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Anny Huang, Ph.D.
Manager, Emission Inventory Analysis Section
California Air Resources Board (CARB)
P.O. Box 2815
Sacramento, CA 95812

Subject: Comments on the Draft Report for Greenhouse Gas Emissions of Contemporary Wildfire, Prescribed Burns, and Forest Management Activities

Dear Dr. Huang,

Southern California Gas Company (SoCalGas) appreciates the opportunity to comment on the Draft Report for Greenhouse Gas (GHG) Emissions of Contemporary Wildfire, Prescribed Burns, and Forest Management Activities released on December 31, 2020.

We commend Staff's efforts to analyze and measure GHG emission impacts from wildfires and related forest management activities. However, the Bay Area Air Quality Management District recently noted that, in the last three years, more than 3,000 diesel backup generators have been installed due to an increase in data centers and PSPS awareness in the region.¹ A recent survey found that 15% of people who experienced outages during a PSPS event purchased a backup generator for power.² In light of this, the GHG emissions, criteria pollutant emissions, and public health impacts from the increasing reliance on diesel backup generators during Public Safety Power Shutoff (PSPS) events should be included in this analysis.

The use of diesel backup generators during PSPS events undermines CARB's GHG and public health goals. For example, nearly one million people were affected by PSPS events in October 2019 and 125,000 diesel backup generators were utilized for electrical power.³ The use of diesel backup generators during these events emitted about 15,000 tons of carbon dioxide (CO₂) or the

¹ California Energy Commission. Workshop to Discuss Research into Clean Energy Alternatives to Diesel Backup Generator Systems. January 21, 2021.

² Energy Institute at HAAS. Electricity Outages Lead to Substantial Backup Generator Purchases. Retrieved from: <https://energyathaas.wordpress.com/2020/05/26/electricity-outages-lead-to-substantial-backup-generator-purchases/>

³ California Air Resources Board (CARB). Emission Impact: Additional Generator Usage Associated with Power Outage. January 30, 2020. Retrieved from: https://ww2.arb.ca.gov/sites/default/files/2020-01/Emissions_Inventory_Generator_Demand%20Usage_During_Power_Outage_01_30_20.pdf

equivalent of about 3,000 passenger vehicles driving on the road for one year.⁴ The public health impacts were even greater—about 9 tons of diesel particulate matter or “soot” were released during these PSPS events equating to about 29,000 diesel trucks driving on California roadways for one month.⁵ Diesel soot from heavy-duty trucks is especially harmful to humans because it is small enough to be inhaled and, once absorbed in lung tissue, can damage DNA and cause cancer.⁶

SoCalGas appreciates the opportunity to provide input on this important report.

Sincerely,

/s/ Tim Carmichael

Tim Carmichael
Agency Relations Manager
Southern California Gas Company

⁴ Author’s calculation of CARB Emission Impact Report.

⁵ CARB Emission Impact Report.

⁶ California Air Resources Board. Summary: Diesel Particulate Matter Health Impacts. Retrieved from: <https://ww2.arb.ca.gov/resources/summary-diesel-particulate-matter-health-impacts#:~:text=Diesel%20engine%20emissions%20are%20believed,is%20a%20known%20health%20hazard>