



September 18, 2012

Ms. Mary Jane Coombs  
Manager, Greenhouse Gas Markets  
California Environmental Protection Agency  
Air Resources Board  
1001 I Street, P.O. Box 2815  
Sacramento, CA 95812

Dear Ms. Coombs:

This letter is in reference to your email to me on August 7<sup>th</sup>.

While we remain committed to working with CARB and Ecofys to ensure that representative data from our facilities is considered as a benchmark is developed for the glass container industry, we have grown increasingly frustrated that more definitive information in our request for the scope of the work to be performed by Ecofys was absent from your response.

Specifically, the California glass container industry remains concerned that the data request to our industry from Ecofys (2010-2011) will not be representative of early action taken by our industry.

As we explained in our June 29<sup>th</sup> letter to Ecofys, conclusions based on the data requested (2010-2011) could only serve to misinform CARB, if the only data were limited to those years.

Critically, the data requested does not address the early action taken by the glass container industry to reduce carbon emissions. Any reference to 2010 and 2011 data is not germane to an evaluation of "early action."

The years selected to be utilized for our industry's benchmarking is critical to the continuing operations of the California glass container industry. As an Energy-Intensive-Trade-Exposed industry, setting benchmarking levels without considering the broad base of data from earlier years places the California glass industry in a precarious position.

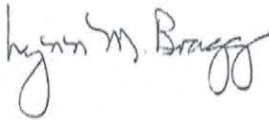
GPI's members have consistently and repeatedly stated that the best years to utilize for the benchmark are 2005 – 2007 and even earlier. We remain willing to provide this information to Ecofys. We are happy to work with you to validate any of the data from these years.

California's glass plant's unique role and early actions in recycling and cullet use, when compared to other states (and countries) is significant. Proper recognition will help serve to protect the California industry from competitive advantages that glass plants in other countries and states enjoy. The California glass container manufacturers operate some of the most efficient facilities in the world, and this is largely attributable to technology advancements and the high use of cullet.

We would also like to ensure that Ecofys is permitted to use their professional judgment and autonomy, as the appropriate years for setting the baseline and benchmarking are determined.

On behalf of the California glass manufacturing industry, we would appreciate the opportunity to discuss the data needed to put together a schedule for submission of information relevant to your request.

Sincerely,



Lynn M. Bragg  
President

CC: Mary Nichols, Chair, California Air Resources Board  
Dee Dee D'Adamo, Board Member, California Air Resources Board  
Michael Rossi, Office of Governor Jerry Brown