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Ms. Pam Burmich
Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Sempra Energy Comments on Mandatory Reporting
Regulation

Dear Ms Burmich:

Thank you for the opportunity to further comment on the Mandatory Greenhouse Gas Reporting Regulation.

There is one additional minor change that Sempra Energy suggests should be incorporated into the regulation. We recommend a specific statement of exemption for internal combustion engines used exclusively as fire pumps. This category of equipment is used and tested for emergency services only and should be treated like other emergency equipment in the regulation.

The current regulation includes language exempting generating units designated as backup or emergency generators in a permit issued by an Air Pollution Control District of Air Quality Management District. Similarly additional language exempting internal combustion engines designated as a fire pumps and/or emergency fire pumps in a permit issued by an APCD or AQMD should also be incorporated into the regulation.

Thank you for considering this comment and your cooperation during the period of development of the regulation.

Sincerely yours,

A handwritten signature in black ink that reads 'Taylor O. Miller'.

Taylor O. Miller

Cc: Doug Thompson