



**Pacific Gas and
Electric Company™**

John W. Busterud

Mailing Address
P.O. Box 7442
San Francisco, CA 94120

Street/Courier Address
Law Department
77 Beale Street
San Francisco, CA 94105

(415) 973-6617
Fax: (415) 973-0516
Internet: JWBb@pge.com

June 5, 2008

Ms. Mary Nichols, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95812

Re: California Air Resources Board Adoption of Mandatory Greenhouse Gas Reporting
Regulations Pursuant to the California Global Warming Solutions Act of 2006 (AB32)

Dear Ms. Nichols:

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to comment on the additional modifications to Air Resources Board (ARB) staff's proposed mandatory greenhouse gas reporting regulations. PG&E commends ARB staff on its diligent efforts to further refine these reporting requirements.

PG&E believes that accurate and comprehensive emissions reporting is critical to AB 32 implementation and will support the State's effort to reach its emissions reduction goal. We encourage the ARB to consider the need for future refinements to the reporting regulations as it develops the Scoping Plan and overall AB32 compliance program. PG&E looks forward to working with the ARB to address any issues that may arise between promulgation of these regulations and adoption of the final AB32 regulatory program.

PG&E also believes it is important to align state and emerging federal reporting requirements, given the likelihood of future national greenhouse gas regulation. The U.S. Environmental Protection Agency (EPA) is developing a nationwide reporting regulation, in accordance with a statutory deadline for a draft rule by September 2008 and a final rule by June 2009. EPA is presently meeting with stakeholders to discuss the proposed rule and seek public comments. We encourage the ARB to work with EPA as it develops the proposed national rules, and seek alignment between California's reporting regulation and EPA's national reporting program. Using a uniform national reporting standard would reduce the likelihood of duplicative or conflicting requirements, while ARB's support for a federal reporting system would demonstrate California's leadership in furthering a national response to climate change.

In addition, PG&E encourages the ARB to expeditiously develop a reporting interface, and to communicate, as soon as possible, the specific requirements for meeting April 1, 2009 reporting deadlines. Given the time needed to compile 2008 generation and transaction data from numerous sources, we believe that all parties would benefit from as much detailed guidance as possible on ARB's specific expectations for data submittals.

Ms. Mary Nichols, Chair
June 5, 2008
Page 2

PG&E appreciates the opportunity to provide these comments, and looks forward to working with the ARB to ensure the successful implementation of the greenhouse gas reporting requirements. If you or your staff have any questions, or if we can be of further assistance, please do not hesitate to call me at (415) 973-6617, or Soumya Sastry at (415) 973-3295.

Sincerely,

/s/

John W. Busterud

JWB:kp

cc: Lori Andreoni
Charles Shulock
Richard Bode
Pam Burmich
Doug Thompson

California Air Resources Board
1001 I Street
Sacramento, CA 95814