

Company: Southern California Gas Company (U 904 G)  
Application: A.25-10-008, Proposing Woody Biomass Pilot Project  
Exhibit: SCG-09

**Sierra Club Response to SoCalGas's Data Request 5**

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY  
PROPOSING WOODY BIOMASS PILOT PROJECT**

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



**California Public Utilities Commission Docket No. A.25-10-008**

**Application of Southern California Gas Company (U 904 G) Proposing Woody Biomass Pilot Project**

**Sierra Club Response to Data Request SoCalGas-Sierra Club-05**

**To:** Ismael Bautista, Jr., on behalf of SoCalGas

**From:** Katherine Ramsey, Sierra Club

**Date Request Sent:** July 2, 2026

**Response Due:** July 17, 2026

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**QUESTION 1:**

From a human health perspective, is PM10 generally recognized as causing more direct and significant adverse health impacts than VOC emissions at the levels shown in Tables 1 and 2? If not, please explain why.

**RESPONSE 1:**

Sierra Club objects on the grounds that this question is vague and calls for speculation. The question does not define “direct,” “significant,” or “generally recognized.” The question does not specify the comparison sought or indicate the location of the emissions.

Subject to and without waiving the foregoing objections, Sierra Club answers as follows:

The Sierra Club witness does not have sufficient information to answer this question. The request for a comparison of “the levels shown in Tables 1 and 2” implies that the PM10 and VOC (each of which can be composed of a wide range of specific pollutants – each with their own adverse health impacts) level changes are experienced by the same populations, which is not certain to be the case for the proposed Project given that the location of many of the baseline emissions have not been provided and/or are not known by SoCalGas. Even if the emissions changes were experienced by the same population, the incremental human health impact of a decrease in a project PM10 emissions factor versus an increase in a project VOC emissions factor has not been evaluated. Health impacts in health risk assessments do not treat VOCs as a single “pollutant.” VOCs are speciated into separate and distinct pollutants with a range of health effects. Similarly, PM10 is also speciated into specific pollutants such as individual metals, each with specific health impacts.

SoCalGas has not indicated the individual pollutants that comprise “VOCs,” a list of which Sierra Club sought but was not provided.

Dr. Ron Sahu is the witness for this answer.

**QUESTION 2:**

Table 1 shows PM10 emissions of 18.55 mg/MJ, while Table 2 shows PM10 emissions of 1.73 mg/MJ. Assuming that the values in Tables 1 and 2 are correct, would Sierra Club agree that this represents a reduction of more than 90 percent? If not, please explain why.

**RESPONSE 2:**

Sierra Club objects on the grounds that this question calls for speculation.

Subject to and without waiving the foregoing objections, Sierra Club answers as follows:

An application of basic arithmetic indicates that a change from 18.55 mg/MJ to 1.73 mg/MJ represents a reduction of more than 90 percent.

Dr. Ron Sahu is the witness for this answer.

**QUESTION 3:**

Assuming that the values in Tables 1 and 2 are correct, when comparing the total criteria pollutant profile in Table 1 to the Bio-SNG scenario in Table 2, would Sierra Club agree that PM10, CO, and SOx emissions decline substantially while only VOC emissions increase modestly? If not, please explain why.

**RESPONSE 3:**

Sierra Club objects on the grounds that this question is confusing, vague, and calls for speculation, as “substantially,” “modestly,” and “total criteria pollutant profile” are not defined.

Subject to and without waiving the foregoing objections, Sierra Club answers as follows:

No, Sierra Club’s witness does not agree. Oxides of nitrogen are “criteria pollutants” that would be in a “criteria pollutant profile,” and a comparison of Table 1 and Table 2 indicates that the levels of NOx increase with the proposed Project in the Bio-SNG scenario with CCS and remain almost the same in the scenario without CCS, with a slight decrease of 0.07mg/MJ indicated, which is in the margin of error. Separate from NOx, a comparison of the two tables at JLMS-15 and JLMS-16 indicates that PM10, CO, and SOx emissions show a decrease between Table 1 and both Bio-SNG scenarios without and with CCS in Table 2.

Dr. Ron Sahu is the witness for this answer.

**QUESTION 4:**

Assuming that the values in Tables 1 and 2 are correct, in evaluating overall community health impacts, would the substantial reduction in PM10 emissions of 16.82 mg/MJ directly benefit the surrounding community? If not, please explain why.

**RESPONSE 4:**

Sierra Club objects on the grounds that this question is confusing, vague, and calls for speculation, as “overall community health” and “the surrounding community” are not defined.

Subject to and without waiving the foregoing objections, Sierra Club answers as follows:

No, not necessarily. The “surrounding community,” if it means the community in the vicinity of the proposed Project, will experience a certain increase in emissions from the proposed Project. The locations of the base case emissions are only partially known. Per SoCalGas’s April 30, 2026 Response 6-10g to Sierra Club’s April 16, 2026 data request, the location of the “biomass plant” is in Stockton, CA at 2526 W Washington St. A comparison of the address of the proposed Project facility and the address of the biomass plant indicates it is approximately 130 miles away. Therefore the “surrounding community” in the vicinity of the proposed Project will not benefit significantly from the reduction in the biomass plant emissions, to the extent that those reductions in fact occur as a result of the proposed Project. (I note this reduction in biomass plant emissions reductions is also speculative, as it is possible that the biomass plant will substitute in different sources of feedstock and continue to operate at its current levels in the Project scenario.) Importantly, the locations of the other base case emissions are not known. Sierra Club sought and was not provided with the location of certain baseline emissions sources including air curtain burners and diesel handling equipment. Therefore, the extent to which the “surrounding community” will benefit from any reduction in PM10 from the proposed Project is unknown and speculative.

Dr. Ron Sahu is the witness for this answer.

**QUESTION 5:**

Assuming that the values in Tables 1 and 2 are correct, would it be incorrect to characterize that “the proposed project will cause an increase of a wide range of pollutants”<sup>1</sup> without also acknowledging that PM10 emissions are reduced by 16.82 mg/MJ, CO is reduced by 9.35 mg/MJ and SOx is reduced by 21.2 mg/MJ while VOC emissions increase by 0.51 mg/MJ? If not, please explain why.

**RESPONSE 5:**

Sierra Club objects on the grounds that this question is confusing and calls for speculation. It appears to be assuming but not specifying that the appropriate comparison is between baseline and the Bio-SNG scenario without CCS.

Subject to and without waiving the foregoing objections, Sierra Club answers as follows:

No, it would not be incorrect. As noted, the proposed Project, whose location is known, will emit a wide range of new pollutants in the vicinity of the new, emitting facility. These facts are known from the Project emissions listed in both Bio-SNG scenarios in Table 2 at JLMS-16. By contrast, the location of many of the base case emissions in Table 1 that are assumed to be displaced by the proposed Project are not known, as indicated above and discussed in Sierra Club testimony. Further, the location of the biomass plant base case emissions are approximately 130 miles from the proposed Project’s facility and its surrounding community. It is not expected that the community in the vicinity of the proposed Project will benefit other than very marginally, from the biomass plant reductions. Finally, Sierra Club notes that the question claims reductions based on a comparison of the base case to the Project Bio-SNG scenario without CCS but not with CCS.

Dr. Ron Sahu is the witness for this answer.

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<sup>1</sup> Sierra Club Rebuttal Testimony (Dr. Sahu) at 18 lines 13-14.

**QUESTION 6:**

Assuming that the values in Tables 1 and 2 are correct, do Tables 1 and 2 support the conclusion that the PILOT PROJECT's Kerman facility produces a significant reduction in the pollutant most associated with particulate inhalation impacts, even though VOC emissions increase modestly? If not, please explain why.

**RESPONSE 6:**

Sierra Club objects on the grounds that this question is confusing and calls for speculation, as “significant” and “modestly” are not defined terms.

Subject to and without waiving the foregoing objections, Sierra Club answers as follows:

A comparison of the values in Table 1 and 2 indicate an increase in NO<sub>x</sub> for the Bio-SNG scenario with CCS. A comparison of the values in Table 1 and 2 indicates a decrease in PM<sub>10</sub> for both scenarios. Sierra Club's witness cannot state whether the decrease is “significant” relative to a “modest” increase in VOCs because the locations of the base case emissions are not known. Sierra Club notes that a vast majority of the PM<sub>10</sub> emissions claimed from the base case (i.e., 18.01 mg/MJ of the 18.55 mg/MJ total) are air curtain burners, the location of which are not known. Sierra Club sought this information from SoCalGas, and SoCalGas did not provide it. Therefore, from the perspective of the people living, working, studying, and traveling near the facility, they will experience a certain increase of pollutants from the Project facility with unknown base case reductions. In addition, NO<sub>x</sub> is a precursor pollutant for fine PM, which is part of PM<sub>10</sub>. We do not believe that SoCalGas has quantified the increase in PM<sub>10</sub> from NO<sub>x</sub> as a precursor. Therefore, broad claims about “a significant reduction in the pollutant most associated with particulate inhalation impacts” is a flawed premise to begin with, even before any VOC comparisons.

Dr. Ron Sahu is the witness for this answer.

**QUESTION 7:**

Assuming that the values in Tables 1 and 2 are correct, based on Tables 1 and 2, is it Sierra Club's opinion that the overall criteria pollutant profile of the PILOT PROJECT's Kerman facility represents a net air-quality benefit or a net air-quality detriment to the surrounding community? Please explain the basis for Sierra Club's conclusion.

**RESPONSE 7:**

Sierra Club objects on the grounds that this question is vague, confusing, and calls for speculation, as "overall criteria pollutant profile" is not defined nor is "net air-quality benefit," "net air-quality detriment," nor "surrounding community."

Subject to and without waiving the foregoing objections, Sierra Club answers as follows:

As noted above, from the perspective of the "surrounding community," nearby criteria pollutant increases are a certainty given the Project emissions presented in Table 2 and elsewhere in the record, while the location of many of the supposedly displaced emissions in Table 1 are unknown and speculative. Therefore, it is the expert opinion of Sierra Club's witness that there is a risk of net air quality detriment to the surrounding community. The basis for Sierra Club witness's conclusion is detailed in testimony.

Dr. Ron Sahu is the witness for this answer.

**QUESTION 8:**

As stated on JLMS-15, the Bio-SNG plant electricity is “electric grid power.” Is it correct that the "Bio-SNG plant electricity" emissions are not emissions released directly at the PILOT PROJECT Kerman facility site? If not, please explain why.

**RESPONSE 8:**

Yes.

Dr. Ron Sahu is the witness for this answer.

**QUESTION 9:**

Would Sierra Club agree that emissions associated with grid electricity generation may occur outside the San Joaquin Valley and therefore may not contribute directly to local air pollutant exposure in the communities surrounding the PILOT PROJECT Kerman facility site? If not, please explain why.

**RESPONSE 9:**

They may occur outside the San Joaquin Valley, but that is not a certainty. From a grid transmission perspective, the San Joaquin Valley is a local capacity area meaning that it has transmission constraints and thus many in-basin power plants to ensure power reliability. Therefore, it is possible that the increased emissions from grid electricity used to power the facility are in the San Joaquin Valley air basin.

Dr. Ron Sahu is the witness for this answer.

**QUESTION 10:**

When evaluating local community air quality impacts, is it important to distinguish between emissions released at the PILOT PROJECT Kerman facility site and emissions associated with electricity generation occurring elsewhere on the grid? If not, please explain why.

**RESPONSE 10:**

Sierra Club objects on the grounds that this question is confusing and calls for speculation. “[E]lsewhere on the grid” is not defined nor explained relative to “local community.”

Subject to and without waiving the foregoing objections, Sierra Club answers as follows:

Yes, if “occurring elsewhere on the grid” means so far from the community that there will not be any adverse human health impacts from those grid emissions.

Dr. Ron Sahu is the witness for this answer.