

## DOCKETED

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**Powers Engineering Reply to Joint Agencies News Release on Critique of their Report**  
*Powers Engineering stands by its rebuttal of regulators' claims that Aliso Canyon Storage Facility necessary to avoid blackouts*

**The statement by the joint agencies that Powers Engineering misunderstands the purpose and focus of the Action Plan is false.**

The joint agencies do not appear to have read the Powers analysis. The analysis specifically critiques, in Section 4.B, the inputs used by the joint agencies in the “hydraulic” modeling used as the technical basis for the contention that natural gas curtailments could result in the summer of 2016 without Aliso Canyon available. The faulty modeling inputs included:

- 1) The assumption that the Playa del Rey storage field, identified as “critical” storage by SoCalGas in testimony and in close proximity to LA Basin power plants and refineries, is not utilized to address potential curtailment situations.
- 2) The assumed summer peak natural gas demand of electric generation is about double the usage necessary to meet CAISO and LADWP local grid reliability requirements.
- 3) The maximum assumed level of flowing pipeline gas—2,067 million cubic feet per day (mmcf)—is about half of SoCalGas’ firm pipeline capacity of 3,875 mmcf. In contrast, on the day of June 30, 2015 when SoCalGas carried-out a partial curtailment to electric generation units in the LA Basin, it had by its own admission access to 2,638 mmcf of pipeline gas supplies (Risk Assessment, p. 53). That is 600 mmcf more pipeline gas than it assumes in any of its hydraulic modeling risk assessment scenarios that result in projected curtailments. It is the opinion of Powers Engineering that the hydraulic modeling exercise would not show potential curtailments in the summer of 2016 if reasonable inputs were used in the modeling exercise.

**Powers analysis “fails to acknowledge the distinct possibility of electrical outages in Southern California this summer if utilization of Aliso Canyon gas supplies and other mitigation measures are not implemented.”**

Powers Engineering acknowledges that it would be irresponsible for the joint agencies to fail to employ the mitigate measures described in the Action Plan to assure natural gas supply reliability in the SoCalGas service territory in the summer of 2016. The California Energy Commission (CEC), one of the joint agencies, identified in November 2015 that the maximum withdrawal rate from storage during the partial gas curtailments that occurred on June 30 and July 1, 2015 in the LA Basin – with Aliso Canyon available – was 1.3 Bcfd. According to the November 2015 CEC staff report describing this event SoCalGas would not expect to pull such high volumes (1.3 Bcfd) from storage in the summer. Honor Rancho and Playa del Rey storage fields, both located on the same LA pipeline loop as Aliso Canyon, have a combined withdrawal rate of 1.4 Bcfd, more than enough to meet the 1.3 Bcfd withdrawal rate at the time of the incident. The CEC states that SoCalGas maintenance schedule showed various summer maintenance activities occurring at the SoCalGas gas storage facilities, which would have precluded large withdrawals. However, the primary cause agents of this event were (Risk Assessment, p. 54): 1) a

pipeline out-of-service for planned preventative maintenance at an inappropriate time, and 2) lack of coordination between SoCalGas and electric generators regarding the high amount of electric generation occurring in the LA Basin when the event occurred. The use of seventeen of the eighteen mitigation measures listed in the Action Plan, if put in to practice before the summer of 2016, would have removed the cause agents behind this incident. There should be no need to employ the eighteenth mitigation measure—*“Utilize the 15 Bcf Currently Stored At Aliso Canyon to Prevent Summer Electricity Interruptions”*—if the first seventeen mitigation measures are conscientiously put into practice.

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