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Mr. Richard Bode
Chief, Emissions Inventory Branch.
Air Resources Board
1001 I Street
Sacramento, CA 95812

Re: May 15, 2008 Notice for Comment;
Mandatory Reporting of Greenhouse Emissions

Dear Mr. Bode:

Semptra Energy appreciates the opportunity to provide comments on the modified text to the Regulation for Mandatory Reporting of Greenhouse Gas Emissions. These comments are being submitted to the Clerk of the Board in response to the Notice of Public Availability of Modified Text, dated May 15, 2008.

We would first like to commend ARB staff's work and responses to earlier comments that were made to the regulations as published in October 19th 2007. In particular, the increase of the de minimis sources cap from 10,000 to 20,000 and the allowance for operators of multiple facilities to aggregate SF6 emissions for all or any subset of sources were very helpful. Overall, changes to the October document have provided increased clarity.

We do have some concern regarding the addition of statement on page A-114, (c) (3) that reads "shall be provided at least ten working days to modify the emissions data report to correct any material misstatement or nonconformance found by the verification team." With the potential for multiple third party verifications at a number of facilities within a single organization, ten working days may not be a sufficient time window for a verifier and potential groups of facilities to reconcile emission data corrections. We suggest a longer time of 30 calendar days or 20 working days, similar to the amount of time allow for Section 95105 (b) of the regulation regarding data requests. The additional time would help insure a reasonable reconciliation period prior to the required submittal to CARB.

At the June 3, 2008 ARB workshop on Reporting, Verification and Enforcement, comments were solicited concerning whether further changes are needed in the mandatory reporting regulations, primarily to address potential additional matters related to potential cap and trade system. SEU defers comment on these matters and is only addressing the technical aspects of the existing regulation as noticed on May 15, 2008 in these comments. Thank you for this opportunity to comment on the regulation as noticed on May 15, 2008.

Sincerely yours,

A handwritten signature in black ink that reads "Taylor Miller".

Taylor O. Miller
Senior Environmental Counsel

Cc: Clerk of the Board
Pam Burmich
Doug Thompson