

March 24, 2016

California Air Resources Board  
1001 I Street  
Sacramento, CA 95812-2828

**RE: Draft Aliso Canyon Methane Leak Climate Impacts Mitigation Program**

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to provide comments on the Air Resources Board's (ARB) March 14, 2016 Draft Aliso Canyon Methane Leak Climate Impacts Mitigation Program (draft program).

In its draft program, ARB staff chose to assign methane a global warming potential (GWP) value based on a 20-year time horizon. However, a 100-year GWP value is the current internationally accepted standard used across myriad State and Federal regulatory regimes, including ARB's own Cap-and-Trade, Low Carbon Fuel Standard, and Greenhouse Gas (GHG) Inventory programs. Indeed, in its January 15, 2016 workshop on the California GHG Inventory, ARB staff explained that it currently uses GWP values from Intergovernmental Panel on Climate Change's (IPCC) 4th Assessment Report as this is, "consistent with national and international organizations" (slide 8). The IPCC uses the 100-year GWP value. If ARB wishes to employ a GWP value that departs from national and international scientific standards, then this modification should be pursued through a formal, transparent, and deliberative rulemaking process that would allow all parties to participate in discussions, and understand the implications of these changes.

Thank you for considering these comments.

Sincerely,

/s/

Claire Halbrook  
Climate Policy Principal  
Pacific Gas and Electric Company