



**Lathrop Irrigation District Comments on the Proposed Amendments
to the Regulation for the California Cap on Greenhouse Gas Emissions and
Market-Based Compliance Mechanisms**

March 9, 2026

Lathrop Irrigation District (“LID”)¹ appreciates the opportunity to provide these comments on the California Air Resources Board’s (“CARB”) Proposed Amendments to the Regulation for the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms (“Cap-and-Trade Regulation”).

LID has reviewed the proposed amendments to the Cap-and-Trade Regulation language and requests modifications to Tables 9-3 and 9-4. LID qualifies as an Electrical Distribution Utility (“EDU”) per the definition of an EDU in Section 95802 of the Cap-and-Trade Regulation. However, LID is not included in Tables 9-3 or 9-4 of the Proposed Regulation Order, which list annual allowances allocated to each EDU from 2021 through 2030 and from 2031 through 2035, respectively.

LID began providing retail electric service in April 2013 after being formed in 2002. LID was formed to be the electric provider for homes and businesses on Stewart Tract, a new and growing section of the City of Lathrop. LID is a publicly owned utility that serves retail customers through LID’s transmission and distribution facilities. LID has an elected board comprised of land-owners that is answerable to local residents.

LID respectfully requests that CARB modify Tables 9-3 and 9-4 in the Cap-and-Trade Regulation to include LID, making LID an eligible resource to receive free allocation of allowances.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Erik Jones", is written over a horizontal line.

Erik Jones
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¹ LID serves electricity to residences and businesses within the River Islands at Lathrop development. For more information, please visit <https://www.lathropirrigation.com/>.