



May 26, 2026

Mr. John Eisenhut, Board Member  
California Air Resources Board  
1001 "I" Street  
Post Office Box 2815  
Sacramento, California 95812

**Re: CLECA Requests the California Air Resources Board adopt the 15-Day Modifications to Proposed Cap-and-Invest Program**

Dear Board Member Eisenhut:

The California Large Energy Consumers Association (CLECA) is asking that you vote yes to adopt the 15-day package as presented by CARB staff, related to California's leading Cap and Invest Program.

CLECA represents some of California's largest industrial employers, including manufacturers, processors, and other energy-intensive businesses that are the backbone of the state's economy. Our members are predominantly energy-intensive and trade-exposed (EITE) industries – facilities that compete directly against producers in other states and countries that face lower energy costs, less stringent regulatory requirements, and no carbon compliance obligations.

**CLECA urges the Board to adopt the Cap-and-Invest proposed regulatory structure with 15 Day Amendments at the May 28, 2026, hearing.** The revised Cap Adjustment Factor trajectory and the restructured Manufacturing Decarbonization Incentive framework represent a significant improvement **to mitigate emissions leakage and encourage industrial decarbonization** over the original Cap and Invest proposal. Adoption will help provide the industrial sector with a regulatory structure to encourage meaningful decarbonization investments, help minimize economic and emissions leakage, and backfill federal funding intended to promote decarbonization that was taken away by the federal government.

If you have any questions regarding CLECA's position, please contact Bruce A. Magnani at (916) 447-9884 or Audra Hartmann at (916) 441-0702.

Sincerely,

Bruce A. Magnani  
CLECA Legislative Advocate  
[bruce@houstonmagnani.com](mailto:bruce@houstonmagnani.com)

Audra Hartmann  
CLECA Legislative Advocate  
[audra@ppallc.com](mailto:audra@ppallc.com)

CC:

Ms. Lauren Sanchez, Chair, California Air Resources Board  
Honorable Steven S. Cliff, Ph.D., Executive Officer, California Air Resources Board  
Ms. Edie Chang, Deputy Executive Officer, California Air Resources Board  
Ms. Rajinder Sahota, Deputy Executive Officer, California Air Resources Board

Airgas USA, LLC • Air Products and Chemicals, Inc. • Anheuser-Busch • Ardagh Glass Inc. • CalPortland Company • CEMEX • CSI-Nucor-JFE • Kinder Morgan  
• Linde Inc. • Lineage Logistics • Messer North America, Inc. • Mitsubishi Cement Corporation •  
National Cement Company • Pacific Steel Group • Specialty Minerals, Inc. •  
UNACEM North America



May 26, 2026

The Honorable Corey A. Jackson, DSW, Assemblymember  
California Air Resources Board  
1001 "I" Street  
Post Office Box 2815  
Sacramento, California 95812

**Re: CLECA Requests the California Air Resources Board adopt the 15-Day Modifications to Proposed Cap-and-Invest Program**

Dear Assemblymember Jackson:

The California Large Energy Consumers Association (CLECA) is asking that you vote yes to adopt the 15-day package as presented by CARB staff, related to California's leading Cap and Invest Program.

CLECA represents some of California's largest industrial employers, including manufacturers, processors, and other energy-intensive businesses that are the backbone of the state's economy. Our members are predominantly energy-intensive and trade-exposed (EITE) industries – facilities that compete directly against producers in other states and countries that face lower energy costs, less stringent regulatory requirements, and no carbon compliance obligations.

**CLECA urges the Board to adopt the Cap-and-Invest proposed regulatory structure with 15 Day Amendments at the May 28, 2026, hearing.** The revised Cap Adjustment Factor trajectory and the restructured Manufacturing Decarbonization Incentive framework represent a significant improvement **to mitigate emissions leakage and encourage industrial decarbonization** over the original Cap and Invest proposal. Adoption will help provide the industrial sector with a regulatory structure to encourage meaningful decarbonization investments, help minimize economic and emissions leakage, and backfill federal funding intended to promote decarbonization that was taken away by the federal government.

If you have any questions regarding CLECA's position, please contact Bruce A. Magnani at (916) 447-9884 or Audra Hartmann at (916) 441-0702.

Sincerely,

Bruce A. Magnani  
CLECA Legislative Advocate  
[bruce@houstonmagnani.com](mailto:bruce@houstonmagnani.com)

Audra Hartmann  
CLECA Legislative Advocate  
[audra@ppallc.com](mailto:audra@ppallc.com)

CC:

Ms. Lauren Sanchez, Chair, California Air Resources Board  
Honorable Steven S. Cliff, Ph.D., Executive Officer, California Air Resources Board  
Ms. Edie Chang, Deputy Executive Officer, California Air Resources Board  
Ms. Rajinder Sahota, Deputy Executive Officer, California Air Resources Board



May 26, 2026

Mr. Cliff Rechtschaffen, Board Member  
California Air Resources Board  
1001 "I" Street  
Post Office Box 2815  
Sacramento, California 95812

**Re: CLECA Requests the California Air Resources Board adopt the 15-Day Modifications to Proposed Cap-and-Invest Program**

Dear Board Member Rechtschaffen:

The California Large Energy Consumers Association (CLECA) is asking that you vote yes to adopt the 15-day package as presented by CARB staff, related to California's leading Cap and Invest Program.

CLECA represents some of California's largest industrial employers, including manufacturers, processors, and other energy-intensive businesses that are the backbone of the state's economy. Our members are predominantly energy-intensive and trade-exposed (EITE) industries – facilities that compete directly against producers in other states and countries that face lower energy costs, less stringent regulatory requirements, and no carbon compliance obligations.

**CLECA urges the Board to adopt the Cap-and-Invest proposed regulatory structure with 15 Day Amendments at the May 28, 2026, hearing.** The revised Cap Adjustment Factor trajectory and the restructured Manufacturing Decarbonization Incentive framework represent a significant improvement **to mitigate emissions leakage and encourage industrial decarbonization** over the original Cap and Invest proposal. Adoption will help provide the industrial sector with a regulatory structure to encourage meaningful decarbonization investments, help minimize economic and emissions leakage, and backfill federal funding intended to promote decarbonization that was taken away by the federal government.

If you have any questions regarding CLECA's position, please contact Bruce A. Magnani at (916) 447-9884 or Audra Hartmann at (916) 441-0702.

Sincerely,

Bruce A. Magnani  
CLECA Legislative Advocate  
[bruce@houstonmagnani.com](mailto:bruce@houstonmagnani.com)

Audra Hartmann  
CLECA Legislative Advocate  
[audra@ppallc.com](mailto:audra@ppallc.com)

CC:

Ms. Lauren Sanchez, Chair, California Air Resources Board  
Honorable Steven S. Cliff, Ph.D., Executive Officer, California Air Resources Board  
Ms. Edie Chang, Deputy Executive Officer, California Air Resources Board  
Ms. Rajinder Sahota, Deputy Executive Officer, California Air Resources Board



May 26, 2026

Mr. David Silva, Board Member  
California Air Resources Board  
1001 "I" Street  
Post Office Box 2815  
Sacramento, California 95812

**Re: CLECA Requests the California Air Resources Board adopt the 15-Day Modifications to Proposed Cap-and-Invest Program**

Dear Board Member Silva:

The California Large Energy Consumers Association (CLECA) is asking that you vote yes to adopt the 15-day package as presented by CARB staff, related to California's leading Cap and Invest Program.

CLECA represents some of California's largest industrial employers, including manufacturers, processors, and other energy-intensive businesses that are the backbone of the state's economy. Our members are predominantly energy-intensive and trade-exposed (EITE) industries – facilities that compete directly against producers in other states and countries that face lower energy costs, less stringent regulatory requirements, and no carbon compliance obligations.

**CLECA urges the Board to adopt the Cap-and-Invest proposed regulatory structure with 15 Day Amendments at the May 28, 2026, hearing.** The revised Cap Adjustment Factor trajectory and the restructured Manufacturing Decarbonization Incentive framework represent a significant improvement **to mitigate emissions leakage and encourage industrial decarbonization** over the original Cap and Invest proposal. Adoption will help provide the industrial sector with a regulatory structure to encourage meaningful decarbonization investments, help minimize economic and emissions leakage, and backfill federal funding intended to promote decarbonization that was taken away by the federal government.

If you have any questions regarding CLECA's position, please contact Bruce A. Magnani at (916) 447-9884 or Audra Hartmann at (916) 441-0702.

Sincerely,

Bruce A. Magnani  
CLECA Legislative Advocate  
[bruce@houstonmagnani.com](mailto:bruce@houstonmagnani.com)

Audra Hartmann  
CLECA Legislative Advocate  
[audra@ppallc.com](mailto:audra@ppallc.com)

CC:

Ms. Lauren Sanchez, Chair, California Air Resources Board  
Honorable Steven S. Cliff, Ph.D., Executive Officer, California Air Resources Board  
Ms. Edie Chang, Deputy Executive Officer, California Air Resources Board  
Ms. Rajinder Sahota, Deputy Executive Officer, California Air Resources Board



May 26, 2026

Ms. Diane Takvorian, Board Member  
California Air Resources Board  
1001 "I" Street  
Post Office Box 2815  
Sacramento, California 95812

**Re: CLECA Requests the California Air Resources Board adopt the 15-Day Modifications to Proposed Cap-and-Invest Program**

Dear Board Member Takvorian:

The California Large Energy Consumers Association (CLECA) is asking that you vote yes to adopt the 15-day package as presented by CARB staff, related to California's leading Cap and Invest Program.

CLECA represents some of California's largest industrial employers, including manufacturers, processors, and other energy-intensive businesses that are the backbone of the state's economy. Our members are predominantly energy-intensive and trade-exposed (EITE) industries – facilities that compete directly against producers in other states and countries that face lower energy costs, less stringent regulatory requirements, and no carbon compliance obligations.

**CLECA urges the Board to adopt the Cap-and-Invest proposed regulatory structure with 15 Day Amendments at the May 28, 2026, hearing.** The revised Cap Adjustment Factor trajectory and the restructured Manufacturing Decarbonization Incentive framework represent a significant improvement **to mitigate emissions leakage and encourage industrial decarbonization** over the original Cap and Invest proposal. Adoption will help provide the industrial sector with a regulatory structure to encourage meaningful decarbonization investments, help minimize economic and emissions leakage, and backfill federal funding intended to promote decarbonization that was taken away by the federal government.

If you have any questions regarding CLECA's position, please contact Bruce A. Magnani at (916) 447-9884 or Audra Hartmann at (916) 441-0702.

Sincerely,

Bruce A. Magnani  
CLECA Legislative Advocate  
[bruce@houstonmagnani.com](mailto:bruce@houstonmagnani.com)

Audra Hartmann  
CLECA Legislative Advocate  
[audra@ppallc.com](mailto:audra@ppallc.com)

CC:

Ms. Lauren Sanchez, Chair, California Air Resources Board  
Honorable Steven S. Cliff, Ph.D., Executive Officer, California Air Resources Board  
Ms. Edie Chang, Deputy Executive Officer, California Air Resources Board  
Ms. Rajinder Sahota, Deputy Executive Officer, California Air Resources Board

Airgas USA, LLC • Air Products and Chemicals, Inc. • Anheuser-Busch • Ardagh Glass Inc. • CalPortland Company • CEMEX • CSI-Nucor-JFE • Kinder Morgan  
• Linde Inc. • Lineage Logistics • Messer North America, Inc. • Mitsubishi Cement Corporation •  
National Cement Company • Pacific Steel Group • Specialty Minerals, Inc. •  
UNACEM North America



May 26, 2026

Mr. Eric Guerra, Board Member  
California Air Resources Board  
1001 "I" Street  
Post Office Box 2815  
Sacramento, California 95812

**Re: CLECA Requests the California Air Resources Board adopt the 15-Day Modifications to Proposed Cap-and-Invest Program**

Dear Board Member Guerra:

The California Large Energy Consumers Association (CLECA) is asking that you vote yes to adopt the 15-day package as presented by CARB staff, related to California's leading Cap and Invest Program.

CLECA represents some of California's largest industrial employers, including manufacturers, processors, and other energy-intensive businesses that are the backbone of the state's economy. Our members are predominantly energy-intensive and trade-exposed (EITE) industries – facilities that compete directly against producers in other states and countries that face lower energy costs, less stringent regulatory requirements, and no carbon compliance obligations.

**CLECA urges the Board to adopt the Cap-and-Invest proposed regulatory structure with 15 Day Amendments at the May 28, 2026, hearing.** The revised Cap Adjustment Factor trajectory and the restructured Manufacturing Decarbonization Incentive framework represent a significant improvement **to mitigate emissions leakage and encourage industrial decarbonization** over the original Cap and Invest proposal. Adoption will help provide the industrial sector with a regulatory structure to encourage meaningful decarbonization investments, help minimize economic and emissions leakage, and backfill federal funding intended to promote decarbonization that was taken away by the federal government.

If you have any questions regarding CLECA's position, please contact Bruce A. Magnani at (916) 447-9884 or Audra Hartmann at (916) 441-0702.

Sincerely,

Bruce A. Magnani  
CLECA Legislative Advocate  
[bruce@houstonmagnani.com](mailto:bruce@houstonmagnani.com)

Audra Hartmann  
CLECA Legislative Advocate  
[audra@ppallc.com](mailto:audra@ppallc.com)

CC:

Ms. Lauren Sanchez, Chair, California Air Resources Board  
Honorable Steven S. Cliff, Ph.D., Executive Officer, California Air Resources Board  
Ms. Edie Chang, Deputy Executive Officer, California Air Resources Board  
Ms. Rajinder Sahota, Deputy Executive Officer, California Air Resources Board

Airgas USA, LLC • Air Products and Chemicals, Inc. • Anheuser-Busch • Ardagh Glass Inc. • CalPortland Company • CEMEX • CSI-Nucor-JFE • Kinder Morgan  
• Linde Inc. • Lineage Logistics • Messer North America, Inc. • Mitsubishi Cement Corporation •  
National Cement Company • Pacific Steel Group • Specialty Minerals, Inc. •  
UNACEM North America



May 26, 2026

Mr. John R. Balmes, MD, Board Member  
California Air Resources Board  
1001 "I" Street  
Post Office Box 2815  
Sacramento, California 95812

**Re: CLECA Requests the California Air Resources Board adopt the 15-Day Modifications to Proposed Cap-and-Invest Program**

Dear Board Member Balmes:

The California Large Energy Consumers Association (CLECA) is asking that you vote yes to adopt the 15-day package as presented by CARB staff, related to California's leading Cap and Invest Program.

CLECA represents some of California's largest industrial employers, including manufacturers, processors, and other energy-intensive businesses that are the backbone of the state's economy. Our members are predominantly energy-intensive and trade-exposed (EITE) industries – facilities that compete directly against producers in other states and countries that face lower energy costs, less stringent regulatory requirements, and no carbon compliance obligations.

**CLECA urges the Board to adopt the Cap-and-Invest proposed regulatory structure with 15 Day Amendments at the May 28, 2026, hearing.** The revised Cap Adjustment Factor trajectory and the restructured Manufacturing Decarbonization Incentive framework represent a significant improvement **to mitigate emissions leakage and encourage industrial decarbonization** over the original Cap and Invest proposal. Adoption will help provide the industrial sector with a regulatory structure to encourage meaningful decarbonization investments, help minimize economic and emissions leakage, and backfill federal funding intended to promote decarbonization that was taken away by the federal government.

If you have any questions regarding CLECA's position, please contact Bruce A. Magnani at (916) 447-9884 or Audra Hartmann at (916) 441-0702.

Sincerely,

Bruce A. Magnani  
CLECA Legislative Advocate  
[bruce@houstonmagnani.com](mailto:bruce@houstonmagnani.com)

Audra Hartmann  
CLECA Legislative Advocate  
[audra@ppallc.com](mailto:audra@ppallc.com)

CC:

Ms. Lauren Sanchez, Chair, California Air Resources Board  
Honorable Steven S. Cliff, Ph.D., Executive Officer, California Air Resources Board  
Ms. Edie Chang, Deputy Executive Officer, California Air Resources Board  
Ms. Rajinder Sahota, Deputy Executive Officer, California Air Resources Board

Airgas USA, LLC • Air Products and Chemicals, Inc. • Anheuser-Busch • Ardagh Glass Inc. • CalPortland Company • CEMEX • CSI-Nucor-JFE • Kinder Morgan  
• Linde Inc. • Lineage Logistics • Messer North America, Inc. • Mitsubishi Cement Corporation •  
National Cement Company • Pacific Steel Group • Specialty Minerals, Inc. •  
UNACEM North America



May 26, 2026

Ms. Lynda Hopkins, Board Member  
California Air Resources Board  
1001 "I" Street  
Post Office Box 2815  
Sacramento, California 95812

**Re: CLECA Requests the California Air Resources Board adopt the 15-Day Modifications to Proposed Cap-and-Invest Program**

Dear Board Member Hopkins:

The California Large Energy Consumers Association (CLECA) is asking that you vote yes to adopt the 15-day package as presented by CARB staff, related to California's leading Cap and Invest Program.

CLECA represents some of California's largest industrial employers, including manufacturers, processors, and other energy-intensive businesses that are the backbone of the state's economy. Our members are predominantly energy-intensive and trade-exposed (EITE) industries – facilities that compete directly against producers in other states and countries that face lower energy costs, less stringent regulatory requirements, and no carbon compliance obligations.

**CLECA urges the Board to adopt the Cap-and-Invest proposed regulatory structure with 15 Day Amendments at the May 28, 2026, hearing.** The revised Cap Adjustment Factor trajectory and the restructured Manufacturing Decarbonization Incentive framework represent a significant improvement **to mitigate emissions leakage and encourage industrial decarbonization** over the original Cap and Invest proposal. Adoption will help provide the industrial sector with a regulatory structure to encourage meaningful decarbonization investments, help minimize economic and emissions leakage, and backfill federal funding intended to promote decarbonization that was taken away by the federal government.

If you have any questions regarding CLECA's position, please contact Bruce A. Magnani at (916) 447-9884 or Audra Hartmann at (916) 441-0702.

Sincerely,

Bruce A. Magnani  
CLECA Legislative Advocate  
[bruce@houstonmagnani.com](mailto:bruce@houstonmagnani.com)

Audra Hartmann  
CLECA Legislative Advocate  
[audra@ppallc.com](mailto:audra@ppallc.com)

CC:

Ms. Lauren Sanchez, Chair, California Air Resources Board  
Honorable Steven S. Cliff, Ph.D., Executive Officer, California Air Resources Board  
Ms. Edie Chang, Deputy Executive Officer, California Air Resources Board  
Ms. Rajinder Sahota, Deputy Executive Officer, California Air Resources Board

Airgas USA, LLC • Air Products and Chemicals, Inc. • Anheuser-Busch • Ardagh Glass Inc. • CalPortland Company • CEMEX • CSI-Nucor-JFE • Kinder Morgan  
• Linde Inc. • Lineage Logistics • Messer North America, Inc. • Mitsubishi Cement Corporation •  
National Cement Company • Pacific Steel Group • Specialty Minerals, Inc. •  
UNACEM North America



May 26, 2026

Mr. Miguel Santiago, Board Member  
California Air Resources Board  
1001 "I" Street  
Post Office Box 2815  
Sacramento, California 95812

**Re: CLECA Requests the California Air Resources Board adopt the 15-Day Modifications to Proposed Cap-and-Invest Program**

Dear Board Member Santiago:

The California Large Energy Consumers Association (CLECA) is asking that you vote yes to adopt the 15-day package as presented by CARB staff, related to California's leading Cap and Invest Program.

CLECA represents some of California's largest industrial employers, including manufacturers, processors, and other energy-intensive businesses that are the backbone of the state's economy. Our members are predominantly energy-intensive and trade-exposed (EITE) industries – facilities that compete directly against producers in other states and countries that face lower energy costs, less stringent regulatory requirements, and no carbon compliance obligations.

**CLECA urges the Board to adopt the Cap-and-Invest proposed regulatory structure with 15 Day Amendments at the May 28, 2026, hearing.** The revised Cap Adjustment Factor trajectory and the restructured Manufacturing Decarbonization Incentive framework represent a significant improvement **to mitigate emissions leakage and encourage industrial decarbonization** over the original Cap and Invest proposal. Adoption will help provide the industrial sector with a regulatory structure to encourage meaningful decarbonization investments, help minimize economic and emissions leakage, and backfill federal funding intended to promote decarbonization that was taken away by the federal government.

If you have any questions regarding CLECA's position, please contact Bruce A. Magnani at (916) 447-9884 or Audra Hartmann at (916) 441-0702.

Sincerely,

Bruce A. Magnani  
CLECA Legislative Advocate  
[bruce@houstonmagnani.com](mailto:bruce@houstonmagnani.com)

Audra Hartmann  
CLECA Legislative Advocate  
[audra@ppallc.com](mailto:audra@ppallc.com)

CC:

Ms. Lauren Sanchez, Chair, California Air Resources Board  
Honorable Steven S. Cliff, Ph.D., Executive Officer, California Air Resources Board  
Ms. Edie Chang, Deputy Executive Officer, California Air Resources Board  
Ms. Rajinder Sahota, Deputy Executive Officer, California Air Resources Board



May 26, 2026

Ms. Patricia Lock Dawson, Board Member  
California Air Resources Board  
1001 "I" Street  
Post Office Box 2815  
Sacramento, California 95812

**Re: CLECA Requests the California Air Resources Board adopt the 15-Day Modifications to Proposed Cap-and-Invest Program**

Dear Board Member Lock Dawson:

The California Large Energy Consumers Association (CLECA) is asking that you vote yes to adopt the 15-day package as presented by CARB staff, related to California's leading Cap and Invest Program.

CLECA represents some of California's largest industrial employers, including manufacturers, processors, and other energy-intensive businesses that are the backbone of the state's economy. Our members are predominantly energy-intensive and trade-exposed (EITE) industries – facilities that compete directly against producers in other states and countries that face lower energy costs, less stringent regulatory requirements, and no carbon compliance obligations.

**CLECA urges the Board to adopt the Cap-and-Invest proposed regulatory structure with 15 Day Amendments at the May 28, 2026, hearing.** The revised Cap Adjustment Factor trajectory and the restructured Manufacturing Decarbonization Incentive framework represent a significant improvement **to mitigate emissions leakage and encourage industrial decarbonization** over the original Cap and Invest proposal. Adoption will help provide the industrial sector with a regulatory structure to encourage meaningful decarbonization investments, help minimize economic and emissions leakage, and backfill federal funding intended to promote decarbonization that was taken away by the federal government.

If you have any questions regarding CLECA's position, please contact Bruce A. Magnani at (916) 447-9884 or Audra Hartmann at (916) 441-0702.

Sincerely,

Bruce A. Magnani  
CLECA Legislative Advocate  
[bruce@houstonmagnani.com](mailto:bruce@houstonmagnani.com)

Audra Hartmann  
CLECA Legislative Advocate  
[audra@ppallc.com](mailto:audra@ppallc.com)

CC:

Ms. Lauren Sanchez, Chair, California Air Resources Board  
Honorable Steven S. Cliff, Ph.D., Executive Officer, California Air Resources Board  
Ms. Edie Chang, Deputy Executive Officer, California Air Resources Board  
Ms. Rajinder Sahota, Deputy Executive Officer, California Air Resources Board

Airgas USA, LLC • Air Products and Chemicals, Inc. • Anheuser-Busch • Ardagh Glass Inc. • CalPortland Company • CEMEX • CSI-Nucor-JFE • Kinder Morgan  
• Linde Inc. • Lineage Logistics • Messer North America, Inc. • Mitsubishi Cement Corporation •  
National Cement Company • Pacific Steel Group • Specialty Minerals, Inc. •  
UNACEM North America



May 26, 2026

Ms. Paula Stigler Granados, Ph.D., Board Member  
California Air Resources Board  
1001 "I" Street  
Post Office Box 2815  
Sacramento, California 95812

**Re: CLECA Requests the California Air Resources Board adopt the 15-Day Modifications to Proposed Cap-and-Invest Program**

Dear Board Member Stigler Granados:

The California Large Energy Consumers Association (CLECA) is asking that you vote yes to adopt the 15-day package as presented by CARB staff, related to California's leading Cap and Invest Program.

CLECA represents some of California's largest industrial employers, including manufacturers, processors, and other energy-intensive businesses that are the backbone of the state's economy. Our members are predominantly energy-intensive and trade-exposed (EITE) industries – facilities that compete directly against producers in other states and countries that face lower energy costs, less stringent regulatory requirements, and no carbon compliance obligations.

**CLECA urges the Board to adopt the Cap-and-Invest proposed regulatory structure with 15 Day Amendments at the May 28, 2026, hearing.** The revised Cap Adjustment Factor trajectory and the restructured Manufacturing Decarbonization Incentive framework represent a significant improvement **to mitigate emissions leakage and encourage industrial decarbonization** over the original Cap and Invest proposal. Adoption will help provide the industrial sector with a regulatory structure to encourage meaningful decarbonization investments, help minimize economic and emissions leakage, and backfill federal funding intended to promote decarbonization that was taken away by the federal government.

If you have any questions regarding CLECA's position, please contact Bruce A. Magnani at (916) 447-9884 or Audra Hartmann at (916) 441-0702.

Sincerely,

Bruce A. Magnani  
CLECA Legislative Advocate  
[bruce@houstonmagnani.com](mailto:bruce@houstonmagnani.com)

Audra Hartmann  
CLECA Legislative Advocate  
[audra@ppallc.com](mailto:audra@ppallc.com)

CC:

Ms. Lauren Sanchez, Chair, California Air Resources Board  
Honorable Steven S. Cliff, Ph.D., Executive Officer, California Air Resources Board  
Ms. Edie Chang, Deputy Executive Officer, California Air Resources Board  
Ms. Rajinder Sahota, Deputy Executive Officer, California Air Resources Board



May 26, 2026

The Honorable Henry Stern, Senator  
California Air Resources Board  
1001 "I" Street  
Post Office Box 2815  
Sacramento, California 95812

**Re: CLECA Requests the California Air Resources Board adopt the 15-Day Modifications to Proposed Cap-and-Invest Program**

Dear Senator Stern:

The California Large Energy Consumers Association (CLECA) is asking that you vote yes to adopt the 15-day package as presented by CARB staff, related to California's leading Cap and Invest Program.

CLECA represents some of California's largest industrial employers, including manufacturers, processors, and other energy-intensive businesses that are the backbone of the state's economy. Our members are predominantly energy-intensive and trade-exposed (EITE) industries – facilities that compete directly against producers in other states and countries that face lower energy costs, less stringent regulatory requirements, and no carbon compliance obligations.

**CLECA urges the Board to adopt the Cap-and-Invest proposed regulatory structure with 15 Day Amendments at the May 28, 2026, hearing.** The revised Cap Adjustment Factor trajectory and the restructured Manufacturing Decarbonization Incentive framework represent a significant improvement **to mitigate emissions leakage and encourage industrial decarbonization** over the original Cap and Invest proposal. Adoption will help provide the industrial sector with a regulatory structure to encourage meaningful decarbonization investments, help minimize economic and emissions leakage, and backfill federal funding intended to promote decarbonization that was taken away by the federal government.

If you have any questions regarding CLECA's position, please contact Bruce A. Magnani at (916) 447-9884 or Audra Hartmann at (916) 441-0702.

Sincerely,

Bruce A. Magnani  
CLECA Legislative Advocate  
[bruce@houstonmagnani.com](mailto:bruce@houstonmagnani.com)

Audra Hartmann  
CLECA Legislative Advocate  
[audra@ppallc.com](mailto:audra@ppallc.com)

CC:

Ms. Lauren Sanchez, Chair, California Air Resources Board  
Honorable Steven S. Cliff, Ph.D., Executive Officer, California Air Resources Board  
Ms. Edie Chang, Deputy Executive Officer, California Air Resources Board  
Ms. Rajinder Sahota, Deputy Executive Officer, California Air Resources Board

Airgas USA, LLC • Air Products and Chemicals, Inc. • Anheuser-Busch • Ardagh Glass Inc. • CalPortland Company • CEMEX • CSI-Nucor-JFE • Kinder Morgan  
• Linde Inc. • Lineage Logistics • Messer North America, Inc. • Mitsubishi Cement Corporation •  
National Cement Company • Pacific Steel Group • Specialty Minerals, Inc. •  
UNACEM North America



May 26, 2026

Ms. Susan Shaheen, Ph.D., Board Member  
California Air Resources Board  
1001 "I" Street  
Post Office Box 2815  
Sacramento, California 95812

**Re: CLECA Requests the California Air Resources Board adopt the 15-Day Modifications to Proposed Cap-and-Invest Program**

Dear Board Member Shaheen:

The California Large Energy Consumers Association (CLECA) is asking that you vote yes to adopt the 15-day package as presented by CARB staff, related to California's leading Cap and Invest Program.

CLECA represents some of California's largest industrial employers, including manufacturers, processors, and other energy-intensive businesses that are the backbone of the state's economy. Our members are predominantly energy-intensive and trade-exposed (EITE) industries – facilities that compete directly against producers in other states and countries that face lower energy costs, less stringent regulatory requirements, and no carbon compliance obligations.

**CLECA urges the Board to adopt the Cap-and-Invest proposed regulatory structure with 15 Day Amendments at the May 28, 2026, hearing.** The revised Cap Adjustment Factor trajectory and the restructured Manufacturing Decarbonization Incentive framework represent a significant improvement **to mitigate emissions leakage and encourage industrial decarbonization** over the original Cap and Invest proposal. Adoption will help provide the industrial sector with a regulatory structure to encourage meaningful decarbonization investments, help minimize economic and emissions leakage, and backfill federal funding intended to promote decarbonization that was taken away by the federal government.

If you have any questions regarding CLECA's position, please contact Bruce A. Magnani at (916) 447-9884 or Audra Hartmann at (916) 441-0702.

Sincerely,

Bruce A. Magnani  
CLECA Legislative Advocate  
[bruce@houstonmagnani.com](mailto:bruce@houstonmagnani.com)

Audra Hartmann  
CLECA Legislative Advocate  
[audra@ppallc.com](mailto:audra@ppallc.com)

CC:

Ms. Lauren Sanchez, Chair, California Air Resources Board  
Honorable Steven S. Cliff, Ph.D., Executive Officer, California Air Resources Board  
Ms. Edie Chang, Deputy Executive Officer, California Air Resources Board  
Ms. Rajinder Sahota, Deputy Executive Officer, California Air Resources Board

Airgas USA, LLC • Air Products and Chemicals, Inc. • Anheuser-Busch • Ardagh Glass Inc. • CalPortland Company • CEMEX • CSI-Nucor-JFE • Kinder Morgan  
• Linde Inc. • Lineage Logistics • Messer North America, Inc. • Mitsubishi Cement Corporation •  
National Cement Company • Pacific Steel Group • Specialty Minerals, Inc. •  
UNACEM North America



May 26, 2026

Ms. Tania Pacheco-Werner, Ph.D., Board Member  
California Air Resources Board  
1001 "I" Street  
Post Office Box 2815  
Sacramento, California 95812

**Re: CLECA Requests the California Air Resources Board adopt the 15-Day Modifications to Proposed Cap-and-Invest Program**

Dear Board Member Pacheco-Werner:

The California Large Energy Consumers Association (CLECA) is asking that you vote yes to adopt the 15-day package as presented by CARB staff, related to California's leading Cap and Invest Program.

CLECA represents some of California's largest industrial employers, including manufacturers, processors, and other energy-intensive businesses that are the backbone of the state's economy. Our members are predominantly energy-intensive and trade-exposed (EITE) industries – facilities that compete directly against producers in other states and countries that face lower energy costs, less stringent regulatory requirements, and no carbon compliance obligations.

**CLECA urges the Board to adopt the Cap-and-Invest proposed regulatory structure with 15 Day Amendments at the May 28, 2026, hearing.** The revised Cap Adjustment Factor trajectory and the restructured Manufacturing Decarbonization Incentive framework represent a significant improvement **to mitigate emissions leakage and encourage industrial decarbonization** over the original Cap and Invest proposal. Adoption will help provide the industrial sector with a regulatory structure to encourage meaningful decarbonization investments, help minimize economic and emissions leakage, and backfill federal funding intended to promote decarbonization that was taken away by the federal government.

If you have any questions regarding CLECA's position, please contact Bruce A. Magnani at (916) 447-9884 or Audra Hartmann at (916) 441-0702.

Sincerely,

Bruce A. Magnani  
CLECA Legislative Advocate  
[bruce@houstonmagnani.com](mailto:bruce@houstonmagnani.com)

Audra Hartmann  
CLECA Legislative Advocate  
[audra@ppallc.com](mailto:audra@ppallc.com)

CC:

Ms. Lauren Sanchez, Chair, California Air Resources Board  
Honorable Steven S. Cliff, Ph.D., Executive Officer, California Air Resources Board  
Ms. Edie Chang, Deputy Executive Officer, California Air Resources Board  
Ms. Rajinder Sahota, Deputy Executive Officer, California Air Resources Board

Airgas USA, LLC • Air Products and Chemicals, Inc. • Anheuser-Busch • Ardagh Glass Inc. • CalPortland Company • CEMEX • CSI-Nucor-JFE • Kinder Morgan  
• Linde Inc. • Lineage Logistics • Messer North America, Inc. • Mitsubishi Cement Corporation •  
National Cement Company • Pacific Steel Group • Specialty Minerals, Inc. •  
UNACEM North America