



Lee Wallace  
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March 30, 2007

Mr. Joseph Cassmassi  
Planning and Rules Manager  
SCAQMD  
21865 Copley Drive  
Diamond Bar, CA 91765

Subject: Second Draft 2007 AQMP

Dear Mr. Cassmassi,

Southern California Gas Company (SoCalGas) and San Diego Gas & Electric Company (SDG&E) appreciate the opportunity to provide comments on the South Coast Air Quality Management District's (SCAQMD) Second Draft 2007 Air Quality Management Plan (AQMP). As always, SoCalGas and SDG&E strongly support the SCAQMD's efforts to develop an AQMP that will lead to the attainment of Clean Air Act standards through cost-effective control measures. We view ourselves as partners with the SCAQMD in our collective effort for cleaner air, and hope that our strong environmental record, customer support for clean and efficient natural gas-fueled equipment, and constructive participation in your regulatory process demonstrate our commitment to that goal.

The combined utilities SoCalGas and SDG&E have the largest regulated gas and electric utility customer base in the United States – more than 6 million meters serving 21 million customers. For the record, as public utilities under the California Constitution, SoCalGas and SDG&E are not the same company as Sempra LNG. Therefore, the comments contained herein should not be attributed to Sempra LNG or other unregulated Sempra affiliates, and Sempra LNG's comments should not be attributed to SoCalGas and SDG&E.

Our joint comments are provided in the following attachments by control measure. We appreciate the extension of time that you have given us to submit written comments on proposed control measures CMB-04 and CTY-01, no later than April 6. In previous correspondence and discussions with SCAQMD Staff and Board members, SoCalGas, SDG&E and a number of other interested parties have expressed concerns about the gas specification proposed in these control measures. However as you know, we are working closely with District staff in an attempt to identify revisions to the AQMP that will address these concerns. We very much appreciate the additional time to explore potential revisions and are hopeful that we can identify mutually agreeable changes within the next several days.

We are ready to answer any questions or provide additional information about our comments; we have included a contact person's name and contact information for each control measure. The most effective way to contact us will be through email, but you can always contact me directly (213-244-8851). Comments are provided on the following control measures:

	Control Measure	SoCalGas/SDG&E Contact
Attachment A	CMB-01 – NO <sub>x</sub> Reduction from Non-RECLAIM Ovens, Dryers and Furnaces	Noel Muyco <a href="mailto:nmuyco@semprautilities.com">nmuyco@semprautilities.com</a>
Attachment B	CMB-03 – Further NO <sub>x</sub> Reductions from Space Heaters	Lance DeLaura <a href="mailto:ldelaura@semprautilities.com">ldelaura@semprautilities.com</a>
Attachment C	MCS-01 – Facility Modernization	Deanna Haines <a href="mailto:dhaines@semprautilities.com">dhaines@semprautilities.com</a>
Attachment D	MCS-03 – Energy Efficiency and Conservation	Rick Hobbs <a href="mailto:rhobbs@semprautilities.com">rhobbs@semprautilities.com</a>
Attachment E	MCS-07 – Application Of All Feasible Measures	Noel Muyco <a href="mailto:nmuyco@semprautilities.com">nmuyco@semprautilities.com</a>
Attachment F	MCS-08 – Emission Charges Of \$5,000 Per Ton For Stationary Sources With Potential To Emit Over 10 Tons Per Year [VOC and NO <sub>x</sub> ]	Noel Muyco <a href="mailto:nmuyco@semprautilities.com">nmuyco@semprautilities.com</a>
Attachment G	MOB-07 – Concurrent Reductions from Global Warming Strategies	Lee Wallace <a href="mailto:lwallace@semprautilities.com">lwallace@semprautilities.com</a>
Attachment H	CTY-02 – Emission Charges Of \$5,000 Per Ton For Stationary Sources With Potential To Emit Over 10 Tons Per Year [VOC and NO <sub>x</sub> ]	Noel Muyco <a href="mailto:nmuyco@semprautilities.com">nmuyco@semprautilities.com</a>

SoCalGas and SDG&E appreciate the hard work by Staff in putting together the Second Draft AQMP, and we look forward to further opportunities to provide input for the most comprehensive, feasible and cost-effective AQMP for the South Coast Air Basin.

Sincerely,



Enclosures