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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)

**MOTION OF SACRAMENTO NATURAL GAS STORAGE, LLC (“SNGS”)
FOR RULING TO DIRECT DISPOSITION OF CONFIDENTIAL DOCUMENTS
SUBMITTED BY SNGS TO THE COMMISSION’S ENERGY DIVISION**

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Dated: February 17, 2010

**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)

**MOTION OF SACRAMENTO NATURAL GAS STORAGE, LLC (“SNGS”)
FOR RULING TO DIRECT DISPOSITION OF CONFIDENTIAL DOCUMENTS
SUBMITTED BY SNGS TO THE COMMISSION’S ENERGY DIVISION**

Pursuant to Rules 11.1 of the Rules of Practice and Procedure of the California Public Utility Commission (“Commission’s Rules”), Sacramento Natural Gas Storage, LLC (“SNGS”) submits this motion for a ruling to direct the disposition of certain documents submitted by SNGS to the Commission’s Energy Division pursuant to the Administrative Law Judge’s Ruling Denying the Avondale Glen Elder Neighborhood Association Motion for an Order Permitting Submission of Confidential Information with Public Comments on the Draft Environmental Impact Report, filed in this proceeding on June 17, 2009 (the “Ruling”).

1. Background

a. The Ruling

On June 3, 2009, the Avondale Glen Elder Neighborhood Association (“AGENA”) moved for permission to submit under seal certain documents which AGENA had received from SNGS pursuant to a confidentiality agreement and which AGENA proposed to reference in its comments on the Draft Environmental Impact Report (“EIR”) issued in this proceeding. In the Ruling on the AGENA motion, Administrative Law Judge (“ALJ”) Smith directed that:

AGENA may in its comments on the Draft EIR identify the Designated Documents [defined in the Ruling to be any confidential documents referenced in AGENA's comments] with sufficient detail to permit the Energy Division to obtain the documents directly from SNGS (e.g., at a minimum, provide a "Bates number" or a data request/data request response number) but without disclosing confidential information, and discuss the relevance of the Designated Documents. However, this permission does not authorize or require AGENA to disclose information that SNGS considers to be confidential. [Ruling at p.7]

The Ruling also directed the Energy Division to "obtain directly from SNGS any Designated Documents identified by AGENA, and determine whether such documents are necessary to enable the Energy Division to determine whether the proposed project may have a significant effect on the environment, pursuant to [Public Resources Code] § 21160." (Ruling at 7.) The Ruling set forth requirements for SNGS to satisfy in requesting confidential treatment of any of the Designated Documents; provided a procedure for AGENA or others to object to a request for confidential treatment "in writing to the Energy Division within 10 days after being served with a copy of the [SNGS] request"; directed the Energy Division to "determine whether confidential treatment of the Designated Documents is warranted" and to "promptly inform SNGS and AGENA of its determination and the basis for that determination"; and provided discussion to achieve informal resolution of disputes with respect to such determinations; and provided for the possibility of an appeal to the ALJ Division with respect to any disputed determination that could not be resolved informally. (Ruling at 9 – 10.)

b. The Designated Documents

In its comments on the Draft EIR,¹ AGENA provided a list of documents that AGENA characterized to be:

¹ Letter to Michael Rosauer, California Public Utilities Commission, from Tina A. Thomas, Remy, Thomas, Moose and Manley, LLP, dated June 22, 2009 (the "AGENA Comments").

currently designated as confidential pursuant to a Confidentiality Agreement between AGENA and SNGS, [and which] either are relied on as the basis for conclusions in the DEIR or are both relevant to the evaluation of the Proposed Project's environmental impacts and that bolster those sections of the DEIR that found significant, unavoidable impacts and demonstrate that other analyses that resulted in preliminary conclusions of less than impacts contained in the DEIR are flawed, incomplete, or, otherwise, inadequate. [AGENA Comments at p. 125.]

The documents listed by AGENA were:

1. Terracon. 2008. Geotechnical Engineering Report, Sacramento Natural Gas Compressor Facility and Wellhead Site. Sacramento, California: Terracon. March 26, 2008. The entire report at SNGS 1746-1842 is marked confidential as produced to AGENA, discussed in Williams comments.
2. SNGS 1100, discussed in Clark comments.
3. SNGS 1156, discussed in Robertson comments.
4. SNGS 1159, discussed in Robertson comments.
5. SNGS 1171, discussed in Robertson comments.
6. SNGS 1173, discussed in Clark comments.
7. SNGS 1191-1193, discussed in Robertson comments.
8. SNGS 1424, discussed in Robertson comments.
9. SNGS 2101-2102, discussed in Robertson and Clark comments.
10. SNGS 2115-2116, discussed in Robertson, Williams and Clark comments.
11. SNGS 2118-2131, discussed in Williams comments.
12. AGENA expert Dr. John Robert[s]on believes that confidential documents SNGS numbers 1100, 1136, 1166, 1167, 1173, 1191, 1193, 1199, 1203, 1204, 1221, 1230 and 1243 are important to analysis of the project and should be obtained by the PUC from SNGS.
13. SNGS documents bates numbers 1099-2102 were designated confidential when produced. AGENA believes these documents are also highly relevant to the EIR analysis and should be obtained from SNGS by the PUC.

(AGENA Comments at pp. 125-26.)²

² AGENA subsequently informed SNGS that there were no "Clark Comments," but that all of the documents identified in references to the "Clark Comments" were also referenced in other comments submitted by AGENA. (Declaration of Alfred F. Jahns at ¶ 3 (Attachment A hereto) ("Jahns Declaration").

c. The SNGS Response

With the limited exceptions discussed below, SNGS timely transmitted to the Energy Division all of the documents identified above in the AGENA Comments, and informed the Energy Division that SNGS would waive their confidential designation and any privileges that would otherwise apply to the documents and would allow the documents to be made publicly available.³ SNGS noted, however, that some of those documents reflect preliminary assessments or evaluations, and thus have at most only limited relevance to the Draft EIR, stating in this regard:

This is particularly true of the preliminary geological characterization of the reservoir by Rich Boyd (*see, e.g.*, SNGS 10991101 and SNGS 2115-2116), the early systems operation study of Simucorp, Inc. (SNGS 16751720), and the early reservoir modeling work of Ryder Scott regarding production and injection cycles that was collected into a binder Ryder Scott delivered to SNGS in March 2008. Ryder Scott's modeling work at that time reflected preliminary assumptions regarding well-head and bottom hole pressures. SNGS has since finalized the maximum well-head pressure, and based on that figure, Ryder Scott calculated a final bottom-hole pressure, which it used to model the maximum pressure of the reservoir at the cap rock. Ryder Scott's final model of reservoir operating pressures is included in the June 2008 report that SNGS submitted to the PUC, which is publicly available. [SNGS Response at pp. 2-3.]

The limited exceptions specified by SNGS consisted of “(a) documents that SNGS is contractually bound to maintain as confidential absent express written authorization from their author and/or right-holder, and (b) documents relating to the Design Process Hazards Analysis (“PHA”) SNGS performed for the Project.” (SNGS Response at p. 1.) As to the former, SNGS noted that:

SNGS is unable to produce the documents labeled as SNGS 2101-2102 at this time. Those documents include seismic images that SNGS purchased from PacSeis, Inc. under a data license and

³ Letter to Michael Rosauer, California Public Utilities Commission, from David A. Diepenbrock, Diepenbrock Harrison, P.C., dated July 3, 2009 (the “SNGS Response”).

confidentiality agreement. The agreement does not permit SNGS to disclose the images to the Commission without written authorization from PacSeis. SNGS will, however, contact PacSeis to determine whether it will authorize SNGS to provide copies of these licensed images to the Energy Division. (SNGS Response at p. 2.)⁴

SNGS subsequently was informed by PacSeis, Inc. that it would not allow disclosure of the referenced seismic images to the Commission in the absence of payment by SNGS of an additional license fee for such disclosure; SNGS so informed the Energy Division and AGENA in separate communications.⁵ SNGS assured the Energy Division that it would proceed to procure authorization to submit the seismic images to the Energy Division on a confidential basis if the Energy Division determined that it needed to review those images. (Jahns Declaration at ¶ 4.) Because the Energy Division ultimately determined that its review of seismic images was not necessary to enable the Energy Division to determine whether the proposed project may have a significant effect on the environment, SNGS has not obtained additional license rights to enable SNGS to submit the images to the Energy Division for review.

With respect to SNGS 1674, which consists of a well-head schematic, SNGS informed the Energy Division that SNGS was unable to release the document because it includes a proprietary notice that states that the document may not be reproduced without the written request of Vetcogray. (SNGS Response at p.3.) Vetcogray subsequently authorized public disclosure of the document and SNGS so informed the Energy Division and AGENA. (Jahns Declaration at ¶ 5; Diepenbrock Declaration at ¶ 5.)

⁴ SNGS acknowledged that, in view of AGENA's reference to the seismic images, SNGS gathers that they were inadvertently provided to representatives of AGENA during the discovery process in this proceeding, but that inadvertent disclosure is covered by the Confidentiality Agreement between SNGS and AGENA and, in any event, does not relieve SNGS of its contractual obligation to PacSeis.

⁵ Jahns Declaration at ¶ 5; Declaration of David A. Diepenbrock at ¶ 7 (Attachment B hereto) (“Diepenbrock Declaration”).

With respect to the documents comprising the PHA, which SNGS did submit to the Energy Division, SNGS asserted:

SNGS will not consent to the public disclosure of documents related to the Design Process Hazards Analysis ("PHA") conducted by SNGS. Even though the relevant information included in these documents was fully considered and is reflected in the risk analysis Robert Weatherwax subsequently performed (which SNGS supplied to the Commission), SNGS is willing to provide all such documents to the Energy Division on a confidential basis. Because the documents include confidential, proprietary business sensitive information that includes trade secrets, SNGS must insist that the Commission maintain their confidentiality.

While preserving its right to assert that these documents are shielded from public release on the grounds that they contain proprietary business sensitive information, SNGS also contends that these documents include trade secret information that must be sealed from the public indefinitely. Specifically, SNGS asserts that the following documents enjoy trade secret protection: SNGS 1441-1488, SNGS 1499-1645, SNGS 1669-1671, and SNGS 1853-2100. These documents were extracted from the documents SNGS now agrees to make publicly available, and are enclosed in a separate envelop[e] to which a copy of the privilege log is attached.

(SNGS Response at p. 3.)⁶ SNGS set forth the details of its asserted legal basis for maintaining the confidentiality of the PHA documents in the SNGS Response. (*Id.* at pp. 3 – 7.)

In accordance with the Ruling, SNGS met and conferred with AGENA by telephone conference on July 17, 2009. (Diepenbrock Declaration at ¶ 3.) By related e-mail correspondence, AGENA informed SNGS that "documents identified as SNGS 2103-2110 and 2112 were inadvertently not included in the list of Designated Documents submitted as part of AGENA's Comments on the Draft Environmental Impact Report (DEIR), but were cited in the comments of Dr. John O. Robertson. (*Id.* at ¶ 4.) SNGS determined that the SNGS 2103-2105,

⁶ SNGS did waive the confidential designation, and any privileges that would otherwise apply, to the documents designated SNGS 1491 – 1498, which comprise a summary of the PHA process.

SNGS 2107, and SNGS 2109-2110 were seismic images subject to licensing constraints and the same confidentiality privileges as SNGS 2101-2102, and so informed AGENA. (*Id.* at ¶ 6.)

d. AGENA's Supplemental Comments

Immediately following the conference between AGENA and SNGS, on July 17, 2009 AGENA submitted to the Energy Division two partially unredacted comment letters on the Draft EIR to disclose the comments therein that made reference to documents which SNGS had agreed could be made available for public review. (Jahns Declaration at ¶ 4.) Recently, on January 26, 2010 AGENA submitted to the Energy Division a completely unredacted form of the Robertson comment letter, to disclose comments therein making reference to the confidential seismic images. (*Id.* at ¶ 7.) In doing so, AGENA asserted that SNGS had authorized such submission. (*Id.*)

While SNGS was not provided the unredacted form of the Robertson letter prior to AGENA's submission of that to the Energy Division, and therefore SNGS could not and did not specifically authorize the disclosure of the unredacted discussion of the seismic images contained therein, having now reviewed that discussion SNGS concludes that it does not disclose any confidential information. The assertions made in the newly unredacted portion of the Robertson letter are within the scope of the assessment of the Robertson comments provided by SNGS in its ex parte letter to Commission Simon and ALJ Smith filed in this proceeding on July 31, 2009. In particular, Robertson's frequent mischaracterizations of the available data and misinterpretation of the structure of the Florin Gas Field are addressed comprehensively in Attachments 2 and 3 to

the SNGS letter.⁷ Fundamental deficiencies in Robertson's characterization of the Florin Gas Field were also identified and addressed in reply testimony submitted by SNGS in response to the rebuttal testimony of Robertson in the evidentiary hearing in this proceeding.⁸

e. The Energy Division Determination

On or about October 2, 2009 the Energy Division informed SNGS that it had decided that it did not need to consider any of the Designated Documents in determining whether the proposed project may have a significant effect on the environment and, therefore, that the Energy Division would not require SNGS to submit the seismic images referenced in the Robertson comment letter. (Jahns Declaration at ¶ 6.) The Energy Division further informed SNGS that it had also informed AGENA of its determination. (*Id.*) The Energy Division reaffirmed this position to SNGS following AGENA's submittal of the unredacted form of the Robertson comments to the Energy Division. (*Id.*)

2. Justification for Return of Confidential Documents

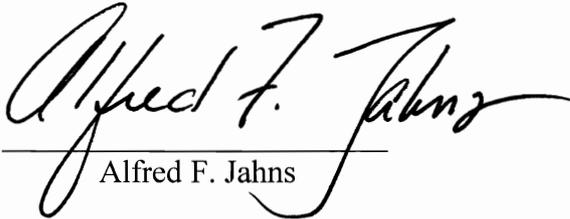
Although the Energy Division has determined that it need not consider any of the Designated Documents in determining whether the proposed project may have a significant effect on the environment, the Designated Documents remain in the possession of the Energy Division as public records. Their current status under the Ruling is not clear, because the Ruling does not address management of the Designated Documents following a determination by the Energy Division that they need not be considered as part of the CEQA review in this proceeding.

⁷ Attachment 2 to the SNGS letter filed on July 31, 2009 is a letter to SNGS from Ryder Scott Company dated July 7, 2009. Attachment 3 to the SNGS letter is a letter to SNGS from Mannon Associates, Inc. Both of those letters focus on clear flaws in the analysis presented in the Robertson comments.

⁸ Reply Testimony of Eric F. Hadsell dated October 3, 2008; Reply Testimony of George F. Dames dated October 3, 2008; Reply Testimony of Bruce Palmer dated October 3, 2008; and Reply Testimony of Robert Mannon dated October 3, 2008.

SNGS has asserted that a discrete portion of the Designated Documents – the documents comprising the PHA – contain confidential information that SNGS has requested not be publicly disclosed. (SNGS Response at pp. 3 - 7.)⁹ Because these documents were submitted directly to the Energy Division pursuant to the Ruling, rather than filed with the Commission under seal pursuant to Rule 11.4 of the Commission’s Rules of Practice and Procedure, it is not clear whether or how the documents would be protected from public disclosure in response to a request under the Public Records Act, Cal. Gov. Code §§ 6250-6270 during or following this proceeding. Under these circumstances, SNGS submits that it is appropriate for the confidential documents to be returned to SNGS and respectfully requests the Energy Division be so directed.

Respectfully submitted,



Alfred F. Jahns

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Attorney for Sacramento Natural Gas Storage, LLC

Date: February 17, 2010

⁹ As previously noted, SNGS has waived the confidentiality of SNGS 1491 -1498, the documents comprising a summary of the PHA process; SNGS also has waived the confidentiality of SNGS 1489 – 1490, the documents listing the participants in the PHA process. SNGS Response at p. 2. Accordingly, SNGS is not requesting the return of those documents.

ATTACHMENT A
DECLARATION OF ALFRED F. JAHNS

**DECLARATION OF ALFRED F. JAHNS
IN SUPPORT OF
MOTION OF SACRAMENTO NATURAL GAS STORAGE, LLC (“SNGS”)
FOR RULING TO DIRECT DISPOSITION OF CONFIDENTIAL DOCUMENTS
SUBMITTED BY SNGS TO THE COMMISSION’S ENERGY DIVISION**

I, Alfred F. Jahns, declare:

1. I make this declaration in support of the Motion of Sacramento Natural Gas Storage, LLC (“SNGS”) for Ruling to Direct Disposition of Confidential Documents Submitted by SNGS to the Commission’s Energy Division, which Motion is being filed concurrently with this declaration.

2. I have personal knowledge of the matters set forth in this declaration, and if called upon to testify to those matters, I would and could so testify.

3. The document attached to my declaration as Exhibit 1 is a true copy of an e-mail message that I received on June 24, 2009 from Christopher J. Butcher, an attorney representing the Avondale Glen Elder Homeowner Association (“AGENA”) in this proceeding.

4. By e-mail message dated July 17, 2009, I was informed by Sarah Ropelato, an attorney representing AGENA in this proceeding, of the submittal of the two partially unredacted comment letters to the Energy Division. The document attached to my declaration as Exhibit 2 is a true copy of that e-mail message.

5. On or about August 17, 2009 I spoke with Eric Chiang, a member of the staff of the Energy Division of the Commission and the current Project Manager for the Commission’s review of the proposed SNGS project under the California Environmental Quality Act, concerning the status of the Energy Division’s review of the documents submitted by SNGS under cover of the Letter to Michael Rosauer, California Public Utilities Commission, from David A. Diepenbrock, Diepenbrock Harrison, P.C., dated July 3, 2009 (the “SNGS Response”).

In that conversation I informed Mr. Chiang that SNGS had learned that it would have to pay additional licensing fees for authorization to submit the seismic images to the Commission and that, while SNGS was willing to do so, SNGS preferred not to incur such expense unless and until the Energy Division determined that its examination of the seismic images would be required in connection with the Energy Division's CEQA review of the SNGS project. In the same conversation I informed Mr. Chiang that SNGS had been authorized by Vetcogray to provide a copy of SNGS 1674 to the Commission if the Energy Division desired to review that document. Mr. Chiang informed me that he would pursue these questions with the Commission's environmental consultant for the SNGS project and inform me of the outcome of that inquiry.

6. On or about October 2, 2009, I again spoke with Eric Chiang concerning the status of the Energy Division's review of the SNGS Response. Mr. Chiang informed me in that conversation that the Energy Division had determined that it would not need to rely on any of the documents submitted as part of the SNGS Response, and that it would not need to examine the seismic images, in connection with the Energy Division's CEQA review of the SNGS project. Mr. Chiang also informed me that Jonathon J. ("Jason") Reiger had so informed AGENA by telephone communication. In a telephone conversation on February 10, 2010, Mr. Reiger confirmed those determinations to me and also confirmed that he had so informed AGENA in October 2009.

7. On January 26, 2010 I received from Colin Bailey, an attorney representing AGENA in this proceeding, an e-mail informing me that: "The attached version of Dr. John Robertson's comments on the Draft EIR, originally submitted on June 22, 2009, were resubmitted to the CPUC's Energy Division today. The text is unchanged other than the fact that

previously redacted text has been revealed in conformance with subsequent conversations between David Diepenbrock and Sarah Ropelato.” The document attached to my declaration as Exhibit 3 is a true copy of that e-mail message.

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

Executed this 17th day of February 2010 in Sacramento, California.


Alfred F. Jahns

EXHIBIT 1
to
DECLARATION OF ALFRED F. JAHNS

From: Chris J. Butcher [CButcher@rtmmlaw.com]
Sent: Wednesday, June 24, 2009 10:55 AM
To: Al Jahns
Cc: Colin Bailey
Subject: RE: SNGS DEIR - AGENA's Comments (5 of 5)
Attachments: Attachment B - RS DEIR Comments FINAL 6-21-09.pdf; Attachment C - AG DEIR Comments FINAL v2 6-21-09.pdf; Attachment D - MJ DEIR Comments FINAL 06-20-09.pdf; Attachment F - RC DEIR Comments FINAL 6.22.09.pdf

We provided you with copies of each of the expert comment letters that make specific reference to any confidential documents. As a courtesy, we are attaching copies of the other expert comment letters to this email.

The mention of a "Clark Letter" was included in error. Please disregard that language. However, the documents listed as included in a "Clark Letter" are also included in the list as documents relevant to Dr. Robertson's expert comment letter. Therefore, all confidential documents listed in AGENA's comment letter are relevant.

Please let me know if you have any further questions.

Thank you,
Chris

From: Al Jahns [mailto:ajahns@jahnsatlaw.com]
Sent: Tuesday, June 23, 2009 3:13 PM
To: Chris J. Butcher
Cc: Tina Thomas; 'Colin Bailey'; 'Stephen Goldberg'; 'Sarah Ropelato'; 'Jack Diepenbrock'; 'David A. Diepenbrock'
Subject: RE: SNGS DEIR - AGENA's Comments (5 of 5)
Importance: High

Chris:

Your incoming, below, indicates that you attached "all expert comment letters including references to confidential information." Please confirm in response to this message that none of the comment letters of the following identified persons contain any reference to Confidential Information (as defined in the SNGS/AGENA Confidentiality Agreement): Dr. Roy J. Shlemon; Dr. Alvin Greenberg; Dr. Michael L. Johnson; Richard C. Casias.

The comment letter submitted by Tina Thomas on behalf of AGENA makes reference to "Clark comments" in relation Confidential Information (at pages 125 and 126 of the letter). Please provide the referenced "Clark comments."

Thank you in advance.

Al Jahns
Attorney for Sacramento Natural Gas Storage, LLC

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From: Chris J. Butcher [mailto:CButcher@rtmmlaw.com]
Sent: Monday, June 22, 2009 5:40 PM
To: Al Jahns; Jack Diepenbrock; David A. Diepenbrock
Cc: Colin Bailey; Stephen Goldberg; Sarah Ropelato
Subject: SNGS DEIR - AGENA's Comments (5 of 5)

Please find attached AGENA's comment letter and expert comment letters including references to confidential information. The comments will be sent in 5 emails. The first email include all the documents except Dr. Williams Comment Letter. Dr. Williams comment letter is being sent in 4 parts. Please let me know if you have trouble opening any of the documents. The files being sent are listed below:

- 1) Comment Letter of AGENA
- 2) Exhibits to AGENA's Comment Letter
- 3) Dr. John O. Robertson, Ph.D., P.E., President (retired 2008), Earth Engineering, Inc., Fallbrook, California. (Attachment A to AGENA's Comment Letter.)
- 4) Confidentiality acknowledgement of Williams, Robertson, Greenberg, and Shlemon
- 5) Dr. Clyde T. Williams, Ph.D., Consultant. (Attachment E to AGENA's Comment Letter.)

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Confidentiality Note: The information contained in this e-mail and any attached files is confidential and intended for the exclusive use of the individual or firm named in the e-mail. The information should not be duplicated or distributed unless an express written consent is obtained from Remy, Thomas, Moose and Manley, LLP, in advance. If you are not the intended recipient of this e-mail, do not disseminate, distribute or copy it. Please notify me immediately and return any attachments.

EXHIBIT 2
to
DECLARATION OF ALFRED F. JAHNS

From: Sarah Ropelato [sropelato@lsnc.net]
Sent: Friday, July 17, 2009 5:39 PM
To: David Diepenbrock; jvd@diepenbrock.com; Al Jahns; Tina Thomas; Chris J. Butcher; constanceslider@sbcglobal.net; scott.pink@dlapiper.com; bchisholm@altshulerberzon.com; jsung@altshulerberzon.com; Stephen Goldberg; Sarah Ropelato
Subject: A.07-04-013 -- SNGS Application for CPCN -- AGENA letter to CPUC Energy Division
Attachments: AGENA letter to CPUC Energy Division 7-17-09.pdf; Attachment A- Partially Unredacted Comment Letter- Dr. J Robertson.pdf; Attachment B- Portion of Unredacted Comment Letter- Dr. C. T. Williams.pdf; Proof of Service and Service List.7-17-09.pdf

Enclosed please find a "pdf" of the following document and related attachments submitted electronically earlier today to the California Public Utilities Commission (CPUC) Energy Division:

LETTER TO ERIC CHIANG DATED JULY 17, 2009 PURSUANT TO THE JUNE 17, 2009 RULING OF ALJ SMITH DENYING AGENA'S MOTION FOR AN ORDER PERMITTING SUBMISSION OF CONFIDENTIAL INFORMATION WITH PUBLIC COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT

If you have any difficulty opening the attachments, please contact the undersigned.

Thank you,

--

Sarah R. Ropelato
Legal Services of Northern California
515 12th Street
Sacramento, California 95814
Phone: (916) 551-2150
Fax: (916) 551-2196

This message contains confidential and privileged material for the sole use of the intended recipient. If you are not the intended recipient, please contact Sarah Ropelato at (916) 551-2150 or sropelato@lsnc.net and delete all copies.

ATTACHMENT B
DECLARATION OF DAVID A. DIEPENBROCK

**DECLARATION OF DAVID DIEPENBROCK
IN SUPPORT OF
MOTION OF SACRAMENTO NATURAL GAS STORAGE, LLC (“SNGS”)
FOR RULING TO DIRECT DISPOSITION OF CONFIDENTIAL DOCUMENTS
SUBMITTED BY SNGS TO THE COMMISSION’S ENERGY DIVISION**

I, David A. Diepenbrock, declare as follows:

1. I am a partner of Diepenbrock Harrison, P.C., and make this declaration in support of Motion of Sacramento Natural Gas Storage, LLC (“SNGS”) For Ruling To Direct Disposition of Confidential Documents Submitted By SNGS To The Commission’s Energy Division. I have personal knowledge of the matters contained in this declaration. If called as a witness, I could and would testify competently to such matters.

2. On July 15, 2009, I received an email from Sarah Ropelato requesting to meet and confer on July 17, 2009 “pursuant to the June 17, 2009 ADMINISTRATIVE LAW JUDGE’S RULING DENYING THE AVONDALE GLEN ELDER NEIGHBORHOOD ASSOCIATION MOTION FOR AN ORDER PERMITTING SUBMISSION OF CONFIDENTIAL INFORMATION WITH PUBLIC COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT”. In the email, Ms. Ropelato stated that “documents identified as SNGS 2103-2110 and 2112 were inadvertently not included in the list of Designated Documents submitted as part of AGENA's Comments on the Draft Environmental Impact Report (DEIR), but were cited in the comments of Dr. John O. Robertson.” Ms. Ropelato asked SNGS to “identify which among those documents you claim are confidential and for what reason[.]”

3. According to my calendar records, a telephonic conference was scheduled for 10:30 a.m. on July 17, 2009 in response to Ms. Ropelato’s request. Based on that entry, and Ms. Ropelato’s July 15 email, I believe the meet and confer teleconference occurred on the morning of July 17, 2009.

4. We subsequently learned that SNGS’ document production included overlapping Bates’ numbers, and that some of those overlapping numbers included documents Ms. Ropelato referenced in her July 15 email. As a result, SNGS requested AGENA to identify the nature of

those documents. On or about July 27, Ms. Ropelato informed me via email that those documents (SNGS 2103-2110 and 2112), which Mr. Robertson had referenced in his comments, included seismic images. Specifically, Ms. Ropelato informed me that the documents Bates labeled as SNGS 2103-2105, SNGS 2107, and SNGS 2109-SNGS 2110 that were referenced in Mr. Robertson's comments consisted of seismic images. Those images had been inadvertently produced to AGENA, and were subject to a licensing agreement between California Natural Gas Storage, LLC and PacSeis, Inc. The document attached to my declaration as Exhibit 1 is a true copy of the subject email message that I received on July 27, 2009 from Ms. Ropelato.

5. By email message transmitted on July 20, 2009 I informed legal counsel for AGENA that SNGS had obtained authorization from Vecogray to release SNGS 1674 to the Commission. The document attached to my declaration as Exhibit 2 is a true copy of that email message.

6. By email dated July 30, 2009, I informed Ms. Ropelato that under the terms of the licensing agreement between CNGS and PacSeis, SNGS was unable to make SNGS 2103-2105, SNGS 2107, and SNGS 2109-SNGS 2110 available to the CPUC. Specifically, I wrote that "we must continue to observe the restrictions and limitations of the PacSeis license agreement." Ms. Ropelato acknowledged receipt of my email on July 31, 2009.

7. By email dated September 14, 2009, Ms. Ropelato asked "whether you have received a reply from PacSeis regarding release of the documents covered by the licensing agreement." The following day, I responded to Ms. Ropelato's email and informed her that PacSeis had informed us that it "would only permit the release of the documents covered by the licensing agreement if an additional co-licensing fee were paid." I further informed Ms. Ropelato that "[w]e do not intend to take any further action on the subject unless and until Energy Division staff inform us that they would like to view the documents covered by the licensing agreement." I made this assertion based on a notification I had previously received in which PacSeis responded to our inquiries about releasing copies of the seismic images to the

CPUC under seal. In the notification, PacSeis stated that the seismic images are copyrighted and proprietary and could be released to the CPUC only if a licensing fee were paid.

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

Executed this 17th day of February 2010 in Sacramento, California.

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke at the end, positioned above a solid horizontal line.

David A. Diepenbrock

EXHIBIT 1
to
DECLARATION OF DAVID A. DIEPENBROCK

From: Sarah Ropelato [sropelato@lsnc.net]
Sent: Monday, July 27, 2009 5:06 PM
To: David Diepenbrock; Jack V. Diepenbrock; Al Jahns; Colin Bailey; Chris J. Butcher; Stephen Goldberg
Subject: SNGS 2103-2110, 2112

Hi David:

Thank you for sending the documents with duplicate labels last week. We consulted with Dr. Robertson to determine which documents he intended to cite in his comments on the DEIR. The intended citations are as follows:

1. Citations to SNGS 2103: Dr. Robertson is citing to the SNGS 2103 that includes the seismic images and *not* to the SNGS 2103 containing the Boyd Correlation. Please note that the Boyd Correlation was also provided with a Bates number of SNGS 2106.
2. Citations to SNGS 2104: Dr. Robertson is citing to the SNGS 2104 that includes the seismic images and *not* to the SNGS 2104 containing the January 2007, Boyd Isopach (at p. 1 of the attachment to your e-mail entitled "SNGS 2104 Boyd Isopach").
3. Citations to SNGS 2105: Dr. Robertson is citing to the SNGS 2105 that includes the seismic images and *not* to the SNGS 2105 containing another Boyd Isopach with the words "Boyd Interpretation" written across the top (at p. 2 of the attachment to your e-mail entitled "SNGS 2104 Boyd Isopach").
4. Citations to SNGS 2106: Dr. Robertson cites to both documents labeled SNGS 2106 at different points in his comments. At page 4, Dr. Robertson is citing the SNGS 2106 containing the Boyd Correlation. At pages 5 and 7, Dr. Robertson is citing to the SNGS 2106 containing the last of the three Boyd Isopachs (at p. 3 of the attachment to your e-mail entitled "SNGS 2104 Boyd Isopach"). At our meet and confer on July 17, 2009, SNGS agreed to the release of the Boyd documents, so it is our understanding that both documents labeled SNGS 2106 and all other identified Boyd documents or depictions may be cited and discussed publicly. If this is incorrect, please notify us at once.
5. Citations to SNGS 2107: Dr. Robertson is citing to the SNGS 2107 that includes the seismic images and *not* to the SNGS 2107 containing responses to AGENA's previous discovery requests.
6. Citations to SNGS 2108: Dr. Robertson is citing to the SNGS 2108 that includes the January 2007, Boyd Isopach and *not* to the SNGS 2108 containing responses to AGENA's previous discovery requests. Please note that SNGS 2104 and 2108 appear to be the same document (i.e. the January 2007, Boyd Isopach).
7. Citations to SNGS 2109: Dr. Robertson is citing to the SNGS 2109 that includes the seismic images and *not* to the SNGS 2109 containing responses to AGENA's previous discovery requests.

8. Citations to SNGS 2110: Dr. Robertson is citing to the SNGS 2110 that includes the seismic images and *not* to the SNGS 2110 containing a written commentary on the Florin Field.

10. Citations to SNGS 2112: Dr. Robertson is citing to the SNGS 2112 that includes one of the Boyd Isopachs (which was also labeled SNGS 2106) and *not* to the SNGS 2112 containing containing a written commentary on the Florin Field.

Given that most of the documents in issue above are seismic images, we will await notice of the outcome of your discussions with PacSeis, Inc. In the meantime, however, please advise as to whether SNGS intends to have the documents re-numbered. As a result of the duplicative numbering, AGENA must now submit amended comments by Dr. Robertson to clarify his citations, particularly regarding the two documents labeled SNGS 2106. A uniform number for these documents is necessary for the CPUC to request them from SNGS. Please also forward the PHA summary at your earliest convenience.

Thank you for your attention to this matter. If you have any questions or concerns, please contact our office.

Sincerely,

--

Sarah R. Ropelato
Legal Services of Northern California
515 12th Street
Sacramento, California 95814
Phone: (916) 551-2150
Fax: (916) 551-2196

This message contains confidential and privileged material for the sole use of the intended recipient. If you are not the intended recipient, please contact Sarah Ropelato at (916) 551-2150 or sropelato@lsnc.net and delete all copies.

EXHIBIT 2
to
DECLARATION OF DAVID A. DIEPENBROCK

From: David A. Diepenbrock [ddiepenbrock@diepenbrock.com]
Sent: Monday, July 20, 2009 10:18 AM
To: Sarah Ropelato; Chris J. Butcher
Cc: Al Jahns
Subject: FW: SNGS 1673-1674 - Vetcogray Doc

Sarah and Chris:

We have obtained authorization from Vetcogray to release the document to the Commission. We will update the Commission regarding this document when we have a response from PacSeis. If you have any further questions regarding the Vetcogray document, please let me know.

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This email and any files transmitted with it may contain privileged or otherwise confidential information. If you are not the intended recipient, or believe that you may have received this communication in error, please let me know by reply email and delete the email you received. Thank you.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served by electronic mail to each person listed on the attached service list, and by U.S. Mail to the Assigned Commissioner, in accordance with Rules 1.9 and 1.10 of the Commission's Rules of Practice and Procedure, the **MOTION OF SACRAMENTO NATURAL GAS STORAGE, LLC (“SNGS”) FOR RULING TO DIRECT DISPOSITION OF CONFIDENTIAL DOCUMENTS SUBMITTED BY SNGS TO THE COMMISSION’S ENERGY DIVISION**, as submitted for electronic filing in proceeding A.07-04-013 on February 17, 2010.

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

Dated February 17, 2010 at Sacramento, California.


Alfred F. Jahns



California Public
Utilities Commission

CPUC Home

CALIFORNIA PUBLIC UTILITIES COMMISSION

Service Lists

PROCEEDING: A0704013 - SACRAMENTO NATURAL GAS
filer: SACRAMENTO NATURAL GAS STORAGE, LLC
LIST NAME: LIST
LAST CHANGED: FEBRUARY 3, 2010

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