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Comment Received From: Loraine Lundquist

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Investigate January withdrawal and ensure true energy reliability

Dear CPUC,

Thank you for your efforts to ensure safety and reliability while Aliso Canyon gas storage facility remains offline. I respectfully ask you to consider the following requests regarding this work:

1) Investigate the January 24-25 withdrawals from Aliso Canyon.

The winter reliability report stated that 4.5 bcf/d could be accommodated without Aliso Canyon, yet SoCalGas withdrew from Aliso on Jan 24 and 25 when demand was less than 4.1 bcf/d. Was the report inaccurate, or did SoCalGas withdraw unnecessarily? Were all the mitigation measures from the Winter Reliability plan followed? If not, will there be consequences? If daily balancing was properly implemented, why did the daily orders not increase on Jan 25 after withdrawal occurred on Jan 24? Cold weather was in the forecast – should improved weather and energy forecasts be better incorporated in daily balancing protocols? Is it possible that SoCalGas withdrew in order to ensure that the facility did not remain idle for 9 months and therefore risk triggering the required rebate to customers for facilities that have remained idle for longer than 9 months as required by section 455.5 of the Public Utilities code?

2) Please take steps to secure enforcement of mitigation measures and penalties for failing to follow them.

Regardless of the outcome of the investigation described in point (1), the CPUC should create clear penalties for failure to adhere strictly to the mitigation measures outlined by CPUC.

You’ve also added the new mitigation measure of injection into non-Aliso fields. According to CPUC documentation ([http://docketpublic.energy.ca.gov/PublicDocuments/17-IEPR-](http://docketpublic.energy.ca.gov/PublicDocuments/17-IEPR-11/TN217642_20170519T105740_Southern_California_Energy_Reliability_May_2017_Summary.pdf)

11/TN217642_20170519T105740_Southern_California_Energy_Reliability_May_2017_Summary.pdf),

"SoCalGas indicated in a March 30th letter to the CPUC that it expected significant injections during the transitional months of April through June. However, injections for April amounted only to 1.9 Bcf. Thus, CPUC had to add injection in non-Aliso fields as an extra mitigation measure. Why has SoCalGas not been injecting in non-Aliso storage fields adequately as promised? Will there be consequences if this continues?

3) Please initiate winter reliability study as soon as possible.

First of all, this will enable stakeholders to have more time to review the documents in advance of the workshop and provide more informed comment at the workshop. Secondly, it will enable consideration of broader scale mitigation measures that will more adequately address any possible reliability concerns.

4) Most importantly, please use this disaster to initiate broader mitigation measures that guide us to a more truly reliable energy system that enables us to make facilities like Aliso canyon obsolete.

I really appreciate the analysis of the impact of mitigation measures already implemented. It’s clear from that report that much more progress could be made to reduce Southern California’s natural gas usage permanently. After all, is it really “reliable” to have such a large facility subject to possible damage from earthquake, such as the well failure of SS4-0 that occurred during 1994 Northridge earthquake? Is it “reliable” to be dependent on a field that LA County Fire Department has such grave concerns about regarding fire danger? Is it “reliable” to be dependent on a field where the fluid leak at SS25-A described in DOGGR’s Mar 29, 2017 letter remains unexplained? Is it “reliable” to be dependent on a field that lacks safety valves, such that if another well failure did occur, another catastrophic release might again continue for months on end? Is it “reliable” to have such a facility in close proximity to residents complaining of health problems associated with it? And in the end, is it really

“reliable” to depend on fossil fuels that are warming our planet to the detriment of our children’s future? Of course we all know it is not, and CPUC and CEC know better the vast scale of how much more needs to be done to address our climate emergency, which represents the greatest energy reliability threat of all. The closure of Aliso canyon thus represents a dramatic opportunity to introduce more transformative mitigation measures that could not only render this unreliable field more obsolete than ever, but also catalyze the political will to make us all safer. True reliability comes from safe, renewable energy.

Thank you for your consideration,
Loraine Lundquist