



Southern California Public Power Authority  
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Ms. Rajinder Sahota  
Deputy Executive Officer  
California Air Resources Board  
1001 I Street  
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## **RE: Comments on Proposed Amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions**

The Southern California Public Power Authority<sup>1</sup> (“SCPPA”) appreciates the opportunity to provide feedback to the California Air Resources Board (“CARB”) staff on the proposed amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (“MRR”), including the proposed 15-day changes posted April 14, 2026.

SCPPA reiterates the prior comments<sup>2</sup> submitted March 9, 2026 and continues to request that CARB address the issues raised in its earlier letter, including preserving flexibility in reporting by allowing the use of resource-specific emissions factors where more accurate data are available, and that CARB make public the underlying data and analyses supporting its conclusions regarding the default emissions factor. Most importantly, SCPPA urges CARB to establish a mechanism for correcting Outstanding Emissions data when errors are identified and cannot be corrected prior to verification.

### **Add a Mechanism to Correct Data**

SCPPA continues to urge CARB to adopt a mechanism that allows corrected or reasonably estimated data, including electricity-import data to be used when calculating Outstanding Emissions, if the original data is later shown to be inaccurate. Even if this cannot be

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<sup>1</sup> SCPPA is a joint powers authority whose members include the cities of Anaheim, Azusa, Banning, Burbank, Cerritos, Colton, Glendale, Los Angeles, Pasadena, Riverside, and Vernon, and the Imperial Irrigation District. SCPPA Members are local publicly owned electric utilities that serve nearly 2.3 million California homes and businesses over 9,000 square miles.

<sup>2</sup> [https://scs-public.s3-us-gov-west-](https://scs-public.s3-us-gov-west-1.amazonaws.com/env_production/oid377/did200184/pid_213313/assets/attachments/81856/x90ci9y6hat_document.pdf?v=30245)

[1.amazonaws.com/env\\_production/oid377/did200184/pid\\_213313/assets/attachments/81856/x90ci9y6hat\\_document.pdf?v=30245](https://scs-public.s3-us-gov-west-1.amazonaws.com/env_production/oid377/did200184/pid_213313/assets/attachments/81856/x90ci9y6hat_document.pdf?v=30245)

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addressed in the current rulemaking, SCPPA respectfully requests that CARB do so in the next rulemaking, which is anticipated to happen soon.

From April 2021 through January 2022, the Western Energy Imbalance Market (“WEIM”) deemed delivered imports to California data incorrectly included transfers that were part of LADWP’s base schedules as part of the real-time imbalance energy transfers attributed to out-of-state WEIM participating resources serving California demand. Although the error was identified before the 2021 emissions data verification deadline, the data could not be corrected, so erroneous data was used to calculate the WEIM Outstanding Emissions due to lack of a true-up mechanism under the existing MRR. SCPPA therefore requests that CARB add a correction or true-up mechanism to the MRR so that erroneous data can be corrected after the fact, along with correcting any subsequent WEIM and EDAM Outstanding Emissions and CAISO Markets Purchaser Emissions calculations.

As SCPPA explained in the March 9, 2026 comments, Outstanding Emissions are intended to account for emissions leakage associated with “WEIM” imports serving California load. If the underlying data are incorrect, the regulation should allow CARB to true-up the calculation after the fact, using corrected data or a reasonable estimate. Furthermore, conducting accurate Greenhouse Gas (“GHG”) emissions accounting in the state is one of CARB’s primary purposes when implementing the MRR and Cap-and-Invest regulations as part of achieving the state’s climate goals. This is necessary to ensure that allowance retirement, compliance obligations, and GHG accounting are accurate to achieve the core missions behind the purpose of these regulations.

### **Conclusion**

SCPPA appreciates the opportunity to comment on CARB’s April 15, 2026 proposed 15-day changes to the MRR.

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