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The joint agencies, California Energy Commission (Energy Commission), California Public Utilities Commission (CPUC), California Independent System Operator, and the Los Angeles Department of Water and Power held a workshop on May 22, 2017 to present the energy reliability assessment without the Aliso Canyon natural gas storage facility for summer 2017 and an update on mitigation measures. Twenty-nine public comments were received, and attached is a summary of comments and response to comments. On July 19, 2017, Chair Weisenmiller of the Energy Commission sent a [letter](#) to President Picker urging the CPUC to plan for the permanent closure of the Aliso Canyon natural gas storage facility within the next ten years to meet the state’s climate change goals, which Senator Feinstein concurred in an August 3, 2017 [letter](#). In addition, on July 19, the Division of Oil, Gas, and Geothermal Resources and the CPUC issued a [joint statement](#) that Aliso Canyon is safe to operate and injection operations may resume at the facility at a greatly reduced capacity. Other related documents are available [online](#). Withdrawal protocols remain in place to ensure that withdrawals from the facility occur only if there is a threat to energy reliability in the region.

Analysis (4 comments)

1	Tim O’Connor	EDF & Skipping Stone (Consulting firm)	<p>Acknowledges the improvements in transparency made since last summer’s assessment. Assumptions and results of the hydraulic modeling seem to be very conservative both upstream capacity and supply deliverability and that capacity is undercounted by 1,068 MMSCF/D, based on system data in the 2016 California Gas Report. Recommends that agencies work on Winter Reliability Assessment right away, opening the assumptions and findings to public review and comment prior to analysis completion. Provides analysis to show that after Line 3000 is returned to service, there will be 15.8% (30,691 Mcf/Hr) more hourly delivery capacity than that presented in the 2017 summer assessment. EDF/Skipping Stone consider the 15.8% difference to be conservative due to the fact that EDF/Skipping Stone used 1,097,000 Mcfd withdrawal high from the past winter in its calculations vs. the SoCalGas reported storage withdrawal capacity to EIA (without Aliso) of 1,820,000 Mcfd. Believes California should embark on developing a gas imbalance market to improve reliability and help achieve our environmental goals. States that with advanced metering installations and</p>	<p>The agencies intentionally used deliverability that is less than shown in the 2016 CCGR, not to be conservative, but to accurately reflect specific outages or realities that affect deliverability today that are different than shown in the CGR. The agencies therefore do not agree that deliverability is undercounted and instead, the full 3.875 Bcf shown in the CGR overstates what is factually achievable today. The assumptions in the hydraulic simulation for the interstate pipelines (3.185 Bcfd) reflect the current Line 3000 outage and reduced operating pressure on the Southern system, which translates to a reduction of 240 mmcfd and 200 mmcfd, respectively. In addition, the California producers supply is modeled at 60 mmcfd. The assumptions for the three storage fields excluding Aliso Canyon was 1.47 Bcfd. These assumptions are reflected on page 8 of the technical assessment report. Table 1 of the report presents results (i.e. required supply from available sources) of the hydraulic model during simulations including the critical peak periods. Table 1 and 2 of EDF/Skipping Stone's comments contain errors in the data. For example, the observed value at Wheeler Ridge for</p>
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			<p>the attribution of market rule changes being responsible for 95% of the gas reductions (from mitigation measures), formation of a gas imbalance market is feasible and worthwhile. Provides a market based framework and details for developing a gas imbalance market as a viable mitigation measure that would apply to core, non-core and electric generator participants.</p>	<p>3/5/2016 (footnote 2 of Table 2) is not correct and appears to include double-counting. In addition, there is a mix of input assumptions and output results of the simulation in the comparison in Table 1 as well as double-counting in the observed values. Discussions are already underway about whether further analysis for the upcoming winter is necessary or needed. The gas imbalance market concept is beyond the scope of the current focus on summer 2017.</p>
2	Herbert S. Emmrich	Individual submission	<p>Suggests authorizing reinjection into Aliso Canyon Facility to at least 20 billion cubic feet (BCF) up to the original 86 BCF inventory level to meet peak day reliability. Believes with all of the safety enhancements made to the field, Aliso Canyon may be the safest field in the U.S. and probably the world. If the Division of Oil and Gas finds a lower level and lower pressure is warranted due to an abundance of caution the historical Aliso Canyon 67 BCF level should be adopted. Aliso operated at that level for over 30 years without incident. Highlights the CPUC report that discusses the critical role of Aliso Canyon in meeting winter reliability. Supports renewable sources and energy storage, but states these technologies do little to help meet peak day gas requirements. SoCalGas' gas transmission and distribution system is designed based on a system of interstate pipelines and storage supplies to meet demand especially in cold and dry hydro years. Problems in transmission and in the production basins (pipeline issues or well freeze-offs for example) can make California vulnerable to supply disruptions. Believes at least 67 Bcf level should be approved to meet core residential and commercial and non-core commercial, industrial, and electric generation customers. Provides analysis of the Aliso Canyon storage inventory and withdrawal capacities needed to assure core cold year and peak day</p>	<p>Authorization to reinject is beyond the scope of the summer 2017 technical assessment and mitigation measures as it is a separate decision to be taken by DOGGR and CPUC pursuant to SB380, as is speculation about the safety of the field relative to others or what inventory level is appropriate. On July 19, 2017, DOGGR and the CPUC issued a joint statement that Aliso Canyon is safe to operate and injection operations may resume at the facility at a greatly reduced capacity (Link and Link for other related documents). The CPUC's Section 715 report requires the California Public Utilities Commission (CPUC) to publish a report assessing the need for natural gas from the Aliso Canyon storage facility to meet the region's natural gas and electricity demand. Specifically, the statute requires the CPUC to determine:</p> <ol style="list-style-type: none"> 1. The range of working gas necessary at the Aliso Canyon storage facility to ensure safety and reliability at a just and reasonable rates in California; 2. The amount of natural gas production at the facility needed to meet safety and reliability requirements; 3. The number of wells and associated injection and production capacity required; and

			(including 4 day peak day event) reliability in a 1-in-35 year cold temperature year and peak day. Analysis shows that 32 Bcf inventory is needed before a 4 day peak event and that 1.86 Bcf withdrawal capacity is needed to meet cold year and dry hydro conditions.	<p>4. The availability of sufficient natural gas production wells that have satisfactorily completed required testing and remediation.</p> <p>Please refer to CPUC Aliso Canyon Working Gas Inventory, Production Capacity, Injection Capacity, and Well Availability for Reliability, July 19, 2017, available here. The July 2017 report will be revised as appropriate to reflect changed conditions.</p>
3	Bill Powers	Powers Engineering	Modeling assumptions are not transparent, and no explanation is provided for how servable demand declines from 4.5 Bcf in winter 2016/2017 to 3.638 Bcf in summer 2017. Does not believe that summer 2016 was a mild summer since SCE recorded second highest 1-hour peak load ever on June 20, 2016. Attached Protect Our Communities Foundation March 17, 2017 comment letter in the CPUC's ongoing Aliso Canyon Order Instituting Investigation to show a review of actual summer 2016 natural gas demand during heat waves and the winter 2016-2017 supply-demand balance during cold spells. Believes that SoCalGas allowed supply/demand balance to drift out of balance by as much as 30% before and during the cold spells and recommends calling for tighter gas balancing (OFO's) before and during a cold event.	The modeling assumptions on pipeline capacity and storage were explicitly described and enumerated at page 8 of the Technical Assessment report and Table 1 provides a detailed breakdown of the hydraulic results by receipt point and storage facility; there is no basis for claiming they were not transparent. Mr. Powers is correct that the 2017 assessment made no attempt to explain the decline in servable demand from winter. The agencies chose not to perform that reconciliation within the context of the summer 2017 assessment, which involves comparing the hourly capacity and hourly demand shown in Table 1 and Figure 1 to those in last winter's assessment. In addition, note the sentences bottom of page 9 and top of page 13. The one peak hour on June 20 does not speak to the relative impact of weather on demand across the whole summer. Summer 2016 as a whole, is often stated to have been hotter on average; it was milder, however, in the sense that we did not see multiple days of sustained extreme high temperatures or daily highs as extreme as the 1-in-10 year forecast used in the agencies' reliability analyses. The tighter balancing may be required if there were no gas at Aliso to fall back on in an emergency but the agencies do not believe it is needed at this time.
4	Independent Review Team	LANL, Walker & Associates	Consider if unplanned outages were adequately addressed.	The analysis assumed only 3.185 Bcf of pipeline capacity, with the Line 3000 portion essentially

				representing an unplanned outage. It also assumed that capacity was only filled to 90 percent of total and discounted the storage withdrawal capability from their maximum levels. In addition, any reduction in storage withdrawal or pipeline capacity reduces the maximum gas demand SoCalGas can serve (see p. 13 of the Technical Assessment). The technical assessment authors acknowledge, based on discussions with the Independent Review Team some residual risk of higher unplanned outages than those currently included in the 2017 Summer Reliability Assessment.
Resume Injections (2 comments)				
5	Rodger Schwecke	SoCalGas Co	<p>To support the establishment of an accurate record for consideration by the Joint Agencies, SoCalGas clarifies three statements made by other Workshop participants. First, the Withdrawal Capacity Rate Used in the Hydraulic Assessment Does Not Take Into Account Unplanned Outages. SoCalGas conducted a hydraulic analysis assuming full receipt point utilization, 1.470 billion cubic feet per day (Bcfd) of storage withdrawal rates, and no withdrawals from Aliso Canyon. These assumptions reflect near perfect conditions. Believes CEC staff stated that unplanned outages are accounted for in the storage assumption because 1.470 Bcfd storage assumption is a reduced amount from 1,640 Bcfd. However, SoCalGas' expects the maximum withdrawal rate to be 840 MMcfd at Honor Rancho. Second, Tighter Balancing Rules Are Not Anticipated to Fully Offset the Limited Availability of Aliso Canyon. SoCalGas agrees that tighter balancing rules are the most meaningful of the mitigation measures, contributing .469 Bcf of the mitigation volumes over the span of a summer season, but this amount is a fraction of what Aliso Canyon provides at 2.5 Bcf average system throughput during that period. EDF's</p>	<p>The agencies do not agree that the system modeled was at near perfect conditions. It reflects less than maximum receipt point capacity and less than maximum storage withdrawal at the other three fields; it also assumes the pipelines were filled only to 90 percent of their assumed maximums. Moreover, p. 13 is clear that any further reduction in the assumed pipeline conditions or storage withdrawal capability results in a one-to-one corresponding decrease in maximum demand that can be served. The agencies believe this adequately addresses the possibility of conditions being more imperfect from the assumed less-than-perfect levels.</p> <p>The summer 2017 analysis is designed to identify reliability mitigation measures needed pending a decision by DOGRR and the CPUC allowing injections to resume. The safety issues are explicitly separate from the reliability planning.</p>

			<p>Comments on the 3.875 Bcfd of Receipt Point Capacity are Not Supported by the Record. At the workshop EDF stated that the assumptions in the summer technical assessment conflict with the California Gas Report and that almost 800 MMcfd should be added to the summer assessment. SoCalGas provides the basis for the 3.185 Bcfd assumption, which accounts for 200 MMcfd reduction at Blythe, 240 MMcfd reduction for the Northern zone due to Line 3000 outage, and 250 MMcfd less CA production. Lastly, the Injection Capability of Aliso Canyon Needs to be restored to support energy reliability for summer. Withdrawals from Aliso may be needed to avoid electric curtailments, and the ability to withdraw from Aliso diminishes as the capacity of the field decreases. Without the ability to reinject adequate supplies into Aliso Canyon, its ability to serve the region this summer is greatly diminished.</p>	
6	<p>Patricia Hoffman, Acting Under Secretary for Science and Energy</p>	<p>Department of Energy</p>	<p>Concerned about regional reliability, in addition to longer-term concerns about overall grid stability in Southern California induced by the closure of Aliso Canyon. Acknowledges the work of the agencies in seeking new ways to use the existing electric and gas infrastructure more effectively, such as the addition of renewables and energy storage. Still concerned that without the availability of Aliso Canyon or some adequate functional equivalent, the region remains vulnerable to energy supply disruptions and possible electricity blackouts triggered by severe weather, unanticipated outages of key facilities, natural or man-made disasters, or a combination of these events. Since Aliso Canyon has undergone a battery of safety tests, serious consideration and possible approval of the near-term reopening of Aliso Canyon should be made. DOE is not suggesting a return to the status quo ante, with lessons learned, mitigations for fuel supply risk should be put in</p>	<p>The joint agencies share many of those same concerns and for that reason have developed action plans to mitigate the risk of outages while the safety reviews are underway. The agencies understand the impact of electric service interruptions and have put forth this update with one new mitigation measure, along with the prior Summer 2016 Action Plan with 21 mitigation measures and a Winter 2016/2017 Action Plan with 10 additional mitigation measures to reduce the risk of curtailments. While we have quantified the maximum demand servable and show a bit of headroom, even, under the assumed conditions described in the technical assessment, there remain conditions where extreme weather combined with facility outages still put the electricity grid at risk. Separate from the short-term reliability and mitigation analyses presented in the IEPR docket, the CPUC has a report required under Section 715</p>

			<p>place. Build-up of inventory to its full capacity of 86 Bcf will be a slow process, and Aliso Canyon may not provide the full reliability benefits this summer, but reopening soon is needed to ensure available supplies for winter 2017/2018. Offers DOE assistance.</p>	<p>of the public utilities Code that calculates how much gas is needed at Aliso and the CPUC has an Order Instituting Investigation underway to determine the long-term future of the field. Senate Bill 380 requires the Division of Oil Gas and Geothermal Recovery (DOGGR) to undergo a process, which is underway, to reopen Aliso Canyon, and the CPUC Executive Director must concur with any DOGGR finding that wells have passed all of the required safety tests for safe operation. Aliso Canyon has reopened to allow injections (see response to #2 Herbert S. Emmrich). The joint agencies will contact DOE for assistance as needed and to keep the Acting Under Secretary and staff informed.</p>
<p>Complete Investigations/Ensure Safety (5 comments)</p>				

7		County of Los Angeles	<p>(Also docketed in 16-IPER-02 on the same day) County maintains that injections should not be resumed until the root cause analysis has been completed. Four points that the County would like to convey:</p> <ol style="list-style-type: none"> 1. Unlikely that withdrawals from Aliso are needed to meet minimum electric reliability requirements and summer peak gas demand. Hydraulic modeling by SoCalGas concluded that the max demand that can be supported without Aliso is 3.638 Bcf/day which is above the projected 2017 summer peak of 3.301 Bcf/day. Assuming 3.185 Bcf/day pipeline receipts and 1.4 Bcf/Day storage withdrawal, the study concluded gas delivery is sufficient to avoid curtailment with minimum electric reliability operations. Curtailment only occurs when flowing gas supply and electricity transmission imports utilization are both below 10% maximum cap, which does not warrant new injections at Aliso Canyon. 2. Ensure SoCalGas can maximize storage injections and increase inventory levels at non-Aliso storage sites. Natural gas system reliability in SoCal depends on maintaining maximum inventory in non-Aliso storage facilities. Agencies must take steps to minimize any regulatory or other barriers to achieving these inventory levels. 3. Agencies should take steps to ensure SoCalGas can maximize linepack to address intra-day imbalances. OFOs can be called in a wider range of conditions. Rule changes helped with preventing supply and demand mismatches and improved reliability. Agencies should eliminate barriers to SoCalGas maximizing line pack as much as 	<p>The decision by DOGGR and the CPUC to approve reinjection in compliance with SB 380 is a separate issue from the summer technical analysis and reliability mitigation measures. The agencies agree that as long as 3.638 Bcf can be delivered via pipelines and storage, and demand is less than the projected 2017 summer peak demand of 3.3 Bcf, no load would appear to need to be curtailed. However, that analysis takes into account only daily demand, while the hydraulic analysis captures hourly demand and the potential for local constraints on the SoCalGas system. Figure 1 of the Technical Assessment demonstrates how the daily demand translates into an hourly demand that exceeds available supply from 1pm until about 7pm. Table 1 also shows the peak hour demand of 221.5 mmcf exceeds the available pipeline capacity of 132.7 mmcf plus storage withdrawal of 61.3 mmcf, which together sum to 194 mmcf. The key is to understand that while total daily demand appears low enough to serve, the shape of that demand over hours becomes limiting. Regarding point no. 2, the agencies (and specifically the CPUC) has taken direct action to assure Gas Acquisition can inject gas this summer and so far the results are promising. The agencies understand that SoCalGas uses the small amount of linepack it has to manage hourly imbalances before turning to storage and have seen no evidence to the contrary or barriers limiting SoCalGas' ability to do so; it is not clear that calling OFOs under a wide range of conditions would be helpful or desirable at this time. The agencies understand this concern and are anxious to see these results. The CPUC is investigating as ultimately it is under their jurisdiction. If the County has suggestions for additional specific mitigation measures, the agencies would like to hear them.</p>
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			<p>possible.</p> <p>4. Encourages CPUC to investigate mitigation measures and the circumstances of the Jan 24 and 25th withdrawal from Aliso. There are unusual circumstances around the withdrawal and may suggest mismanagement or manipulation. Need to understand what happened to increase public trust in regulatory agencies and to understand how to prevent this from occurring during Winter 2017/18. Results should be made public. County does not support injections at Aliso until the root cause analysis is complete. Since winter reliability concerns have been raised, all possible mitigation measures should be investigated to minimize the need for gas storage.</p>	
8	Matthew d'Alessio	CSU Northridge	<p>Commenter provided an attached document from his public comment to DOGGR on the Aliso Canyon Comprehensive Safety Review and wants it to be considered in the 2017 summer reliability study. Believes SoCalGas desires short term electric reliability, but is downplaying seismic risk in the long term. Wants the seismic risk studies from Berkeley, Sandia and Lawrence Livermore National Lab to be completed and added to the public record so they can be reviewed and discussed. States that the financial impact of another major leak is much larger than the cost of a short-term electrical curtailment. Suggests aggressive investment into mitigation strategies such as demand response and energy</p>	<p>SB 380 requires the Division of Oil Gas and Geothermal Recovery (DOGGR) to undergo a process, which is underway, to reopen Aliso Canyon, and the CPUC Executive Director must concur with any DOGGR finding that the wells have passed all of the required safety tests for safe operation. Aliso Canyon has reopened to allow injections (see response to #2 Herbert S. Emmrich). The seismic studies are underway. In addition to the seismic studies already underway, the Energy Commission's FY 2017/2018 Natural Gas Budget Plan includes seismic research for underground natural gas storage facilities. Research will include new and advanced methods, such as seismic</p>

			<p>efficiency would be more likely to ensure short and long-term reliability than depending on Aliso Canyon.</p>	<p>probabilistic risk assessment to identify overall seismic risk and how to determine the vulnerabilities to earthquakes at a particular gas storage facility. The agencies believe the EE and DR-related mitigation measures are as aggressive as they can be. The agencies will consider suggestions about specific measures Mr. d'Alsessio or others think should be implemented that they do not see on our list. CPUC Order Instituting Investigation (OI) 17-02-002 on Aliso Canyon will address the long-term viability of Aliso Canyon including the feasibility to reduce or eliminate the use of the Aliso Canyon Natural Gas Storage Facility while still maintaining electric and energy reliability for the region. Previous electricity outages have been shown to impose significant costs to people, equipment and our economy, but the CPUC OII on the long-term outlook for Aliso Canyon is the best place to consider specific financial impact analyses and is explicitly part of the scope of that proceeding.</p>
9	Lorraine Lundquist	Individual Submission	<p>Consider 4 request: 1) Investigate January 24 and 25 emergency withdrawals from Aliso. Winter reliability report stated that 4.5 bcf/d of demand could be served without Aliso support, but demand was less than 4.1 bcf/d. Was the Winter report inaccurate, or was the SoCalGas withdrawal unnecessary? Was the Reliability plan followed, if not what are consequences? Why didn't gas orders increase for the 25th after 24th? Were weather forecasts not incorporated into daily balancing protocols. Did SoCalGas withdraw in order to avoid 9 month idle facility rebate to customers? 2) Ensure enforcement and penalties for failing to follow mitigation measures. CPUC asked SoCalGas to increase injections at storage facilities (excluding Aliso) as they had only stored 1.9 Bcf in April. Wants</p>	<p>The agencies understand the concern about the January 24 and 25 emergency withdrawals from Aliso. The CPUC is currently analyzing the withdrawals from Aliso Canyon made on January 24 and 25 of 2017. The CPUC and SoCalGas have worked together to reduce the barriers to injections at its other storage fields. SoCalGas adjusted its storage nomination procedure effective May 4, 2017 to help increase inventories. CPUC Executive Director Timothy Sullivan issued directive to SoCalGas on May 8, 2017 to maximize storage injections and to submit a plan as to how to do. SoCalGas filed that plan in Advice Letter No. 5139 on May 19, 2017 "Expedited Advice Letter Requesting Approval of the Proposed Injection Enhancement Plan and Injection Enhancement Memorandum between the System Operator and</p>

			<p>to know why they hadn't been injecting as they indicated in their letter and will there be consequences?</p> <p>3) Initiate winter reliability study ASAP to allow stakeholders to review before workshop and allow more time to develop the study.</p> <p>4) Enact mitigation measures that help guide toward more reliable energy system that does not include Aliso facility and similar. Reduce gas use permanently. Questions reliability of facility with earthquake risk, fire risk, unknown leaks (SS-25A fluid leak), lack of safety valves, proximity to residents with health issues blamed on the field, and overall dependence on fossil fuel.</p>	<p>the Gas Acquisition Department for Services to Maintain Summer Reliability Pursuant to the May 8, 2017 Letter from CPUC Executive Director Timothy Sullivan." That plan requested approval for operational and market changes to assure that core Gas Acquisition could get its gas injected into storage. SoCalGas is now on track to achieve its monthly storage targets. Discussions are already underway about whether further analysis for the upcoming winter is necessary or needed. The joint agencies have developed multiple mitigation measure to reduce the risk of curtailments and support a more reliable energy system.</p>
10	Margery Brown	Individual Submission	<p>Aliso Canyon is dangerous and unnecessary. Dangerous due to high fire risk, earthquake/fault risk and additional gas leaks and continuing health issues for surrounding residents. Unnecessary due to studies showing gas storage there is unnecessary, and no energy shortages have occurred while it has been shut down. SoCalGas also refuses to reveal all chemicals and radio nuclides that have been used/found. At least keep Aliso closed until the root cause study is complete.</p>	<p>See response to 8. Matthew d'Alessio.</p>
11	Lori Kalman	Individual Submission (Resident)	<p>Moved to Porter Ranch in 1995, never informed about Aliso Canyon. Raised family in the subdivision. Smelled gas before during and after the 2015 leak. Aliso's been closed 18 months with no power outages so there's no need for it. Believes January withdrawal was due to SCG deliberately not bringing in enough gas and having an excuse to withdrawal from the facility. Make sure the facility is leak proof before reopening.</p>	<p>See response to 8. Matthew d'Alessio.</p>
Shut Aliso Canyon Down (13 comments)				
12	Patricia Glueck	Individual Submission	<p>The facility is not dependable due to the risk of another leak losing more methane. She cites out 3 primary reasons for lack of reliability: earthquake</p>	<p>See response to 8. Matthew d'Alessio.</p>

			risk, wild fire danger and continued public health issues that she believes are associated with the natural gas leak. Earthquake risk with the Santa Susana fault and other faults could cause additional leaks and loss of life. High fire danger as many small fires have broken out on the facility grounds, and LA County Fire Dept. has criticized the emergency plan submitted by SoCalGas as inadequate.	
13	Donald Veatch	Individual Submission	A short comment: "Aliso Canyon Gas Facility is Dangerous and un-reliable. For two years this facility has presented health issues and maintainability issues - it cannot be trusted as a reliable source of energy and should never have been located so near populated areas."	See response to 8. Matthew d'Alessio.
14	Tina Gioulis	Individual Submission	Expresses frustration at how SS-25 did not have proper safety devices and that signs of leakage were ignored, and that SoCalGas is calling for reinjection before root cause analysis is complete. Mentions earthquake and fire risk to the facility. Is concerned about SoCal Gas not following up on clean-up of homes. Claims that Aliso is unnecessary for meeting energy needs in SoCal and cites the recent Los Angeles time article on the glut of energy.	See response to 8. Matthew d'Alessio.
15	Laura Shaw	Individual Submission	Blames past leaks as well as the 2015 leak on health issues within and outside of their household. Concerned about further health problems coming up due to "chronic" leaks. Claims that Aliso is not needed for energy reliability citing the EES Consulting study. Calls for complete shutdown.	See response to 8. Matthew d'Alessio.
16	Elenor T. Avanesian	Individual Submission	Facility is unsafe due to fire risk, fault lines and proximity to housing developments and schools. Suffering of community from the major leak. Facility is not needed which is backed up by several engineering studies. The gas company keeps threatening the public of a shortage which we have not had any blackouts since the moratorium. Please do your best to keep Aliso closed.	See response to 8. Matthew d'Alessio.

17	Jennifer Glueck	Individual Submission	Aliso Canyon is not a reliable source of gas. Natural gas itself is not reliable as it is not renewable and is finite. Asks to please help California transition to renewables and be an example.	See response to 8. Matthew d'Alessio.
18	Carol & Walter Burch	Individual Submission (Resident)	Aliso Canyon is a time bomb. Regulators would be ignoring warning signs from the 2015 leak and would be responsible for a disaster in the case of an earthquake on the Santa Susana Fault. Regulators would be taking undue risk and hoping for no future disasters. A bet that most would not make if they had loved ones in the area. Smelled gas before and called SoCalGas, thinking it was their house, now questioning what was being released. Having an "outdated, repurposed" gas storage facility close to housing is "unconscionable." Facility is not safe regardless of the repairs or new safety protocols being implemented with earthquake and fire risk.	See response to 8. Matthew d'Alessio.
19	Maureen Capra	Individual Submission (Resident)	43-year resident smelled gas on-and-off through that time, and daughter had recurring nosebleeds throughout that time. Granddaughter had bloody noses while staying as well. She developed asthma and headaches worsening though the years. Family had further health problems through the 2015 leak. Could not relocate and still do not feel safe. The fire, seismic and landslide risks, combined with the age of the wells are concerning. Proven we do not need gas for energy reliability, eventually energy will be 100% green. LA County Fire Department, LA Health Department and LA Unified School District agree as well to close down Aliso.	See response to 8. Matthew d'Alessio.
20	Siouxen Kang	Individual Submission (Relative of Resident)	Shut down Aliso Canyon permanently. Aliso was the largest methane leak in US history, and the leak was ongoing for 6 months. Still having minor leaks occurring, with continued health complaints. Commenter's partner had melanoma cancer cells. Reported gas smells over the years, and having a gas storage facility so close to residential areas is unsafe. No assurances the facility can be made safe,	See response to 8. Matthew d'Alessio.

			especially with fire and earthquake risks.	
21	Patricia Iarcara	Individual Submission (Resident)	Aliso is not safe so close to a residential area with schools. People, including the commenter, have been having health issues mild to serious (Asthma, allergies, rashes, and cancer). People are dying because of the chemicals coming out of the wells. Need alternative, renewable energy sources. Facility will never be safe. SoCalGas should put people before profit. They have ruined the lives of people who have made their home nearby.	See response to 8. Matthew d'Alessio.
22	Craig Galanti	Individual Submission	Shutdown Aliso Canyon. After 2015 leak began many got sick. Other emissions continue to make people sick due with proximity to Aliso being the common denominator. 69.3% of the 114 wells failed DOGGR testing (not sure which tests he is referring to). Thinks this points to either negligence or incompetence on SoCalGas, DOGGR and CPUC part. This is further reflected in discussing re-opening the facility without: completion of the root cause analysis of the SS25 leak, a comprehensive health study, a more robust seismic study of the faults under the field, an adequate evacuation plan, completion of a assessment of the true need of Aliso. Also points out that Aliso has been closed for over 18 months without NG shortages. Believes residents have no confidence in SCG, CPUC or any agency to protect them. Thinks that another blowout is all but certain.	See response to 8. Matthew d'Alessio.
23	Vikki Salmela	Individual Submission (Resident & Business Owner)	Gives reasons for the facility to close. Mentions a June 1st 2017 appearance of Gov. Brown on MSNBC speaking about decarbonizing the CA economy. If that's his goal Aliso Canyon needs to be closed due to excess methane emissions. Smelled a burning rubber odor, AQMD employee reported it was not natural. There have been no blackouts or loss of service since the leak ended. A SoCalGas employee stated that there are an average 2 leaks/day at AQMD abatement hearing and still reports of some	See response to 8. Matthew d'Alessio.

			unknown leakage from SS25 and other associated wells. 4 independent studies including EES study have agreed with Bill Power's reliability assessment. Health study funded by SoCalGas has yet to begin, and soil and water around the facility is yet to be tested. LA county school district supports decommissioning Aliso, and a teacher was lost to cancer. There needs to be answers to what chemicals may have been released. LA Fire Dept. should be included in your studies as there are risks of fire and seismic activity. There's no safety plan in place for other problems that may arise. The SoCalGas methane monitors seem unreliable and don't agree with the other set of monitors. Thinks that SoCalGas is not to be trusted and that should be included when considering long-term viability. Believes if the facility reopens there will be another disaster.	
24	Melanie Demont-Schott	Individual Submission	Wants Aliso Canyon closed. Suffered illness, nausea. States facility is a repurposed oil field, subject to frequent earthquakes, very poorly maintained, subject to fires, and is surrounded by millions of nearby residents, adjacent and below affected by the injected gas leaking constantly.	See response to 8. Matthew d'Alessio.
Other (5 comments)				
25	Joseph E. Tack	Sweetener Products Company	Opposes the possible passing of SB 57. Says that SoCalGas' response to SB380 has gone above and beyond what that law required. Also cites the CPUC Jan 17th report that SoCalGas was in full compliance with the SB380 requirements and that the report also found that Aliso Storage did not have enough natural gas to reliably meet demand this 2017 summer.	See response to 6. Patricia Hoffman of Dept. of Energy
26		Concerned Neighbor	TN217874 : Provides links to a few known faults under Aliso canyon as reported by the LA Regional Water Quality Control Boards.	See response to 8. Matthew d'Alessio.
27		Concerned Neighbor	TN217875 : Provides links and a few examples of	See response to 8. Matthew d'Alessio.

			cancer causing radiation found in canyons near Aliso Canyon facility by the State Water Board.	
28		Concerned Neighbor	TN217885 : Provides a link to the story of a well fire at Aliso Canyon in 1975. Which they say was not extinguished until 1979. Makes a claim that if the SS25 well that leaked had caught fire it would still be burning.	See response to 8. Matthew d'Alessio.
29		Porter Ranch Neighborhood Council	Provides a response to SoCalGas' letter to the CEC, CAISO, and CPUC dated April 28, 2017. SoCalGas expressed concerns about gas supply reliability for Southern California over the upcoming summer and winter seasons, but the Porter Ranch Neighborhood Council (PRNC) is disappointed in their approach to the problem. In the letter, SoCalGas highlights that their other 3 storage fields at Honor Rancho, Playa Del Rey, and La Goleta have 40% less inventory than the same time last year, but they do not tell you that they made no effort to replenish that storage when their demand was significantly less than their receipt capacity. Provides data analysis between Dec. 2016 and April 2017 that shows when demand exceeds receipt capacity of 3.2 Bcf, SoCalGas used storage to meet demand, but when demand is less than receipt capacity, supply is reduced to meet demand. This shows that SoCalGas could have built up inventory at the other 3 storage fields made no effort to replenish their stored supply. States that SoCalGas can inject .25 Bcf into the other storage fields, but provides data showing that much less was injected into storage. PRNC find it disappointing that as SoCalGas makes no good-faith effort to replenish their storage volume, they come to the State with the "threat" of gas supply shortage unless they get back their ability to inject gas into Aliso Canyon. It appears that SoCalGas' sole objective is to do whatever it takes to convince you to return to the old way of operation and forget about everything that has happened.	See response to 9. Loraine Lundquist. As described above, CPUC took action and changed rules to help core Gas Acquisition get its gas into storage, and inventory appears on track to meet winter targets.

