

DOCKETED

Docket Number:	16-IEPR-02
Project Title:	Natural Gas
TN #:	211190
Document Title:	Susan Gorman-Chang Comments: Aliso Canyon Action Plan to preserve gas & electric reliability
Description:	N/A
Filer:	System
Organization:	Susan Gorman-Chang
Submitter Role:	Public
Submission Date:	4/22/2016 12:42:16 PM
Docketed Date:	4/22/2016

Comment Received From: Susan Gorman-Chang

Submitted On: 4/22/2016

Docket Number: 16-IEPR-02

Aliso Canyon Action Plan to preserve gas & electric reliability

Additional submitted attachment is included below.

Memo

To: California Energy Commission
From: Susan Gorman-Chang
Cc: Governor Jerry Brown, Mayor Eric Garcetti, Councilman Mitch Englander
Date: April 22, 2016
Re: Comments on Aliso Canyon Action Plan to Preserve Gas and Electric Reliability for the Los Angeles Basin

I have read through the entire Aliso Canyon Action Plan to Preserve Gas and Electric Reliability for the Los Angeles Basin, and was disappointed at its narrow scope and failure to reflect a deeper and broader approach to this issue. Although on the title page, at the bottom, it shows California ISO, LADWP, California Public Utilities Commission and State of California Energy Commission, the report appears to have been written by and all statistics taken from SoCalGas. Based on the evidence below, I am sure that none of these agencies even fact checked this report let alone did any gathering of facts and statistics and independent analysis of their own. This is very disappointing and further erodes my faith in you as regulators.

Overall, the report attempts to substantiate the existence of and need for Aliso Canyon Gas Storage Facility in a manner like a car owner would substantiate their need for a individual, gas powered car for every commute and errand WITHOUT and IGNORING the alternatives of car pooling, public transit such as our Metrolink train, buses, as well as Uber, Lyft, Zip Cars, electric cars, and hybrid cars.

Another analogy is a hoarder, who of course has a justification for every item they have hoarded including used empty toothpaste tubes, crumbled pieces of paper and molded food; they cannot seem to see the big picture of what they have become and what they are doing. SoCalGas, and by proxy Los Angeles, have become hoarders of Aliso Canyon stored gas, unable to see the harm they are causing, and unable, due to this cognitive dysfunction, of seeing the bigger picture.

Glaring Factual Errors

Honor Rancho Gas Storage Facility

Page 7 of your report, Table 1, shows The Honor Rancho Santa Clarita Gas Storage Facility as being connected to the Backbone North. This is incorrect based on SoCalGas Direct Testimony of Phillip E. Baker dated November 2014 regarding Underground Storage before the **Public Utilities Commission of the State of**

California. Could you not even fact check this important piece of information against **your own records**? According to this document, dated November 2014, page PEB-4, *"Honor Rancho is also located in Northern Los Angeles County, approximately ten miles north of Aliso Canyon, with a working capacity of approximately 26 Bcf and deliveries to the Los Angeles pipeline loop."* This is important because we can draw gas from this facility and your report assumes, incorrectly, for reliability purposes, that we cannot.

Your report goes on to page 8 to state, *"Aliso Canyon and Playa del Rey are the only two fields inside the L.A. Basin and are on the lower pressure local transmission system (sometimes referred to as the "LA Loop)."* This statement is crafted very carefully to imply that Honor Rancho cannot be used as a source of gas, since it is not perhaps technically in the "LA Basin" by whatever definition you may use for LA Basin, but the fact is, that it **is connected to the LA Loop**. This statement is incorrect AND misleading. Again, Regulators, did you not EVEN fact check the report on which your name is listed as author? Shameful. Disappointing. No wonder everyone seems to have lost faith in the government. Never ask yourself why again. This is why.

Page 8 goes on to state *"that Honor Rancho is several hours of flow farther away"* and this is misleading. What exactly does that mean? It appears to imply that we cannot use it AT ALL for gas flow. That is incorrect. Again, this report's carefully crafted words are deceiving.

Your Aliso Canyon Action Plan to Preserve Gas and Electric Reliability for the Los Angeles Basin statements regarding this are cleverly and terribly misleading. Did you think we citizens could not read or would not catch this? I keep trying to give you regulators the benefit of the doubt, thinking you are strapped with a low budget and not enough staff members to do the work you need to do, but reports like this are inexcusable, even for those government agencies on a limited budget and with limited time. Do you not have even minimal, ethical and quality standards for a paper upon which you place your name and official seal?

LADWP Does Not Buy SoCalGas

LADWP does not buy its gas from SoCalGas to generate electricity. This is a fact. Why is this nowhere in your report? You were aware of that, right? *"The Los Angeles Department of Water and Power buys its natural gas from out of state companies, not from SoCalGas, said DWP spokeswoman Michelle Figueroa. But that gas is shipped to LADWP over SoCalGas pipelines."* (Sharon McNary, Feb 1, 2016)

Pipeline Capacity

The report does not bring out the fact that the existing SoCalGas intrastate pipeline system shows there is MORE physical pipeline capacity connecting to the SoCalGas system than SoCalGas has under firm capacity contract. The total capacity is 6,725 MMcfd of pipeline but only 3,875 under contract, meaning there is 2,875 of ADDITIONAL MMcfd of capacity. This of course is available to third parties to bring in

¹ This is calculated by taking 3,600 acres (size of Aliso Cyn) x 160,000 homes (powered by Desert Solar Sunlight Farm) divided by 4,000 acres (size of Desert Solar Farm) = 144,000 homes that could be powered by an Aliso Cyn Solar Farm.

more gas from other sources, such as the gas purchased by LADWP from out of state suppliers. Why was this fact not in your report? Because you were too busy justifying the existence and use of Aliso Canyon Gas Storage Facility. The hoarder justifying their hoarding. (See third paragraph for hoarding analogy.)

Convenience not Reliability

Convenience should not be confused with reliability. While the Aliso Canyon Gas Storage Facility is convenient it is not necessary for energy reliability. Again, my analogy that owning a gas powered car is convenient, but there ARE alternatives for many of the trips we take, including commuting and errands. But ask anyone to justify using their own, personal gas powered car and they will of course come up with justification. Just as you all have come up with justification for Aliso Canyon. Convenience is not reliability. Please do not confuse the two.

Clean Energy

Why is this report so near sighted? We need to look to the future. If every house in the 5 mile radius of Aliso Canyon installed solar panels, what affect would this have on the need for gas from that storage facility to power the state's electricity needs? Why was this possibility not considered?

In the LADWP Green Power Annual Report 2014, it states that the LADWP Green Power Program purchased 66,400 kwh of "green power" which is enough to electricity, on average, per the report, for 10,733 homes. There are approximately 30,275 homes in Porter Ranch, Chatsworth and Granada Hills, the areas that border Aliso Canyon to the south, east and west. Using LADWP figures and a ratio, we can estimate that if all those households used alternative energy for electric power, that would save **LADWP the burden of providing 187,297 kwh of power!** Of course, LADWP Green Power figure assumes a combination of solar, wind, biomass waste, geothermal and small hydroelectric.

So let's take solar alone. The existing Desert Solar Sunlight Farm, near Joshua Tree National Forest in California, sits on approximately 4,000 acres and can provide electricity for 16,000 homes. (See article at <http://www.latimes.com/local/lanow/la-me-ln-solar-farm-20150209-story.html>) . We can use this as a reference point to calculate an approximation of how much Aliso Canyon could produce if made into a solar farm. If the land on Aliso Canyon Gas Storage Facility, which is approximately 3,600 acres, were turned into a solar farm it would power **144,000 homes.**¹ **At 5,725 (per LADWP) average kwh usage, that is 824,400,000 kwh.**

Another possibility for more electricity, is suggested in the Aliso Canyon Methane Leak Climate Impacts Mitigation Program, dated March 14, 2016 on page 13 & 14. The Air Resources Board suggests SoCalGas can mitigate the methane released during the well blowout by funding production of "*marketable biogas from methane emissions that could be captured at anaerobic digesters situated at...landfills.*" Might I suggest

¹ This is calculated by taking 3,600 acres (size of Aliso Cyn) x 160,000 homes (powered by Desert Solar Sunlight Farm) divided by 4,000 acres (size of Desert Solar Farm) = 144,000 homes that could be powered by an Aliso Cyn Solar Farm.

Sunshine Canyon Dump for such a program. SCAQMD stated in their Town Hall Meeting at Van Gogh Elementary School in April 21, 2016, that the current Gas-To-Energy efforts at Sunshine Dump generates 24 MW of renewable energy, which translates to power for 18,000 homes, since 1 MW provides electricity to 750 homes per SCAQMD report. If SoCalGas as part of its mitigation responsibility were to say double that, electricity could be generated for 36,000 homes.

Conclusion

Your Aliso Canyon Action Plan to Preserve Gas and Electric Reliability for the Los Angeles Basin Report is inaccurate in its “facts”, misleading and backward thinking, serving only to attempt to substantiate SoCalGas’s use of this facility for Aliso Canyon Gas Storage Facility without looking at other viable solutions.

The report fails to take a long term view of reliability and sustainability, which can be accomplished, in large part though perhaps not entirely, using solar power and by increasing the ability of Sunshine Canyon Dump’s Gas-To-Energy plant production paid for by SoCalGas.

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