

Emissions Experts Inc (Michael Taylor)

Please find comments regarding the following proposed language "95833. Disclosure of Corporate Associations. (c)(3) "A covered entity or opt-in covered entity subject to a direct corporate association pursuant to section 95833(a)(6) due to a relationship with an individual Cap-and-Invest Consultant or Advisor who has shared roles is not required to disclose direct corporate association information resulting from the relationship and is not required to apply for the Shared Role Exemption described in section 95833(c)(4) if the Cap-and-Invest Consultant or Advisor both provides Cap-and-Invest consulting services pursuant to section 95979(b)(2) to only covered entities, opt-in covered entities, or both, and does not have a user account in the tracking system."

Numerous small compliance entities have relied on Cap-and Invest Consultants since 2012 to assist them with compliance with the Cap-and-Invest Program. This includes having consultants familiar with the CITSS tracking system and assisting them with numerous tasks including sharing screens and walking employees of these small firms through their three accounts in CITSS and do transfers from their general account to their compliance accounts. Many small businesses have not been able to afford to hire a dedicated employee to manage all the aspects to comply with the Cap-and-Invest Program and rely on consultants. Some of the services have included ensuring their CITSS account is ready for each annual compliance date as well as understanding how to accept and or initiate pending transfers from their general account, and how to check their annual allocation as well as to manage where to have their True UP amount in CITSS for past years as not easy for many small businesses. ARB regulations have allowed for 14 years for consultants to have access to tracking system, and this change especially harms small businesses. I have not seen any of the small businesses with consultants who have view only access express support to ARB for this meaningful change to the program after 14 years of benefits have been received.

Please amend the proposed language with prevents Consultants access to the tracking system as clause that would require entities to apply for Shared Role Exemption.

In addition, ARB has utilized Consultants with access to the tracking system to assist in reaching out to companies that were on path to not comply with the regulations when ARB was unsuccessful in getting any response from those firms. This removes a tool ARB has successfully used in the past to ensure as close to 100% compliance with program as possible. Air Pollutant Specialists in ARB's Market Monitoring Section have experience utilizing this tool.

Thank you.