

Tamara Rasberry
Manager
State Agency Government Affairs

925 L Street, Ste 650, Sacramento, CA 95814
Tel: 916.492.4252 Mobile: 916.205.7084 Fax: 916.443.2994
trasberry@semptrautilities.com



Tamara Rasberry

12-6-2

Darrell R. Johnson
Principal Air Quality Specialist
Environmental Programs

555 West 5th Street, GT17E2
Los Angeles, Ca. 90013

(213) 244-2142
Fax: (213) 244-8046
djohnson@semptrautilities.com

September 19th, 2012

California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Proposed Amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions

Dear Board Members:

Southern California Gas Company (SoCalGas) appreciates the opportunity to comment on proposed changes to the Regulation for the Mandatory Reporting of Greenhouse (GHG) emissions. We support the Air Resources Board's (ARB) efforts to align California's GHG emissions reporting with updates to the United States Environmental Protection Agency (EPA) Final Rule on Mandatory Reporting of Greenhouse Gases to streamline and avoid duplicate GHG reporting and to continue to provide the quality data needed to support California's Cap-and-Trade regulation. These comments recommend changes to areas in the proposed amendments that are inconsistent with EPA alignment and are not data needed for the cap-and-trade program.

Section 95153(a). Natural Gas Pneumatic Devices needs a Requirement and Definition Changes.

The current definition of intermittent bleed pneumatic devices does not correctly represent actual emissions and treats this category of equipment exactly like a continuous high bleed device. The regulation currently states, "high bleed devices are defined as all natural gas powered devices (both intermittent and continuous bleed devices which bleed at a rate greater than 6 scf/hr." Intermittent bleed pneumatic devices are snap-acting or throttling devices that discharge all or a portion of the full volume of the actuator intermittently when a control action is necessary.

A design bleed rate for an intermittent device can only relate the potential gas volume a device would release at a maximum for an hour, assuming it was open for that entire hour. The inherent nature of an intermittent device is to only release gas when actuated.

ARB should not consider an intermittent device in the same category as a continuous high bleed device. EPA allows reporters to determine the type of pneumatic devices using engineering estimation based on best available information and SoCalGas suggests that ARB do the same.

By trying to reclassify intermittent devices as high bleed pneumatic devices with the use of the cumulative bleed rate of 6 standard cubic feet per hour, ARB has in turn added a new requirement to reporting that does not align with current EPA's regulation.

It is important to mention that estimated emissions from this category of equipment have overall been very small. SoCalGas recommends that intermittent bleed devices be excluded from the requirement to install metering.

Additionally, SoCalGas also suggest revisions to Section 95152(a), where it states that "For unmetered devices the operator must use the method specified in section 95153(a)." Section 95153(b), "Non-metered Natural Gas Pneumatic Device Venting" would be the actual correction needed to appropriately align the references.

Section 95152. Equipment and Pipeline Blowdowns in Natural Gas Distribution Systems Should Allow for Engineering Estimates.

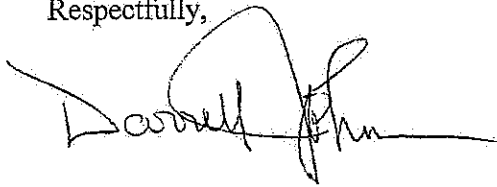
Section 95152(i) requires the operator to report CO₂, CH₄, and N₂O emissions from equipment and pipeline blowdowns. The means of reporting is then stipulated in Section 95153(g), where temperature at actual conditions in the unique physical volume (°F) and absolute pressure at actual conditions in the unique physical volume are required. These requirements are above and beyond alignment with the EPA regulation. They are not an emission needed to support the State's Cap-and-Trade regulation as the emissions would be incorporated under Section 95122 as an allowance obligation for suppliers of natural gas.

The requirement to calculate the temperature and pressure at actual condition for equipment and system blowdown throughout the entire distribution system for SoCalGas would require substantial changes to present operations. It is not a current practice and would entail the development of new work practices, employee training, and equipment and system changes.

SoCalGas suggests that ARB revise the calculation requirements found in Section 95153(g) to add and/or allow for the use of engineering calculations for pressure and temperature based on current industry standards.

Thank you very much for the opportunity to submit these comments.

Respectfully,

A handwritten signature in black ink, appearing to read "David J. Smith", with a stylized flourish at the end.