

Gerald SUMNER

I am writing to respectfully request that the proposed amendments to California's Mandatory Reporting Regulation for Greenhouse Gas Emissions be reconsidered and resent for further evaluation.

While I recognize the importance of accurate greenhouse gas reporting and California's leadership in climate policy, it is equally important that regulatory changes fully consider their economic and operational impacts on key industries within the state, including the oil and energy sector.

California's oil industry continues to play a critical role in supporting the state's energy reliability, workforce, and tax base. Regulatory adjustments that increase reporting complexity or administrative burden should be carefully evaluated to ensure they do not unintentionally disadvantage in-state producers compared to out-of-state or imported energy sources. Policies that encourage responsible domestic production while maintaining strong environmental standards can better balance environmental goals with economic stability.

For these reasons, I respectfully ask that the state revisit the current proposal and consider revisions that recognize the positive contributions of the oil and energy sector, including technological improvements in emissions management, operational efficiency, and investments in lower-carbon fuel strategies.

Thank you for your time and consideration. I appreciate the opportunity for public input on this important regulatory process.