



 Sempra Energy[®] utilities



Bernie Orozco
Director
State Governmental Affairs

Ph. (916) 492-4244
Fax (916) 443-2994
borozco@sempra.com

July 14, 2006

Ms. Song Her, Clerk to the Board
State Water Resources Control Board
Executive Office
1001 I Street, 24th Floor
Sacramento, CA 95814

RE: Comments on Revised Proposed Total Residual Chlorine and Chlorine-Produced Oxidants Policy of California (Policy)

Dear Ms. Her:

Sempra Energy, parent company of San Diego Gas & Electric (SDG&E) and the Southern California Gas Company (SCG), appreciates this opportunity to comment on the revised State Water Resource Control Board (SWRCB) Proposed Total Residual Chlorine and Chlorine-Produced Oxidants Policy of California (TRC Policy).

In our original comment letter of June 5, 2006 we commented that SCG and SDG&E maintain thousands of miles of natural gas pipelines that are routinely monitored and checked for integrity and safety. New piping and repairs to existing piping often involve regulatory required hydrostatic pressure testing in order to verify their integrity and public safety. The pipelines are often in remote areas of the utilities' service territories. These hydrostatic tests often utilize potable water from public water supply agencies which have used chlorine as a disinfectant. Sempra Energy commented that pipeline location in the field, non-availability of treatment technologies for remote field operation, and problems regarding field sampling and analytical techniques precluded the utilities from complying with the original policy.

SWRCB staff kindly responded to our comments citing their response to Comments 3.5 and 3.6. We interpret the SWRCB staff's clarifying response to include SCG and SDG&E operations that discharge potable water derived from drinking water utilities or agency potable water, when the Sempra Utilities themselves do not add chlorine in the process. We interpret SCG and SDG&E activities as including but not limited to hydrostatic testing of pipelines using potable water, dewatering piping where potable water is the only chlorine source, dewatering operations where potable water may be encountered and potable water is the only chlorine source. We are making this comment because the SWRCB staff's response to Comment 3.6 and the corresponding permit wording could be misinterpreted to apply to only drinking water utilities or agencies. We believe that this wording in the Response to comment 3.5 and 3.6 and the permit is due to originally being a response to a water utility's comments. We interpret that the SWRCB is including the appropriate Sempra Utilities operations due to the SWRCB reference to these comments in response to Sempra Energy's comments.

With these changes in the policy and this understanding, Sempra Energy can support the *Total Residual Chlorine and Chlorine-Produced Oxidants Policy of California (Policy)*. We reserve the right to vehemently oppose any change from this understanding due to the impossible compliance

situation that the Sempra Energy Utilities would find themselves in if they were required by policy and regulation to meet the requirements.

Sempra Energy appreciates the opportunity to work with the SWRCB on the proposed TRC policy. Thank you for consideration of our recommendations. If you have any questions regarding these comments, please contact Mr. Scott Koken at (858) 637-3727.

Very truly yours,

Bernie Orozco