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Mandatory Comprehensive Testing

Additional submitted attachment is included below.

Mandatory Comprehensive Testing

The debate about the Aliso Canyon Energy Reliability Workshop concerning the aging Aliso Canyon Methane Storage Facility is simply a trick to cloud the real issue "Is it safe to operate the equipment and wells?"

SoCalGas has put out a study, rubber stamped by other equally biased entities, that the antiquated storage facility is too big to fail and must be put back on line prior to comprehensive testing or there will be massive blackouts which is creating fear in Southern California equaling the biblical 10 plagues. The facts in the report are highly debatable since it takes the worst case scenario which has not been reached in 10 years, assumes other facilities are down for maintenance, and is silent to other currently available methane sources and purchasing power from the grid. But all that aside, let us talk about the real issue.

Governor Brown's State of Emergency required SoCalGas to do comprehensive testing of the remaining 114 operating wells in the Aliso facility to verify they are safe to operate before it is reopened. This process requires 6 tests on each well. However, the illusion being put forward by SoCalGas is that since the facility is mandatory to the power infrastructure for backup power generators, in their plan's Stage 1 it uses the term "Comprehensive" as meaning only the 2 most superficial tests. This changes the meaning of the word "Comprehensive" in the Governor's State of Emergency. The supposed reason for this is so they can slowly complete 2 superficial tests in the next 3 or 4 months and then be back on line injecting Methane at pressures up to 3,000 PSI less than a mile from the already devastated Porter Ranch. But since there are plenty of well testing companies and many wells can be tested at the same time, SoCalGas could already have performed the required comprehensive 6 tests in the last 3 months. SoCalGas has had time to accomplish these tests, but instead spent their time making a report clouding the issue to get around testing.

The only logical reason that SoCalGas has not ordered the required testing is if they already knew many, most or even all the wells will not pass 6 safety tests. The apparent reason the Aliso Canyon storage is so important to SoCalGas's parent company, Semptra, is that much of the gas expected to be stored inside of it is not for Southern California. They lease the rights to other entities (some owned by Semptra) who buy methane low and sell high. Theoretically, Semptra could buy methane at a low price using a subsidiary company and store it in Aliso, then after the price goes up, sell that methane already in Aliso to SoCalGas who can claim to the CPUC they paid a high price to justify higher rates to customers, as they hide their real profit in the subsidiary company.

The meaning of the word "Comprehensive" should not be changed from a thorough 6 tests to only 2 superficial tests especially after the recent catastrophic effects from the October 2015 blowout from well SS-25 at this same facility which prior passed those 2 superficial tests. Even if the highly debatable "facts" from the recent report are true, and there is an extremely remote chance of roving blackouts, this does not outweigh the horrible effects to human life and the environment should any of the other 60-year-old wells have another blowout.

Paul E. Hunt
Porter Ranch