Los Angeles Department of Water and Power (Cindy Parsons)

See attached comment letter.

May 4, 2026

Mr. Syd Partridge
Manager, Climate Change Reporting Section
California Air Resources Board
1001 I Street
Sacramento CA 95814

Submitted electronically

Dear Mr. Partridge:

Subject: Comments on the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions

The Los Angeles Department of Water (LADWP) appreciates the opportunity to provide input regarding the California Air Resources Board's (CARB's) Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (MRR).

While this comment is beyond the scope of the current rule amendments, LADWP encourages CARB to include within the scope of the next rulemaking a mechanism to adjust for errors in data used to calculate the Outstanding Emissions.

In LADWP's comments on the proposed 45-day amendments to the Cap-and-Invest regulation, LADWP recommended that CARB include in the regulations a mechanism to enable the Outstanding Emissions calculation to be adjusted in the event of incorrect data for electricity imported to California via the California Independent System Operator's (CAISO) Western Energy Imbalance Market (WEIM) and Enhanced Day Ahead Market (EDAM). LADWP would like to reiterate this comment for the MRR.

In 2021, a WEIM software programming error resulted in the deemed delivered imports to California being inflated by 1,097,129 MWh, which also inflated the Outstanding Emissions by an estimated 478,963 metric tons of GHG emissions, resulting in CARB withholding and retiring too many allowances from California electrical distribution utilities that purchased electricity from the market. The erroneous data was not corrected, and CARB did not have a mechanism to adjust the Outstanding Emissions calculation and allowances withheld from the California electrical distribution utilities.

Since CARB requires that reported GHG emission data be accurate, LADWP encourages CARB to include a mechanism in the MRR to adjust the Outstanding Emissions calculation using a reasonable estimate in the event of a WEIM and/or EDAM GHG emission accounting error. Equally important is for the Cap-and-Invest regulation to include a mechanism to restore or back fill allowances that were withheld and retired in error. Having the ability to correct GHG accounting errors is important given the significant increase in volume of electricity transacted in the EDAM market. LADWP encourages CARB to include this within the scope of the next rulemaking.

If you have any questions, please contact me at (213) 367-0436 or Mses. Andrea Villarin or Cindy Parsons, of my staff, at (213) 367-0409 or (213) 367-0636, respectively.

Sincerely,

Katherine Rubin

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Katherine Rubin
Director of Corporate Environmental Affairs

CP:cv
c: Ms. Andrea Villarin
Ms. Cindy Parsons