

DOCKETED

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PASADENA WATER AND POWER

October 31, 2017

Michael Picker, President, California Public Utilities Commission
Robert B. Weisenmiller, Chair, California Energy Commission

Re: Comments on Draft Aliso Canyon Withdrawal Protocol

Dear President Picker and Chair Weisenmiller:

On behalf of Pasadena Water and Power ("Pasadena"), I am writing to express our concerns regarding the Draft Aliso Canyon Withdrawal Protocol released last week by the California Public Utilities Commission. Our primary concern is regarding the proposed protocol that states withdrawals are only to be made after alternatives including curtailment of non-core customers are exhausted.

As a SoCalGas non-core customer, this constraint presents several critical issues for Pasadena. Large consumers of gas such as electric utilities are categorized as "non-core" customers, and are among the first consumers required to curtail gas use. However, some non-core customers like Pasadena, have a critical need of natural gas supply to fuel natural gas fired generation within its city limits to prevent citywide and/or regional blackouts when electricity consumption exceeds our import capabilities. Aliso Canyon should be utilized to meet that need to avoid blackouts and ensure electric reliability, which compromises the public health and safety.

As you know, approximately 60% of electricity in California is generated with the use of natural gas. Aliso Canyon supplies natural gas to 17 power plants that serve 10 million residents and businesses. This includes the City of Pasadena. The ability to continue providing our customers with uninterrupted electric service hinges upon having timely delivery of natural gas.

Due to operational constraints such as import limitations, distribution system failures and transmission curtailments, Pasadena relies on natural gas-fired generation internal to its distribution system for approximately 50 to 70 days per year in order to meet peak demand and avoid rolling blackouts. Since Pasadena's power plant operates on natural gas, severely restricting use of the Aliso Canyon facility would jeopardize local electric reliability any time the electric consumption exceeds our ability to bring in enough electricity from sources outside the city limits.

Further, Pasadena Water and Power is unable to import all of its electricity needs during high-use periods due to local electric grid capacity limits. We *must* rely on local natural gas-fueled electric generators during peak conditions to keep the lights on, and there currently are no other feasible and cost-effective options that can be implemented quickly.

If our concerns regarding the reliability of our internal electric distribution system cannot be met, we respectfully request an exemption from the proposed protocol. As the winter months quickly approach, utilities must again prepare for the extreme temperature swings that occur. It is imperative that we can rely on adequate supplies of natural gas.

Until the Draft Aliso Canyon Withdrawal Protocol specifically allows the use of Aliso Canyon to meet the needs of both core and non-core customers, electric utilities (such as Pasadena) and communities they serve will have ongoing concerns and likely experience blackouts. We are hopeful that you will revise the Draft Aliso Canyon Withdrawal Protocol accordingly in order to provide affected utility customers with the safety assurances and electric reliability they deserve.

Sincerely,



GURCHARAN S. BAWA
General Manager

Cc: Steve Mermell, City Manager – City of Pasadena
Julie Gutierrez, Assistant City Manager – City of Pasadena