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Additional submitted attachment is included below.



PASADENA WATER AND POWER

September 7, 2016

Dr. Robert Weisenmiller, Chair California Energy Commission 1516 Ninth Street, MS-33 Sacramento, CA 95814 August 31, 2016

Re: Comments on Docket Number 16-IEPR-02 - Natural Gas

Dear Chair Weisenmiller.

On August 26, 2016, the California Energy Commission, California Public Utilities Commission, California Independent System Operator and the Los Angeles Department of Water and Power held a Joint Agency Workshop on the Aliso Canyon Action Plan for Local Energy Reliability for Winter of 2016 to 2017 as part of the 2016 Integrated Energy Policy Report (2016 IEPR) Update proceeding. I appreciate the opportunity to provide these written comments.

Because all sectors of the local economy depend on natural gas or electricity generated by gas, it is imperative that Aliso Canyon be brought back online in a manner that is as safe as it is timely to ensure energy reliability in the region.

As you know, approximately 60% of electricity in California is generated with the use of natural gas. We know that the California Public Utilities Commission, Cal ISO and LADWP through concerted effort with all of California's electric utilities have worked hard to manage the shortage of gas this summer, and commercial and residential customers have contributed by conserving energy. As we move into the winter months, however, significantly more gas will be used for heating, which means we still face increased risk of shortages.

Electric utilities like Pasadena Water and Power are unable to import all of their electricity power needs during high-use periods due to local electric grid capacity limits. These utilities must rely on local natural gas-fueled electric generators during peak conditions to keep the lights on due to these local grid constraint issues.

In the transitioning to a decarbonized energy future, natural gas generation remains an important resource, to ensure reliable service to our customers at an affordable cost, and to support the integration of the

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growing amount of renewable resources onto the electric grid. Transitioning off of out-of-state coal, the extreme drought impacting hydropower resources, and lack of available nuclear power only puts more pressure on the natural gas system, as the only remaining widely available low carbon base load fuel source.

We understand some have argued for closing the wells permanently and are sensitive to environmental concerns. But, if the wells undergo rigorous testing and are determined to be safe for the surrounding communities, they should be reopened. State agencies must act with urgency to inspect and assess the Aliso Canyon storage facility, and accelerate a meaningful return to service as quickly as can be safely accomplished, for all families in the Region.

Sincerely,

GURCHARAN S. BAWA

Interim General Manager