

A. INTRODUCTION/OVERVIEW

This Environmental Impact Report (EIR) has been prepared by the California Public Utilities Commission (CPUC) as the lead agency under the California Environmental Quality Act (CEQA) to inform the public and to meet the needs of local, state, and federal permitting agencies to consider the project proposed by Sacramento Natural Gas Storage, LLC (SNGS, LLC or “the applicant”). This EIR does not make a recommendation regarding the approval or denial of the project; it is purely informational in content and will be used by the CPUC in considering whether or not to approve the Proposed Project or an alternative.

On April 9~~5~~, 2007, SNGS, LLC submitted an application (Application No. 07-04-013) and a Proponent’s Environmental Assessment (PEA) to the CPUC for the Sacramento Natural Gas Storage (SNGS) Facility (the Proposed Project) (SNGS, LLC 2007a). The purpose of the application is to obtain a Certificate of Public Convenience and Necessity (CPCN) from the CPUC. A supplement to the original application and PEA was submitted on July 16, 2007 (SNGS, LLC 2007b). Additionally, an amendment to the application and PEA was submitted on October 9, 2007 (SNGS, LLC 2007c). This amendment included the addition of the Yolo County Interconnect with Pacific Gas and Electric (PG&E) Line 172 in Yolo County and construction of a metering station in the City of West Sacramento. On September 12, 2008, SNGS, LLC filed a second amendment, which withdrew its proposal to include the Yolo County Interconnect and metering station (SNGS, LLC 2008).

The purpose of this EIR is to evaluate the environmental impacts that would be expected to result from the construction and operation of the proposed SNGS Facility and to provide recommended mitigation measures that, if adopted, would avoid or minimize the significant environmental impacts identified. In accordance with CEQA requirements, this EIR identifies alternatives to the proposed SNGS Facility that could avoid or minimize significant environmental impacts associated with the project as proposed by SNGS, LLC (including the No Project Alternative), and evaluates the environmental impacts associated with these alternatives. Based on this environmental impact assessment, as well as the relative sensitivities of impacts in the study region, this EIR determines the Environmentally Superior Alternative as required by CEQA (see Section E of this EIR).

The content of this EIR reflects input by government officials, agencies, non-governmental organizations, and concerned members of the public during the EIR scoping period following the CPUC’s publication of the Notice of Preparation (NOP) of an EIR (November 16, 2007). During this comment period, several public involvement activities were completed, including public distribution of the NOP and a scoping meeting notice, establishment of an Internet web page, and a public scoping meeting (see Section H of this EIR for additional details).

This section of the EIR is organized as follows:

- Section A.1 briefly describes the SNGS Facility as proposed by SNGS, LLC.
- Section A.2 presents information related to the purpose and need for the Proposed Project.
- Section A.3 describes agency use of the EIR and includes a brief description of the CPUC process for consideration of project approval.
- Section A.4 provides a reader's guide to this EIR, explaining how it is organized.
- Section A.5 describes the public review period for the project.
- Section A.6 lists references cited in this section of the EIR.

A.1 Overview of Proposed Project

As proposed by SNGS, LLC, the Proposed Project would use a depleted natural gas reservoir (Florin Gas Field) located within the City of Sacramento and partially within and adjacent to an unincorporated area of the County of Sacramento to store up to 7.5 billion cubic feet (bcf) of working natural gas. The Proposed Project includes the existing underground natural gas storage reservoir, a wellhead site, a compressor station, a buried 16-inch interconnection pipeline between the wellhead and compressor site, and a buried 16-inch interconnection pipeline between the compressor site and Sacramento Municipal Utilities District (SMUD) Line 700. Please refer to Section B, Description of Proposed Project, of this EIR for additional details regarding the project.

The Proposed Project would store up to 7.5 bcf of working natural gas in the depleted Florin Gas Field reservoir, which is situated approximately 3,800 feet below the ground surface. Natural gas was previously extracted from the Florin Gas Field by Proctor and Gamble, Vendada National, TXO Production Corporation, and Union Oil Company until 1987 when the natural gas supply was depleted. Shortly thereafter, the wells and appurtenance facilities were capped and abandoned in accordance with regulations set forth by the California Department of Conservation's Division of Oil, Gas, and Geothermal Resources (DOGGR). Because there was no additional use for the wells, they were capped and abandoned.

The Florin Gas Field is centered at the corner of Power Inn Road and Wagon Trail Way in the City of Sacramento. Approximately 43% of the field is in the City of Sacramento and 57% is in Sacramento County. The wellhead site, compressor station, and associated interconnecting pipelines would be situated within the City of Sacramento. The wellhead site would be located at the northeast corner of the intersection of Junipero Street and Power Inn Road; the compressor station would be located north of the wellhead site on the historic Sacramento Army Depot that is Depot Park.

A.2 Project Purpose and Need

A.2.1 Background

Natural gas is a gaseous fossil fuel that primarily consists of methane. Natural gas is not a pure product and frequently contains significant quantities of ethane, propane, butane, pentane, carbon dioxide, nitrogen, helium, and hydrogen sulfide. These heavy hydrocarbons and inorganic compounds are removed as condensate when the natural gas is processed. The gas is found in oil fields either dissolved or isolated in natural gas fields, in coal beds (as coalbed methane), or produced by the anaerobic decay of non-fossil organic material, such as in swamps, marshes, and landfills, sewage sludge, and manure.

Once natural gas has been extracted from the ground and processed to remove impurities, it can be transported through a network of intrastate and interstate gas pipelines. The gas can then be transported to homes and businesses through distribution lines. Many private companies no longer purchase natural gas services from only one company. Instead, many California companies arrange to purchase gas directly from producers across the western half of North America and then contract with pipeline owners to transport the gas to the end point in California.

Natural gas pipeline capacity into California has increased over the last 15 years but demand has risen as well, due mostly to population growth and electric power plants switching from oil to natural gas to fuel their boilers. Requirements to reduce air pollutant emissions have contributed to increased demand for natural gas. In 2003, the California Energy Commission, California Power Authority, and the CPUC adopted an Energy Action Plan (EAP) that listed joint goals for California's energy future. For natural gas supply, demand, and infrastructure, the EAP has set goals to ensure reliable, long-term natural gas supplies to California at reasonable rates. In addition, the EAP seeks to provide a natural gas delivery and storage system that is sufficient to meet California's peak demand, encourage the development of additional in-state natural gas storage to enhance reliability and mitigate price volatility, and adopt additional natural gas and electric efficiency programs and standards to reduce the reliance on natural gas for various uses.

PG&E Lines 400/401, which run north and south across the center of the state, define the backbone of the natural gas conveyance system in California. Two PG&E lines and one SMUD pipeline interconnect to lines 400/401 to direct natural gas to the Sacramento region. The Sacramento area is located at the end of the pipeline with the majority of the gas coming from Canada, nearly 1,000 miles away. Disruption of this supply pipeline can create a substantial adverse situation because this gas is used to generate approximately 30% of the electricity in the Sacramento area, as well as providing fuel for many other residential, industrial, and commercial uses. While there is currently adequate pipeline capacity, there is no storage in the Sacramento

area in the event of a disruption in the gas supply. SMUD has identified the need for at least a 30-day backup supply to be stored in the Sacramento area.

The state's two largest natural gas utilities, PG&E and Southern California Gas Company (SCGC), have stored natural gas in various storage facilities around the state as a method of alleviating the effects of a supply shortage. Currently, there are two companies other than PG&E and SCGC ~~that~~ Currently operate their own natural gas storage facilities in California—Lodi Gas Storage, LLC and Wild Goose Storage, Inc. Lodi Gas Storage operates the Lodi Gas Storage Facility northeast of the City of Lodi in San Joaquin County and the Kirby Hills Facility in Solano County. Wild Goose Storage, Inc. began operations at its facility in Butte County in the late 1990s and later expanded its permitted storage and operational capacity in 2002.

In the United States, there are currently three types of underground natural gas storage facilities in use: abandoned salt caverns, water aquifers, and old production fields. However, in California, only old production fields are currently used as storage facilities. An existing, pressurized production field is considered the most desirable by storage facility developers for several reasons, including that the field was previously used for gas production, the geology of the reservoir is generally well-known, and the cap rock covering the permeable basin has been documented as holding natural gas in. Once an underground reservoir has been identified, a geophysical team can determine whether extraction (or injection) is feasible and where wells would have the greatest probability of reaching the deposit. The exact placement of a drill site depends on a variety of factors, including the nature of the potential formation to be drilled, the characteristics of the subsurface geology, and the depth and size of the target deposit.

The Florin Gas Field is a depleted natural gas field that was used for production by three separate entities during an eight-year production period ending in 1987. By 1987, the field had been depleted to a point where more water was being extracted than gas and the amount of gas that was recovered could not justify the production costs. By 1993, the five extraction wells and three non-production wells that had been established above the gas field were abandoned under the supervision of DOGGR.

The gas field is located approximately 3,800 feet below the ground surface and is capped by a shale unit ranging between 150 and 300 feet thick. The field underlies approximately 379 acres of surface land. Land uses contain residential, commercial, industrial, park land, or city-owned parcels. The majority of the residential and other land uses were in existence prior to original development of the Florin Gas Field for natural gas extraction.

A.2.2 Statement of Objectives

CEQA Guidelines (Section 15126.6(a)) requires that project objectives be set forth in an EIR in order to help define alternatives to the Proposed Project that meet most of the basic project objectives. SNGS, LLC lists the following basic objectives of the Proposed Project:

1. Provide strategically located natural gas storage in California.
2. Provide a secure and reliable gas supply for the Sacramento metropolitan area in the event of a disruption of service from the main supply pipeline that services the area.
3. Satisfy SMUD's natural gas storage needs to specifically provide a fuel supply to power their electrical generating plants. The total volumetric capacity available to SMUD under its Storage Service Agreement with SNGS, LLC is 4.0 bcf, which yields approximately a 30-day supply.

A.3 Agency Use of this Document

A.3.1 CPUC Process

CPUC oversees the regulation of investor-owned public utilities, such as SNGS, LLC, pursuant to Article XII of the Constitution of the State of California. CPUC is also the lead state agency for consideration and analysis of SNGS, LLC's proposed SNGS Facility with CEQA. CPUC has directed the preparation of this EIR, which will ultimately be used by the CPUC, in conjunction with other information developed in the CPUC's formal record, to act on SNGS, LLC's application for a CPCN for construction and operation of the Proposed Project. Under CEQA requirements, the CPUC will determine the adequacy of the Final EIR and, if adequate, will certify the document as complying with CEQA. If the CPUC approves a project with significant and unmitigable impacts, it must state why in a "Statement of Overriding Considerations," which would be included in the CPUC's decision on the application.

CPUC has assigned Administrative Law Judge (ALJ) Richard Smith to oversee the proceeding on the Proposed Project, and Timothy Alan Simon is the Assigned Commissioner for the CPCN application. The ALJ, in accordance with the Scoping Memo, is expected to hold evidentiary hearings on the CPCN application and will issue a proposed decision on the SNGS Facility Project. The ALJ's decision and the evidentiary hearings will cover issues specific to the SNGS Facility, including project need, project cost, and other considerations.

A.3.2 Other Agencies

Construction, operation, and maintenance of the Proposed Project would be in accordance with all applicable federal, state, and local regulatory requirements, which may include, but are not limited to, those outlined in Table A-1.

Table A-1
Permits Required for the Sacramento Natural Gas Storage Facility

Permits	Agency	Jurisdiction/Purpose
Federal Agencies		
Section 404 Nationwide Permit Program, Clean Water Act	U.S. Army Corps of Engineers (ACOE)	Dredge or fill of waters of the United States, including wetlands.
Section 7 consultation (through ACOE's review process)	U.S. Fish and Wildlife Service (USFWS)	Consultation on federally listed species; incidental take authorization (if required).
=	U.S. Department of Transportation (DOT)	Review and approvals related to pipeline safety.
State Agencies		
Certificate of Public Convenience and Necessity	CPUC	Overall Project approval and CEQA review.
=	California Accidental Release Prevention Program (CalARP)	For the prevention of the accidental release of regulated toxic and flammable substances.
Permit to Operate a Storage Field Permit to Conduct Well Operations Authorization to Inject Produced Waters	California Department of Conservation (CDC), Division of Oil, Gas, and Geothermal Resources	Install, test, and operate injection and extraction wells, such as those proposed at the wellhead site.
=	California Department of Conservation (CDC), Division of Oil, Gas, and Geothermal Resources	Gas well and water injection plan approvals.
National Pollutant Discharge Elimination System (NPDES)– Construction Stormwater Permit	California State Water Resources Control Board (SWRCB)	Stormwater discharges associated with construction activities disturbing more than 1 acre of land.
General Order for Dewatering and Other Low Threat Discharges to Surface Waters	California Regional Water Quality Control Board (RWQCB), Central Valley Region	Discharge hydrostatic test water or trench water.
Section 401 Water Quality Certification (or waiver thereof)	RWQCB	Requests RWQCB's certification that the project is consistent with state water quality standards.
Basin Plan Conditional Waiver– Drilling Mud Pits	RWQCB	Conditional waiver to use drilling mud pits to contain drilling mud during the drilling process.
Section 1601 Streambed Alteration Agreement	California Department of Fish and Game (CDFG)	Alteration of the natural state of any stream.
Encroachment Permit	Central Valley Flood Protection Board State Reclamation Board	Any activity that would affect levees or the floodway within/between levees, or the designated floodway if no levees are present, within the Sacramento and San Joaquin rivers and their tributaries.

Table A-1 (Continued)

Permits	Agency	Jurisdiction/Purpose
<i>Local Agencies</i>		
Authority to Construct/Permit to Operate	Sacramento Metropolitan Air Quality Management District	Installing or operating new equipment or processes that may release air pollutants to ensure that rules and regulations are adhered to.
=	<u>Sacramento Metropolitan Air Quality Management District</u>	<u>Approval of air quality plans.</u>
Special Use Permit	City of Sacramento	A Conditional Use Permit used for zoning purposes and to review the location, site development, or conduct of certain land uses.
Franchise Agreement	City of Sacramento	Required by City of Sacramento for construction of the pProject on Depot Park property.
Roadway Encroachment and Closure Permits	City and County of Sacramento	Construction, operation, and maintenance within roadway rights-of-way (ROWs).
=	<u>City of Sacramento</u>	<u>Approval of erosion sediment control plan.</u>
=	<u>City of Sacramento</u>	<u>Approval of traffic control plan.</u>
=	<u>City of Sacramento Fire Department</u>	<u>Approval of fire and emergency plans.</u>
=	<u>City of Sacramento</u>	<u>Storage right lease for City-owned property above the reservoir.</u>
<u>Crossing Permit</u>	<u>Union Pacific Railroad</u>	<u>Required for direction bore crossing beneath UPRR track.</u>
Local Ordinances	City and County of Sacramento	Construction, operation, and maintenance within, under, or over city or county road ROW.
<u>Local Variance</u>	<u>City of Sacramento</u>	<u>Required for continuous drilling operations for new well-heads.</u>
=	<u>Union Pacific Railroad</u>	<u>Right to have gas pipeline cross under tracks.</u>
=	<u>Sacramento Municipal Utilities District</u>	<u>Pipeline capacity lease.</u>
=	<u>County and City of Sacramento residents and businesses</u>	<u>Storage right leases for residences and businesses located above the reservoir.</u>

A.4 Reader's Guide to this EIR

A.4.1 Available for Review

SNGS, LLC's PEA and other supporting documentation, submitted as part of Application No. A.07-04-013 for the Proposed Project, contains certain information that is incorporated by reference in some sections of this EIR. These documents are available for public review during normal business hours at the following locations:

CPUC Central Files
505 Van Ness Avenue
San Francisco, California 94102

City of Sacramento Public Library
828 I Street
Sacramento, California 95814

Arthur F. Turner Branch Library
1212 Merkley Avenue
West Sacramento, California 95691

Yolo Branch Public Library¹
37750 Sacramento Street
Yolo, California 95697

A.4.2 EIR Organization

This EIR is organized as follows:

- **Executive Summary.** A summary description of the Proposed Project, its alternatives, their respective environmental impacts, and identification of the environmentally superior alternative.
- **Impact Summary Tables.** A tabulation of the impacts and mitigation measures for the Proposed Project and alternatives.
- **Section A (Introduction/Overview).** A discussion of the background, purpose, and need for the project, briefly describing the proposed SNGS Facility, and outlining the public agency use of the EIR.
- **Section B (Description of Proposed Project).** Detailed description of the proposed SNGS Facility.
- **Section C (Alternatives).** Description of the alternatives evaluation process and alternatives considered but eliminated from further analysis and the rationale, and a description of the alternatives carried forward and analyzed in Section D.

¹ The Notice of Preparation (NOP) was submitted to the Arthur F. Turner Branch Library and the Yolo Branch Public Library because at the time of distribution, components of the project were within these jurisdictions.

- **Section D (Environmental Analysis).** A comprehensive analysis and assessment of impacts and mitigation measures for the Proposed Project and alternatives, including the No Project Alternative. This section is divided into main sections for each environmental issue area (e.g., Air Quality, Biological Resources) that contain the environmental settings and impacts of the Proposed Project and each alternative. At the end of each issue area analysis, a mitigation monitoring, compliance, and reporting table is provided.
- **Section E (Comparison of Alternatives).** Identification of the CEQA environmentally superior alternative and a discussion of the relative advantages and disadvantages of the Proposed Project and alternatives that were evaluated. Table E-1 in Section E.2 provides a summary of significant unmitigable (Class I) impacts of the Proposed Project versus the alternatives.
- **Section F (Other CEQA Considerations).** A discussion of growth-inducing impacts, irreversible environmental changes, and cumulative impacts.
- **Section G (Mitigation Monitoring and Reporting).** A discussion of the CPUC's mitigation monitoring, compliance, and reporting program requirements.
- **Section H (Public Participation).** A brief description of the public participation program for this EIR.
- **Section I (Report Preparation).** Lists the preparers of this EIR and contacts with public agencies, and a list of acronyms and abbreviations used in preparation of this EIR.

A.5 Summary of Public Review Process

A.5.1 Public Involvement

The CEQA EIR process for the SNGS Project began with the CPUC's issuance of the Notice of Preparation (NOP) of an EIR in November 2007 and has lead up to the finalization of an EIR in 2010. The public involvement milestones include the following.

- The CPUC issued the NOP on November 16, 2007, and distributed it to the State Clearinghouse (SCH No. 2007112089) and federal, state, and local trustees and agencies that may be affected by the Proposed Project. Public notification of the NOP included direct agency and public notification, a newspaper announcement, and posting on the project website: http://www.cpuc.ca.gov/environment/info/dudek/sngs/SNGS_Home.htm. The NOP was sent to 62 federal, state, and local agencies, five Native American groups, three local libraries, as well as Yolo County, the City of Sacramento, and the County of Sacramento. A copy of the NOP may be viewed on the project's website. Public notification was sent to over 767 stakeholders.

- One public scoping meeting was held in December 2007 prior to the selection of alternatives and the preparation of the analysis documented in this EIR. The scoping meeting was held at the Conference Center at Depot Park, 8215 Ferguson Street, Sacramento, California. Approximately 24 persons attended the scoping meeting, including representatives from local and state agencies, organizations, and private citizens.
- In total, nine letters were received from public agencies and individuals during the NOP scoping period (November 16 to December 17, 2007) and six individuals provided comments during the scoping meeting. In December 2007, a Scoping Report was issued summarizing comments received.
- In April 2009, the Notice of Availability (NOA) of the Draft EIR was mailed to over 1,300 interested parties, federal and state agencies, local jurisdictions, regional and local agencies, Native Americans, attorneys, and property owners adjacent to the Proposed Project's alignment as well as those adjacent to identified project alternatives. The NOA included information on how to gain access to the Draft EIR; information on the Proposed Project; the date, time, and location for the informational meeting on the Draft EIR and the CPUC's public participation hearing, and how to comment on the Draft EIR.
- The CPUC issued the Draft EIR on April 8, 2009, including an analysis of impacts in 12 environmental disciplines, and an evaluation of alternatives to the Proposed Project, including the No Project Alternative. Copies of the full Draft EIR and appendices were sent to 25 interested parties and agencies, including three libraries used as document repositories. Seventy-seven copies of the Executive Summary with CDs with the text of the Draft EIR were also sent out to interested parties and agencies. The public comment period for the Draft EIR was schedule to end May 25, 2009, but was extended to June 22, 2009, allowing interested parties extra time to provide comments on the Proposed Project.
- The NOA was also provided to the *Sacramento Bee* newspaper and was printed at the beginning of the public review on April 8, 2009.
- ~~A public participation hearing~~An informational meeting was held on April 28, 2009, at the Conference Center at Depot Park, 8215 Ferguson Street, Sacramento, California. Twelve members of the public, including representatives of organizations and government agencies, were documented in attendance at the ~~public participation hearing~~informational meeting. Following the informational meeting on the Draft EIR, the CPUC held a public participation hearing to take comments on the Proposed Project, including the Draft EIR
- A second public participation hearing ~~informational meeting~~ was held on October 27, 2009. Forty-five~~nine~~ members of the public commented on the Proposed Project, including the Draft EIR~~gave their statement at this meeting.~~

A list of persons, organizations, and public agencies commenting on the Draft EIR, the comments received on the Draft EIR, and responses to the comments are provided in Volume 1, Section 2 of this Final EIR.

A.5.2 EIR Information and Repository Sites

Four repository sites were established for citizens to view the Draft EIR documents and make copies of them. In addition, copies of the Draft EIR on CD, or a separately bound Executive Summary, were available upon request by mail and on the project's website:

http://www.cpuc.ca.gov/environment/info/dudek/sngs/SNGS_Home.htm.

Copies of the Draft EIR were available to the public at the locations listed below.

Dudek
11521 Blocker Drive, Suite 200
Auburn, California 95603

Southgate Public Library
6132 66th Avenue
Sacramento, California 95823

City of Sacramento Public Library
828 I Street
Sacramento, California 95814

Colonial Heights Library
4799 Stockton Boulevard
Sacramento, California 95820

A.5.3 Public Review Period

In compliance with PCR Section 21091(a) and CEQA Guidelines Section 15105(a) (14 CCR 15000 et seq.), the CPUC provides a public review period of 45 days for the EIR. The public review period was extended by the CPUC to 75 days (from April 8, 2009 through June 22, 2009). The reason for this extension was twofold: (1) there were numerous questions raised at the public meeting held on April 28, 2009, concerning the potential for groundwater contamination near the reservoir cap rock in the Florin Gas Field, and (2) the State Clearinghouse had decided not to distribute the Draft EIR to the Department of Water Resources (DWR), a potential trustee agency. The CPUC allowed written comments on the Draft EIR to be submitted by U.S. mail, email, fax, or at the public information meeting. The comments received by the CPUC during the public review period and at the April 28 informational meeting on the Draft EIR and public participation hearing, and the ~~2009 and~~ October 27, 2009, public participation hearing ~~public meetings~~ are reproduced in this Final EIR along with responses to comments (Volume 1, Section 2, Response to Comments).

A.5.4 Public Information Meeting

In order to help affected communities understand the Proposed Project and the Draft EIR, and to explain how the public can participate in the CPUC's decision-making process including commenting on the Draft EIR, the CPUC held two public information meetings on April 28, 2009, and October 27, 2009, at the Conference Center at Depot Park, 8215 Ferguson Street, Sacramento, California. At this information session, the EIR team and CPUC staff were available to respond to questions and provide clarification regarding the impact analysis and conclusions presented in the Draft EIR.

Immediately after the April 28, 2009 informational workshop meetings, a public participation meeting hearing was held at the same location as the informational meeting for formal comments on the Draft EIR where the public spoke formally on the record commented on any issues of concern related to SNGS, LLC's CPCN Application, including the Draft EIR. A second public participation hearing was held on October 27, 2009 at the Will C. Wood Middle in Sacramento where the public commented on any issues of concern related to SNGS, LLC's CPCN Application, including the Draft EIR.

A.5.6 References

- SNGS (Sacramento Natural Gas Storage), LLC. 2007a. *Proponent's Environmental Assessment (PEA) for the Sacramento Natural Gas Storage (SNGS) Project*. Sacramento, California: Sacramento Natural Gas Storage, LLC and EIP Associates, a division of PBS&J. April 5, 2007.
- SNGS, LLC. 2007b. *Supplement to the Proponent's Environmental Assessment for the Sacramento Natural Gas Storage Project*. Sacramento, California: Sacramento Natural Gas Storage, LLC and EIP Associates, a division of PBS&J. July 16, 2007.
- SNGS, LLC. 2007c. Amendment to the 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. Prepared by the Law Office of Alfred F. Jahns. October 9, 2007.
- SNGS, LLC. 2008. Second Amendment to the 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. Prepared by the Law Office of Alfred F. Jahns. September 12, 2008.