

DOCKETED

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BWPs Comments to Aliso Canyon Winter Assessment

Additional submitted attachment is included below.



Always There for You!

December 5, 2017

Robert B. Weisenmiller, Chair
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Dear Chair Weisenmiller:

Burbank Water and Power (“BWP”) respectfully, submits comments on the Aliso Canyon Winter Risk Assessment Technical Report 2017-18 Supplement dated November 28, 2017 (“Assessment”) and the proposed mitigation measures to address electric reliability in the absence of both the Aliso Canyon storage facility and three inoperable natural gas pipelines used to serve customers of the Southern California Gas Company (“SoCalGas”).

BWP is a municipal utility serving the residences and businesses of Burbank. BWP is also the operator of Magnolia Power Plant (MPP), a highly efficient, environmentally advanced combined-cycle natural gas plant that serves not only Burbank but the cities of Anaheim, Cerritos, Colton, Glendale, and Pasadena.

Our societies and economies depend on reliable electric service. This electric reliability depends on generating facilities like MPP; facilities like MPP, in turn, depend on a reliable supply of natural gas. As you are aware, this dependency on natural gas has increased over time as California addresses adverse impacts on our environment and health by eliminating dirty fuels such as oil. As a result, however, **natural gas has become a vital fuel source for electric reliability.**

We are therefore encouraged by the Commission’s recognition of the need for a reliable natural gas system serving Southern California, but gravely concerned about gas system reliability (and thus electric service reliability) this winter. As outlined in the recent Aliso Canyon Withdrawal Protocol dated November 2, 2017, under certain conditions SoCalGas will be forced to curtail gas supplies to generators like MPP. BWP has plans and programs to reduce Burbank’s natural gas and electricity consumption at those times but these **plans and programs may not be sufficient** to avoid electric service interruptions under those circumstances.

We support the Assessment’s intent and attempt to mitigate regulatory imposed restrictions on Aliso Canyon and loss of various pipeline capacity. We urge the state to plan for a reliable gas system, **including unplanned events.** The CEC/CPUC Letter to LA County Supervisor Kathryn Barger dated December 4, 2017, puts the issue in bold relief: recommending adoption of an interim moratorium on new connections for gas service while the region is in the midst of a housing crisis.

Robert B. Weisenmiller, Chair
California Energy Commission
December 5, 2017

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We thank you for the opportunity to share our concerns and look forward to participating in a solution that ensures electric reliability.

Sincerely,



Jorge Somoano
General Manager

Cc: The Honorable Anthony Portantino, California State Senate
The Honorable Laura Friedman, California State Assembly
Los Angeles County Supervisor, Kathryn Barger
Will Rogers, Mayor – City of Burbank
Ron Davis, City Manager – City of Burbank
David Jones, Emanuels Jones and Associates