

## DOCKETED

<b>Docket Number:</b>	16-IEPR-03
<b>Project Title:</b>	Environmental Performance of Electricity Generation System
<b>TN #:</b>	212837
<b>Document Title:</b>	SDG&E Comments - Draft 2016 Environmental Performance Report of California's Electrical Generation System
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	SDG&E
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	8/18/2016 1:56:15 PM
<b>Docketed Date:</b>	8/18/2016

*Comment Received From: Debran Jones Reed*

*Submitted On: 8/18/2016*

*Docket Number: 16-IEPR-03*

**SDG&E Comments - Docket #16-IEPR-03 Draft 2016 Environmental Performance Report of California's Electrical Generation System**

*Additional submitted attachment is included below.*



Heidi Barsuglia  
Director  
State Governmental Affairs

925 L Street, Suite 650  
Sacramento, CA 95814  
(916) 492-4244  
hbarsuglia@semprautilities.com

August 18, 2016

California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814-5512

**RE: Docket # 16-IEPR-03- Draft 2016 Environmental Performance Report of California's Electrical Generation System**

Dear Commissioners:

The 2016 Draft 2016 Environmental Performance Report of California's Electrical Generation System ("EPR") represents a substantial effort on the part of the Energy Commission and its staff. San Diego Gas and Electric Company (SDG&E) is providing a few comments to Chapter 4, The Environmental Performance of the Electricity System, to increase the accuracy of the report.

**Page 51, Figure 15**

Figure 15 should be changed to reflect the Air Resources Board ("ARB") greenhouse gas ("GHG") accounting consistent with the 2006 Intergovernmental Panel on Climate Change guidelines. The ARB chart of emissions by GHG type (available on the ARB website) shows in 2014, carbon dioxide accounted for 84.3 percent of GHG emissions in California. Revising Figure 15 would make it consistent with the other GHG charts in Chapter 4.

**Page 52, Emissions of Imports**

A footnote should be added to page 52 to indicate that the ARB GHG inventory underestimates the GHG reductions from the electric sector by not including all out-of-state renewable power the CEC considers delivered to California under firm-and-shaped contracts (grandfathered contracts and category 2 renewable energy credits). ARB only counts the tagged electrons from those renewable facilities crossing the California border.

**Page 55, Figure 18**

To be complete and provide a consistent treatment with the criteria emissions section Tables 2 and 3, Figure 18 should split the In-state Electric Generation into Electric Generation and Cogeneration. According to the ARB Inventory, Cogeneration produced 14.8 million metric tons ("MMT") of GHG compared to the in-state total for electric generation of all types of 51.8 MMT. Twenty-nine percent of the in-state generation total, roughly 3.4 percent of the statewide total, is cogeneration based on ARB GHG Inventory data.

**Page 60, Table 2**

To provide an accurate picture of electric generation criteria pollutant emissions, the electric generation category should be further split into natural gas generation, renewable generation, and other generation. A substantial amount of the SOx and particulate matter are due to biomass, waste, and landfill gas renewable generation, and to the limited amount of coal generation in the state.

Respectfully submitted,

*Heidi Barsuglia*