



Tamara Rasberry
10-2-9

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California Air Resources Board
1001 I Street
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RE: Board Agenda Item 10-2-9 Notice of Public Meeting to Consider a Process for Adoption of GHG Accounting Protocols for Compliance Purposes, Including Withdrawal of Board Adoption of Voluntary Protocols

Dear Members of the Board:

Sempra Energy appreciates the opportunity to submit comments on the Air Resources Board proposal to consider a process for adoption of Greenhouse Gas (GHG) accounting protocols, including withdrawal of the Board's adoption of voluntary protocols.

As CARB implements AB 32, it must remain mindful of the need to create and maintain market and regulatory certainty. Offsets result from voluntary investments that would not have otherwise been made and which reduce GHG emissions. To the extent potential investors are sent signals by CARB that offset protocols on which they rely may be changed in the future, they will be unwilling to make such investments because they could become stranded. This uncertainty would fly in the face of the overall objective of AB 32 to reduce GHG emissions because investments that would otherwise have reduced GHG emissions will be unnecessarily discouraged.

Additionally, the voluntary Climate Action Reserve (CAR) protocols have each undergone extensive stakeholder-involved processes where large amounts of time, knowledge and expertise have been used. CARB should not abandon these substantial amounts of work. Potential modifications to the existing protocols may be a more viable and efficient means to address areas of concern highlighted in any pending litigation, and in turn help to maintain important market signals for existing offsets and minimize costs to CARB.

Where investments have already been made in reliance on these protocols, will the Board provide assurance that these investments will not be stranded? If the answer is "no," it should be readily apparent why withdrawal of these offset protocols would discourage voluntary investments to reduce GHG emissions.

In order to achieve accurate market signals, preserve work product, and minimize costs, Sempra respectfully asks the Board not to withdraw the previous adoption of the voluntary protocols.

Sincerely,

A handwritten signature in cursive script that reads 'Tamara Rasberry'.