



Bernie Orozco
Director
State Governmental Affairs

Ph. (916) 492-4244

Fax (916) 443-2994

borozco@sempra.com

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SAN DIEGO GAS & ELECTRIC COMPANY

CEC Docket # 07-OIP-1 and CPUC Rulemaking 06-04-009

Joint California Energy Commission (CEC)/California Public Utilities Commission (CPUC) Staff Request for Information Related to "Current" Entity-Specific Greenhouse Gas (GHG) Emissions Levels

In response to the joint CPUC/CEC data request issued on July 17, 2007, SDG&E offers the following general and specific responses:

General

1. The Energy Information Administration (EIA) uses a particular method to split GHG emissions between thermal and electric applications for combined heat and power (CHP) applications. The California Air Resources Board (CARB) is currently analyzing this issue, having held a workshop on July 24, 2007. To the extent that CARB ultimately decides to report the split between electric generation emissions and thermal emissions reported in the industrial sector differently than the EIA method, the GHG emissions inventory should be adjusted.
2. The analysis does not identify load serving entity (LSE) purchases from asset-owning entities outside California for this period. If there is a change in CPUC/CEC methods to include such purchases, the analysis would need to be modified to associate plants with asset-owning entities and factor in LSE purchases from asset-owning entities in the analysis.
3. The analysis does not identify resources reserved by utilities outside of California. If such resources are identified and agreed upon by California, Washington and other states, those plants should be removed from the plants used to derive emission factors for unspecified imports.

Yours sincerely,

Bernie Orozco

Specific Responses

Tab	Tab name	Cell addresses	Current value	Recommended New Value	Explanation for Recommended Change
13	Out of state-details	X83 – Boardman MWh	565,000 MWh for both years	SDG&E purchases only 2004 - 538,203 2005 – 544,593 Source: FERC Form 1 for SDG&E	SDG&E does not know the Turlock purchases, it is only reporting it own purchases
13	Out of state-details	Yuma Cogeneration Rows 210-212 in 2004 200-201 in 2005	In unspecified purchase section 2004-338,309 MWh 2005-351,911	Should be a specified purchase 2004 – 335,381 2005 – 348,186 Source: FERC Form 1 for SDG&E	Known SDG&E QF purchase with long-term contract – should be moved to specified section
3	California Out of State Summary	F37	7.5%	3% being considered by CARB	Transmission losses should be from plant to border
3	California Out of State Summary	I46	419 lbs./MWh	Higher than 419 lbs./MWh	Northwest hydro is not entirely unspecified. Washington state letter to CPUC and CEC, July 10, 2007

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