

DOCKETED

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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Investigation pursuant to Senate Bill 380 to determine the feasibility of minimizing or eliminating the use of the Aliso Canyon natural gas storage facility located in the County of Los Angeles while still maintaining energy and electric reliability for the region.

Investigation 17-02-002
(Filed April 7, 2018)

**COMMENTS OF ISSAM NAJM
ON ADMINISTRATIVE LAW JUDGE'S RULING ANNOUNCING CONTRACT WITH LOS
ALAMOS NATIONAL LABORATORY, ORDERING SOUTHERN CALIFORNIA GAS
COMPANY TO UNDERTAKE HYDRAULIC MODELING, SETTING FORTH NEXT STEPS
AND SEEKING COMMENTS FROM PARTIES**

On April 4, 2018, the assigned Administrative Law Judge (ALJ) issued a ruling under I17-02-002 ordering Southern California Gas Company (SoCalGas) to undertake the hydraulic modeling that is a cornerstone of the proceeding's to "determine the feasibility of minimizing and eliminating the use of the Aliso Canyon natural gas storage facility."

I strongly urge the assigned ALJ to re-consider this decision and adopt a different approach. The fact of the matter is that SoCalGas has expressed no desire to even consider the minimization or elimination of the use of the Aliso Canyon facility, and in fact, has expressed strong opposition to the CPUC's temporary hold on the use of the facility as demonstrated in its numerous communications including the October 30, 2017 letter to CPUC President Picker and CEC Chair Weisenmiller,¹ its December 6, 2017 comments on the CPUC's 715 Report,² and its 30-Day Aliso Canyon Withdrawal Report dated April 3, 2018,³ among many others. Based on the position already taken by SoCalGas, it is completely unreasonable to have any expectation that SoCalGas will present ANY model scenarios that support the ability to minimize or eliminate the use of Aliso Canyon.

¹[http://www.cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/News_Room/News_and_Updates/2017%2010%2030%20SoCalGas%20Response%20Letter%20to%20CPUC%20CEC%20with%20attachments%20A-E%20\(Fi....pdf](http://www.cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/News_Room/News_and_Updates/2017%2010%2030%20SoCalGas%20Response%20Letter%20to%20CPUC%20CEC%20with%20attachments%20A-E%20(Fi....pdf)

²[http://www.cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/News_Room/News_and_Updates/SoCalGas%20Comments%20on%20715%20Report%20\(12062017\).pdf](http://www.cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/News_Room/News_and_Updates/SoCalGas%20Comments%20on%20715%20Report%20(12062017).pdf)

³http://www.cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/Safety/Aliso%20WD%2030_Day%20Report_Public%20Version.pdf

Furthermore, the oversight by Los Alamos National Laboratory (Los Alamos) is only provided over the outcome of the modeling effort, not over the modeling effort itself. It should be obvious to anyone that SoCalGas will not bring forward any model run outcomes that show the system to be reliable without the use of Aliso Canyon. This omission will make Los Alamos' oversight of the effort immaterial to the goal of the proceeding.

Los Alamos has staff members that is trained in highly complex mathematical modeling, and is capable of developing the expertise required to conduct the modeling effort themselves. If SoCalGas staff can, surely one of the Nation's premier collection of engineers and scientists can as well. It only takes time and money, and I hope that this option was not rejected purely based on cost.

The glaring conflict of interest that SoCalGas has with the outcome of the modeling effort should disqualify them from conducting it or having any input on it. Otherwise, the entire proceeding will be tainted, and its outcome will be biased and invalid.

I strongly urge ALJ Semcer to change course and contract with Los Alamos to conduct the modeling effort themselves.

Dated: April 7, 2018

Respectfully Submitted,

A handwritten signature in cursive script, appearing to read "Issam Najm", written over a horizontal line.

Issam Najm, Resident
Porter Ranch, California