

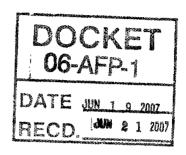
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California Energy Commission Docket Office, MS-4 Attn: Docket 06-AFP-1 1516 Ninth Street Sacramento, CA 95814-5512



Subject: Alternative Transportation Fuels Plan

Southern California Gas Company (SoCalGas) and San Diego Gas & Electric (SDG&E) would like to thank the California Energy Commission (CEC) for this opportunity to offer comments on the CEC report, Publication CEC-600-2007-003, entitled "Full Fuel Cycle Assessment: Well to Wheels Energy Inputs, Emissions and Water Impacts" (Report).

SoCalGas and SDG&E are 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 and SDG&E offer the following comments on the Report:

- 1. In Section 3.4 of the Report, "Natural Gas", we recommend that a note be added that states the analysis for natural gas fuels does NOT assess the benefits of using bio-methane (renewable natural gas). For example, the effect of using bio-methane will not change "tank to wheels" GHG emissions but should dramatically reduce "well to tank" GHG emissions. This change should result in lower "well to wheels" GHG emissions for natural gas vehicles that use bio-methane.
- 2. In Section 6 of the Report, "Recommendations", we recommend that the CEC commission a follow-up study that includes an analysis of bio-methane both as an additive to natural gas and a standalone transportation fuel.

Based upon the findings of the Report, SoCalGas and SDG&E encourage the CEC to endorse state policies which will continue to promote natural gas and electric drive technologies as viable alternative fuels that can economically reduce petroleum dependency, improve regional air quality, and reduce greenhouse gas emissions.

SoCalGas and SDG&E hope that these comments will help to improve the accuracy and completeness of the Report and the final AB 1007 plan currently under development. 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

San Diego Gas & Electric