

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



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Application of Sacramento Natural Gas)
Storage, LLC, for a Certificate of Public) Application No. 07-04-013
Convenience and Necessity for Construction) (Filed April 9, 2007)
and Operation of Gas Storage Facilities and)
Requests for Related Determinations)
_____)

**AVONDALE GLEN ELDER NEIGHBORHOOD ASSOCIATION'S COMMENTS
ON RESPONSE OF SACRAMENTO NATURAL GAS STORAGE, LLC TO
ADMINISTRATIVE LAW JUDGE'S RULING DIRECTING SACRAMENTO
NATURAL GAS STORAGE, LLC TO SERVE DECLARATIONS AND
ADDITIONAL EVIDENCE**

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For: Avondale Glen Elder Neighborhood Association

Dated: September 30, 2010

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INTRODUCTION

Avondale Glen Elder Neighborhood Association (AGENA) submits the following comments on Sacramento Natural Gas Storage, LLC’s (SNGS) Response to the September 10, 2010 Administrative Law Judge (ALJ) ruling requiring SNGS to serve additional evidence regarding the environmentally superior alternatives (Alternatives) to its proposed underground natural gas storage project at the Florin Reservoir (Project) as identified in the Final EIR.¹ Under the California Environmental Quality Act (CEQA), the California Public Utilities Commission (CPUC) must find that the Alternatives to the

¹ / On September 24, 2010, AGENA filed a Motion to Modify the Proceeding Schedule (Motion to Modify). AGENA’s Motion to Modify argues that AGENA is incapable of submitting complete comments until it has an opportunity to review the redacted information submitted by SNGS. A ruling on this motion is still pending. Because the proceeding schedule has not yet been modified, AGENA submits these comments to comply with the existing proceeding schedule. However, these comments are necessarily incomplete because AGENA has not yet been provided unredacted versions of all the Additional Evidence submitted by SNGS. Therefore, filing of these comments does not render the Motion to Modify or the other pending motions moot; a ruling on the pending motions is necessary to protect AGENA’s right to procedural due process.

Project identified in the Final Environmental Impact Report (FEIR) are infeasible in order to approve the Project. In the CEQA context, feasibility means “capable of being accomplished within a reasonable period of time” (14 Cal. Code Regs. § 15364 [CEQA Guideline].) Feasibility of alternatives analyzed in an EIR must be considered at the end of the environmental review process before a lead agency may approve a project with one or more significant effects on the environment. (Pub. Resources Code, § 21081; *see California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 981; *Uphold Our Heritage v. Town of Woodside* (2007) 147 Cal.App.4th 587, 597, *rev. den.*) As part of this inquiry, the lead agency may consider whether specific economic, legal, social, technological, or other considerations make the environmentally superior alternatives identified in the EIR infeasible. (Pub. Resources Code § 21081(a)(3).)

Pursuant to the September 10, 2010 ALJ ruling, SNGS submitted Additional Evidence comparing certain economic factors of the Project to the Alternatives identified in the FEIR.² Despite being given a second chance and specifically directed to submit evidence comparing the proposed Project to the Alternatives, SNGS’ new supplemental submission still does not show that the Alternatives are infeasible in comparison to the Project. SNGS’ submission is deficient and does not meet its burden of proof.

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² / The ALJ’s ruling was issued before AGENA had the opportunity to submit comments on or brief issues raised in SNGS’ prior supplemental direct testimony about Alternatives to the Project.

ARGUMENT

I. SNGS HAS NOT DEMONSTRATED THAT THE ALTERNATIVES ARE ECONOMICALLY INFEASIBLE

A. SNGS' Submission is Insufficient Because It Does Not Compare Revenue Projections of the Project and the Alternatives

Neither of SNGS' submissions about Alternatives contains revenue or profit and loss projections for the Project. This analysis must include comparative costs, profit and loss and economic benefit between the proposed project and the Alternatives. (*Citizens of Goleta Valley v. Board of Supervisors* (1988) 197 Cal.App.3d 1167, 1180 [*Goleta I*]; *Uphold Our Heritage, supra*, 147 Cal.App.4th at p.599.) The only items included about the Project in the supplemental comparison submission are cost projections. Absent a revenue or profit and loss projection, there is no way to determine the actual economic feasibility of the Project either by itself or in comparison to the Alternatives.

Revenue projections for the Alternatives were included in SNGS' prior testimony. (See Special Direct Testimony of Nicole M. Houston [hereinafter Houston Testimony] Exhibit B, pages 1, 3-6 [Snodgrass]; 8-11 [Freeport]; 13-16 [Thornton 7.5 bcf buildout considered in the FEIR].) Revenue Projections must also be included for the Project for there to be any basis for comparison between the Project and the Alternatives. The projections for the Alternatives demonstrate that SNGS can perform that analysis and presumably has done so for the Project. SNGS' failure to produce this evidence means that the evidence SNGS did submit should be viewed with distrust. (Evid. Code § 412; see *People v. Ochoa* (1985) 165 Cal.App.3d 885, 889.) In addition, the failure to produce the comparative evidence that is in SNGS' possession raises the inference that the

evidence would be adverse to SNGS' position. (Evid. Code § 413; *see e.g. People v. Denny* (1984) 152 Cal.App.3d 530, 539.)

Furthermore, neither the Additional Evidence nor any other testimony or evidence submitted by SNGS contains any indication that the Project will have any customers other than SMUD, which will use, at most, half of the storage space of the Project. (*See* Reply Testimony of Jim Fossum, Exhibit SNGS-8 at Q8 p.5 [at the time of the hearing, SMUD was the only tenant of the project].) Absent at least some indication of the probability of leasing the remainder of the storage space, it is impossible to determine the economic feasibility of the Project either by itself or in comparison to the Alternatives.

B. SNGS' Claim that the Engineering and Permitting Costs For the Project and the Alternatives is Wrong.

SNGS says engineering and permitting costs are the same for the Project and each of the Alternatives. However, Exhibit C to SNGS' Response to ALJ's Ruling Directing SNGS to Serve Declarations and Additional Evidence (hereinafter "SNGS Response") contains several explanations why costs are different for each of the Alternatives. In particular, Exhibit C states that the engineering costs are higher for the Project because of safety measures required by the FEIR. (SNGS Response, Exhibit C, p. 2) With that critical difference, the engineering costs for each project cannot reasonably be assumed to be identical, especially given that SNGS presents no quantitative analysis to support this suspect conclusion.

SNGS also stated that its projected Engineering, Permitting, and Legal costs for the Alternatives were based on estimates for the Project. (Houston Testimony, Exhibit B,

pp. 2, 7, 12; SNGS Response, Exhibit C, pp. 1-2.) The assumption that these costs would be the same for all four fields is belied by SNGS' own statement that the Engineering and Design Costs for the Florin Project will be higher because of additional safety measures required by the FEIR. (SNGS Response, Exhibit C, p. 2.) Using the Florin Project estimate for the Alternatives is nothing but a slight of hand to avoid discussing the higher costs of the Project. This invalidates the comparison between the fields because the costs for the Project are artificially low in comparison to the Alternatives.

In addition, SNGS contends that the financing costs for the Project are much lower than for the Alternatives. (SNGS Response Exhibit A at p.2.) However, SNGS gives no explanation for the lower financing costs for the Project. If the same assumptions on page 2 of Exhibit A of SNGS' Response are used for each of the Alternatives, there is no reason why the financing costs should be different. If different financing assumptions are used for the Alternatives, those must be stated and explained for any comparison to be meaningful.

C. SNGS' Submission Does Not Properly Evaluate Eminent Domain and Storage Rights Leasing Costs For the Project

Page 2 of Exhibit A of SNGS' Response states that SNGS will pay \$466,000 for eminent domain storage rights. This cost item as stated has several problems. Page 2 of Exhibit A assumes 250 units of eminent domain cost. (SNGS Response, Exhibit A, page 2.) However, there are about 700 property owners who will be entitled to payment for storage rights. (FEIR, Vol. 1, Comment D2-53 [SNGS stating that leases are required for 771 parcels].) The data presented by SNGS only accounts for eminent domain costs and

fails to include costs associated with obtaining storage rights from the remaining property owners. SNGS must pay rent based on leases signed by these property owners. In fact, assuming that SNGS has made accurate statements to the community, the rental cost for properties where leases have been signed is, on a per-property-basis, higher than payments made as part of an eminent domain proceeding because SNGS has alleged it paid a premium to property owners who signed leases. (*See* Letter from Jim Fossum, SNGS Chairman, to Jerry William Samla, Jr., April 14, 2009, stating, in reference to the "City of Sacramento's independent lease study", "the evaluation study shows that SNGS lease payments are 62% more than market rent..." (internal citations omitted), Public Participation Hearing Transcript, Volume 3 at p. 46 of 160; SNGS Post-Public Participation Hearing Brief, filed June 29, 2009, at pp. 18-19 and Exhibit A at p. 46.) The leasing cost is not included in the cost projection for the Project submitted by SNGS. It is a cost that does not exist or is substantially lower for the Alternatives. This omission improperly lowers the cost estimate for the Project in comparison to the Alternatives.

SNGS also does not include the legal costs of the eminent domain proceeding in its cost projection for the Project. This means that, despite SNGS' assumption that the legal costs for the Project and the Alternatives would be the same, the legal costs for Florin are higher because of the eminent domain proceedings that will be required for SNGS to obtain the authority to do eminent domain and for the amounts individual property owners above the field would get if eminent domain authorities is awarded and used. (FEIR, Vol. I, Comment D2-53 [as of June 18, 2009 SNGS stated that it had not obtained leases for 218 parcels (i.e. 28% of all parcels above of the Florin Field

boundaries as defined by SNGS]; see Code Civ. Proc., § 1230.010 *et seq.* [establishing law applicable to eminent domain proceedings]; see also Pub. Util. Code, § 625, subd. (f) [establishing a hearing procedure required for the CPUC to authorize a public utility offering competitive services to pursue eminent domain; this CPUC procedural requirement supplements the requirements of Section 1230.010 *et seq.* of the Code of Civil Procedure.].) SNGS presents no evidence suggesting that eminent domain proceedings would be necessary to develop the Alternatives; the evidence suggests the use of eminent domain would be substantially less likely for the Alternatives because they are not in densely populated areas similar to the Florin field.

Moreover, SNGS states that the eminent domain costs are based on a formula. (SNGS Response, Exhibit A p.2.) However, SNGS does not state what formula was used. Absent a statement of the formula, this cost item cannot be properly evaluated.

D. SNGS' Submission Improperly Compares the Project to Thornton Full Buildout Instead of to the Thornton Limited Buildout Alternative Considered in the FEIR.

Finally, SNGS' submission compares the Project to full buildout of the Thornton field. (SNGS Response, Exhibit B [stating that Thornton would have 54 bcf of storage space, which is full buildout].) However, the financial projection for Thornton in SNGS' previous testimony was based on 7.5 bcf of storage capacity. (Houston Testimony Exhibit B p.13 [using 7.5 bcf storage capacity for financial projection for Thornton].) SNGS did not submit cost projections for Thornton full buildout because that is not an alternative considered in the FEIR. (Direct Testimony of Jim Fossum, July 23, 2010, Q15; *see* FEIR, Vol. 2, p. C-9, Table C-1 [stating that Thornton “[w]ould have a working

gas storage capacity of +7.5 bcf’].) The Thornton full buildout option is more expensive because of the bigger field, higher pad gas costs, and longer required pipeline and therefore makes the comparison invalid. (See Direct Testimony of Jim Fossum, July 23, 2010, at Q15 p.5 [describing need for 22 mile long pipeline for Thornton full buildout that would not be needed for other alternatives].) SNGS does not compare the Project to the Thornton limited buildout alternative that was actually considered in the FEIR. SNGS’ submission is irrelevant because it does not address an alternative considered in the FEIR. The Thornton full buildout analysis cannot show that Thornton partial buildout is infeasible because it does not compare the Project to Thornton partial buildout. (*Goleta I, supra*, at p.1180; *Uphold Our Heritage, supra*, 147 Cal.App.4th at p.599 [comparison to alternatives identified in the EIR is required].)

E. SNGS’ Prior Testimony and Evidence On Alternatives Lacks Foundation And Is Suspect.³

SNGS presents no additional testimony or declarations to support any conclusions to be drawn from the numbers in its Supplemental Response. SNGS’ prior testimony and evidence does not address comparison between the Project and the Alternatives. At this point, all SNGS provided for comparison between the Project and the Alternatives is numerical conclusions with no explanation. Absent testimony to explain what the data means and to draw conclusions, SNGS’ submission tells nothing.

³ / AGENA is uncertain whether these Comments are limited to responding to SNGS’ Supplemental Response or if these Comments should address both of SNGS’ submissions about the Alternatives. In an abundance of caution, AGENA includes its comments on SNGS’ prior testimony and evidence on alternatives here in case this is AGENA’s only opportunity to comment on SNGS’ prior testimony and evidence.

The testimony and evidence SNGS previously submitted that discussed only the Alternatives in isolation do not assist SNGS. The two letters attached to Jim Fossum's Supplemental Direct Testimony only state that two investors would not invest in the alternative fields. (Letter from Hugh D. Babowal, attached to Supplemental Direct Testimony of Jim Fossum as Exhibit A, Letter from James P. Baker, attached to Supplemental Direct Testimony of Jim Fossum as Exhibit B.) The letters contain no conclusions about investors in general or whether there would be a general market for investment in the Alternatives. They therefore have little probative value. SNGS presents no opinion about the market for investing in any of the Alternatives.

The letter from Hugh Babowel is suspect as well because it is from Wells Fargo Securities, which is an investor in the Project, has a seat on SNGS' Board of Managers, and has a clear financial interest in the Project. (Supplemental Direct Testimony of Jim Fossum Q8.) The letter from James P. Baker of Simmons & Company is also suspect because it lacks the necessary foundation to indicate that the author has any experience in natural gas storage, energy markets, or investment markets in California and suggests the opposite is true as the letter is from a Texas company. This missing information means the Baker letter has little or no evidentiary value. (*Center for Biological Diversity, supra*, at pp. 884-5.)

II. SNGS HAS NOT DEMONSTRATED THAT THE ALTERNATIVES TO THE PROJECT ARE GEOLOGICALLY INFEASIBLE

SNGS' geological evidence does not compare the Project to the Alternatives. The testimony of Eric Frank Hadsell discusses data and conclusions about the three

alternative fields, but does not compare the Alternative to the Project. (Supplemental Direct Testimony of Eric Frank Hadsell at Q6.) Absent such a comparison, it is impossible to evaluate whether the Alternatives are geologically infeasible as compared to the Project. (*See Goleta I* at p.1180; *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal. App.3d 692, 735 [“absence of quantitative, comparative data . . . precluded a meaningful consideration of . . . alternative[s]”].)

III. SNGS HAS NOT PROVEN THAT THE “NO PROJECT” ALTERNATIVE IS INFEASIBLE

SNGS has presented no evidence why the “no project” alternative is infeasible. In fact, the evidence shows that the no project alternative is feasible. Pacific Gas and Electric (PG&E), in comments on the Draft EIR, stated that PG&E can provide natural gas to the Sacramento region without interruption and that SNGS’ claims to the contrary are false. (Letter from Steven A. Whalen to Jim Fossum, April 10 2008, Ex AGENA-17.)

In the FEIR, the CPUC even acknowledges that “Pacific Gas and Electric (PG&E) has an integrated and highly reliable gas supply network.” (Final EIR, Vol. 1, p. B3-1.) Barry Brunelle, SNGS’ key witness supporting the notion that something needs to be done regarding natural gas supply in the Sacramento area, was unaware of this critical evidence. (TR 64 lines 13-17 and TR 63 lines 2-10.)

In addition, SNGS has no evidence that there ever has been a disruption in natural gas service to the Sacramento region. (SNGS Response to AGENA Data Request No. 1, Response 4.1 p.34, Ex-AGENA 19.) The Sacramento Municipal Utilities District

(SMUD) Board⁴ recently stated that, if this project does not occur, SMUD will use an existing alternative. (Official Statement Relating to Sacramento Municipal Utility District \$250,000,000 Electric Revenue Bonds, 2010 Series W p.28, attached to AGENA Request for Official Notice, August 27, 2010 as Exhibit C.) Mr. Brunelle himself acknowledged “we are currently living without the project today so it must be recognized that we can live without it.” (Electronic Mail Message from Barry Brunelle to Jim Fossum and Don Russell, November 30, 2007; TR 64 line 18 – TR 66 line 4.)

Mr. Brunelle continued that SMUD wants the project to avoid any risk of a peak demand disruption. (*Id.*) Mr. Brunelle admitted that the risk of a disruption is very small, but SMUD wanted the project to avoid “even the most remote chance” of disruption. (TR 73 lines 26-28.) However, avoidance of “the most remote chance” is not the standard for whether an alternative, and in particular the no project alternative, is infeasible. In the CEQA context, feasibility means “capable of being accomplished within a reasonable period of time” (14 Cal. Code Regs. § 15364 [CEQA Guideline].) The unsupported claim of avoiding the most remote chance of interruption is insufficient to make the status quo (that is the “no project” alternative) infeasible. In fact, the statements by PG&E, the SMUD Board, and the CPUC itself show that not doing the Project is entirely feasible. Because the FEIR found significant and

⁴ / SMUD is currently the only tenant for the project. (Reply Testimony of Jim Fossum, Ex. SNGS-8 at Q8 p. 5) SNGS’ claims about the project are based on SMUD’s alleged needs. (*See* Direct Testimony of Barry Brunelle at Q13-Q15; Final Environmental Impact Report, Sacramento Natural Gas Storage Project, vol. 2 p. ES-2.)

CERTIFICATE OF SERVICE BY ELECTRONIC MAIL OR U.S. MAIL

I, the undersigned, state that I am a citizen of the United States and am employed in the City and County of Sacramento; that I am over the age of eighteen (18) years and not a party to the within cause; and that my business address is 455 Capital Mall, Suite 210, Sacramento, CA 95814.

I am readily familiar with the business practice of the City of Sacramento for collection and processing of correspondence for mailing with the United States Postal Service. In the ordinary course of business, correspondence is deposited with the United States Postal Service the same day it is submitted for mailing. On the September 30, 2010, I served a true copy of:

**AVONDALE GLEN ELDER NEIGHBORHOOD ASSOCIATION'S COMMENTS
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[XX] By Electronic Mail – serving the enclosed via e-mail transmission to each of the parties listed on the official service list for A.07-04-013 with an e-mail address.

[XX] By U.S. Mail – by placing the enclosed for collection and mailing, in the course of ordinary business practice, with other correspondence of the City of Sacramento, enclosed in a sealed envelope, with postage fully prepaid, addressed to those parties listed on the official service list for A.07-04-013 without an e-mail address.

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

Executed on this September 30, 2010 at Sacramento, California.

/s/ Matthew C. Tabarangao
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