

**SOUTHERN CALIFORNIA GAS COMPANY (SOCALGAS)**  
**SIERRA CLUB-SCG-09**  
**WOODY BIOMASS PILOT PROJECT APPLICATION (A.25-10-008)**  
**DATE REQUESTED: June 16, 2026**  
**RESPONSE DUE: June 22, 2026**

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**QUESTION 9-1:**

What is approximate length of radius, in miles, from the Project facility at 8325 S Madera Ave, Kerman, CA 93630, from which the woody biomass that will provide the project feedstock would be sourced? Please indicate the witness responsible for this answer.

**RESPONSE 9-1:**

The Project plans to source 100% of its almond biomass from members of the Central California Almond Growers Association (CCAGA), whose processing facility is adjacent to the proposed Project site. For shells and sticks, transport distance is zero miles. Using a length of radius is not an appropriate form of measurement based on CCAGA's stated service span. On the CCAGA website,<sup>1</sup> it states that its service area spans the Central San Joaquin Valley of California, from Merced to Tulare. The City of Merced is ~55 miles to the northwest of the SB 1440 Pilot Project facility and City of Tulare is ~50 miles to the southeast of the SB 1440 Pilot Project site. The service area cannot extend approximately 55 miles to the east or west due to mountain ranges on both sides.

**Witness:** Dr. Matthew Summers.

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<sup>1</sup> [Growers – Central California Almond Growers Association](#)

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**QUESTION 9-2:**

In SoCalGas's Data Request Response 8-9(a), it states that "[t]he 7-to-8-mile buffer between the facility and the populated areas provides significant mixing..."

**QUESTION 9-2a:**

Does SoCalGas consider impacts of the Project's emissions to be limited to the exposures to project emissions that occur in "populated areas"?

**RESPONSE 9-2a:**

No. SoCalGas and West Biofuels recognize that air pollutants disperse and that potential impacts are not limited strictly to "populated areas." The specific reference to the 7-to-8-mile buffer was provided to address the narrative introduced in Sierra Club's Prepared Testimony (Dr. Sahu), which implied direct and harmful impacts to the residents of the City of Kerman.<sup>2</sup> Yet later admitted in discovery that his findings regarding local health impacts did not assume any specific distances.<sup>3</sup>

SoCalGas provided this distance data to demonstrate that Sierra Club's characterization was flawed. At such a range, incremental pollutant concentrations from a small-scale stationary source are indistinguishable from regional background levels. For the purposes of public health protection and regulatory compliance, the SB 1440 Pilot Project's localized impacts will be evaluated at the property line and at the nearest sensitive receptors (such as schools, hospitals, or residences) as a mandatory component of the SJVAPCD Rule 2201 review, promoting safety for all nearby areas regardless of their status as a "population center."

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<sup>2</sup> Sierra Club Prepared Testimony (Dr. Sahu) at 19, 26, 38, and 39.

<sup>3</sup> SCG-Sierra Club-DR-03, Question 1a, at 1 (Attachment 3).

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**QUESTION 9-2b:**

Please indicate the witness responsible for this answer.

**RESPONSE 9-2b:**

Witnesses: James Lucas and Dr. Matthew Summers.

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**QUESTION 9-3:**

In Attachment 1 to SoCalGas's Rebuttal Testimony, the attachment lists "Process Lanes and Gas Composition." Do the lanes listed in this section correspond to the lanes indicated in the "WBF Process Flow Diagram" presented in Response 4 of Data Response Cal Advocates-SCG-A2510008-001? If yes, please indicate the corresponding lanes from Figure 2 of SoCalGas's Direct Testimony at JLMS-7. If not, please indicate to which figure depicting project "lanes" the Attachment 1 refers. Please also indicate the witness responsible for this answer.

**RESPONSE 9-3:**

Yes. The lanes listed in Attachment 1 to the Rebuttal Testimony correspond directly to the technical stages shown in the WBF Process Flow Diagram (PFD) provided in Cal Advocates DR-01 Response 4. Lanes 3 and 4 in both the "Process Lanes and Gas Composition" and "WBF Process Flow Diagram" correspond to Lane 3 of Figure 2 of SoCalGas's Direct Testimony at JLMS-7.

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**QUESTION 9-4:**

In SoCalGas's Data Request Response 8-10, it states that "[i]n this capacity, [Mr. Summers] has utilized air dispersion modeling for several projects and has also reviewed health-risk assessments and the underlying analysis performed by regulatory entities related to multiple past projects."

**QUESTION 9-4a:**

Has Mr. Summer conducted any heath risk assessment for facilities that involved gasification and/or methanation of woody biomass?

**RESPONSE 9-4a:**

No. While Dr. Summers has utilized air dispersion modeling for several projects and has reviewed health risk assessments (HRAs) and underlying analyses performed by regulatory entities during his 25+ year career, he has not personally conducted a formal HRA for a facility involving the gasification and/or methanation of woody biomass. The HRAs for West Biofuels' recent projects were not conducted by Dr. Summers.

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**QUESTION 9-4b:**

If the answer to the above question is yes, please list those analyses and provide them.

**RESPONSE 9-4b:**

Not applicable.

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**QUESTION 9-5c:**

Please indicate the witness responsible for this answer.

**RESPONSE 9-5c:**

Dr. Matthew Summers.