

DOCKETED

Docket Number:	16-IEPR-02
Project Title:	Natural Gas
TN #:	214013
Document Title:	Update to Aliso Canyon Gas and Electric Reliability Winter Action Plan
Description:	October 14, 2016
Filer:	Patty Paul
Organization:	California Energy Commission
Submitter Role:	Commission Staff
Submission Date:	10/14/2016 2:30:14 PM
Docketed Date:	10/14/2016

Update to Aliso Canyon Gas and Electric Reliability Winter Action Plan

Prepared by the Staff of the California Public Utilities Commission, California Energy Commission, the California Independent System Operator and the Los Angeles Department of Water and Power

October 14, 2016



California ISO



The California Energy Commission jointly conducted a workshop with the California Public Utilities Commission (CPUC), the California Independent System Operator (California ISO), and the Los Angeles Department of Water and Power (LADWP) on August 26, 2016 to discuss the near-term gas and electricity reliability risks to the Los Angeles Basin due to recent events at the Southern California Gas Company's (SoCalGas) Aliso Canyon gas storage facility. The joint agencies presented an action plan, technical analysis, and an independent third party review describing the reliability risks and recommended mitigation measures to reduce those risks for winter 2016. The agencies asked for stakeholders to comment on the Action Plan, its proposed mitigation measures and the associated risk assessment.

The main portion of this update summarizes the general themes from the comments and provides information about the implementation status of the mitigation measures. Specific comments and associated agency staff responses are documented in an attachment to this update. Eighty-one stakeholders commented on the Action Plan and risk assessment. Most of the comments were from local officials and the business community or from local residents. Local officials and the business community are concerned about energy reliability and rate impacts and are generally supportive of safely reopening Aliso Canyon. Comments from local residents of the Porter Ranch community stated concerns about the health impacts, air quality and safety of the field and opposition to reopening the field.

In preparing the Winter Action Plan, agency staff developed 10 new mitigation measures. Some of these, such as Add Core Balancing Rules, were added based on Summer Action Plan comments. In general, stakeholder comments show significant support for the 10 new mitigation measures presented at the August workshop, and none of the comments persuade the agencies that any of the measures should be deleted.

Some stakeholders raised issues about the 1-in-10 year peak demand used in the analysis and suggest a lower demand value should be used because the forecast demand has not occurred in the last 10 years. The 1-in-10 year peak demand is the criterion approved by the CPUC for gas system planning in the SoCalGas service area, and, by definition, may not occur in any particular ten-year period. Moreover, the methodology to determine it has been approved in a series of CPUC proceedings¹. In addition, the hydraulic modeling and reliability analysis were reviewed by Los Alamos National Laboratory and the consulting firm Walker & Associates, who concurred not only with the general findings of the analysis but with the interpretation of the 1-in-10-year forecast.

A few stakeholders were not supportive of the Prepare to Buy LNG mitigation measure. This mitigation measure is another that was also added in response to several stakeholders commenting on the Summer Action Plan because the 200 to 400 mmcf additional gas supply potentially provided would reduce the magnitude of any curtailments. As indicated in the Action Plan at p. 22, the purpose of this measure is to address objections that "affiliate issues" prevent the purchase of LNG and delivery through the Otay Mesa receipt point.

Many of the stakeholders suggested mitigation measures that are already underway, such as Develop and Deploy Gas Demand Response Program. The CPUC Energy Division directed SoCalGas to develop new programs and those have been submitted for approval through the Advice Letter process.

¹ The methodology and its results are reviewed by stakeholders in SoCalGas' Triennial Cost Allocation Proceeding at the CPUC

Stakeholders and SoCalGas seem in agreement to keep the tighter noncore balancing rules. Several stakeholders encourage implementation of the core balancing rules, while SoCalGas opposes based on concerns about implementation. This is a measure that requires CPUC action and that may be addressed in ongoing settlement discussions among parties.

PG&E suggested adding a measure to recognize how SoCalGas will need to depart from its standard operating patterns at its four storage fields and must be careful in using storage inventory so that inventory is not drawn down too early in the season. Doing so would put customers at risk of curtailment later in the winter season. The agencies recognize this and made this very point in our Action Plan analysis. The constrained operations at Aliso Canyon puts the energy system in uncharted territory, and the agencies recognize the need to continue monitoring operations to protect reliability, which necessarily includes monitoring the use of inventory at all of SoCalGas’ storage fields. This is effectively embodied in the measure to Update the Aliso Canyon Withdrawal Protocol and Gas Allocation Process.

In compliance with Senate Bill 380 (Pavley, Chapter 14, Statutes of 2016), CPUC published *Aliso Canyon Working Gas Inventory, Production Capacity, Injection Capacity, and Well Availability for Summer 2016 Reliability, June 28, 2016*², which, consistent with the Summer Action Plan, identified a minimum withdrawal capability of 420 million cubic feet per day (MMcfd) to minimize energy vulnerabilities this summer. The CPUC also issued an order to SoCalGas to maintain that 420 MMcfd minimum withdrawal capability³. As the seasons have changed and weather has moderated, combined with the beneficial system impact of the tighter noncore gas balancing rules, the CPUC issued an order at the end of September to SoCalGas reducing the minimum withdrawal capability to 207 MMcfd⁴. The methodology to calculate and revise the minimum withdrawal capability was also reviewed by Los Alamos National Laboratory and confirmed to be reasonable.

Table 1 provides a status update of both the summer and winter mitigation measures, many of which are already being implemented, and which the joint agencies are tracking to ensure timely implementation. Some of the mitigation measures still require work to put in place for winter.

**Table 1
Status of Mitigation Measures**

CATEGORY	MITIGATION MEASURE	Tracking Status as of 10/6/16 ⁵
Prudent Aliso Canyon Use	1. Make Available 15 Bcf Stored At Aliso Canyon to Prevent Summer Electricity Interruptions	Completed

²http://www.cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/News_Room/News_and_Updates/Preliminary%20Report%20-%20Section%20715%20of%20the%20Public%20Utilities%20Code.pdf

³http://www.cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/News_Room/News_and_Updates/06-15-16%20Letter%20to%20SoCal%20Gas%20re%20Aliso%20Canyon%20Natural%20Gas%20Storage%20Facility%20comprehensive%20safety%20testing.pdf

⁴http://www.cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/News_Room/News_and_Updates/Scanner411909302016144410.pdf

⁵Completed – done and nothing more to do. Continuing – mitigation measure put in place, is relevant to winter and will continue. Underway – in progress and more work needed to implement

CATEGORY	MITIGATION MEASURE	Tracking Status as of 10/6/16⁵
	2. Efficiently Complete the Required Safety Review at Aliso Canyon to Allow Safe Use of the Field	27 wells have now passed all tests required under the safety review and have been given the green light by DOGGR.
Tariff Changes	3. Implement Tighter Gas Balancing Rules. Implement the curtailment settlement agreement (as required by settlement approximately 90 days after Commission decision, i.e. on or about November 1)	Completed; see below for changes for winter
	4. Modify Operational Flow Order (OFO) Rule	Completed
	5. Call Operational Flow Orders Sooner in Gas Day	On Standby List for further development if needed
	6. Provide Market Information to Generators Before Cycle 1 Gas Scheduling	Completed
	7. Consider ISO market changes that increase gas-electric coordination	Continuing
Operational Coordination	8. Increase Electric and Gas Operational Coordination	Completed
	9. Establish More Specific Gas Allocation among Electric Generators In Advance of Curtailment	Completed
	10. Determine if Any Gas Maintenance Tasks Can be Safely Deferred	Completed
LADWP Operational Flexibility	11. Curtail Physical Gas Hedging	Continuing
	12. Stop Economic Dispatch	Continuing
	13. Curtail Block Energy and Capacity Sales	Continuing
	14. Explore Dual Fuel Capability	Continuing
Reduce Natural Gas and Electricity Use	15. Ask customers to Reduce Natural Gas and Electricity Energy Consumption	Completed (Electricity Flex Alerts) Completed (Conserve Energy SoCal)
	16. Expand Gas and Electric Efficiency (EE) Programs Targeted at Low Income Customers	Underway. Commission decision D.16-04-040, issued April 28, 2016 authorized intensified deployment of the Energy Savings Assistance (ESA) Program measures in the impacted Aliso Canyon area utilizing unspent funds and suspended specific program rules in an effort to increase energy savings and

CATEGORY	MITIGATION MEASURE	Tracking Status as of 10/6/16⁵
		reduce natural gas usage.
	17. Expand Demand Response (DR) Programs that Target Air Conditioning and Large Commercial Use	Underway for electricity
	18. Reprioritize Existing Energy Efficiency Towards Projects with Potential to Impact Usage	Completed
	19. Reprioritize Solar Thermal Program Spending to Fund Projects for Summer and by end of 2017	Completed for summer and underway for winter
	20. Accelerate Electricity Storage	Underway. SDG&E received CPUC approval for storage contract, online by 1/31/2017. SCE submitted Advice Letters to CPUC for storage contracts, online by end of 2016.
Market Monitoring	21. Protect California Ratepayers	Continuing
Gas-targeted Programs to Further Reduce Usage	22. Develop and Deploy Gas Demand Response (DR) Program	SoCalGas has proposed three demand response programs and filed a tier 3 Advice Letter with the CPUC on September 27, 2016
	23. Develop and Deploy Gas Cold Weather Messaging	Gas/cold weather messaging will begin in the fall
Winter Operations Changes	24. Create Advance Gas Burn Operating Ceiling for Electric Generation	Impose a ceiling on the electric generation gas burn for very cold days
	25. Keep the Tighter Noncore Balancing Rules	Settlement could expire by November 30, 2016. Ongoing settlement discussions will determine next steps.
	26. Add Core Balancing Rules	Reduce core customer imbalances by requiring core customers to balance to actuals rather than forecast demand. Currently subject of ongoing settlement discussions.
Use of Gas from Aliso Canyon	27. Update the Aliso Canyon Withdrawal Protocol and Gas Allocation Process	Revise protocol and gas allocation process as necessary
Reduce Gas Maintenance Downtime	28. Submit Reports Describing Rapid Progress on Restoring Pipeline Service	Bring transparency so the public is assured lines out during maintenance outages are back in service as quickly as possible
Increase Gas Supply	29. Identify and solicit additional gas supply sources including more CA Natural Gas Production	CEC staff has reached out to producers and is awaiting a response
	30. Prepare to buy LNG	SoCalGas had indicated that affiliate rules are an impediment to procuring LNG, but staff research does not show affiliate rules to be an impediment. Noncore customers

CATEGORY	MITIGATION MEASURE	Tracking Status as of 10/6/16 ⁵
		currently can contract for either BajaNorte capacity or LNG capacity and should contact SoCalGas if they are worried about supplies.
Refineries	31. Monitor Natural Gas Use at Refineries and Gasoline Prices	CEC has process in place to monitor refinery gas use and operations

The Winter Action Plan was designed with a narrow purpose: analyzing and preparing for any risks to energy reliability this winter associated with the anticipated gas curtailments resulting from Aliso Canyon, and to develop mitigation measures to reduce this risk. Evaluating the long term viability of Aliso Canyon is outside the scope of this Action Plan. Senate Bill 826 Budget Act of 2016 provides funding for California Council on Science and Technology to conduct an independent study assessing the long-term viability of natural gas storage facilities in California. This study is to be completed by the end of 2017. Additionally, SB 380 requires that the CPUC initiate a proceeding concerning the viability of Aliso Canyon no later than July 2017.

The Department of Conservation’s Division of Oil, Gas and Geothermal Resources (DOGGR) is overseeing a comprehensive safety review requiring all 114 wells successfully pass six tests or be isolated from the field before SoCalGas can apply for permission to inject any new gas supply at Aliso Canyon. Information about the status of this review can be found at <http://www.conservation.ca.gov/dog/AlisoCanyon>.

The Joint Agencies want to again express their appreciation to those that have participated in the summer and winter action plan workshops and to those who have provided comments. The agencies will continue to work on curtailment risk mitigation and assuring reliability of natural gas and electricity supplies.

Attachment

Public Comments and Response to Comments

Public Comments 16-IEPR-02 Natural Gas, August 26 Workshp on Aliso Canyon Winter Action Plan

Name	Assoc.	Comments	Staff Response
Analysis (5 Comments)			
1 Timothy O'Connor	Environmental Defense Fund	While the plan hits many of the high notes for short term reliability, it can still be improved in four distinct ways. 1) The plan presented at the workshop does not purport to require additional or transparent regular reporting on weatherization programs and efficiency efforts being performed by utilities. The report does not require SoCalGas the most basic of gas burn reduction efforts to be completed by SoCalGas. 2) While the current Action Plan focuses on things that can be done in the short term to enhance reliability, it misses a major opportunity to engage the public and industry in a conversation about more holistic market rule changes which is needed to ensure price formation and investments that can lead to increased diversity of resources. 3) The reliability report should include a discussion of need to finalize leakage detection standards currently under development at California Air Resources Board without delay, especially at gas storage operations. 4) The plan and reliability analysis doesn't discuss the environmental implications associated with imports and the use of out-of-state coal.	The CPUC undertakes on a cyclical basis evaluation, measurement and verification studies of utility energy efficiency. The CPUC and SoCalGas held a series meetings to design winter demand response programs as a mitigation measure which was filed as a tier 3 Advice Letter on September 27, 2016 and includes three proposed demand response programs. One of these programs that has been proposed is a rebate for core customers to drop gas load during a "Natural Gas Conservation Alert" and as designed could include any end-use that requires natural gas, including pool or spa heating. The other issues identified are outside the scope of the Winter Action Plan.
2 Rachel Sherrard	Peak Reliability	Peak Reliability's independent studies confirm those of CAISO and LADWP that the system can reliably maintain electric supply, assuming all facilities in service, through a combination of imports and minimum natural gas units served by SoCalGas system to serve the LA Basin load. However, our collective studies also indicate that if a particular transmission contingency occurs during a 1 in 10 year winter peak load condition and 100% curtailment of gas fired generation, the system may not be able to operate in a reliable post-contingency state without the need for load shedding. Peak Reliability makes this comment to raise awareness of the risks that still exist for winter operations.	The joint agencies appreciate the analysis conducted by Peak Reliability as confirmation of our findings. The joint agencies agree that risks still exist for winter operations.

Public Comments 16-IEPR-02 Natural Gas, August 26 Workshp on Aliso Canyon Winter Action Plan

	Name	Assoc.	Comments	Staff Response
3	Matthew d'Allessio	Resident of the SoCalGas service district and an associate professor of geological sciences at California State University Northridge	<ul style="list-style-type: none"> • Recommends summarizing and highlighting conclusions at the beginning of the executive summary, such as customers at home and small businesses do not appear to be at risk of losing electricity or natural gas even for the 1-in-35 year coldest day unless there are multiple failures in the system. • The forecast peak demand is 5.077 Bcf. How does this forecast compare to the peak demand over the last 10 years? An actual demand value number should be used based on the peak usage for the last 10 years and forecast ahead based on trends in demand. • This line should be removed from the report: "Preliminary indications are that the threshold those customers feel they can absorb may be zero." The California Energy Commission provides oversight on behalf of the public. This line implies that the CEC is shirking its oversight capacity and letting refiners write their own rules. • The report should include core residential demand response. The report should include data about demand response. What percent of SoCalGas customers currently have smart meters? What percent of the demand do these customers represent? • Does not support the inclusion of LNG shipments as a potential mitigation strategy because LNG has about 9% more emissions than conventional gas and recommends removing it from the list of mitigation measures. 	<p>The forecast peak demand is determined in CPUC Triennial Cost Allocation Proceeding and is based on a 1-in-10 peak temperature cold day. Using an actual demand value based on the last ten years could underestimate the risk. Risk comes from low likelihood but high impact events. The curtailment rules are defined in CPUC D.16-07-008, which allows refineries to establish minimum usage requirements. This clause recognizes the minimum usage requirements are based on a level of operation required to maintain safety, avoid damage to equipment and avoid the possibility of prolonged outages/delayed restarts. The CPUC is working with SoCalGas to explore and implement gas demand response programs including residential programs. The joint agencies included LNG shipments as a potential mitigation measure because this mitigation measure would reduce the risk of curtailments. The joint agencies have agreed to explore this option.</p>

Public Comments 16-IEPR-02 Natural Gas, August 26 Workshp on Aliso Canyon Winter Action Plan

	Name	Assoc.	Comments	Staff Response
4	Rodger R. Schwecke	SoCalGas	<p>Certain conclusions in the Action Plan are not supported by the Technical Report.</p> <ul style="list-style-type: none"> • The Action Plan presents an optimistic winter reliability situation that is not supported by the Technical Support. The Action Plan relies primarily upon a simple mass balance analysis to project system reliability and ability to serve customer loads. This analysis does not take into account the hourly changes and dynamic system behavior that the hydraulic analysis provides as explained in both the Technical Report and the Independent Review. • The Action Plan also assumes that service to core customers is not at risk this winter, which is not entirely consistent with the Technical Report. The Action Plan is based upon an overly optimistic level of pipeline supplies available to southern California in the winter season. • SoCalGas is concerned that Mitigation Measure 5 could be read to imply that SoCalGas has not acted with urgency to restore line 3000 to service. SoCalGas is already doing everything possible to restore this pipeline to full service. • Southern California Generation Coalition (SCGC) statements at the joint agency workshop regarding core customer balancing were not accurate. SCGC’s proposal does not reflect the fact that it is not physically possible for core customers to balance to real-time usage in the near-term, and that it would require in excess of \$90 million in additional annual expenditures to develop this capability in the long term. it would not be possible under the current AMI configuration for Gas Acquisition and other core balancing agents to receive meaningful real-time core usage information. 	<p>The joint agencies disagree that the Action Plan relies primarily upon a simple mass balance analysis. The agencies agree that mass balance, hydraulic analysis, and electric impact analysis are all key analyses that must be conducted to understand the energy reliability impact from constrained operations at Aliso Canyon. The Action Plan frames the risk to core customers, and the joint agencies acknowledge increased risk without Aliso Canyon but consider the risk to core customers is low due to their level of demand of 3.0 to 3.1 Bcf, the ability of the system to deliver 4.5 Bcfd, and their higher priority of service. The joint agencies did not intend to imply that SoCalGas is not working urgently to restore Line 3000, but rather, it is a mitigation measure intended to bring transparency to the public. The issues surrounding core balancing will be addressed in the CPUC settlement agreement. The CPUC is working with SoCalGas to explore and implement gas DR programs.</p>

Public Comments 16-IEPR-02 Natural Gas, August 26 Workshp on Aliso Canyon Winter Action Plan

	Name	Assoc.	Comments	Staff Response
			<ul style="list-style-type: none"> • SoCalGas is evaluating the viability of natural gas demand response programs. The effects of natural gas demand response programs, if any, would likely not result in a meaningful impact to gas system reliability this winter. However, SoCalGas is actively engaging with Energy Division to develop a set of pilot programs to test the feasibility of natural gas demand response programs. • The restoring injection capability of Aliso Canyon to support energy reliability for the winter heating season is critical. Without Aliso Canyon, our ability to meet this demand is reduced, increasing the risk of natural gas curtailments for the entire region and potentially affecting all customers. Merely hoping for normal winter weather conditions and relying on upstream pipeline companies for supplies is not a prudent way to operate a pipeline system that provides natural gas to over 21 million consumers. SoCalGas' system was designed to serve their customers through a network of pipelines and storage fields. 	

Public Comments 16-IEPR-02 Natural Gas, August 26 Workshp on Aliso Canyon Winter Action Plan

	Name	Assoc.	Comments	Staff Response
5	William Powers	Food and Water Watch	<p>2016 Winter Risk Assessment and Winter Action Plan demonstrate that the mitigation measures applied to Los Angeles Basin natural gas users will ensure adequate natural gas supply to reliably meet winter peak demand without Aliso Canyon. Permanent closure of Aliso Canyon will not compromise LA Basin natural gas supply on either summer or winter day peak. The economic benefits to ratepayers from the closure of Aliso Canyon is in the range of \$70 million per year. An economic analysis should be conducted that compares the cost savings to SoCalGas core customers realized by permanently closing Aliso Canyon. Bill Powers provides a further critique of the Winter Risk Assessment Technical report, Winter Action Plan, and Independent Evaluator report.</p> <p>Winter Risk Assessment Technical Report:</p> <ul style="list-style-type: none"> • The Winter Risk Assessment states that the minimum SoCalGas supply available in the winter of 2016-2017 without use of Aliso Canyon will be 5.1 billion cubic feet per day (Bcfd) when a mass balance calculation approach is used to determine available supply, and 4.5 to 4.7 Bcfd based on pipeline hydraulic model simulations. The Winter Risk Assessment also states that, factoring in the new winter 2016-2017 mitigation measures and the continued application of summer 2016 mitigation measures, the maximum 1-in- 10 year demand will be 4.1 to 4.2 Bcfd. • Line 3000 maintenance should be deferred, similar to Line 4000 deferral of maintenance. Elective (non-emergency) maintenance should not occur in the midst of winter. • Shell Energy controls 50 percent of the capacity at Costa Azul and could provide additional supply without the affiliate issues. However, LNG is not needed when a minimum of 4.5 to 4.7 Bcfd of supply is already assumed to be available to meet projected SoCalGas winter peak of 4.1 to 4.2 Bcfd. 	<p>The joint agencies do not agree with Mr. Power's statement that permanent closure of Aliso Canyon will not compromise LA Basin and Southern California natural gas supply on either summer or winter day peak. The Winter Action Plan focuses on energy reliability for the upcoming winter season and does not address the long-term viability or impact of Aliso Canyon availability. Evaluating the long-term viability of Aliso Canyon is outside the scope the Winter Action Plan. Senate Bill 826 Budget Act of 2016 provides funding for California Council on Science and Technology to conduct an independent study assessing the long-term viability of natural gas storage facilities in California to be completed by 12/31/2017.</p> <ul style="list-style-type: none"> • Demand of 4.1 to 4.2 Bcfd does not represent a 1-in-10 peak temperature cold day. The adjusted demand of 4.1 to 4.2 Bcfd is in part achieved through reducing gas supply to electric generators resulting in reducing electric generation to minimum reliability levels that presume multiple outages do not occur on the electric and natural gas systems, all generation in key locations is in service, and all transmission lines are in service. The minimum generation operating levels reflected in the winter assessment represent a significant departure from prudent and economic operational practices that are not sustainable as normal operating practice. Such limited operation on a sustained basis could impede the ability to perform needed maintenance or sustain planned or other unplanned outage work that could jeopardize electric reliability. • The CPUC has worked with SoCalGas on deferring elective maintenance events. The maintenance on Line 3000 is safety related, not elective maintenance and requires necessary remediation.

Public Comments 16-IEPR-02 Natural Gas, August 26 Workshp on Aliso Canyon Winter Action Plan

Name	Assoc.	Comments	Staff Response
		<ul style="list-style-type: none"> • LNG could be provided by Shell Energy, but there is no compelling reason to pay for additional backup supply of natural gas at Otay Mesa given the significant winter peak day supply surplus projected with the summer and winter mitigation measures in place. • Any hypothetical natural gas curtailments to refineries due to LA Basin natural gas supply constraints would last a few days at most. <p>Independent Evaluator Report</p> <ul style="list-style-type: none"> • Agrees with recommendations for tighter balancing rules and deferring maintenance. • Does not agree with unsupported statements regarding the need for Aliso Canyon. <p>Other comments:</p> <ul style="list-style-type: none"> • Summer Action Plan erroneous claims of up to 14 days of LA Basin curtailments reverberated unchallenged in the press for months because the risk analysis was not revised with the more stringent balancing requirements. • Permanent shutdown of Aliso Canyon appear to be economically beneficial at least to core customers. • Neither the Winter Action Plan nor Winter Risk Assessment Technical report address how much costs have increased for non-core customers. • Recommend an economic analysis be conducted that compares savings to core customers if Aliso is permanently closed and increased costs to non-core customers due to tighter balancing rules and other mitigation measures. 	<ul style="list-style-type: none"> • The joint agencies included LNG shipments as a potential mitigation measure because this mitigation measure would reduce the risk of curtailments. The joint agencies have agreed to explore this option. • The economic impact of the permanent shutdown of Aliso Canyon is outside the scope of the Winter Action Plan.
Energy Reliability/Support Reopening (36 Comments)			
6 Dennis Huang	Asian Business Association	Concerned about energy reliability and the impact of the shutdown of Aliso Canyon on energy reliability and costs. Asian business like all businesses need reliable energy. Suggest more communication and outreach to Asian Pacific Americans as they make up more than a quarter of the population at Porter Ranch.	The energy agencies are committed to ensuring wells are deemed safe before being brought back in service. The agencies understand the impact of electric service interruptions and have put forth a Summer Action Plan with 21 mitigation measures and a Winter Action Plan with 10 new mitigation measures to reduce the risk of curtailments.

Public Comments 16-IEPR-02 Natural Gas, August 26 Workshp on Aliso Canyon Winter Action Plan

	Name	Assoc.	Comments	Staff Response
7	Robert Pacheco	City Councilman, City of Walnut	Appreciates the progress reports from SoCalGas describing their efforts to ensure energy reliability this summer and the upcoming winter and the steps SoCalGas is taking to comply with DOGGR Order 1109 and SB 380. Concerned that SoCalGas may not have planned sufficiently for future Southern California needs because of the heavy reliance on a single facility. Concerned about the long-term capability of the system to meet high or expanded demand. Focusing on reliability is critical. Supports the mitigation plans including use of supplies at Aliso Canyon to avoid curtailment, gas balancing rules, relying on imports. Concerned about the impact to consumers of curtailment of supplies or increased costs. Believes reviewing existing fuel contracts or exploring dual fuel capability is needed in light of increasing interdependence of the gas and electric industries.	See response to 6. Asian Business Association.
8	Heather Stratman	Association of California Cities Orange County	Supports SoCalGas' efforts to provide energy reliability in the region by reopening the Aliso Canyon storage facility as soon as possible. The Winter Technical Assessment report determined that Aliso Canyon was an essential part of meeting the energy needs of the Los Angeles and Orange County region. Energy reliability is critical to businesses, residences, hospitals, schools, and public services. The association strongly believes that SoCal has taken the necessary measures to make Aliso Canyon more safe and dependable. The association is confident in the work SoCal has done and believes strongly that public safety will remain their top priority as they bring the facility back online.	See response to 6. Asian Business Association.
9	Gilbert F. Ivey, David Fleming, Tracy Hernandez	Biz Fed	Concerned about the risks to energy reliability, both natural gas for heating and for electric generation, if Aliso Canyon remains offline. Concerned about the potential threat to the economy and the burden on lower and middle income families in the event of shortfalls. Concerned about risk of shortages during winter peak. Rather than settling for a quick fix, or giving in to emotional pleads to shut Aliso Canyon down, now it is the time to do the hard work required to get Aliso Canyon functioning.	See response to 6. Asian Business Association.
10	Michele Ware	Building Owners and Managers Association Greater Los Angeles Area	Concerned about the risks if Aliso Canyon remains offline. Supports bringing it back safely and timely to ensure energy reliability to support the economy and quality of life. Concerned about energy reliability this winter due to the heating gas demands. Feels energy agencies should review their energy management plans and consider a wide-range of supply.	See response to 6. Asian Business Association.

Public Comments 16-IEPR-02 Natural Gas, August 26 Workshp on Aliso Canyon Winter Action Plan

	Name	Assoc.	Comments	Staff Response
11	Charlie Woo/Kim Yamasaki	Center for Asian Americans United for Self Empowerment	Support reopening Aliso Canyon. Worked closely with SoCalGas on their Veteran's Initiative Programs. Finds SoCalGas to be a responsible corporate citizen and community partner.	See response to 6. Asian Business Association.
12	Carol E. Schatz	Central City Association of LA	CCA supports reopening Aliso Canyon natural gas storage facility for the storage and transmission of natural gas for use around Southern California. Supplies and availability without Aliso are well below what could be needed to provide the electricity needed this upcoming winter. It is estimated that levels are one-half billion cubic feet below what could be needed. This will impact many businesses around LA county and beyond. Compliance with Senate Bill 380 ensures the safety and integrity of wells that have passed inspection and those wells that have passed should be put back in service. The CEC must go forward with a realistic program that will give assurances to the businesses and to the residents throughout Southern California that their access to the gas that powers their ovens, furnaces and core equipment as well their electricity will be available when it is needed this winter. CCA urges you to move forward with reopening the Aliso Canyon natural gas storage facility.	See response to 6. Asian Business Association.
13	Rick Gibbs	City of Murrieta	Support reopening Aliso Canyon in a safe and expeditious manner. This facility forms the backbone of gas delivery and plays a central role in meeting regional electrical demand. If the wells undergo rigorous testing and are determined to be safe by industry standards, they should be reopened.	See response to 6. Asian Business Association.
14	Gurcharan S. Bawa	City of Pasadena - Pasadena Water and Power	It is imperative to bring Aliso Canyon back online in a manner that is safe as it is timely to ensure energy reliability in the region. Despite having being able to provide natural gas for the summer, we still run the risk of shortage this upcoming winter as more natural gas will be used for heating. Utilities in Pasadena are unable to import all of their electricity needs due to limitation within their grid system. Natural gas is still an important source of energy and due to the extreme drought, renewables integration, and lack of nuclear energy available, there is even more pressure on the natural gas system. Wells should be reopened if they have already been tested and proven to be safe.	See response to 6. Asian Business Association.

Public Comments 16-IEPR-02 Natural Gas, August 26 Workshp on Aliso Canyon Winter Action Plan

	Name	Assoc.	Comments	Staff Response
15	Margaret Finley	Council Member and Mayor, City of Duarte	Supports safely reopening Aliso Canyon as soon as possible. Concerned about energy reliability, both for electric generation during the summer and gas supply during the winter, and potential impact to the economy without Aliso Canyon. Also, SoCalGas helped their community after devastating fires during this past June by providing air purifiers.	See response to 6. Asian Business Association.
16	Gil Hurtado	Council Member, City of Southgate	Support reopening Aliso Canyon. Concerned about energy reliability and curtailments and impact to economy if Aliso Canyon remains shutdown. Feels SoCalGas has complied with all new safety regulations and that the facility is safe to reopen to provide reliable energy.	See response to 6. Asian Business Association.
17	Liz Reilly	Councilwoman, City of Duarte	Concerned about energy reliability for her constituents and fear of power outages. SoCalGas facilities are integral to electric power plants that generate 60% of electricity for California. It is critical to reopen Aliso Canyon to ensure our communities' energy sources are not curtailed.	See response to 6. Asian Business Association.
18	Elizabeth Warren	Future Ports	Urging the Energy Commission to reopen Aliso Canyon. Concerned about energy reliability and costs and the potential impact to the goods movement industry, which could impact the entire California economy. Supports bringing Aliso Canyon back online once deemed safe to ensure electricity generators have the fuel they need to prevent brownouts and to ensure a constant supply of reliable electricity.	See response to 6. Asian Business Association.
19	Bob Amano	Hotel Association of LA	Concerned of the risks, either inadequate heating supply or electrical interruptions, the hotel industry will face if Aliso Canyon remains shut down. It is imperative that Aliso Canyon be brought back online in a manner that is as safe as it is timely to ensure energy reliability in the region. During the forthcoming peak in natural gas consumption during winter months, the region could face increased risk of shortages. Rather than settling for a quick fix, or giving in to emotional pleas to shut Aliso Canyon down, now is the time to do the hard work required to get Aliso Canyon functioning.	See response to 6. Asian Business Association.
20	Ronald Wong	Imprenta Communicati ons Group	Concerned about the risk of electricity interruptions and impact to the economy, if Aliso Canyon remains offline. Natural gas is a vital part of our electricity infrastructure. Concerned about the burden on lower and middle income families in the event of shortfalls. Support bringing Aliso Canyon safely back online as soon as possible to avoid severe economic impact as a result of electricity curtailments.	See response to 6. Asian Business Association.

Public Comments 16-IEPR-02 Natural Gas, August 26 Workshp on Aliso Canyon Winter Action Plan

	Name	Assoc.	Comments	Staff Response
21	Steve Kang	Korean American Coalition	Supports resumption of Aliso Canyon especially before winter. Believes SoCalGas is taking actions to bring safe and clean energy to the region and working to rebuild the trust of the community and bring transparency of the well inspections and incident reporting.	See response to 6. Asian Business Association.
22	Gary Toebben	Los Angeles Area Chamber of Commerce	Natural gas is a core economic input for the Los Angeles economy -- it is a necessity to everyday operations. Many businesses and industry rely on natural gas for their operations and even a small disruption in service could have significant impacts on operations. Although we are nearing the end of summer, natural gas will be critical to winter usage and reliability. Without Aliso Canyon open for operation in the middle of this past summer, we resorted to dirtier resources which we do not want to become the norm. The business community wants to convey safety and urgency as priorities in meeting energy reliability. The safe, continued operation of Aliso Canyon facility is absolutely necessary to providing a reliable supply of energy for our regional economic prosperity.	See response to 6. Asian Business Association.
23	Sam Pedroza	Mayor, City of Claremont	Support reopening Aliso Canyon. Aliso plays an important role in meeting the region's energy needs. Want to ensure that residences, communities, and businesses are not at risk of being affected by gas curtailments. Concerned about energy reliability and risk of electrical outages and the impact to the local economy. Feels that SoCalGas has complied with all new safety regulations and undergone numerous well inspections to guarantee the facility is safe to reopen.	See response to 6. Asian Business Association.
24	Terry Marques	Mother's of East Los Angeles	Support for the reopening of Aliso Canyon that can help to ensure constant energy reliability and the wellbeing of East Los Angeles residents. Concerned about energy reliability, both power outages and gas service to homes and believes it is irresponsible to keep the facility closed. SoCalGas has worked diligently to undertake inspections, work with state and local agencies to safely bring the facility back in service.	See response to 6. Asian Business Association.
25	Todd Ament	President & CEO of Anaheim Chamber of Commerce	Concerned about energy reliability in the wake of the Aliso Canyon natural gas leak and the ramifications of DOGGR's prohibition on injections. Aliso is critical to meeting the energy needs of residential and commercial customers as well as the fuel source for gas-fired electrical generators. Support DOGGR lifting the ban on injections to ensure SoCalGas meets demand and avoids disruption of service.	See response to 6. Asian Business Association.

Public Comments 16-IEPR-02 Natural Gas, August 26 Workshp on Aliso Canyon Winter Action Plan

	Name	Assoc.	Comments	Staff Response
26	Dan Hoffman	South Bay Association of Chambers of Commerce	Concerned about the risks to energy reliability, both natural gas for heating and for electric generation, if Aliso Canyon remains offline. Concerned about the potential impact to the economy and the burden on lower and middle income families in the event of shortfalls. Rather than settling for a quick fix, or giving in to emotional pleas to shut Aliso Canyon down, now it is the time to do the hard work required to get Aliso Canyon functioning.	See response to 6. Asian Business Association.
27	Cesar Motts	Southeast Community Development Corporation	Southeast Community Development Corporation supports reopening Aliso Canyon and is concerned about energy reliability.	See response to 6. Asian Business Association.
28	Ken Dami	Tesoro	Concerned about the risks to energy reliability, both natural gas for heating and for electric generation, if Aliso Canyon remains offline. Concerned about the potential impact to the economy and the burden on lower and middle income families in the event of shortfalls. Rather than settling for a quick fix, or giving in to emotional pleas to shut Aliso Canyon down, now it is the time to do the hard work required to get Aliso Canyon functioning.	See response to 6. Asian Business Association.
29	Donna Duperron/Leah Hamilton	Torrance Chamber of Commerce	Concerned about the risks to energy reliability, both natural gas for heating and for electric generation, if Aliso Canyon remains offline. Concerned about the potential impact to the economy and the burden on lower and middle income families in the event of shortfalls. Rather than settling for a quick fix, or giving in to emotional pleas to shut Aliso Canyon down, now it is the time to do the hard work required to get Aliso Canyon functioning.	See response to 6. Asian Business Association.
30	-	United Chambers of Commerce	We must reopen the Aliso Canyon facility as soon as it is deemed safe, reliable and operable to avoid uninterrupted service. This facility is imperative to the San Fernando Valley and regions for our source of natural gas. Sempra Energy has been diligent in keeping the community updated on the progress they have been working on.	See response to 6. Asian Business Association.

Public Comments 16-IEPR-02 Natural Gas, August 26 Workshp on Aliso Canyon Winter Action Plan

	Name	Assoc.	Comments	Staff Response
31	Robin Downs	Utility Workers Union of America, Local 483	Support accelerating safely reopening Aliso Canyon. Aliso Canyon has played a vital role in meeting customer demand for many winters over decades, and without Aliso Canyon, SoCalGas' ability to meet demand is significantly reduced, increasing the risk of natural gas shortages for an entire region. Concerned about union members livelihood if Aliso Canyon remains offline. Their union members have worked hard to complete all the necessary work timely and safely, to restore injections and normal operations.	See response to 6. Asian Business Association.
32	Kenn Phillips	Valley Economic Alliance	Supports restoring Aliso Canyon in a safe and responsible way. Valley Economic Alliance recognizes the multi-agency efforts to ensure safety, energy solutions and environmental concerns as well as SoCalGas' safety enhancements and field monitoring and supports the continued efforts to insure the safety and testing. Concerned about energy reliability and impact to businesses, residences, and the manufacturing sector, which has seen a 3.8% growth. A safe and reliable energy delivery system is imperative to support on-shoring of middle class jobs.	See response to 6. Asian Business Association.
33	Kevin Tamaki/ Stuart Waldman	Valley Industry and Commerce Association	Supports the safe reopening of the Aliso Canyon Natural Gas Storage Facility. Concerned about energy reliability and the economic impact to businesses and impact to air quality. The cost of outages is significant to manufacturers, which L.A. is the largest manufacturing center in the country. Risking jobs and our economy by failing to reopen the Aliso Canyon facility will not have any environmental benefit since back-up diesel generators may be used and are much worse for air quality.	See response to 6. Asian Business Association.

Public Comments 16-IEPR-02 Natural Gas, August 26 Workshp on Aliso Canyon Winter Action Plan

	Name	Assoc.	Comments	Staff Response
34	Catherine H. Reheis-Boyd	Western States Petroleum Association	The ability to inject and produce natural gas from the Aliso Canyon facility is critical to the maintenance of reliable energy supply throughout Los Angeles and Orange Counties. Both summer and winter plans demonstrate that simply decommissioning Aliso Canyon would place all of Southern California at risk of a severe disruption of electricity and natural gas supplies. Concerned about the impact any service outages may have on the state’s transportation fuel supply – 60% of which is produced in the LA Basin. The most responsible and effective solution to Aliso Canyon will require that all stakeholders do their part to mitigate the risks of natural gas and electric service disruption while safely and incrementally returning Aliso Canyon to full operation. Recommends the state should increase their forecasting capacity in order to reduce the risk associated with potential curtailments. WSPA supports the prompt return of Aliso Canyon to service to the extent it can be done safely.	See response to 6. Asian Business Association.
35	David Elliott		Energy is becoming more vital to Orange County as well as storage and usage of natural gas. As long as Safety precautions are met we need facilities like Aliso Canyon.	See response to 6. Asian Business Association.
36	Elizabeth Shapiro		Support reopening Aliso Canyon. Concerned if Aliso Canyon remains offline that there will not be sufficient storage for energy production and heating during the winter.	See response to 6. Asian Business Association.
37	Nancy Lulejian Starczyk		Porter Ranch resident who did not relocate and did not have any negative health impacts. Only one family on her street relocated, and no other families on her street suffered any health impacts. She is a birder who said there was no change in wild life. She is a realtor and stated no data shows real estate prices have decreased, rather prices have increased. Believes SoCalGas has kept them informed. Wants reliable and safe operations, and costs to remain affordable. Supports bringing Aliso Canyon back in service as long as SoCalGas complies with all safety regulations.	See response to 6. Asian Business Association.
38	Paul Little		Do not jeopardize energy availability by forcing the Aliso Canyon gas storage facility to remain closed even after wells and storage have already been declared safe and operable.	See response to 6. Asian Business Association.
39	Ray Jan		Supports reopening Aliso Canyon especially before winter to meeting heating needs. Believes reopening will help prevent price increases and keep prices affordable.	See response to 6. Asian Business Association.

Public Comments 16-IEPR-02 Natural Gas, August 26 Workshp on Aliso Canyon Winter Action Plan

	Name	Assoc.	Comments	Staff Response
40	Richard Xavier Corral		Concerned about the risks to energy reliability, both natural gas for heating and for electric generation, if Aliso Canyon remains offline. Concerned about the potential impact to the economy and the burden on lower and middle income families in the event of shortfalls. Rather than settling for a quick fix, or giving in to emotional pleas to shut Aliso Canyon down, now is the time to do the hard work required to get Aliso Canyon functioning.	See response to 6. Asian Business Association.
41	Wade Trimmer		Concerned about the implications related to not re-opening the Aliso Canyon field. The loss of Aliso Canyon and the resources it contains will surely raise rates and adversely impact low-income residents. Support a safe and viable field for gas wells and want to see it safely operated.	See response to 6. Asian Business Association.
Environment (4 Comments)				
42	Cori Redstone		States that exposure to the gas leak extends beyond Porter Ranch to all of LA County and Pacoima area. She and area high school students suffered headaches, nose bleeds, eye burning and fatigue. States the unwillingness of government officials to issue warnings and publicly publish and monitor gas levels in real time online is a dereliction of duty.	Air quality and protecting the environment are critical issues. The California Air Resources Board is taking the lead on expanding its real-time monitoring of emissions in the community and providing frequent, publicly accessible updates on local air quality. The Air Board is also taking the lead on developing a program to fully mitigate the leak's emissions of methane. For more information, please see https://www.arb.ca.gov/research/aliso_canyon_natural_gas_leak.htm
43	Elena Semper		Longtime valley resident, about a dozen miles from Porter Ranch and affected by the gas blowout. SoCalGas has said under oath on average their facility leaks twice a day. Earlier in the year the EPA reported that an overwhelming amount of gas and oil fugitive releases have gone unreported for decades. We should consider solar energy. California is a climate leader, but we can do better through our political will.	See response to 42. Cori Redstone.
44	-	Valley Family Center	Poor air quality creates high societal costs, including billion in healthcare costs and missed work and school days. Grateful for the work SoCalGas has done to promote use of renewable fuels like natural gas for the trucking industry. Natural gas is a cleaner source of energy and it is important to ensure an adequate supply.	See response to 42. Cori Redstone.

Public Comments 16-IEPR-02 Natural Gas, August 26 Workshp on Aliso Canyon Winter Action Plan

	Name	Assoc.	Comments	Staff Response
45	Gary Bessler		Poor air quality creates high societal costs, including billion in healthcare costs and missed work and school days. Grateful for the work So Cal Gas has done to promote use of renewable fuels like natural gas for the trucking industry. Natural gas is a cleaner source of energy and it is important to ensure an adequate supply.	See response to 42. Cori Redstone.
Mitigation Measures (9 Comments)				
46	John W. Leslie of Dentons US LLP	Alliance for Retail Energy Markets and Shell Energy	The joint parties urge the joint agencies to add, to the list of mitigation measures, development of a protocol to trade daily imbalances on the Southern California Gas Company and San Diego Gas & Electric Company systems on operational flow order days. The joint parties support the Winter Action Plan. In addition, the Winter Action Plan should be amended to include a directive to SoCalGas to provide for the trading of daily imbalances on OFO days. More transparency is needed on SoCalGas' well inspection and the projected capabilities for winter. The joint parties support the mitigation measure to extend balancing rules to winter including core customers. The joint parties support the joint agencies' efforts to identify and increase additional sources of gas supply for delivery to the SoCalGas/SDGE system by exploring whether California gas producers can increase deliveries to the SoCalGas system and purchasing LNG.	Daily imbalance trading is a subject of settlement discussions between SoCalGas and parties. Those settlement talks are focused on core balancing and keeping tight noncore balancing rules both of which are in the Action Plan mitigation measures. The inspection of wells is under the jurisdiction of the Division of Oil Gas and Geothermal Resources and the specifics of the inspection were not part of the Action Plan.

Public Comments 16-IEPR-02 Natural Gas, August 26 Workshp on Aliso Canyon Winter Action Plan

	Name	Assoc.	Comments	Staff Response
47	Kelly Knutsen	California Solar Energy Industries Association	<p>Rooftop solar technologies, both photovoltaic (PV) and thermal, play an important role as part of the ongoing response to the leak at Aliso Canyon. Supports the mitigation measures to reduce natural gas use during summer and winter, especially the measure to reprioritize solar thermal program spending to fund projects for summer and by the end of 2017. As previously mentioned in their comments to the Summer Action Plan, they support streamlining permitting and interconnection and allowing PPA's in LADWP territory. The expanded rebates for solar are expected to save 86.6 MMBtu by the end of 2016 due to commercial pools rebate and single-family home rebates. The market rate commercial sector showed no increased level of savings due to the expanded rebates, most likely due to the mismatch in business cycles and the short time frame to implement projects by the end of 2016. Recommends extending the California Solar Initiative Solar Thermal expanded rebate program at the current budget level through December 31, 2017 to allow sufficient time for commercial projects to be completed.</p>	<ul style="list-style-type: none"> • LADWP is taking steps to reduce approval times for solar system installations. The Customer Net Metered (CNM) LADWP Solar Interconnection process was streamlined in December 2015. The new on-line interconnection process, permit coordination improvements, and technical field requirement simplifications resulted in faster meter installation response times. LADWP continues to improve the process through work management efficiencies resulting in about 1000 installations per month, an approximate 100% increase compared to 2015. • LADWP has an active Feed-in-Tariff (FiT) with an authorized 150MW of approved capacity. LADWP currently offers a FiT program, and once the initial 150MW FiT Program is fully allocated and built out, an expanded FiT Program will be provided. In addition to the FiT program, LADWP also allows lease agreements and equipment purchase by owners, giving a wide variety of financial structures for solar on commercial sites. • LADWP Solar Incentive Program (SIP) still has funding available through 2016 for both residential and commercial installations in the City of LA. The SIP Program has supported the development of about 170 MW of customer solar in the City of LA.
48	Adriano Martinez	Earthjustice for Sierra Club	<p>We need to shift away from our reliance on fossil fuel infrastructure for power generation. After reviewing all the materials from the workshop, we are not persuaded that it is safe or needed to recommend further use of the Aliso Canyon storage facility. We believe strategies to reduce or eliminate the use of gas in residential settings can be effective tools to address winter gas usage issues. While the proceeding and report do not dive too deeply into specific demand response approaches for core customers, we want to highlight one additional strategy that could be pursued. Pool and Spa heating in the region causes significant NOx emissions, and while not the largest residential use of gas, this appears to be a good place for demand response and other strategies</p>	<p>The CPUC and SoCalGas held a series meetings to design winter demand response programs as a mitigation measure which was filed as a tier 3 Advice Letter on September 27, 2016 and includes three proposed demand response programs. One of these programs that has been proposed is a rebate for core customers to drop gas load during a "Natural Gas Conservation Alert" and as designed could include any end-use that requires natural gas, including pool or spa heating.</p>

Public Comments 16-IEPR-02 Natural Gas, August 26 Workshp on Aliso Canyon Winter Action Plan

	Name	Assoc.	Comments	Staff Response
49	Evelyn Kahl, attorney	Indicated Shippers, Energy Producers, Users Coalition	IS/EPUC urges the joint agencies to adopt several of the mitigation measures in the Winter Action Plan and integrate an additional measure of daily Operational Flow Order (OFO) imbalance trading to mitigate the increased costs on noncore customers. IS/EPUC supports revised core balancing rules to ensure that the core class, which dominates winter load, does not create excessive imbalances on an OFO day. Continuing to allow the gas acquisition group's deliveries to deviate substantially from the actual core consumption, alone, may cause curtailments this winter. Those curtailments almost certainly would fall on noncore customers rather than higher priority core customers. Continuing to require noncore customers to manage their gas supplies within tight tolerances on a daily basis while permitting core customers to miss the mark by up to 50% without penalty, discriminates unreasonably against noncore customers. IS/EPUC also supports additional supplies from LNG, evaluating the potential for more California production, and further investigation of demand response for core and noncore customers.	See response to 46. Alliance for Retail Energy Markets and Shell Energy.
50	Veronica Padilla	Pacoima Beautiful	Concerned about LADWP's emergency authorization allowing 3 of its 4 plants to burn diesel fuel especially at the Valley Generating station due to its close proximity to the community. Does not support this dual fuel capability because of the impact to already adversely impacted communities. Supports the work DOGGR is doing to inspect and ensure compliance including withdrawal of gas through tubing only and believes Aliso Canyon can be safely reopened.	LADWP is committed to utilizing diesel fuel as a backup to natural gas only as a last resort to ensure reliability by conducting limited readiness testing and in the event of natural gas curtailments. Accordingly, LADWP has invested heavily in mitigation measures to help increase reliability in the event of gas curtailments, including expanding Demand Response and Energy Efficiency programs, launching the Summer Shift load shifting program, and accelerating energy storage projects.

Public Comments 16-IEPR-02 Natural Gas, August 26 Workshp on Aliso Canyon Winter Action Plan

	Name	Assoc.	Comments	Staff Response
51	Wm. Spencer Olinek	PG&E	<p>Many Assumptions in the Aliso Canyon Gas and Electric Reliability Winter Action Plan and Aliso Canyon Winter Risk Assessment Technical Report may be optimistic. The study assumes that the storage inventory levels at SoCalGas' other storage fields will need to be full or nearly full throughout the winter to maintain the withdrawal capabilities assumed in the assessment. The study highlights the criticality of adequate gas storage inventory management, and PG&E suggests adding a mitigation measure that would allow for a gas burn operating ceiling for gas storage inventory management to maintain adequate withdrawal deliverability throughout the winter season. The Aliso Canyon Gas and Electric Reliability Winter Action Plan and Aliso Canyon Winter Risk Assessment Technical Report Overlook the Rest of California's Electrical System. Very broad assumptions that the rest of electric and gas systems will be operating at full capacity throughout winter are made in the assessment. A multi-day, west-wide cold spell would stress the entire gas and electric system's ability to serve customers – not only in Southern California, so the assessment should consider the potential for system-wide shortages in the upcoming season.</p>	<ul style="list-style-type: none"> •The assessment does identify that risk still exists if there are sustained supply shortages that affect the gas supply to external to Southern California as well as into to Southern California. To the extent such supply conditions effect gas generation availability that would have been relied upon as replacement electric supply outside of the SoCalGas system in case of gas curtailment to resources in Southern California, the risk to electric reliability does exist and would be a condition that withdrawal from Aliso Canyon may be necessary for the winter. •The CPUC is currently working to further identify the storage inventory levels needed at Aliso for winter reliability. This will include identifying the associated withdrawal capacity, considering the wells available for withdrawal and their capacity and the impact of the level of inventory on the withdrawal capacity. Additionally the existing protocol designed for making summer withdrawals from Aliso is being reviewed to identify and incorporate changes necessary to respond to winter conditions.
52	Loraine Lundquist	Resident of Northridge	<p>Unique opportunity to transition away from natural gas. Urge the agencies implementing this action plan to lean heavily towards mitigation measures that will permanently reduce our natural gas use. The executive summary does not compare costs of opening and operating Aliso Canyon to moving out of the Basin. Was not able to find an explanation of where the 5.2 Bcf design criteria came from besides the statement that is a 1 in 10 year peak demand. When was the last time we had a peak demand that high? How often does it occur? Oil refineries should be curtailed before electric generation. LADWP's should expand its Rush Hour Incentive DR program under the Nest Thermostat program. LNG shipment should be removed from the list of mitigation strategies.</p>	<ul style="list-style-type: none"> • SoCalGas' peak demand on January 14, 2013 was 5.1 Bcfd, which is near their system design criteria. • The joint agencies included LNG shipments as a potential mitigation measure because this mitigation measure would reduce the risk of curtailments. The joint agencies have agreed to explore this option. • LADWP's Smart Thermostat deployment efforts will help reduce peak load and is an important part of LADWP's overall Energy Efficiency and Demand Response programs. Additionally, LADWP is currently seeking approval for an expanded Residential DR program with a goal of deploying 50,000 Smart Thermostats starting the first half of 2017.

Public Comments 16-IEPR-02 Natural Gas, August 26 Workshp on Aliso Canyon Winter Action Plan

	Name	Assoc.	Comments	Staff Response
53	Catherine Hackney	Southern California Edison	Supports the Winter Action Plan and its focus on mitigation measures to preserve the safe and reliable operation of the natural gas and electric grid systems in Southern California. SCE especially agrees with the Core Balancing mitigation measure to help reduce risk during the upcoming winter. Noncore customers (including electric generators) can be completely in balance, while SoCalGas is responsible for doing nothing to reduce a core customer imbalance that could be large enough to put the system in stress. Electric generators are the first to be curtailed, regardless of the customer group that is the source of the gas supply shortage.	See response to 46. Alliance for Retail Energy Markets and Shell Energy.
54	Norman Pedersen, attorney	Southern California Generation Coalition	Southern California Generation Coalition (SCGC) supports the Winter Action Plan and the ten new mitigation measures, particularly keep the tight noncore balancing rules and add core balancing rules. There is uncertainty surrounding completing the safety testing, resuming reinjection, and what the withdrawal capabilities will be. It is critical that this winter the Commission bring core customers into parity with noncore customers by requiring SoCalGas Acquisition Department to balance daily core Measurement Day usage against daily core gas day supply. Since the use of Aliso Canyon is extremely restricted, the system operator will not be able to accommodate the kind of imbalances from Gas Acquisition that have occurred under existing system of permitting Gas Acquisition to balance gas day supplies against a 5:00 am forecast of core demand.	See response to 46. Alliance for Retail Energy Markets and Shell Energy.
Other (1 Comment)				
55	Lori Kalman		Resident of Porter Ranch. Proceedings should remain local and held on the weekends so that more residents can testify. Concerned that people outside of their area went to testify in Diamond Bar.	The joint agencies will make every attempt to hold future hearings in the local community.
Shut-it Down (26 Comments)				

Public Comments 16-IEPR-02 Natural Gas, August 26 Workshp on Aliso Canyon Winter Action Plan

	Name	Assoc.	Comments	Staff Response
56	Adriana Perez		<p>Youngest son experienced heavy and severe nose bleed. Doctors wrote a letter to SoCalGas asking them to relocate the family and they denied. In hospital with daughter who now has aplastic anemia. One of the causes of this condition is benzene. Daughter almost died and the company still refuses to move them. Daughter is receiving bone marrow transplants and she and her husband continue to miss work. Gas company being cheap by not keeping people safe. Does not support reopening.</p>	<p>Air quality and protecting the environment are critical issues. The California Air Resources Board is taking the lead on expanding its real-time monitoring of emissions in the community and providing frequent, publicly accessible updates on local air quality. The Air Board is also taking the lead on developing a program to fully mitigate the leak's emissions of methane. For more information, please see https://www.arb.ca.gov/research/aliso_canyon_natural_gas_leak.htm. The joint agencies are committed to ensuring wells are deemed safe before being brought back in service. The California Department of Conservation's Division of Oil, Gas, & Geothermal Resources in consultation with its independent experts have developed an inspection and safety protocol to ensure each well is thoroughly tested before being brought back in service. See http://www.conservation.ca.gov/dog/AlisoCanyon. The Winter Action Plan addresses reliability for winter 2016-2017 only. Subsequent analyses are underway to address longer-term issues. Senate Bill 826 Budget Act of 2016 provides funding for California Council on Science and Technology to conduct an independent study assessing the long-term viability of natural gas storage facilities in California to be completed by 12/31/2017.</p>
57	Ben Attai		<p>Was adversely impacted for many months from the natural gas blowout. Concerned about re-opening Aliso Canyon. The many supporters backing the re-opening of Aliso Canyon are organizations who have never been to Porter Ranch and whose sympathetic statements are only about money, not the health of locals who have to live 24/7 with the risk of another gas leak. Encourages the CEC to take a harder look at the SoCalGas' track record in cutting corners to maximize profit. Our regulatory agencies should not allow business as usual at Aliso Canyon Facility if it cannot positively guarantee its safety with 100% certainty.</p>	<p>See response to 56. Adriana Perez.</p>

Public Comments 16-IEPR-02 Natural Gas, August 26 Workshp on Aliso Canyon Winter Action Plan

	Name	Assoc.	Comments	Staff Response
58	Donna B. Siers		Blowout has affected her heart. Before Aliso Canyon was sealed she suffered from many symptoms including runny nose, breathing difficulty, nausea, and developed a cough. Even now that the wells are sealed her symptoms appear when the methane levels are high. Also, she cant enjoy spending time outside her home without feeling ill. The fact SoCalGas is installing new turbines with more power just two miles from the blowout site without compensating the residents who were forced to relocate to protect their health shows that human costs are irrelevant to them. Need to prove Aliso Canyon is safe to live within a mile or shut it down.	See response to 56. Adriana Perez.
59	Halleh		Resident of Porter Ranch who is sick of getting sick and supports shutting Aliso Canyon down. Rushed to ER in November 2015 and March 2016 and put on IVs, pain meds and anti nausea IVs. Suffered from constant headaches, fatigue, dizziness, nausea, burning of my skin, coughs, stomach pains, female issues, fogginess, memory loss, anxiety, depression and rapid hair loss. Head of SoCalGas operations testified that the facility leaks an average of 2 leaks per day. Concerned about her health and those of others and the long-term effects. Was not informed that the facility was nearby when she moved into the neighborhood. Believes the field is not needed and supports Food and Water Watch findings and believes corporate greed is the driver of keeping it open. Request that you vote to shut it down to protect the health and well-being of the residents.	See response to 56. Adriana Perez.
60	Helen Ritenour		Resident of Porter Ranch who wants Aliso Canyon shutdown. Believes SoCalGas has created fear in the community, rather than the other way around as suggested by a SoCalGas representative, by lack of communication regarding the leak, saying there was no harm from the leak, telling residents that the oily mist never left the grounds, no cogent answer to the cause of the leak, lack of transparency and record of telling lies. The SoCalGas operations manager testified under oath that there was an average of 2 leaks per day. Experienced health symptoms, relocated from the community for 7 months, and experienced symptoms upon return. Many of their neighbors and friends have moved due to fear about the risk of living in proximity to Aliso, and they also plan to move to protect their health and safety. It's not a natural disaster; it's a man made one. No one should have to move. The facility should be shutdown.	See response to 56. Adriana Perez.

Public Comments 16-IEPR-02 Natural Gas, August 26 Workshp on Aliso Canyon Winter Action Plan

	Name	Assoc.	Comments	Staff Response
61	Jon Teboe		Fifteen year resident of Porter Ranch who wants the facility shut down. Has experienced same symptoms as methane poisoning, has been to urgent care 4 times, and has not fully recovered yet. SoCalGas has not had his home professionally cleaned. SoCalGas has testified on August 6 that they are still finding an average of 2 leaks per day. Please close Aliso Canyon Facility permanently.	See response to 56. Adriana Perez.
62	Kristina Zitkovich		Local resident who wants Aliso Canyon shut down. During the blowout, her child experienced symptoms and even after the wells have been sealed her daughter continues to have effects from the exposure. The list of chemicals has yet not been given, so doctors are playing guessing games. SoCalGas has put the entire community at high risk. The company has lied about removing the safety valves and instead of putting their profits into infrastructure they chose to pocket them. Has no trust in SoCalGas. Local residents have relocated, which has affected the small businesses in the area. She wants her life back and the only way to do it is by shutting down Aliso Canyon.	See response to 56. Adriana Perez.
63	Larry Capra		Resident of Porter Ranch for 42 years and supports shutting Aliso Canyon down. Suffered health problems over the years, but did not relocate. SoCalGas will not clean his home. Believes SoCalGas is negligent and careless and that the fields are old and were not meant to be a natural gas field as they were Getty Oil when he moved in.	See response to 56. Adriana Perez.
64	Maureen Capra		Porter Ranch Resident for 42 1/2 years, did not relocate, family has been ill with nosebleeds, asthma, cough, headaches, stomach aches, fatigue. Wants Aliso Canyon shut down, believes it leaks methane and is making them suffer mentally, physically and financially.	See response to 56. Adriana Perez.
65	Maureen Capra		Second comment letter.	See response to 56. Adriana Perez.
66	Maureen Capra		Third comment letter.	See response to 56. Adriana Perez.
67	Maureen Capra		Fourth comment letter.	See response to 56. Adriana Perez.

Public Comments 16-IEPR-02 Natural Gas, August 26 Workshp on Aliso Canyon Winter Action Plan

	Name	Assoc.	Comments	Staff Response
68	Patricia Glueck Comments		Resident of Porter Ranch who is opposed to reopening Aliso Canyon. She has suffered illness, fatigue, hay-fever, metallic taste, conjunctivitis, bronchitis. Her husband has suffered aches, weird feelings, kidney pain, and been placed on blood pressure medication. Daughter has suffered migraines. Believe SoCalGas has not been forthcoming about the leak, absence of safety valves, and other problems on site, so the facility should remain closed. Other reasons to keep the facility closed: age of facility means wells are not built to current standards, active earthquake faults right underneath, exposure to toxic chemicals. SoCalGas has showed bad faith and still owes people reimbursement for expenses incurred. Believes there are many studies showing it is not needed. Facility should remain closed for health and safety reasons.	See response to 56. Adriana Perez.
69	Vikki Salmela		We will be energy secure with Aliso Canyon shut down. Personal health and of her pet has been severely affected by chemicals that are still unknown. SoCalGas did not clean the home properly, and she has had to continually leave what she thought was her dream home. Cannot lease the home due to the chemicals still in the area which continue to make people sick. Furthermore, her ability to work has dramatically decreased due to her exposure to the chemicals. Mitigation measures have worked, and Bill Powers also finds the facility is not needed. There is nothing reliable about Aliso Canyon and any risk of re-injecting is so huge compared to the risk of maintaining energy without it. It must be shut down.	See response to 56. Adriana Perez.
70	Alan Stanley		No, do not reopen, shut it down. If it reopens, evacuation plans and compensation funds need to be established, including buying out homes within 20 miles and monitoring the health of all residents.	See response to 56. Adriana Perez.
71	Andrea Leon-Grossman		Wants Aliso Canyon shutdown. Believes SoCalGas puts profits first before safety or the environment. Doesn't believe we need the facility and supports rapid transition to clean, renewable energy.	See response to 56. Adriana Perez.
72	Cheri Derohanian		Resident of Porter Ranch who wants it shutdown. Feels health of the community is at risk. Does not feel the facility is safe due to its age, wear and tear, unsafe casings, absence of shutoff valves. Feels there is a serious problem if public health is put second after corporate profits and unsafe business practices.	See response to 56. Adriana Perez.

Public Comments 16-IEPR-02 Natural Gas, August 26 Workshp on Aliso Canyon Winter Action Plan

	Name	Assoc.	Comments	Staff Response
73	Gloria Choi		Wants Aliso Canyon's Sempra/Southern CA Gas Fields shut down completely.	See response to 56. Adriana Perez.
74	Helen		Resident of Granada Hills, less than 3 miles from Aliso Canyon. Do the right thing & shut that old facility down! Adversely impacted by the leak with health symptoms and the need to relocate for over six months. Believes the gas company is fear mongering about energy shortages and is only concerned about their business and \$\$\$\$. The facility leaks on a daily basis, and it was the biggest man made environmental disaster in the history of the United States, which polluted the air and released a horrendous amount of greenhouse gas. California, with its progressive environmental policy, should be very concerned about reopening this facility.	See response to 56. Adriana Perez.
75	Jacqueline Petralia		Bill Powers of Powers Engineering found that as long as existing mitigation measures remain in place, Aliso Canyon is not needed to guarantee either summer or winter gas supplies in the L.A Basin. Methane readings above 2ppm are still causing symptoms. Support for Solar Energy Industries Association advocacy towards 100% renewables. Industry is trying to instill fear in the public and paying off their supporters. Industry doesn't take responsibility for assuring clean air and public health. Support keeping Aliso Canyon shut down and creating more opportunities for geothermal and solar. (note attachment, Solar Energy Industries Association Action Plan, which was filed as comments to the April 8, 2016 workshop)	See response to 56. Adriana Perez.
76	Laura Shaw		Shut it down and do not inject any more natural gas into these antiquated wells. Family has suffered health issues. It has been shown that the facility is not needed.	See response to 56. Adriana Perez.
77	Margery Brown		Please shut Aliso Canyon down permanently. It is very old, sits on top of earthquake faults, is too close to residents, has caused residents to flee due to illness, and has risk of fire explosion.	See response to 56. Adriana Perez.
78	Rania Shanny		Resident of Porter Ranch who wants it shutdown to allow the community to heal. Has suffered ailments and lost her dog to kidney/liver failure. Believes the plants, wildlife, and other animals are impacted. Does not feel the facility is safe given the age of the facility and that 67 wells have not passed inspection and the fall out from the blowout.	See response to 56. Adriana Perez.

Public Comments 16-IEPR-02 Natural Gas, August 26 Workshp on Aliso Canyon Winter Action Plan

	Name	Assoc.	Comments	Staff Response
79	Ray Hill		Do not allow the facility to reopen. We were forced out of our homes due to the fact that SoCalGas did not bother to keep up and properly maintain their important facility. They have lied and falsified records. They do not care about the people of Porter Ranch. They do not take any responsibility for the major disruption in our lives.	See response to 56. Adriana Perez.
80	Tina Gioulis		Keep Aliso Canyon closed. Subsurface safety valves need to be in place before this facility can be reopened. Believes lack of oversight by the state agencies contributed to the disaster. Risk of harm must outweigh the .03 risk possible curtailment without Aliso. Facility must be made completely safe of it should be permanently closed. Family suffered physically with gas smells, school closures. Their community should not be the sacrifice for which the regions energy needs are balanced.	See response to 56. Adriana Perez.
81	Tyler Aguirre		Want Aliso Canyon shut down. Believes that the Winter Action Plan can't be relied upon because of SoCalGas' involvement and that ratepayers are paying the cost of this aging facility while SoCalGas is profiting from it. Believes that opening this facility back up comes at great cost to our climate and the health of the community that is burdened by air pollution from the constantly leaking wells.	See response to 56. Adriana Perez.