

DOCKETED

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Comment Received From: Adriano Martinez

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Sierra Club Comments

See attached comments

Additional submitted attachment is included below.



September 9, 2016

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 16-IEPR-02
1516 Ninth Street
Sacramento, CA 95814-5512

Re: IEPR 2016-08-26 Workshop (Joint Agency Workshop on Aliso Canyon Action Plan for Local Energy Reliability for Winter of 2016 to 2017)

Dear Mr. Chairman and Commissioners:

On behalf of Sierra Club, Earthjustice submits these comments on the Aliso Canyon Action Plan for Local Energy Reliability for Winter of 2016 to 2017. Overall, we are appreciative of all the hard work and resources California's agencies have expended to deal with the aftermath of So Cal Gas' failures at its Aliso Canyon facility. We submit these comments to provide some additional thoughts on short-term actions that could be taken to help further reduce gas use this winter.

Overall, the Aliso Canyon storage facility leak highlights the fragility of our fossil fuel infrastructure. The gas leak, which imposed immense harm to adjacent communities and resulted in significant greenhouse gas emissions, signals that we need to shift away from our reliance on fossil fuel infrastructure for power generation and residential uses. In reviewing all the materials from this workshop, we are not persuaded that it is safe or needed to recommend further use of the Aliso Canyon storage facility to address any potential issues this winter. Sierra Club supports demand response and promotion of rapid deployment of clean energy as the clearly preferred approach moving forward. In addition, we believe strategies to reduce or eliminate the use of gas in residential settings can be effective tools to address winter gas usage issues.

The record from this proceeding addressing winter gas use calls into hyper-focus the need to reduce core user gas consumption. In particular, this is highly relevant considering the South Coast Air Quality Management District has identified residential gas use an important place to achieve Nitrogen Oxide (NOx) emissions to meet federal and state clean air standards for ozone and fine particulate matter. The agency in its Air Quality Management Plan identified several zero emission options for water heating, space heating, and pool heating that could be effective in curbing these harmful emissions. The efforts to increase the penetration of these zero emissions technologies should be pursued in the near term because these are programs that can be implemented quickly.

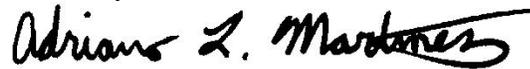
While the proceeding and report do not dive too deeply into specific demand response approaches for core customers, we want to highlight one additional strategy that could be pursued. Pool and spa heating in the region causes significant NOx emissions, and while not the largest residential use of gas, this appears to be a good place for demand response and other

strategies. Simply stated, in the extremely unlikely scenario of a gas shortage, short-term suppression of pool and spa heating could be an effective strategy to reduce gas use. Moreover, simple and cheap options like pool covers are exceptionally effective in reducing gas use, and as a corollary, NOx emissions. Finally, efforts to ensure pool filters and pumps are operating correctly and efficiently could also lead to additional reductions in emissions and gas use. Our assessment is that significant savings of gas and ultimately NOx pollution could be achieved by these simple strategies.

At future workshops, we will provide additional information about efforts to promote zero emission options for residential uses as a way to make sure we can fix the high levels of gas use by core customers in the region, which is not only necessary to shift away from reliance on dangerous facilities like the Aliso Canyon storage facility but also reduce air pollution that harms the region.

I appreciate your consideration of these comments. Please feel free to contact me if you have any questions about this

Sincerely,

A handwritten signature in black ink that reads "Adriano L. Martinez". The signature is written in a cursive style with a long, sweeping underline.

Adriano L. Martinez

Earthjustice

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