

# Southern California Public Power Authority (Elisabeth de Jong)

Attached.



Southern California Public Power Authority  
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Ms. Rajinder Sahota  
Deputy Executive Officer  
California Air Resources Board  
1001 I Street  
Sacramento, California 95814

## **RE: Comments on Proposed Amendments to the Mandatory Greenhouse Gas Reporting Regulations**

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 Mandatory Greenhouse Gas Reporting Regulation (MRR) posted January 20, 2026.

SCPPA offers specific feedback on the proposed amendments, below.

### **Feedback on Proposed Amendments to MRR**

#### **Request Consideration and Updates to the Default Emissions Factor**

SCPPA appreciates CARB staff’s review and summary of reasons for not updating the default emissions factor at this time. SCPPA, as well as other entities participating in the Cap-and-Invest program, have expressed concern that other California regulatory agencies, including the California Energy Commission (“CEC”) may be using the default emissions factor for applications and purposes not intended or originally contemplated by CARB. For example, the CEC has concluded that the default emissions factor is the best available value for describing in-state emissions in its recently amended Power Source Disclosure regulation.

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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.

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As such, SCPPA requests that CARB make public the underlying data and analyses used to support its conclusions in Appendix B of the rulemaking package.

### **Retain Flexible Emissions Factor for In-State Resources**

As currently proposed, Section 95111(a)(12)(A)(2)(i) eliminates the 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. In some instances, POUs are positioned to provide more accurate in-state facility emissions data when they act as the reporting entity for an electric distribution utility (“EDU”) and an in-state covered electric generation facility. This allows the POU to utilize the most recent data when reporting emissions associated with CAISO Sales. SCPPA requests that, instead of removing this ability, CARB consider amending the language to use a resource-specific EF when the EDU reporting CAISO Sales is also the reporting entity for the resource using the resource-specific EF.

### **Add Mechanism to Correct Outstanding Emissions Data**

Outstanding Emissions, a provision intended to account for emissions leakage associated with Energy Imbalance Market (“EIM”) imports to serve load in California, are calculated pursuant to section 95111(h)(1). In the event that data on electricity imported to California via the EIM is incorrect, the MRR should include a provision enabling CARB to true-up or recalculate the Outstanding Emissions after-the-fact using corrected or estimated data. In addition, since CARB withholds and retires allowances from EDUs that purchase electricity from the EIM, if too many allowances are withheld and retired due to an error, CARB should withhold fewer allowances in the next cycle to adjust for the error and make the EDUs whole.

From April 2021 through January 2022, the EIM 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 EIM participating resources serving California demand. Despite the market operator identifying and announcing this error prior to the 2021 GHG emissions data report verification deadline, the erroneous data was not corrected since the market operator could not provide better data at that time and CARB’s regulations did not contain a mechanism to correct the data after verification. As a result, the erroneous data was accepted and verified and used to calculate the Outstanding Emissions, resulting in too many allowances being withheld. The regulations should support rectifying erroneous data and require accurate data or a reasonable estimate be used when determining Outstanding Emissions and quantity of

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allowances to be withheld and retired from the EDU allocations under the Cap-and-Invest program. SCPPA requests CARB to add such a mechanism to the regulations to rectify errors in data used to calculate the EIM, and someday EDAM Outstanding Emissions.

### **Conclusion**

SCPPA appreciates this opportunity to provide feedback to CARB regarding the proposed amendments to the MRR, posted January 20, 2026. We stand ready to discuss these comments with staff as you finalize changes.

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