

Sempra (Allison Snell)

Comments of Sempra on proposed California Corporate Greenhouse Gas Reporting and Climate-Related Financial Risk Disclosure Initial Regulation



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Clerk's Office
California Air Resources Board
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Re: Comments of Sempra in Response to CARB's Draft Regulatory Materials for California Climate Disclosure Legislation: Senate Bills 253 and 261, as Amended by SB 219

Sempra appreciates the opportunity to submit the enclosed Comments in Response to CARB's draft regulatory materials on Senate Bills (SB) 253, 261 and 219.

Sempra is a California-based holding company with energy infrastructure investments in North America. Our businesses invest in, develop and operate energy infrastructure and provide electric and gas services to customers. Sempra's business activities are organized under various reportable segments, including Sempra California, which consists of 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 reportable segment, Sempra 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/ Allison Snell

Enclosure

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Definitions

Exclusions

Wholesale sales of electricity are currently proposed to be excluded from the definition of sales as it pertains to revenue and "doing business in California." CARB should consider applying the same rationale to wholesale sales of natural gas. As stated by Senator Weiner in his Letter to the Senate, excluding entities from reporting requirements whose only transactions in California are wholesale sales of electricity is intended to reduce the risk of out of state business entities retreating from the energy market, which would reduce the reliability of electricity for the state. Natural gas remains a critical resource for energy reliability in California and should be treated the same as wholesale electricity by excluding wholesale natural gas sales from the definition of doing business in California.

SB 253 reporting deadline

Given CARB's enforcement notice for SB 253, we support the deadline of no sooner than August 10 for the first reporting year to align with the MRR. For future years, CARB should consider a later deadline as reporting requirements increase substantially to include scope 3 emissions information. The fourth quarter of the year would be more realistic for all companies as they undergo verification of scope 1 and 2 data and perform timely and complex calculations to estimate scope 3 emissions.