

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Implement the
Commission's Procurement Incentive Framework
and to Examine the Integration of Greenhouse Gas
Emissions Standards into Procurement Policies.

Rulemaking 06-04-009
(Filed April 13, 2006)

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BEFORE THE CALIFORNIA ENERGY COMMISSION

Order Instituting Informational Proceeding AB-32
Implementation: Greenhouse Gases

Docket 07-OIIP-01

**COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M) AND
SOUTHERN CALIFORNIA GAS COMPANY (U 904 G) ON ADMINISTRATIVE
LAW JUDGE'S RULING REQUESTING COMMENTS ON
TYPE AND POINT OF REGULATION ISSUES
FOR THE NATURAL GAS SECTOR**

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December 17, 2007

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**I.
INTRODUCTION AND BACKGROUND**

In accordance with the Rules of Practice and Procedure of the California Public Utilities Commission (the "Commission") and the *Administrative Law Judge's Ruling Requesting Comments on type and point of regulation issues for the natural gas sector* (the "ALJ Ruling"), dated November 28, 2007, San Diego Gas & Electric Company ("SDG&E") and Southern California Gas Company ("SoCalGas") hereby submit the following responses to the questions posed by the ALJ Ruling.^{1/}

The ALJ Ruling sets forth specific issues and questions to be addressed which focus on the general type and point of regulation to be used to reduce greenhouse gas ("GHG") emissions in the natural gas sector.^{2/} The ALJ Ruling provides that parties may submit comments on the specific questions contained in the ruling, and any other

^{1/} Ruling by ALJ's TerKeurst and Lakritz available at <http://docs.cpuc.ca.gov/eFile/RULINGS/75732.pdf>.

^{2/} *Id.* at p. 1.

issues they deem to be related to this topic.^{3/} Parties are encouraged to refer to their comments filed in response to the November 9, 2007, *Administrative Law Judge's ruling requesting Comments on type and point of regulation issues* for the electrical sector.

II. COMMENTS TO QUESTIONS

The preface to section 3, "Basic Design Questions," of the ALJ's Ruling recognizes that there are several different definitions of "the natural gas sector." In normal usage, the natural gas sector would include all uses of natural gas; however, in section 3 of the ALJ Ruling, a more restrictive definition is outlined. For clarity, the "natural gas sector" is defined consistently with the Commission's definition in section 3 throughout the entirety of these comments to include only a fraction of the natural gas used in the State. The referenced "natural gas sector" does not include sources likely to be directly regulated by the California Air Resources Board ("ARB") - large point sources using natural gas and electricity generation fueled by natural gas. Specifically, the "natural gas sector" would exclude all natural gas used for electric generation including all natural gas used by cogeneration facilities (including the thermal use of the cogenerator). The "natural gas sector" would also exclude all utility deliveries to wholesale customers, to avoid double counting. For distribution operations of utilities, it would include only the natural gas combustion not covered directly by ARB as large point sources and fugitive emissions associated with the distribution and transmission systems. For interstate pipelines, it would include the combustion of all customers served directly by the interstate pipeline that are not large point sources, all interstate pipeline natural gas combustion in the state of California not covered as large point sources, and all fugitive emissions within the state of California. The natural gas

^{3/} *Id.*

consumption and fugitive emissions of independent natural gas storage facilities would be included if they are not covered directly by ARB as large point sources.

General

1. *What do you view as the incremental benefits of a market-based system for GHG compliance in the natural gas sector, in the current California context?*

Response: Regulated entities within and across sectors and locations will have different internal GHG abatement cost curves which, on the basis of experience and analysis to date, will be significant. A market-based system will provide price visibility and access to the global marginal price of abatement and would allow participating entities to make better trade-offs to find the lowest overall cost of compliance.

For the “natural gas sector,” the benefits of a market-based approach outlined above are more likely to be more theoretical than actual because of the fundamental difficulties with imposing the cap necessary to establish properly functioning market-based mechanisms. Some of these include: (1) imposing responsibility on upstream providers for downstream natural gas use despite the fact that these emissions are outside the upstream provider’s control; (2) increases in natural gas prices that would result, but which might not result in commensurate reductions in usage; (3) difficulties in measuring fugitive emissions; (4) difficulties with monitoring fuel substitution; and (5) issues surrounding jurisdictional control over interstate pipelines.

2. *Can a market-based system for the natural gas sector provide additional emissions reductions beyond existing policies and/or programs? If so, at what level? How much of such additional emission reductions could be achieved through expansion of existing policies and/or programs?*

Response: In general, a market-based system can provide additional emissions reductions beyond existing policies and programs and beyond what can be achieved through expansion of existing policies and programs where imposed on combustion sources of sufficient scale and scope to warrant inclusion in such a program. Smaller sources can best be addressed through mandatory efficiency standards. A market-based system provides incentives to find additional reductions that may not have occurred to regulators, may be too small or difficult to mandate, and/or may come about through the adoption of a new technology or innovation. But the point of regulation should not be imposed on the commodity provider; in the “natural gas sector,” the upstream regulated entity will not be in a position to find additional reductions at their customers’ facilities, to force customers to make changes that may be too small or difficult to mandate, or require that customers adopt new GHG-reducing technologies or innovations.

Principles or Objectives to be Considered in Evaluating Design Options

In the November 9, 2007 ruling, we described principles or objectives that the Public Utilities Commission Staff proposes be used to evaluate GHG program design options and to develop recommendations regarding a GHG regulatory approach. Recognizing that some of the stated objectives are more applicable to the electricity sector, we repeat the Staff-proposed objectives below (omitting those items that are only relevant to the electricity sector):

- ***Goal attainment:*** Does the approach being considered have any particular advantages in terms of meeting overall emission reduction goals? For example, does the approach have any advantages to promoting energy efficiency or combined heat and power?
 - ***Cost minimization:*** Is the approach likely to minimize the total cost to end users of achieving a given GHG reduction target?
 - ***Legal risk:*** Is the approach at greater relative risk of being delayed or overturned in court?
 - ***Environmental Integrity:*** Does the approach mitigate or allow the leakage of emissions occurring outside of California as a result of efforts to reduce emissions in California?
 - ***Expandability:*** Would the approach integrate easily into a broader regional or national program? A related consideration is the suitability of the approach as a model for a national or regional program.
 - ***Accuracy:*** Does the approach support accuracy in reporting and, therefore, ensure that reported emission reductions are real?
 - ***Administrative Simplicity:*** Does the approach promote greater simplicity for reporting entities, verifiers, and state agency staff? How easy will the program design be to administer?
3. *What objectives or principles should the Public Utilities Commission and the Energy Commission use to determine the appropriate method of regulating GHG emissions in the natural gas sector, and why? Please rank the objectives you propose, in order of importance, adding any objectives not covered above.*

Response: The criteria for assessing the regulatory structure seem adequate. They should be arranged in a hierarchy of criteria. First, the legal issues should be addressed. The design of a regulatory structure for achieving GHG reductions should be a choice only between legally allowed options. For the “natural gas sector,” the issue of regulation of interstate pipelines becomes an issue, as does that of administrative simplicity (covering sources of sufficient scale and scope to warrant the resulting administrative costs) and goal attainment (not imposing responsibility on entities that are unable to ensure goal attainment because they lack control over the emitting resources).

Second, the structure should be judged on its ability to meet the over-arching objectives of AB-32 of emissions reductions and cost effectiveness – feasibility, verifiability, and cost minimization. These over-arching objectives of AB-32 seem to be contained in the

above list under items of “goal attainment,” “administrative simplicity,” “accuracy,” and “cost minimization.” The “accuracy” goal is at issue in the “natural gas sector” given the difficulty in measuring fugitive emissions of distribution operations and potential fuel substitution among customers in this sector. The goal of “cost minimization” is also at issue since the small customer decision-makers in this sector are known to be price insensitive and have high discount rates (leading to lower than optimal adoption of high efficiency equipment). Administrative simplicity is an issue because it would create unnecessary complications to include in a cap and trade program sources that lack sufficient scale and scope to warrant the resulting administrative costs. Goal attainment is an issue in that the odds of goal attainment are minimized if responsibility is imposed on entities that are unable to ensure goal attainment because they lack control over the emitting resources.

Basic Design Questions: Scope of GHG Regulation

For the purposes of answering questions in Sections 3.3, 3.4, 3.5, 3.6, and 3.7, the referenced natural gas sector does not include sources likely to be directly regulated by the California Air Resources Board (ARB), e.g., cement plants, oil refineries, and large point sources, or natural gas used for electricity generation (these emissions are included in the electricity sector).

4. *Should GHG emissions from the natural gas sector be capped under AB 32? Are there certain sources of emissions within the sector that should be exempt from an enforceable cap?*

Response: SDG&E and SoCalGas do not believe “the natural gas sector,” other than large point sources with verifiable emissions, should be included in a cap-and-trade system. SDG&E and SoCalGas would recommend a programmatic approach to reducing emissions from remaining emitters in this sector, plus the development of offsets in this sector that could be used for compliance in the capped sector. Allowing firms in this sector to be a source of offsets effectively provides incentives for these smaller customers to find low cost GHG reductions and connects this sector with the capped sector.

5. *For each of the following sources of GHG emissions, state whether the sources described should be subject to an enforceable cap and, if so, whether the cap should be covered by a cap-and-trade approach or only by programmatic measures. For sources you recommend covering programmatically, what specific programmatic actions should be taken? For sources you recommend covering in a cap-and-trade program, are there specific programmatic measures that should be undertaken as complementary to the cap-and-trade program? For each source, discuss how your recommended approach is likely to affect rates.*
- a. *Natural gas combustion in the residential, commercial, and small industrial segments of the natural gas sector.*
 - b. *Natural gas combustion by natural gas vehicles.*

- c. *Combustion-related emissions from operating the infrastructure (including infrastructure related to proprietary operations) used to deliver natural gas to end users within the State.*
- d. *Fugitive emissions, including from pipelines, storage facilities, and compressor stations.*
- e. *Non-combustion uses of natural gas (please specify).*
- f. *Other sources of natural gas sector emissions not listed above (please specify).*

Response:

- a. Natural gas combustion in the residential, commercial, and industrial segments of “the natural gas sector” can best be reduced by a combination of building and equipment/appliance standards and utility and third-party energy efficiency programs. These customers tend to have high discount rates so that changing actions by raising natural gas prices alone may be insufficient to meet the cost effectiveness criteria of AB-32 since customer natural gas bills are a relatively small percentage of most budgets in the “natural gas sector.” Increasing building and equipment/appliance standards can capture substantial energy savings without creating uneconomic fuel substitution to LPG or propane (assuming other gaseous fuels would not be covered in the “natural gas sector” but would be subject to similar standards). Energy efficiency programs can supplement appliance/equipment standards and building standards as can the development of offsets in this sector that could be used in the cap-and-trade program. The ability to create offsets will provide similar economic incentives for firms in the “natural gas sector” to find additional sources of GHG reductions in their operations as being in a capped sector. The development of offsets provides direct benefits to GHG reduction to the firms making equipment decisions.
- b. Natural gas combustion by natural gas vehicles. Capping the GHG emissions from natural gas vehicles would be very hard to accomplish, and undermine the overall goals of AB-32, since NGVs are part of the solution to reducing GHG from vehicles. Natural gas vehicles have shown they can reduce GHG emissions and provide air quality benefits in a variety of applications. While SDG&E and SoCalGas agree with the Staff’s recommendation that NGVs be considered as part of the transportation sector, NGVs should be viewed as sources of conversion-based offsets, not as GHG sources that should face a cap.
- c. Combustion-related emissions from operating the infrastructure (including infrastructure related to proprietary operations) used to deliver natural gas to end users within the State. Other than the facilities that would be regulated as large point sources by the ARB, SDG&E and SoCalGas do not believe natural gas combustion in utility operations, interstate pipelines, and independent storage producers should be included in a cap-and-trade system. These kinds of emissions, which are not easily subject to measurement or verification, should be addressed through programmatic measures. Emissions from this sector represent less than 0.03% of statewide CO₂e emissions. Since it is likely that the critical

infrastructure facilities are going to be regulated as large point sources by the ARB, the near-term focus should be on these large facilities.

- d. Fugitive emissions, including from pipelines, storage facilities, and compressor stations are not easily subject to accurate measurement or verification. Cap-and-trade programs require measurement certainty. These emissions are better addressed through programs aimed at best practices in managing leaks and other methane emissions. The EPA's Natural Gas STAR Program, mentioned in Staff's proposal, has an array of measures that can be implemented. EPA has worked with companies that produce, process, and transmit and distribute natural gas to identify and promote the implementation of cost-effective technologies and practices to reduce emissions of methane. A programmatic approach to reducing leaks is preferable to including these emissions in a cap-and-trade program.
- e. Non-combustion uses of natural gas. Review of data for Southern California finds only one firm that would be in the "natural gas sector" that uses gas as a feedstock; the vast majority would qualify as large point sources that would be regulated directly by ARB. Therefore, SoCalGas and SDG&E recommend that natural gas used as a feedstock be excluded from the "natural gas sector," but that the combustion emissions from the single customer be included and treated as other combustion emissions as described in 5a above.

6. *For the sources you recommend exempting from an enforceable cap, how would emission reductions be achieved?*

Response: SDG&E and SoCalGas recommend a programmatic approach that would reduce emissions from the sources in the "natural gas sector." Per capita GHG emissions in California associated with natural gas consumption by core customers have declined since the 1970s through building and appliance standards combined with energy efficiency programs. Programs and standards could be expanded to the degree that they are cost effective. In addition, developing an offset program for this sector will provide incentives for firms in the "natural gas sector" to find additional GHG reductions.

7. *As the Public Utilities Commission does not currently have authority to oversee all potential GHG-reducing programs for all kinds of natural gas entities in California, which agency(ies) should regulate in such areas? For example, should ARB require that publicly owned utilities meet energy efficiency targets? Would additional legislation need to be enacted?*

Response: AB-32 provides that it is the intent of the Legislature that ARB consults with the CPUC in the development of emission reduction measures, including limits on emissions of GHG applied to the natural gas sector. The ARB shall adopt rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions from sources or categories of sources in furtherance of achieving the statewide GHG emission limits. In making the determinations required by AB-32, the ARB is charged with monitoring and regulating sources of emissions and given broad powers to enact programs and regulations to reduce GHG emissions to the maximum extent feasible. Since energy efficiency therm savings would be similar to a cap on GHG

emissions, it is likely that ARB could implement energy efficiency therm savings requirements in addition to minimum energy efficiency standards for buildings, equipment, and appliances to the extent these measures provide cost effective GHG reductions.

Basic Design Questions: Point of Regulation

8. *If you believe that the natural gas sector and other sources of emissions related to combustion of natural gas should be included in a cap or cap-and-trade system, where should the compliance obligation be placed: upstream, as close to the fuel source as possible (for example, on natural gas processing plants and pipelines) or midstream/downstream (large point sources and, for smaller users, the local distribution company level)? If you suggest another option for assigning responsibility, please describe in detail.*

Response: Not applicable. It should also be noted that the local distribution company is “upstream” and not “downstream” as suggested in the question; “downstream” would be at the point of combustion of the natural gas.

9. *Should core aggregators or natural gas marketers bear responsibility for the GHG emissions of the customers for whom they procure natural gas?*

Response: SDG&E and SoCalGas do not believe “the natural gas sector” should be included in a cap-and-trade system except for large point sources as noted above. Since neither the distributors of natural gas nor procurement agents are using the natural gas, neither have any control over these kinds of emissions. Where an entity lacks the ability to ensure compliance with a regulation, it should not be the point of regulation. Programmatic measures, as noted above, are appropriate for point sources that are not appropriate for inclusion in a cap and trade program.

10. *If ARB chooses to individually regulate emissions from facilities in certain sectors as well as emissions from other large point sources, what level of GHG emissions should ARB use as the threshold to define large point sources? Explain your reasoning.*

Response: ARB has adopted a reporting threshold of 25,000 metric tons per year of CO₂ for general stationary source combustion sources. Large point sources are those that produce 25,000 metric tons or more. The Commission should use the ARB definition in its analysis.

Deferral of a Market-Based Cap-and-Trade System and Coordination with Other States

Section 3.5 of our November 9, 2007 ruling described a scenario in which a California-only cap-and-trade system may not be implemented at this time. Similar questions are asked here for the natural gas sector.

11. In developing recommendation to ARB, should the Public Utilities Commission and the Energy Commission give consideration to actions other states may take regarding the regulation of natural gas sector GHG emissions? If so, how?

Response: Yes. The Cap-and-Trade system implemented in Europe only includes natural gas users producing 25,000 metric tons of CO₂ equivalent – large point sources and electric generators. The “natural gas sector” is not part of the European cap-and-trade program. SoCalGas and SDG&E are unaware of any state programs to cap GHG emissions from the “natural gas sector.”

The “natural gas sector” is best addressed using programmatic regulations and developing a method of developing offsets that can be used in the capped sectors. The development of offsets from the “natural gas sector” creates similar incentives to find cost effective reductions without the problems associated with directly capping the “natural gas sector.”

12. Is it important that the regulation of California natural gas sector GHG emissions be consistent with actions taken by other states?

Response: No. Many other states do not even have energy efficiency programs. The regulation of the “natural gas sector” should not be limited by the lack of GHG reduction efforts in other states. That being said, it is important to not create costly structures that cannot be unwound when a regional or national program is put in place.

13. Would deferral of a cap-and-trade program for the natural gas sector facilitate or hinder California's integration into a subsequent regional or federal program?

Response: SDG&E and SoCalGas do not favor a cap and trade program for the natural gas sector. Immediate implementation of such a program would certainly increase the risk of transition difficulties to a future federal or regional program and could lead to stranded investment by capped entities. There would appear to be no reason to defer implementation of new appliance efficiency standards.

14. If neither a regional system nor a national system is implemented within a reasonable timeframe, should California proceed with implementing its own cap-and-trade system for the natural gas sector? If so, how long should California wait for other systems to develop before acting alone?

Response: SDG&E and SoCalGas do not believe “the natural gas sector” should be included in a cap-and-trade system except to the extent outlined above. If California is determined to develop a cap-and-trade system in isolation, ARB should only include smaller point sources within the “natural gas sector” as a source of offsets that can be used in the capped sector. A market will only work if there are broad enough sources to provide a diversity of GHG reduction activities. If there is no geographic diversity from a regional or national program, there may be a need to include as many diverse sectors in

California as possible. The natural gas sector can be included indirectly through the offset program.

15. If a market-based cap-and-trade system is not implemented for the natural gas sector in 2012, how would you recommend addressing early actions that entities may have undertaken in anticipation of a market?

Response: The allocation of GHG reduction responsibility within the “natural gas sector” should take account of early actions. For example, energy efficiency therm savings goals that may be adopted should recognize the extent to which a utility has already expended resources to achieve GHG savings.

Relationship to GHG Regulatory Approach in the Electricity Sector

16. For purposes of natural gas GHG regulation under AB 32, does it matter what is decided regarding electricity sector type and point of regulation? For example, would a load-based cap for the electricity sector necessitate a similar type of cap for the natural gas sector, with local distribution companies as the point of regulation? If applicable, explain the relationships you see between the electricity and natural gas sectors for AB 32 purposes.

Response: SoCalGas and SDG&E believe that regulation of the “natural gas sector” is independent of the type and point of regulation in the electric industry except that it would make no sense to have a cap-and-trade program for the “natural gas sector” and not for the electric sector that uses one-third of all natural gas consumed in California. To the extent that the electric sector regulatory approach regulates natural gas combustion used by electric generation plants, this natural gas should not be double regulated as part of the natural gas sector. Programs should be designed such that natural gas used for electric power generation as part of the electricity sector is not double regulated and is only regulated at the combustion source (the electric generation plant).

17. If the electricity sector is not included in a California (or wider) cap-and-trade system, could/should the natural gas sector be included? What are your reasons?

Response: No. A cap-and-trade system for the “natural gas sector” made up almost entirely of two large gas utilities and large point sources, but excluding one-third of the natural gas used in the state for electric generation, does not seem to be workable. Not including the transportation sector, the electric sector and small source in other sectors would make a market that only covers 20 percent of GHG emissions, at best. It would be too small and too concentrated to be effective.

18. What implications might there be for fuel switching if GHG emissions for one sector (electricity or natural gas) are capped and GHG emissions for the other sector are not? Would such fuel switching likely lead to an overall decrease, or increase, in GHG emissions?

Response: Since SDG&E and SoCalGas believe that it only makes sense that the electric sector is part of a cap-and-trade system while the “natural gas sector” is subject to programmatic rules and regulations, the question is answered for that direction. The primary impact would be on equipment choice for customers that are small enough to be in the “natural gas sector.” If the customer had electric equipment, the customer would consider the costs of the natural gas equipment and likely fuel costs compared to costs of the electric equipment and the expected electricity costs. The electric fuel costs would reflect the cost of GHG, while the price of natural gas equipment itself would reflect these costs in the natural gas sector. It is difficult to say that fuel switching would go in any particular direction where the impact of GHG emissions reduction is accounted for in both sectors, with one affecting the operating cost and one affecting the capital cost of the firm (given the high discount rates of customers in the “natural gas sector.”) For natural gas equipment owners that are making an equipment decision, the choices are similar except that they may try to extend the life of the existing equipment to avoid the costs associated with any new equipment, either gas or electric.

Fuel substitution may be more of a problem with regard to LPG and propane if the “natural gas sector” was capped, but there were no comparable programmatic standards in place for equipment using LPG and propane. For small customers there is no tracking of equipment, so the measured GHG emissions would be reduced in “the natural gas sector;” however, in actuality, leakage would simply occur. Potential equipment buyers would factor in the lower equipment and lower relative fuel costs for fuels not subject to GHG mitigation costs.

19. How should the GHG emissions of cogeneration, combined heat and power, and distributed generation end users be considered and regulated (e.g., in the electricity sector, in the natural gas sector, or as a point source)?

Response: Cogeneration should be considered as a point source since that approach makes splitting the GHG emissions between industrial and electric generation sectors unnecessary. This approach could be accomplished in the First Seller approach fairly simply. Similarly, self-generation should be considered as a point source in the electric sector.

Recommendation and Comparison of Alternatives

20. Please explain in detail your proposal for how the natural gas sector should be treated under AB 32. Address whether the following emissions sources should be subject to an enforceable cap, and if so, whether reductions in the cap should be achieved by a cap-and-trade approach or only through programmatic requirements: end-user combustion of natural gas, combustion-related emissions from operating the infrastructure, fugitive emissions from pipelines and compressor stations, and non-combustion uses of natural gas. Identify the appropriate point of regulation for each source of emission that should be included in a cap or a cap-and-trade system. Should there just be a sectoral cap, or entity-specific caps as well? Should there be a cap-and-trade system? Address the relationship between programmatic strategies

(e.g., energy efficiency programs and pipeline leak detection programs) and a sectoral cap. Discuss any legal concerns or need for new legislation to implement your recommended approach.

Response: See response to question 5. There are no legal concerns with the SDG&E/SoCalGas recommended approach.

21. Describe how your recommended approach satisfies each one of the principles or objectives set forth in Section 3.2.

Response: A programmatic approach to the “natural gas sector” does not satisfy all the principles of section 3.2, but provides the best trade-offs. For example, a hard cap may seem to better assure GHG reductions if it is imposed on an entity that actually has control over the subject emissions, but the cost may be unacceptably high (i.e., not cost-effective), and may lead to substantial leakage depending on ARB regulation of LPG and propane. A hard cap with trading may lead to lower costs if there is access to a wide range of GHG reduction opportunities or access to low cost offsets. On the other hand, under the approach of upstream providers being responsible, the range of reduction options may be more limited than the alternative of a programmatic approach plus including giving firms in this sector the ability to undertake actions to generate offsets that can be used in the capped sectors. The programmatic approach is much simpler administratively since the entire trading framework does not have to be developed.

22. How does your recommended approach differ from the Public Utilities Commission Staff's preliminary recommendations for the natural gas sector attached to the July 12, 2007 ruling?

Response: SDG&E and SoCalGas agree with Staff's preliminary recommendations with regard to large point sources that use natural gas (large commercial and industrial customers and electric generators), they should be part of a cap-and-trade program. SDG&E and SoCalGas also agree that transportation-related uses should be addressed separately by ARB as part of the transportation sector.

SDG&E and SoCalGas disagree that capping natural gas distribution companies or procurement agents is an appropriate point of regulation for achieving GHG emissions reductions from small natural gas customers. It will be less able to accomplish the goals of AB-32 than the combination of a programmatic approach with the development of an offset mechanism that directly affect decision-makers. Emissions from natural gas infrastructure can be part of the cap-and-trade program, but may not be worth the effort since large point sources will already be covered as part of a cap-and-trade program, so the “natural gas sector” would be limited to aggregation of small natural gas infrastructure sources. Fugitive emissions should be excluded or addressed through programmatic measures due to the failure to be able to accurately measure methane emissions from leaks.

III. CONCLUSION

For the reasons set forth herein, the Public Utilities Commission and the Energy Commission should adopt type and point of regulation for the natural gas sector in accordance with the above comments of SDG&E and SoCalGas.

Respectfully submitted this 17th day of December 2007.

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing **COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M) AND SOUTHERN CALIFORNIA GAS COMPANY (U 904 G) ON ADMINISTRATIVE LAW JUDGE'S RULING REQUESTING COMMENTS ON TYPE AND POINT OF REGULATION ISSUES FOR THE NATURAL GAS SECTOR** on each party named in the official service list for proceeding R.06-04-009 by electronic service, and by U.S. Mail to those parties who have not provided an electronic address.

Copies were also sent via Federal Express to Commissioner Michael R. Peevey and assigned Administrative Law Judges Charlotte TerKeurst and Jonathan Lakritz .

Executed this 17th day of December 2007 at San Diego, California.

/s/ Susan A. Long

Susan A. Long



CALIFORNIA PUBLIC UTILITIES COMMISSION

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TOP OF PAGE
BACK TO INDEX OF SERVICE LISTS