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Clerk of the Board
Air Resources Board
1001 "I" Street, 23rd Floor
Sacramento, CA 95814

RE: Low Carbon Fuel Standard

Dear Board Members:

Sempra Energy submits these comments concerning the Second Notice of Public Availability of Modified Text and Availability of Additional Documents and Information released September 23, 2009. During the past year, Sempra Energy has filed multiple comments concerning GREET model inputs for imported LNG, most recently on August 19, 2009 and September 9, 2009. These comments noted that the California-modified GREET model pathway for natural gas from remote sources was set to double-count process emissions under both "Processing" and "Overseas Liquefaction" (see e.g., page 5 of the September 23, 2009 v.2 document). Prior Sempra Energy comments provided information showing that processing is included within the liquefaction plant emissions at overseas facilities. We also noted that the assumed transportation distance of over 8,000 was unrealistic and that a distance of 5,000-6,000 miles is more likely.

Since no change has been made to the September 23, 2009 pathway document or to the value listed in the Look-Up Table 6, (page 48-49 of the regulation) from the value set forth in the July 20, 2009 version, we must assume that ARB staff have thus far not accepted our recommended changes. The result is that the values reflected in Table 6 for imported LNG are inaccurate estimates. Values for overseas LNG are overstated by at least 4.0 gCO₂e/MJ. We have not yet seen an explanation of why staff have chosen not to accept these comments, if that is the case. Sempra Energy requests that the Look Up Table 6 be changed to provide a more accurate carbon intensity for imported LNG.

Thank you for considering these comments. Sempra Energy would be pleased to continue to work with your staff to resolve our remaining concerns with the regulation.

Yours sincerely,

A handwritten signature in black ink, appearing to read "M. Murray".

cc: Mr. James Goldstene
Mr. Dean Simeroth
Mr. Anil Prabhu
Mr. Floyd Vergara