

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Sound Energy Solutions

Docket No. CP04-58-000

State of California

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County of San Francisco

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AFFIDAVIT OF WENDY MARIA PHELPS

I, WENDY MARIA PHELPS, declare as follows:

1. I am employed by the California Public Utilities Commission (CPUC) as a Utilities Engineer in the CPUC's Energy Division. I have personal knowledge of the facts stated herein except as to matters stated upon information and belief, and as to those matters, I believe them to be true. If called upon to testify, I could and would competently do so. I make this Declaration in support of the CPUC's Notice of Intervention and Protest.

2. I am assigned as a Utilities Engineer in the Natural Gas section of the Natural Gas, Energy Efficiency, & Resource Advisory Branch of the CPUC. This branch provides technical assistance to the CPUC's Administrative Law Judges in formal proceedings, prepares analyses and research to support the Commissioners and their staff of advisors, and prepares resolutions for the CPUC to consider in response to informal advice letter

tariff filings by the utilities. I have held this or similar positions in the Energy Division as a Utilities Engineer for over 2 ½ years. Beginning in 2003, I have been assigned to the Natural Gas section and have been the staff person primarily assigned to provide support for the CPUC's role in FERC natural gas proceedings.

3. In my position I personally review advice letters and prepare draft resolutions, review utility reports and other requests and filings, assist in coordinating workshops, and review draft and final CPUC decisions relating to natural gas issues. In addition, I am the Energy Division staff person principally assigned to natural gas FERC matters in which the CPUC participates. I am thus broadly familiar from my day-to-day responsibilities with natural gas issues affecting California. I am also a member of the State of California Liquefied Natural Gas (LNG) Interagency Working Group. This group meets regularly to become educated about the various West Coast proposed LNG projects and to address LNG regulatory and technical issues. In particular, my work assignments have included review of safety issues for the proposed Sound Energy Solutions (SES) Port of Long Beach (POLB) LNG facilities.

4. One of the safety issues with which I have been involved concerns siting of the proposed LNG facilities. I have become knowledgeable about the population and demographics of the nearby Cities of Long Beach and Los Angeles. Generalized land use within two miles of the proposed site includes not only harbor port related (i.e. Ports of Los Angeles and Long Beach) and industrial uses but also mixed uses (non-industrial) and open space/parks (See SES App., Figure 8-1). Specifically, the demographic zoning characteristics within two miles of the proposed LNG facilities include medium to high

density residential uses. I obtained this demographic zoning information on-line from Southern California Association of Governments (SCAG) website at www.scag.ca.gov using the following links: a) Data & Maps (left side); b) SCAG Interactive Atlas (bottom); c) Go To SCAG Interactive Atlas (bottom); d) Map: Landuse – 2000 Land Use; e) Zoom in to Level 8; f) Pan Port of Long Beach (POLB) into middle of screen; g) Zoom in to Level 7; h) Pan POLB into middle of screen; i) Zoom in to Level 6; j) Pan POLB into middle of screen; k) Zoom in to Level 5.

5. There are residential neighborhoods in the Cities of Long Beach and Los Angeles approximately two miles from the proposed LNG facilities. There is an elementary school (Edison Elementary School) located at 625 Maine Avenue in Long Beach with an enrollment of 960 students (see <http://www.lbusd.k12.ca.us/edison/index.htm>) within two miles from the proposed LNG facilities, and a private elementary school (St. James School) located at 250 W. 3rd Street in Long Beach less than two miles from the proposed LNG facilities. There also is a chartered middle school (Constellation Community Middle School) located at 501 Pine Avenue in Long Beach approximately two miles from the proposed LNG facilities. I obtained the names and addresses of these three schools from page 795 of the latest edition of the Thomas Guide Digital Edition (CD ROM), Los Angeles & Orange Counties 2004.

6. There is a residential neighborhood approximately one and-a-half miles from the proposed LNG facilities. I have learned through phone conversations between myself and representatives at both Long Beach Unified School District and City of Long Beach Planning Department in February 2004 that there is a new elementary school under

construction, located at W. Broadway and Golden Avenue, in Long Beach with a planned opening date of September 2004, approximately one-and-a-half miles from the proposed LNG facilities. I estimated the distances between the residential neighborhoods, the schools and the proposed LNG facilities using both a Rand McNally Long Beach 2004 map and street guide detail maps (pages 795 and 825) of the Thomas Guide, Los Angeles & Orange Counties 2004 (hardback copy).

7. There are growing residential and commercial neighborhoods in downtown Long Beach within two miles of the proposed LNG facilities. The public buildings in downtown Long Beach within approximately two miles of the proposed LNG facilities include the Long Beach Federal Building, Long Beach City Hall, Police Station, Fire Station, Long Beach Municipal Courthouse, Long Beach Library and California State University Chancellor's Office. I obtained the names of these public buildings, except for the Long Beach Federal Building, from page 825 of the latest edition of the Thomas Guide Digital Edition (CD ROM), Los Angeles & Orange Counties 2004. I obtained the name and location of the Long Beach Federal Building, Glenn M. Anderson Federal Building, located at 501 W. Ocean Blvd. from the U.S. General Services Administration's website at <http://www.iolp.gsa.gov/iolp/BuildingInfo.asp?bID=CA0273>. I estimated the distances between all of these neighborhoods, buildings and the proposed LNG facilities using both a Rand McNally Long Beach 2004 map and street guide detail maps (page 825) of the Thomas Guide, Los Angeles & Orange Counties 2004 (hardback copy).

8. The main transportation corridors near the Port of Long Beach site include: a) Ocean Boulevard which as of 2001 had a traffic count of 53,400 vehicles per day (which I learned through phone conversation between myself and an engineering aide from City of Long Beach Department of Public Works in February 2004) and is less than a half-mile from the proposed LNG facilities; b) Terminal Island Freeway or Highway 47 which is less than one mile from the proposed LNG facilities; and c) Interstate 710 which is less than one-and-a-half miles from the proposed LNG facilities. These freeways and arterial streets in the proposed project area are shown in SES Application, Figure 5-3 (Not to Scale). The estimated distances were calculated using SES App., Figure 1-10, Project Location USGS Map and a Rand McNally Long Beach 2004 map.

9. Some examples of recreation and tourist attractions within two miles of the proposed LNG facilities are: a) Queen Mary; b) Catalina Cruise Lines; c) Shoreline Village (waterfront stores); d) Downtown Long Beach Marina; e) Aquarium of the Pacific; and f) multiple hotels and restaurants (i.e. Sheraton, Long Beach Hilton, Hyatt Regency and Renaissance Long Beach Hotel). I obtained these estimated distances from page 825 of the Thomas Guide (both hardcopy and CD-ROM Digital Edition), Los Angeles & Orange Counties 2004 and a Rand McNally Long Beach 2004 map.

I affirm that the foregoing is true and correct.

Executed this 23rd day of February 2004, at San Francisco, California.



Wendy Maria Phelps

Subscribed to and acknowledged before
me this 23rd day of February, 2004



Cindy I. Philapil
Notary Public in and for the
City and County of San Francisco
State of California

My Commission expires: 12/17/08

