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Rajinder Sahota, Deputy Executive Officer
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812-2815

Subject: Comments on the 2022 Scoping Plan Update – Initial Modeling Results Workshop

Dear Deputy Executive Officer Sahota:

Southern California Gas Company (SoCalGas) appreciates the efforts California Air Resources Board (CARB) staff and consultants put into the March 15, 2022 California Air Resources Board (CARB) 2022 Scoping Plan Update – Initial Modeling Results Workshop. CARB staff have been given a challenging task to put forth a viable pathway to achieve the State’s respective climate goals in 2030, 2035 and 2045. Public review, comments, and engagement enhances the 2022 Scoping Plan and supports the development of outcomes in advancing the public interest.

To achieve the State’s emission reduction goals, it is critical that the planning alternatives considered be feasible and cost-effective. The ability to appropriately determine these guideposts is dependent on transparency and access to underlying data used in the assessments as part of Scoping Plan activities. The opportunity to review the cost data or the detailed assumptions and metrics utilized in the modeling presented is critical. It presents challenges for stakeholders and the public to meaningfully participate and evaluate the feasibility or cost-effectiveness of the modeled alternatives without access to this information. Understanding the data behind the modeling is important, as the modeling will better inform and refine the policies implemented to achieve the State’s goals.

SoCalGas recognizes and appreciates the work put into the modeling scenarios presented at the workshop. However, SoCalGas respectfully submits that the information provided does not include sufficient detail to perform meaningful review as to the prospective implications and merits of each modeled scenario. Determining and rendering findings on technological feasibility and cost-effectiveness are at the core of CARB’s enabling authority. Without the opportunity to review the underlying data and assumptions, the extent to which the modeling results incorporate and

address affordability, practical achievability, reliability, and leakage minimization remains uncertain.

Prospective policy alternatives must achieve carbon neutrality while likewise maintaining an affordable, reliable, and resilient energy system for diverse populations and businesses statewide. In this regard, several of the alternative scenarios modeled do not appear to support viable policy alternatives for advancing climate policy. For instance, alternative 1 calls for only ZEVs on the road by 2035, this expedited timeline would be costly to consumers, is not practically achievable due to the low customer adoption rates and will lead to a lack of sufficient infrastructure for ZEV operators throughout the state. Stakeholders would benefit by CARB releasing the underlying data that was utilized to run the PATHWAYS model and the complete results. Transparency is a prerequisite for informed decision making and for beneficial prospective policy outcomes. Making the data available as soon as feasible will provide stakeholders with the opportunity to analyze the data, perform reliability analysis, and provide meaningful comments on the modeled scenarios, so as to improve upon both the questions being assessed and the policy outcome.

We look forward to receiving and reviewing the modeling data and to further engaging with CARB staff and stakeholders to jointly determine a cost-effective, equitable, and sustainable path in pursuit of greenhouse gas emission reduction targets. We also look forward to a continued open and collaborative process among policymakers, stakeholders and energy market participants to develop the solutions needed to achieve our shared carbon neutrality targets.

Respectfully,

/s/ Kevin Barker

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