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Michelle Buffington, Air Pollution Specialist  
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P.O. Box 2815  
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Re: Comments on June 30/July 1, 2011 LCFS Advisory Panel Meeting Documents

Dear Ms. Buffington,

Thank you for the opportunity to comment on the agenda items and documents for the recent LCFS Advisory Panel meeting on June 30 and July 1, 2011. SDG&E offers the following comments and observations:

Topics 6 & 7 – Supply and Availability outline. This chapter should include additional coverage of natural gas vehicles by adding to natural gas vehicles to section I.D. Vehicle Technology and Commercialization.

Topics 8 & 12 – Economic Impacts outline. This chapter should include an analysis of the impact of LCFS credits generated by using electricity as a transportation fuel. Electricity as a transportation fuel should be included in section A.2. “Purpose for Revisiting the Topic” and section B.2. “Impact on the State”. One potential impact could be on electricity rates as LCFS credits generated by electric utilities are flowed to customers.

Respectfully submitted,

Alex Y. Kim  
Director, Customer Innovations  
San Diego Gas & Electric