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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application by Sacramento Natural Gas
Storage, LLC for a Certificate of Public
Convenience and Necessity for Construction
and Operation of Natural Gas Storage
Facilities and Requests for Related
Determinations

Application No. 07-04-013
(filed April 9, 2007)

**REPLY
OF
SACRAMENTO NATURAL GAS STORAGE, LLC (“SNGS”)
TO COMMENTS RESPONDING TO
AMENDED SCOPING MEMO AND RULING OF
ASSIGNED COMMISSIONER AND ADMINISTRATIVE LAW JUDGE**

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Dated: June 28, 2010

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TO COMMENTS RESPONDING TO
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ASSIGNED COMMISSIONER AND ADMINISTRATIVE LAW JUDGE**

SNGS submits this reply to the comments of the other parties filed on June 21, 2010 in response to the Amended Scoping Memo and Ruling of Assigned Commission and Administrative Law Judge filed in this proceeding on January 21, 2010 (“Amended Scoping Memo”).¹

I. Summary of SNGS’ Position

The existing administrative record supports the Commission’s approval of the SNGS Application in this proceeding without the need for supplemental testimony in any issue area. SNGS has already presented substantial evidence in this proceeding demonstrating that none of the alternative natural gas fields examined in the Final Environmental Impact Statement issued in this proceeding on June 10, 2010 (the “Final EIR”) is an economically feasible alternative to the proposed storage project utilizing the Florin Gas Field. No party has provided any evidence to

¹ Comments in response to the Amended Scoping Memo were filed by Sacramento Natural Gas Storage, LLC (the “SNGS Comments”), by Pacific Gas and Electric Company (the “PG&E Comments”), by the City of Sacramento

the contrary. While SNGS is prepared to sponsor direct testimony to confirm its demonstration, SNGS submits that, in view of the fact that no other party proposes to provide direct testimony on this point, the Commission should avoid further delay and proceed to schedule briefing on the issue of the feasibility of the identified alternatives on the basis of the existing administrative record in this regard.

SNGS also has already presented substantial evidence in this proceeding demonstrating that the Florin Gas Field is uniquely situated in relation to the demand load within the Sacramento metropolitan area, and therefore provides a uniquely valuable opportunity for reinforcing the reliability of the natural gas supply to potential customers such as the Sacramento Municipal Utility District (“SMUD”). This substantial evidence provides a compelling basis in the existing administrative record for the Commission to conclude that the social benefits of approving the project outweigh the limited remaining significant environmental impacts that the Final EIR concludes cannot be avoided or substantially lessened. No party has proposed to sponsor supplemental direct testimony on this point; therefore, SNGS submits that the Commission should avoid further delay and proceed to schedule briefing on the issue of “overriding considerations” on the basis of the existing administrative record in this regard.

The remaining considerations proposed by AGENA to be addressed by supplemental testimony are “quality-of-life” and “environmental justice” impacts. These considerations were fully addressed in the original hearings in the context of the Commission’s consideration of “community values” in relation to the proposed project. SNGS submits that it is not appropriate to re-open this issue area, especially since no party has proposed to sponsor any further direct testimony in this regard.

(the “City Comments”), and by the Avondale Glen Elder Neighborhood Association (the “AGENA Comments”). The Division of Ratepayer Advocates did not file comments.

II. Discussion

A. Overview of Comments

1. PG&E Comments

PG&E stated that it does not contemplate filing supplemental testimony or participating in further evidentiary hearings. PG&E also stated “that it believes that the EIR’s findings regarding the potential impacts of gas leakage from an underground gas storage reservoir are misleading and could adversely affect the storage industry beyond the scope of this single project.”²

SNGS agrees with PG&E’s assessment of the Final EIR with respect to the gas migration issue. SNGS plans to address that concern in the brief that SNGS understands it will have the opportunity to file whether or not supplemental hearings are held.³

2. City Comments

The City of Sacramento merely stated that it “does not believe it will sponsor supplemental testimony addressing the issues identified in the [Amended Scoping Memo], nor is the City presently aware of any other issues that may require supplemental testimony in the event that further hearings are needed.”⁴

3. AGENA Comments

AGENA stated that it does not oppose supplemental hearings to address the issues of the feasibility of mitigation measures or alternative identified in the Final EIR, and whether

² PG&E Comments at p.1.

³ The Amended Scoping Memo provides that “parties may address such issues [as challenges to the conclusions or recommendations in the EIR] in briefs that will be permitted to be filed after the close of any supplemental hearings that may be held. SNGS is proposing that the Administrative Law Judge and Assigned Commissioner proceed to schedule briefing with respect to the feasibility of alternatives and the nature of the overriding considerations on the basis of the existing administrative record, and that, as contemplated in the Amended Scoping Memo, the parties be allowed to comment on the Final EIR in their briefs.

⁴ City Comments at p. 1.

overriding considerations outweigh the significant effects on the environment identified in the Final EIR.⁵ AGENA further stated that, if supplemental hearings are held, AGENA believes that the hearings must also consider “quality-of-life” and “environmental justice” impacts of the proposed Project.⁶ AGENA indicated that it will not sponsor any supplemental direct testimony on any issues, but requested that the schedule set forth in the Amended Scoping Memo be amended to allow “at least four weeks between the submission of direct testimony and the date rebuttal testimony is due” to allow AGENA “sufficient time to review SNGS’s supplemental direct testimony and to develop supplemental rebuttal testimony.”⁷ As is discussed below, SNGS objects to the schedule modification requested by AGENA.

B. Supplemental Hearings Are Not Necessary

1. The administrative record contains substantial, uncontradicted evidence demonstrating that none of the project alternatives identified as “environmentally superior” to the proposed project is economically feasible.

In its comments on the Draft EIR, SNGS submitted analyses demonstrating the economic infeasibility of developing and operating any of the three alternative gas fields examined in the Final EIR.⁸ Those analyses demonstrate that a positive cash flow cannot be achieved from the development and operation of any of those fields for natural gas storage.⁹ The responses to those comments set forth in the Final EIR merely take note of the SNGS comments and reiterate that the Draft EIR did not address the economic feasibility of the identified alternative fields.¹⁰

⁵ AGENA Comments at pp. 1-2.

⁶ *Id.* at p. 2.

⁷ *Id.* at p. 6.

⁸ SNGS Comment Letter dated June 19, 2009, at p. 34 and Appendix 23. The SNGS comments are identified in the Final EIR as D2-98, D2-99, D2-100 and D2-299.

⁹ *Id.*

¹⁰ Final EIR, Vol. 1, Responses to Comments D2-98, D2-99, D2-100 and D2-299.

The California Environmental Quality Act (“CEQA”) defines "feasible" as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors."¹¹ The California Court of Appeal has determined that “[a]n environmentally superior alternative cannot be deemed infeasible absent evidence the additional costs or lost profits are so severe the project would become impractical.”¹² The demonstration by SNGS that none of the alternatives identified as “environmentally superior” in the Final EIS could achieve even a positive cash flow, let alone profitability, provides substantial evidence demonstrating that each identified “environmentally superior” alternative is impractical.¹³

AGENA asserts that the “administrative record and FEIR currently lack the quantitative and comparative data required to allow the Commission to make such a feasibility determination.”¹⁴ Without even acknowledging the SNGS analyses, AGENA suggests that it is incumbent on SNGS to provide supplemental direct testimony on the feasibility issue, and that AGENA will need at least four weeks to develop supplemental rebuttal testimony. AGENA is not proposing to sponsor any direct testimony.

CEQA requires that a finding that an environmentally superior alternative is infeasible must be supported by substantial evidence.¹⁵ CEQA does not require that such evidence be developed in a hearing process. SNGS submits that its comments on the Draft EIR addressing the issue of the economic feasibility of the identified environmentally superior alternatives

¹¹ Cal. Pub. Res. Code § 21061.1.

¹² *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 736 (quoting *Citizens of Goleta Valley v. Board of Supervisors* (1988) 197 Cal.App.3d 1167, 1181).

¹³ The SNGS analyses show a cumulatively increasing negative cash flow for each of the identified alternatives, ranging in Year 12 from (\$36,209,000) for the Freeport Gas Field to (\$67,858,000) for the Thornton Gas Field.

¹⁴ AGENA Comments at p. 2.

provides a legally sufficient basis for the Commission to find each of those alternatives to be infeasible from the standpoint of objective economic considerations.¹⁶ The SNGS analyses are specific and quantitative assessments of the economic infeasibility of the alternatives examined.

AGENA has not even acknowledged the SNGS analyses, let alone explained why AGENA considers those analyses to “lack the quantitative and comparative data required to allow the Commission to make such a feasibility determination.”¹⁷ To require that SNGS now convert its comments on the Draft EIR into testimony would cause unnecessary further delay in this proceeding; especially so if AGENA’s request for at least a month to prepare rebuttal testimony were to be granted.

As represented in the SNGS Comments, however, if the Assigned Commissioner and Administrative Law Judge so direct, then SNGS stands ready to sponsor supplemental direct testimony confirming the economic infeasibility of developing and operating the alternative natural gas storage fields already demonstrated in the SNGS comments on the Draft EIR. In that event, however, SNGS strongly objects to any extension of the time specified in the Amended Scoping Memo for the submission of rebuttal testimony. AGENA has been informed of SNGS’ prior analyses in this regard since July 2009 and conducted further discovery in this respect in February and March 2010. No other party is planning to sponsor direct supplemental testimony. Under these circumstances, AGENA has no justification for its assertion that it needs at least four weeks to review supplemental direct testimony.

¹⁵ *E.g., California Native Plant Society v. City of Santa Cruz*, 177 Cal. App. 4th 957, 982 (Cal. App. 6th Dist. 2009).

¹⁶ *See, e.g., Marin Mun. Water Dist. v. KG Land California Corp.* (1991) 235 Cal.App.3d 1652, 1164 (“If the agency finds certain alternatives to be infeasible, its analysis must explain in meaningful detail the reasons and facts supporting that conclusion. The analysis must be sufficiently specific to permit informed decision-making and public participation, but the requirement should not be construed unreasonably to defeat projects easily.”)

2. SNGS is prepared to rest on its demonstration in the existing administrative record that the social benefits of the location of the proposed SNGS project outweigh the unavoidable adverse environmental effects identified in the Final EIR.

The Final EIR identifies temporary nighttime construction noise from well drilling and potential consequences from the “unlikely” migration of gas from the Florin Gas Field as significant impacts that may result from approval for the proposed SNGS project.¹⁸

Accordingly, if the Commission proceeds to certify the Final EIR as written, to approve the proposed SNGS project the Commission must determine that “specific economic, legal, social, technological, or other benefits of [the SNGS project] outweigh the unavoidable adverse environmental effects.”¹⁹

In the evidentiary hearings conducted in this proceeding in November 2008, SNGS demonstrated through unrebutted testimony that the Florin Gas Field is uniquely situated in relation to the demand load within the Sacramento metropolitan area, and therefore provides a uniquely valuable opportunity for reinforcing the reliability of the natural gas supply to potential customers such as SMUD.²⁰ This substantial evidence provides a compelling basis in the existing administrative record for the Commission to conclude that the social benefits of approving the project outweigh the limited remaining significant environmental impacts that the Final EIR concludes cannot be avoided or substantially lessened.

SNGS is prepared to rest on the existing administrative record in this regard, and no other party has indicated that it will sponsor supplemental direct testimony in this issue area. A

¹⁷ AGENA Comments at p. 2.

¹⁸ With respect to the potential for migration of gas from the Florin Gas Field, the Final EIR concludes: “There is sufficient evidence to conclude that the leakage of gas into the overlying groundwater aquifer is unlikely to occur.” Final EIR, at p. D7-23.

¹⁹ Cal. Pub. Res. Code § 15093(a).

²⁰ Direct Testimony of Jim Fossum, SNGS-8 at pp. 4-5, Responses to Questions 9 and 10; Direct Testimony of Barry Brunelle, SNGS-5 at pp. 3-4, Response to Questions 12 and 13.

supplemental evidentiary hearing therefore is not necessary with respect to overriding considerations.

3. Community values, including “quality-of-life” and “environmental justice” issues were fully addressed in relation to the proposed SNGS project in the original hearings in this proceeding.

AGENA asserts that supplemental hearings should be conducted to consider “quality-of-life impacts of the proposed Project” and “environmental justice impacts” to allow the Commission to balance the need for the proposed project against community values.²¹ Those considerations were addressed in the original hearings in this proceeding in accordance with the Scoping Memo and Ruling of Assigned Commissioner and Administrative Judge filed on July 25, 2008 (the “Original Scoping Memo”).²² Indeed, AGENA’s rebuttal testimony in the original hearings largely focused on those considerations.²³ SNGS is prepared to rest on the existing administrative record in this regard, and no other party has indicated that it will sponsor supplemental direct testimony with respect to community values. A supplemental evidentiary hearing therefore is not necessary with respect to community values.

C. Conclusion

The existing administrative record supports the Commission’s approval of the SNGS Application in this proceeding without the need for supplemental testimony in any issue area. SNGS therefore requests that the Assigned Commissioner and Administrative Law Judge

²¹ AGENA Comments at p. 4.

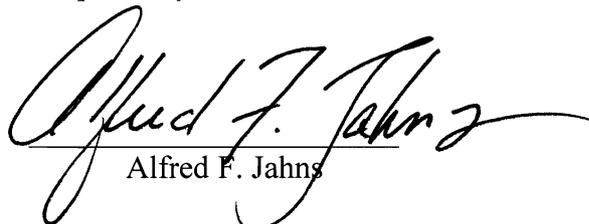
²² Original Scoping Memo at p. 22.

²³ Rebuttal Testimony of Booker Byrd dated September 26, 2008; Rebuttal Testimony of Luke W. Cole dated September 26, 2008; Rebuttal Testimony of Germaine Gill dated September 26, 2008; Rebuttal Testimony of Evergene Heard dated September 26, 2008; Rebuttal Testimony of Eddie Jiles dated September 26, 2008; Rebuttal Testimony of Callas Faye Kennedy dated September 26, 2008; Rebuttal Testimony of Gloria Melbert dated September 26, 2008; Rebuttal Testimony of Carl Pinkston dated September 26, 2008; Rebuttal Testimony of Dennis Robert Smith dated September 26, 2008.

proceed to schedule briefing addressing the feasibility of alternatives, overriding considerations, and any comments by the parties on the Final EIR.

If, alternatively, the Assigned Commissioner and Administrative Law Judge so direct, SNGS is prepared to sponsor supplemental direct testimony to confirm its demonstration in comments on the Draft EIR that none of the “environmental superior” alternatives identified in the Final EIR is economically feasible. In the event that a supplemental hearing is conducted, however, SNGS requests that the hearing schedule set forth in the Amended Scoping Memo be maintained.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Alfred F. Jahns", written over a horizontal line.

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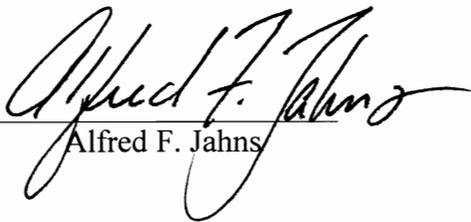
Date: June 28, 2010

CERTIFICATE OF SERVICE

I hereby certify that I have this day served by electronic mail to each person listed on the attached official service list with an e-mail address, and by U.S. Mail, with postage fully prepaid, to the Assigned Commissioner and to each person listed on the attached official service list without an e-mail address, in accordance with Rules 1.9 and 1.10 of the Commission's Rules of Practice and Procedure, the **REPLY OF SACRAMENTO NATURAL GAS STORAGE, LLC ("SNGS") TO COMMENTS RESPONDING TO AMENDED SCOPING MEMO AND RULING OF ASSIGNED COMMISSIONER AND ADMINISTRATIVE LAW JUDGE**, as submitted for electronic filing in proceeding A.07-04-13 on June 28, 2010.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated June 28, 2010 at Sacramento, California.


Alfred F. Jahns

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