

DOCKETED

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Aliso Canyon Workshop Comments

Additional submitted attachment is included below.

April 22, 2016

The Honorable Robert B. Weisenmiller
California Department of Energy
Dockets Office, MS-4
Re: Docket No. 16-IEPR-02

RE: ACTION PLAN FOR LOCAL ENERGY RELIABILITY – SUMMER 2016

Distribution: Attached

Please allow me to begin by voicing my profound sympathy for the residents of Porter Ranch whose lives have been irreversibly disrupted by the Aliso Canyon gas leak disaster. The events that have recently unfolded are truly unfortunate. Also I would like to thank the public servants who are working hard to mitigate the impact of the disaster. Often civil servants – especially politicians – are inappropriately scapegoated after working tirelessly and selflessly to help improve the lives of those they serve. No good deed goes unpunished.

As a native resident of San Diego with the memories of the early 2000 rolling blackouts still clearly etched in my mind, the findings in the “Aliso Canyon Risk Assessment Technical Report” are alarming. It is quite concerning that Californians are now being subjected to even the threat of 14 rolling blackouts days this summer. Amplifying the concern, the “Aliso Canyon Action Plan to Preserve Gas and Electricity for the Los Angeles Basin” proposes actions that are admittedly insufficient to fully eliminate the risk of electricity blackouts caused by Aliso Canyon gas curtailments, and in fact raise the specter of shifting the problem from the Los Angeles area to San Diego and Orange County.

As was pointed out by several workshop participants, the proposed actions in the plan seem to be severely limited in scope and highly Southern California Gas Company centric - in effect preserving the pre-emergency reliance on local gas-fired power plants. In the action plan, critical and obvious alternatives were either not considered or not discussed. Given the potential for severe financial and public safety consequences of rolling blackouts, it is recommended that the technical assessment group amend the action plan to explicitly address maximizing electricity imports throughout southern California (beyond LADWP) until the emergency is fully resolved. It is critical that electricity imports be planned and procured in advance rather than in real-time to ensure reasonable cost and availability.

The Resource Adequacy program was established by the state (CPUC Code 380) in 2004 as a response to the energy crisis. Each month all load serving entities (utilities) must provide a compliance document to the state showing they have enough reserve capacity a few months in advance to serve customers reliably and affordably, with a 15% margin. The compliance documents are confidential (competition sensitive) thus not available to the public. It is recommended the Resource Adequacy program be adequately staffed and directed to analyze the compliance reports in aggregate to ensure that southern California electricity imports are in fact being maximized and there is not a planned over reliance on the depleted natural gas supply.

Sincerely,
John Smith
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