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California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102

Re: Draft Aliso Canyon Withdrawal Protocol

Dear CPUC:

The County of Los Angeles ("County") hereby submits this comment letter to the California Public Utilities Commission ("CPUC") in support of the draft Aliso Canyon Withdrawal Protocol dated October 18, 2017.¹ The County supports the CPUC's position that Aliso Canyon continue to be treated as the "asset of last resort" and used for withdrawals only after all other alternatives have been exhausted as defined by the protocol.

SoCalGas should be required to implement all mitigation measures previously identified and the additional mitigation measures referenced in its October 30, 2017 letter to the CPUC. There remain numerous unresolved safety and public health issues at Aliso Canyon and the County opposes SoCalGas'

¹ As you know, the County is currently in litigation with DOGGR and the CPUC regarding the lack of compliance with SB 380 by DOGGR. It remains that County's position that DOGGR did not comply with SB 380 and that no additional injection of gas into Aliso Canyon should occur until: (1) SB 380 is fully complied with by DOGGR, (2) DOGGR complies with the California Environmental Quality Act ("CEQA") regarding its decision to lift the prohibition on injection at Aliso Canyon, (3) the root cause analysis of the gas leak is completed, and (4) the CPUC concludes a legislatively required investigation to determine the feasibility of minimizing or eliminating the use of the Aliso Canyon gas storage facility.

attempt to return to business as usual. The County urges the CPUC to reject the proposed changes to the draft Withdrawal Protocol submitted by SoCalGas.

The County is also troubled that there has not been a full and transparent investigation into the January 24 and 25, 2017 withdrawals from Aliso Canyon. A complete investigation is necessary by the CPUC and others to determine the circumstances surrounding those withdrawals and their necessity. The County requests that the CPUC provide the public with a timeline for a completion of such an investigation.

SoCalGas has had over 2 years to develop a plan for dealing with the reduced use of Aliso Canyon and the CPUC should investigate if SoCalGas has taken all reasonable steps to mitigate for the reduced availability of Aliso Canyon.

Should you have any questions, please contact me at (213) 974-1852.

Very truly yours,

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