

October 24, 2007

Ms. Mary D. Nichols
Chair, California Air Resources Board
California Environmental Protection Agency
1001 I Street
Sacramento CA, 95814

**Re: *Comments of Southern California Edison Company on the
Expanded List of Early Action Measures***

Dear Ms. Nichols:

Earlier this month, the California Air Resources Board ("CARB") issued its *Expanded List of Early Action Measures to Reduce Greenhouse Gas Emissions in California Recommended for Board Consideration*. This list of discreet early actions sets forth measures that CARB intends to regulate by January 1, 2010 in order to reduce greenhouse gas ("GHG") emissions. Southern California Edison Company ("SCE") supports the revised list of discreet early actions.

Despite this support, SCE urges CARB to exercise due caution if it intends to expand this list of discreet early actions. Given proper incentives, SCE believes those subject to mandatory reductions of GHG emissions under Assembly Bill 32 will develop cost-effective means of doing so. Developing innovative ways of reducing GHG emissions requires that regulated entities be assured that their efforts will yield credits that can be used to meet compliance obligations. An aggressive expansion of regulated discreet early actions could be detrimental to parties' efforts to add cost-effective, voluntary, early and longer-term actions to California's GHG emissions reduction programs. CARB should not discourage such voluntary action.

SCE thanks CARB for its continued efforts to implement Assembly Bill 32. SCE appreciates the listing of early actions and supports any additional efforts to define a process for expediting voluntary actions which can be taken by businesses, local governments or other entities. The development of guidelines for discreet or other early actions should go hand in hand with the development of a process to encourage voluntary early and long-term actions to reduce GHG emissions in the most cost-effective manner.

Thank you for your consideration of these comments. We look forward to continued collaboration in the implementation of Assembly Bill 32.

Very truly yours,



Michael M. Hertel

MMHLIG/g 1422236

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