



An EDISON INTERNATIONAL Company

Dr. Michael Hertel - 07-10-2

Michael M. Hertel
Director of Corporate Environmental Policy
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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 Concepts for Promoting and Recognizing Voluntary Early Actions* (October 25 Board Agenda item 07-10-02)

Dear Ms. Nichols:

Southern California Edison urges the Board to direct staff to develop methodologies for granting credit for voluntary early actions to reduce greenhouse gas emissions as specified in Assembly Bill 32. Since the enactment of Assembly Bill 32 SCE has worked to develop a portfolio of projects to reduce GHG emissions that can be carried out quickly and that can be granted credit in final rules adopted by the Board to implement Assembly Bill 32. Edison's voluntary early action portfolio focuses on projects that provide cost-effective GHG reductions; many of which, provide co benefits, such as benefits of reduced smog-forming emissions to underserved communities. SCE plans to submit its portfolio of projects with their respective methodologies to the staff to provide case examples that can aid in the development of the methodology to grant credit for voluntary early actions. We look forward to working with the Board and the staff to encourage the development of cost-effective ways of reducing GHG emissions to meet the goals of Assembly Bill 32.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Michael M. Hertel", written in a cursive style.

Michael M. Hertel

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