

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

Order Instituting Rulemaking to Implement Dairy
Biomethane Pilot Projects to Demonstrate
Interconnection to the Common Carrier Pipeline
System In Compliance with Senate Bill 1383

Rulemaking 17-06-015
(Filed June 22, 2017)

**COMMENTS BY LEADERSHIP COUNSEL FOR JUSTICE AND ACCOUNTABILITY ON
JOINT UTILITY DRAFT SOLICITATION FOR SB 1383 DAIRY PILOT PROJECTS BY
PACIFIC GAS & ELECTRIC COMPANY, SAN DIEGO GAS & ELECTRIC® SOCALGAS®,
AND SOUTHWEST GAS CORPORATION**

MICHAEL CLAIBORNE
NIKITA DARYANANI
Leadership Counsel for Justice & Accountability
764 P Street, Suite 12
Fresno, CA 93721
Phone: (559) 369-2790
Email: mclaiborne@leadershipcounsel.org
ndaryanani@leadershipcounsel.org

February 5, 2018

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

Order Instituting Rulemaking to Implement Dairy
Biomethane Pilot Projects to Demonstrate
Interconnection to the Common Carrier Pipeline
System In Compliance with Senate Bill 1383

Rulemaking 17-06-015
(Filed June 22, 2017)

**COMMENTS BY LEADERSHIP COUNSEL FOR JUSTICE AND ACCOUNTABILITY ON
JOINT UTILITY DRAFT SOLICITATION FOR SB 1383 DAIRY PILOT PROJECTS BY
PACIFIC GAS & ELECTRIC COMPANY, SAN DIEGO GAS & ELECTRIC® SOCIALGAS®,
AND SOUTHWEST GAS CORPORATION**

Leadership Counsel for Justice and Accountability (“Leadership Counsel”) respectfully submits its comments to the January 18, 2018 Joint Utility Draft Solicitation for SB 1383 Dairy Pilot Projects.

Leadership Counsel partners with resident leaders of disadvantaged communities of color throughout the San Joaquin Valley and Eastern Coachella Valley. We submit the following comments to strengthen this program’s application requirements and scoring criteria to protect disadvantaged communities from further air or water pollution.

5.0 Environmental Benefits

Given the proximity of most dairies to overburdened communities in the San Joaquin Valley, we ask that as a minimum requirement projects be required to demonstrate no net on-farm emission increases of any toxic air pollutants or criteria air contaminants. Projects that increase truck traffic must not be eligible for funding. Should there be any criteria pollutant or toxic air contaminant emissions, mitigation must occur on-site. Offsite mitigation of criteria pollutants and TAC emissions must not be accepted.

We are particularly concerned with the air quality impacts dairy digester facilities have on nearby disadvantaged communities and believe that a project should not be selected nor considered if the applicant does not thoroughly discuss, quantify, and mitigate any negative impacts. Providing details about impacts and mitigation measures must be a baseline requirement for applicants.

5.4 Project Co-Benefits and 6.2 Localized Economic Benefits

Project co-benefits such as job development and other environmental benefits must be discussed with and supported by community residents during the outreach and engagement process. This discussion and subsequent comments must be included in the community meeting details and demonstration of community engagement.

7.3 Reporting

To ensure water and groundwater protection, applicants must be required to submit quarterly analyses and reports of groundwater quality as well as air contaminants. Reports must be made available for public review.

We also ask that all solicitation applications be made immediately available to the public by the state agencies to allow for review of community impacts and mitigation methods, documentation of community engagement, and other records.

Dated: February 5, 2018

Respectfully submitted,

/s/ _____

MICHAEL CLAIBORNE
NIKITA DARYANANI
Leadership Counsel for Justice and Accountability
764 P Street, Suite 12
Fresno, CA 93721
Phone: (559) 369-2790
Email: mclaiborne@leadershipcounsel.org
ndaryanani@leadershipcounsel.org