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Docket Office
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Subject: Alternative Transportation Fuels Plan Full Fuel Cycle Analysis Workshop Comments

Southern California Gas Company (SoCalGas) would like to thank the California Energy Commission (CEC) for this opportunity to offer comments on the CEC report, Publication CEC-600-2007-004-D, entitled "Full Fuel Cycle Assessment: Well to Wheels Energy Inputs, Emissions and Water Impacts" (Report).

SoCalGas is hopeful the Report will expand our understanding of the effect of alternative fuels on the energy inputs and GHG emissions of motor vehicles. To that end, SoCalGas offers the following comments on the Report:

1. Table 3-11 on Page 3-20 of the Report provides information on the "GHG Impact" of CNG Vehicles (both "Passenger Cars" and "HDVs"). It is not clearly labeled which Scenario Year (2012 or 2022) corresponds to each range provided. The ranges must be labeled clearly, as is shown in similar tables for other fuels in the Report, to ensure there is no confusion.
2. Table 3-11 on Page 3-20 of the Report provides a "GHG Impact" range of -15% to -27% for "Passenger Cars", presumably in 2012 (see Comment #1 above). However, when the "Natural Gas" data on Page A-6 was consulted, a range of -16% to -27% was calculated. This discrepancy must be corrected to reflect the actual GHG impact.
3. Table 3-11 on Page 3-20 of the Report provides a "GHG Impact" range of 0% to -10% for "HDVs", presumably in 2012 (see Comment #1 above). However, when the "Natural Gas" data on Page A-6 was consulted, a range of -9% to -21% was calculated. This discrepancy must be corrected to reflect the actual GHG impact.
4. No table or data was included in the Report detailing the "Effect of Scenario Years" on "HDV" CNG Vehicles. Page A-15 provides some of this information for "CNG Passenger Cars", but does not include projections for "WTT Case ID" C2, so it was not possible to replicate the 2022 "GHG Impact" ranges shown in Table 3-11 on Page 3-20 for either "Passenger Cars" or "HDVs". This information must be included in order to understand and reflect the actual GHG impact in 2022.

SoCalGas would also like to take this opportunity to point out that the economics of alternative fuels, including CNG, play a major role in the market penetration of each alternative fuel. Since potential market penetration will guide future policy decisions regarding alternative fuels, SoCalGas encourages the CEC to provide stakeholders the opportunity to participate in future workshops and discussions on any fuel forecast that the Commission intends to apply in setting future alternative fuel policies.

SoCalGas hopes that these comments will help to improve the accuracy and completeness of the Report. If you have any questions or comments, please feel free to contact me at any time.

Sincerely,

Edwin T. Harte, Jr.
Low Emission Vehicle Program Manager
Southern California Gas Company