



Christopher M. Lyons
Associate General Counsel
488 8th Avenue
San Diego, CA 92101
cmlyons@sempra.com

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Clerk's Office
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Comments of Semptra in response to CARB's October 10, 2025 draft scope 1 and 2 GHG Reporting Template and accompanying guidance memo to advise the implementation of CA SB 253

Semptra appreciates the opportunity to submit the enclosed comments in response to CARB's October 10, 2025 draft scope 1 and 2 GHG reporting template and accompanying guidance memo for the Corporate Greenhouse Gas Reporting Program.

Semptra is a California-based holding company with energy infrastructure investments in North America. Our operating companies invest in, develop and operate energy infrastructure and provide electric and gas services to customers and include San Diego Gas & Electric Company ("SDG&E") and Southern California Gas Company ("SoCalGas"). SDG&E is a regulated public utility that provides electric and natural gas services to more than 3 million people in San Diego County and a portion of Orange County. SoCalGas is also a regulated public utility that owns and operates a natural gas distribution, transmission and storage system that delivers natural gas to approximately 21 million people in Southern California and portions of Central California. Another operating company, Semptra Infrastructure, develops, builds, operates and invests in energy infrastructure to help enable the energy transition in North American markets and globally.

Please contact me if you have any questions regarding this submission.

Respectfully submitted,

/s/ Christopher M. Lyons

Enclosure

Comments of Sempra in Response to CARB's October 10, 2025 draft scope 1 and 2 GHG Reporting Template and accompanying guidance memo to advise the implementation of CA SB 253

CARB's guidance memo indicates that the template is voluntary, and that CARB will provide guidance for subsequent reporting cycles. CARB also invited reporting entities to provide feedback on the structure, substance, and alignment of the draft template with SB 253. In response to that invitation, Sempra submits the comments below.

Comments on the guidance memo

Disclosure by Source vs. Gas

CARB should continue to require emissions reporting by source only, and in carbon dioxide equivalents, and it should limit reporting disaggregated by greenhouse gas to optional disclosures, including for future reporting periods. Some emissions factors only allow for calculation in CO₂e. Thus, some companies may only be able to report using this unit. Additionally, reporting by gas may involve significant administrative burden on covered entities, which seems inconsistent with CARB's stated goal of streamlining reporting.

Organizational Boundaries

CARB indicated in the guidance memo that it is evaluating whether to require companies to use one prescribed organizational boundary. Sempra recommends that CARB remain flexible and continue to allow covered entities to choose their organizational boundary based on which boundary is most relevant for their business and corporate structure, particularly in light of the vast variety of entity types covered under SB 253 reporting.

Emissions Reduction Initiatives

The fields presented on emissions reductions from contracted renewable electricity and natural gas are too limiting and may not be applicable to all covered entities. Some may have other emissions reduction initiatives or projects that are not reflected through the current required fields. Additionally, contracted renewable electricity may already have been accounted for through the emissions factors used for market-based emissions calculations. We recommend that CARB remove the required fields for reporting emissions reductions and should consider instead including an optional field for qualitative discussion of emissions reductions programs or progress.

Comments on the Reporting Template

Alignment with MRR Program

Sempra recommends that CARB establish a reporting deadline for SB 253 that falls after the reporting deadline for the MRR Program, which currently requires emissions verification to be submitted by mid-August. As SB 253 will typically cover a larger inventory, and as some companies are covered under both reporting requirements, submitting any information for SB 253 prior to the MRR deadline would present increased administrative burden and could result in conflicting inventories.

Calculation methodology

In the reporting template, CARB includes a required field for companies to report their emissions calculation methodology using the example of “activity data x emissions factor,” but it is unclear how much detail would be required for this field. Additionally, companies are asked to report any process specific calculations. CARB should provide more clarity on the level of detail required when describing calculation methodology and also describe an example of a process specific calculation that would fit into the additional required field.

Scope 2 emissions reporting

In the inventory boundary section, CARB requests that companies specify whether market-based emissions and location-based emissions are included in their boundary, but the other fields related to Scope 2 emissions do not ask companies to specify which method is being used. As the Greenhouse Gas Protocol states that companies shall dual report their emissions (reporting both location-based and market-based) where possible, CARB should include space for companies to report Scope 2 emissions calculated using both methods.

Stationary combustion

CARB requests that companies specify whether stationary combustion emissions are included in their inventory boundary, but this category is not listed for reporting in the Scope 1 reporting section. CARB should include a field for reporting stationary combustion alongside mobile, fugitive and process emission totals in this section.

Purchased electricity

Similarly, companies are required to indicate whether purchased electricity is included within their boundary, but purchased electricity is not included in the Scope 2 reporting section. CARB should include a field for reporting purchased electricity totals for both

market- and location-based emissions alongside purchased steam, cooling, and heating totals.

Carbon intensity

CARB currently requires the reporting of carbon intensity metrics for both Scopes 1 and 2 and lists carbon intensity for Scope 2 emissions in the optional fields of the reporting template. Carbon intensity can be a useful metric for stakeholders to analyze how carbon impacts relate to economic output and business productivity. However, the most relevant intensity metric can vary among different industries and business models. Given this variability, CARB should not require the reporting of carbon intensity metrics.