

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Monday, September 25, 2023 6:38 PM  
**To:** Rosauer, Michael; [REDACTED]; Garcia, Albert J; [REDACTED]  
**Cc:** Brewster Birdsall; Susan Lee; Henriquez, Roxanne  
**Subject:** Re: Ventura Compressor Station Modernization Project PEA Deficiency Letter

Mike,

We have received the PEA Completeness Review for the Ventura Compressor Modernization Project.

Please have a nice evening.

Jeff

[REDACTED]  
Regulatory Affairs  
SoCalGas  
[REDACTED]

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**From:** Rosauer, Michael <michael.rosauer@cpuc.ca.gov>  
**Sent:** Monday, September 25, 2023 6:07:29 PM  
**To:** [REDACTED]@socialgas.com>; [REDACTED]@socialgas.com>; Garcia, Albert J <AGarcia6@socialgas.com>; [REDACTED]@socialgas.com>  
**Cc:** Brewster Birdsall <Bbirdsall@aspenerg.com>; Susan Lee <Slee@aspenerg.com>; Henriquez, Roxanne <Roxanne.Henriquez@cpuc.ca.gov>  
**Subject:** [EXTERNAL] Re: Ventura Compressor Station Modernization Project PEA Deficiency Letter

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SoCalGas Team,  
Please confirm receipt of VCS Modernization Project PEA Completeness Review.  
Thanks,  
Mike

Sent from my iPhone

On Sep 22, 2023, at 4:00 PM, Rosauer, Michael <michael.rosauer@cpuc.ca.gov> wrote:

SoCalGas Team,

Please see the attached Completeness Review Report on A.23-08-019 Ventura Compressor Station Modernization Project PEA deficiencies. Please contact me with any questions regarding the attached Completeness Review and identified PEA deficiencies.

Thanks,  
Mike

<\_Completeness Review VCM 9-22-2023.docx>  
<\_Completeness Review VCM 9-22-2023.pdf>

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# PEA COMPLETENESS REVIEW

## Ventura Compressor Station Modernization Project

*Prepared for*

**CPUC Energy Division**

*Submitted by*



**September 2023**

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## 1. OVERVIEW

Southern California Gas Company (SoCalGas) prepared and submitted to the CPUC the Application for a Certificate of Public Convenience and Necessity (CPCN) for the Ventura Compressor Station Modernization Project (proposed project). CPUC General Order (GO) 177 for Gas Infrastructure requires that all applications for CPCNs shall include an Applicant-prepared Proponent's Environmental Assessment (PEA). The application (A.23-08-019) and PEA were submitted concurrently, dated August 24, 2023.

### 1.1. Completeness Review Process

CPUC Energy Division CEQA Unit Staff must determine if the PEA meets the requirements defined in GO 177, which are defined in the CPUC's 2019 Guidelines for Energy Project Applications Requiring CEQA Compliance: *Pre-filing and Proponent's Environmental Assessments*, including the PEA Checklist.

GO 177 requires that CPUC Staff review the application and notify the utility of any deficiencies in the information and data submitted in the application [GO 177, § VI(B)] no later than 30 days after the filing of the application for a CPCN.

Prior to filing the application for a CPCN, and as required by GO 177, § VI(C), the Applicant submitted a Draft PEA and participated in pre-filing meetings with CEQA Unit Staff. SoCalGas uploaded a Draft PEA on May 24, 2023, and the CEQA Unit Staff and the CPUC consultant team (Aspen Environmental Group) provided a preliminary review of that draft.

For the formal application, dated August 24, 2023, CEQA Unit Staff and Aspen have reviewed the PEA. These comments identify deficiencies in the PEA that must be remedied before the PEA can be deemed complete.

### 1.2. Use of the PEA Checklist

The PEA Checklist included within the 2019 Pre-filing Guidelines provides Applicants with detailed guidance about information that the CEQA Unit Staff requires in a sufficient PEA. The CPUC and its consultant team use the PEA Checklist to focus on the types, scope, and thoroughness of data expected for data adequacy purposes and for the PEA to be deemed complete.

When a PEA is developed according to the 2019 Pre-filing Guidelines and PEA Checklist, the CEQA Unit Staff and CPUC consultant team is able to efficiently determine PEA completeness. This completeness review follows the organization of the PEA Checklist and provides comments to SoCalGas, as the Applicant, requesting correction of the PEA for identified deficiencies.

## 2. PEA COMPLETENESS AND DEFICIENCY REPORT

The CPUC Energy Division CEQA Unit Staff and Aspen Environmental Group reviewed the PEA for the Ventura Compressor Station Modernization Project, dated August 24, 2023. This report summarizes the results of our completeness review.

The PEA is incomplete in the areas of hazards and public safety, water use, traffic impact analysis, and for geospatial information, especially regarding alternatives, as described below.

### 2.1. Deficiency Area #1, Hazards and Public Safety

**Project Description, Hazards, and Public Safety.** The PEA Checklist and GO-177 generally require information on public safety and reliability. The CEQA review will require detailed information on the existing compressor station safety systems to allow establishing a baseline and a comparative risk analysis with implementation of the proposed project.

The narrative of PEA Section 3.2.1.1 gives an overview of certain safety features. The discussion of Project Operations and Maintenance, PEA Section 3.8, outlines “additional inspection programs.” The Project Description lacks details on certain safety, administrative, and design features.

#### Deficiency Requests:

1. Please provide details for both the existing facilities and proposed project, to establish how the proposed site improvements compare with the existing conditions, for the safety systems listed below.

Emergency Shutdown (ESD) System:

- Equipment that is activated by the ESD including the intended action (activate/deactivate or open/close).
- Activation modes (automatic or manual) and what conditions could energize the ESD automatically.
- Classification of the ESD as a safety instrumented function (SIF) and specified safety integrity level rating.

Pressure Relief Devices (PRD):

- Type of pressure relief devices.
- Sizing contingencies in relation to American Petroleum Institute (API) Standards 520 and 521.
- Set pressure as a percentage of Maximum Allowable Operating Pressure (MAOP).
- Approximate installation locations for the PRDs.
- Discharge location if different than the blowdown stack.

Gas Detection Sensors and Systems:

- Number of sensors and type.
- Approximate placement of sensors in the site building including elevation.
- Alarm and activation setpoints.
- Calibration frequency.

Vibration Monitoring System:

- Narrative for compressor and gas engine vibration monitoring system.

**Environmental Setting, Public Safety, Section 5.9.1.5, Pipeline History.** The PEA Checklist requires a review of the history of the pipeline system(s) to which the project would connect and a detailed summary

of pipeline safety and inspection history. The PEA (pg. 5.9-8) and PEA Appendix Q provide an overview of inspection dates by year.

**Deficiency Request:**

2. Please provide details supporting the pipeline inspection history and show: whether inspections were visual or instrumented; identify the test methods used; and summarize the results of inspections and whether any corrective actions, replacements, or repairs were implemented.

**Impact Analysis, Public Safety, Section 5.9.4.4, Accident or Upset Conditions.** The PEA Checklist requires a description of how the proposed project would minimize potential hazard to the public from the failure of project components as a result of accidents or natural catastrophes. The impact analysis for public safety (PEA pp. 5.9-16 to 5.9-20) lacks details on the potential for hazardous release scenarios. The analysis lacks quantitative assessment of the frequency (likelihood) and/or possible consequences of potential hazardous release scenarios.

**Deficiency Request:**

3. Please provide details on the frequency and consequences for potential hazards to the public in the baseline conditions and conditions at the site with the proposed project for consideration of potential loss of containment and hazard scenarios, such as but not limited to those listed below:

Accidental Release of Natural Gas:

- Compressor startup with blocked outlet.
- Compressor connecting rod seal catastrophic failure.
- Vibration induced piping fatigue failure.
- Instrumentation connection leak or failure.
- Undetected drain/vent valve left open after maintenance.
- Third-party mechanical damage to operating systems during construction and demolition heavy lifts.

Leaks of Combustible Liquid:

- Lube oil piping system leak or failure (fire risk).

**Impact Analysis, Public Safety, Section 5.9.4.6, Health and Safety Plan and Section 5.9.4.7 Health Risk Assessment.** The PEA Checklist requires identification of risks from potential gas leaks, fires, etc., and potential impacts to sensitive receptors if there is a gas release. The PEA Appendix O includes a Preliminary Health and Safety Plan (HASP), and PEA Appendix B includes an Air Quality Health Risk Assessment. The HASP lacks details on the types of natural gas releases considered.

**Deficiency Requests:**

4. Please identify the types of upset incident scenarios that would be addressed by the HASP.
5. Please identify when shelter-in-place or evacuation would be considered for onsite staff and offsite receptors.
6. Please provide details on the timing and possible scopes of future process hazard analyses, including Hazard and Operability (HAZOP) and Layer of Protection Analysis (LOPA) studies, to be completed during the design and construction phases (PEA pg. 5.9-19).

## 2.2. Deficiency Area #2, Water Use

**Project Description, Water Use.** The PEA Checklist, Section 5.10.4.2, requires evaluation of the effects of water use for hydrostatic testing as part of the impact analysis for hydrology and water quality. The water use requirements should be included in the impact analysis in PEA Section 5.10.4.

**Deficiency Request:**

7. Please quantify the volumes of water that could be used for hydrotesting and dust control, as mentioned in PEA Section 3.5.8, and incorporate this project effect in the impact analysis.

## 2.3. Deficiency Area #3, Description of Alternatives

**Description and Site Plan for Supplemental Electric-Driven Compressor Alternative.** In PEA Section 4.3.1, the description of this alternative begins with: “the replacement of the existing natural gas-driven compressors with two new natural gas compressors and two new electric-driven compressors” (PEA pg. 4-14). However, the description later claims that: “No removal of the existing equipment and buildings related to the natural gas compressors would occur” (PEA pg. 4.-15).

**Deficiency Request:**

8. Please clarify whether the existing natural gas compressors would be retained under this alternative, and address whether new natural gas compressors would be installed. Please also provide a conceptual site plan showing the components of this alternative.

## 2.4. Deficiency Area #4, Traffic Impact Analysis

**Transportation, Traffic Impact Analysis.** The PEA Checklist, Section 5.17.4.3, requires the application to include a traffic impact study. According to the PEA (pg. 5.17-6), the City of Ventura General Plan notes that project proponents should analyze traffic impacts and provide adequate mitigation in the form of needed improvements, in-lieu fee, or a combination thereof.

**Deficiency Request:**

9. Please provide a traffic impact study, prepared in accordance with guidance from the City of Ventura, where appropriate.

## 2.5. Deficiency Area #5, Geospatial Information

**GIS Data Requirements.** The PEA Checklist, Attachment 1, includes specific requirements and format of GIS data. The PEA filing included electronic format GIS Native Files from preliminary or conceptual CADD drawing format, showing conceptual piping and structure footprints for the proposed project site.

**Deficiency Request:**

10. Please provide GIS data layers including labels or a site plan legend with an index and description of the various elements from the drawing. The labels or tabulated index should briefly describe the features identified in the detailed site plan of PEA Appendix A.



**GIS Data Requirements for Alternatives.** The PEA Checklist, Attachment 1, requires GIS data for alternative project facilities.

**Deficiency Request:**

11. Please provide GIS data or Google-earth format drawings for each of the “Alternatives Considered Further” (PEA Section 4.3). This data should include the alternative sites themselves, the areas required for permanent ground disturbance and temporary disturbance during construction, and the new off-site infrastructure such as road improvements, new pipeline, and electrical utility extensions (described in PEA Section 4.3; depicted on PEA Figure 4-1).

### 3. ADDITIONAL INFORMATION FOR COMPLETENESS

The remainder of this review provides an initial list of follow-up information that the CPUC needs for continuing the review of the PEA. These additional information requests are based on the PEA Checklist (defined in Section 2 above), as required for the CPUC to prepare an adequate CEQA document. The Applicant should provide responses to these requests with its response to the deficiency report.

*Note: Section numbers correspond with items in the PEA Checklist in the 2019 Pre-filing Guidelines.*

#### 3.1. Executive Summary

No comments.

#### 3.2. Introduction

No comments.

#### 3.3. Project Description

The Project Description requires additional information; see “PEA Completeness” above.

#### 3.4. Alternatives

The discussion of alternatives requires additional information; see “PEA Completeness” above.

#### 3.5. Environmental Analysis

##### 3.5.1. Aesthetics

###### Information Request:

12. **Aesthetics, Section 5.1.1.7.** In PEA Section 5.1.1.6, photos of existing conditions appear to be taken on January 27, 2023 (PEA pg. 5.1-9). However, Table 5.1-1 in PEA Section 5.1.1.7 (PEA pg. 5.1-11) says that they were taken on July 11, 2023. Please confirm the dates of representative photos.

##### 3.5.2. Agriculture

No comments.

##### 3.5.3. Air Quality

No comments.

##### 3.5.4. Biology

###### Information Request:

13. **Biological Resources, Section 5.4.1.5.** The PEA Checklist Section 5.4.1.5.f (on special-status species) requires identifying the potential to occur within the survey area (i.e., Present, High Potential, Moderate Potential, Low Potential, or Not Expected), with justification based on the results of the records search, survey findings, and presence of potentially suitable habitat. Terms for level of potential were included for one plant (i.e., “medium potential” for white rabbit-tobacco) but were

missing for two other plants. Please provide the level of potential for Ventura marsh milk-vetch and Coulter's goldfields.

### **3.5.5. Cultural**

No comments.

### **3.5.6. Energy**

No comments.

### **3.5.7. Geology, Soils, and Paleontological Resources**

No comments.

### **3.5.8. Greenhouse Gas Emissions**

#### **Information Request:**

14. **Greenhouse Gas Emissions Setting, Section 5.8.1.1.** The PEA Checklist Section 5.8.1.1 requires consideration of GHG emissions from existing infrastructure, and PEA Section 5.8.1 (PEA pg. 5.8-1) identifies reported volumes of natural gas due to compressor-vented emissions and fugitive leaks from components. Please convert the volumes of natural gas to quantify the GHG emissions in terms of mass (metric tons of CO<sub>2</sub>-equivalent) for each baseline year for the vented and fugitive leak emissions.

### **3.5.9. Hazards, Hazardous Materials, Public Safety**

The discussions of hazards and public safety require additional information; see "PEA Completeness" above.

### **3.5.10. Hydrology, Water Quality**

#### **Information Requests:**

15. **Hydrology and Water Quality, Section 5.10.2.1, Regulatory Setting.** The PEA Checklist requires identification of applicable standards regarding hydrologic and water quality. Please reference the latest permit for municipal separate storm sewer systems (MS4) that covers the proposed project area, Order R4-2021-0105 (Regional Permit), July 23, 2021, and update total maximum daily loads (TMDLs) listed in new MS4 for Ventura River for the regional regulatory setting (PEA Section 5.10.2.3).

16. **Hydrology and Water Quality, Section 5.10.4.4, Impermeable Surfaces.** The PEA Checklist requires identification of new impermeable surfaces. Please provide the acreage of total new impervious surfaces to support the impact analysis of PEA Section 5.10.4.

### **3.5.11. Land Use and Planning**

No comments.

### **3.5.12. Mineral Resources**

No comments.

**3.5.13. Noise**

No comments.

**3.5.14. Population and Housing**

No comments.

**3.5.15. Public Services**

No comments.

**3.5.16. Recreation**

No comments.

**3.5.17. Transportation**

The discussion of traffic impact analysis requires additional information; see “PEA Completeness” above.

**Information Request:**

17. **Transportation, Section 5.17.4.2, Vehicle Miles Traveled (VMT).** The PEA Checklist requires detailed information regarding VMT generation for project construction. Please quantify VMT for construction and provide this information in terms of the fleet mix between light-duty and heavy-duty vehicles. Please also evaluate project VMT relative to the average VMT for the area.

**3.5.18. Tribal Cultural Resources**

No comments.

**3.5.19. Utilities and Service Systems**

No comments.

**3.5.20. Wildfire**

No comments.

**3.6. Comparison of Alternatives**

No comments.

**3.7. Cumulative and Other CEQA Considerations**

No comments.

**3.8. List of Preparers**

No comments.

### **3.9. References**

No comments.