




A  Semptra Energy utility®

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California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**RE: 15 Day Rule Language 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.

On Sep 20, 2012, CARB revised Subpart W to require annual compressor vent measurements for all 3 modes of operation if operating hours in each mode exceeds 200 hours. This language deviates from EPA Subpart W language that requires an annual measurement in each mode that a compressor is found. SCG would like to emphasize the importance of harmonized regulations to ease the reporting obligation and to ensure that consistent emissions are reported at State and Federal levels.

The change in language has the potential to cause a severe burden to SCG. In 2011, SCG had a total of 40 compressors that were subject to Subpart W. These compressors are located in facilities from Los Angeles to the Arizona border. It would be an overwhelming task for our centralized engineering group to manage up to 120 separate measurements each year. It is likely that measurements will be required at multiple sites at the same time, requiring additional resources, equipment and training. In addition, it is possible that measurements may be required towards the end of the year as the 200 hour threshold is approached. Any unplanned shut down of a compressor may be enough to trigger Subpart W measurements. In summary, the rule

language revision will cause a loss of flexibility to schedule site visits over the year and a level of uncertainty due to the inclusion of the 200 hour threshold.

The benefits of such a change in rule language are questionable. GHG emissions in the 2 non-operating modes (standby/pressurized and depressurized) are negligible compared to the operating mode, meaning that the additional burden does not result in a decidedly more accurate inventory.

SoCalGas suggests that ARB revise the calculation requirements to be consistent with the existing EPA regulation.

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

Respectfully,