supports proposed language stating that “GHG emissions data reported under this section are not considered covered emissions” and the methodology for calculation of emissions for imported hydrogen in (b)(1)(A).

We also request that CARB remove section (d) – Additional Data Reporting Requirements. Similar to comments on 95121, this section requires the reporting of LCFS pathway codes and creates additional administrative burdens for importers of hydrogen.

Section 95133 – Conflict of Interest Requirements for Verification Bodies

Comment: CCEEB urges CARB to reconsider new Section (b)(5) which proposes to deem conflict of interest risk high when a verifier has provided compliance services for the LCFS. Both State and Federal verification requirements are increasing and the pool of eligible verifiers is limited.

CCEEB thanks CARB for the opportunity to comment on this rulemaking. If you have any questions, please feel free to contact Kirstin Kolpitke, Senior Associate at kirstink@cceeb.org or me at timc@cceeb.org.

Sincerely,



Tim Carmichael
President and CEO
California Council for Environmental and Economic Balance (CCEEB)