

## DOCKETED

<b>Docket Number:</b>	17-IEPR-11
<b>Project Title:</b>	Southern California Energy Reliability
<b>TN #:</b>	221899
<b>Document Title:</b>	Pasadena Water and Power Comments on Aliso Canyon Winter Risk Assessment Technical Report 2017-18 Supplement
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Pasadena Water and Power
<b>Submitter Role:</b>	Public Agency
<b>Submission Date:</b>	12/5/2017 1:30:02 PM
<b>Docketed Date:</b>	12/5/2017

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*Submitted On: 12/5/2017*

*Docket Number: 17-IEPR-11*

## **Comments on Aliso Canyon Winter Risk Assessment Technical Report 2017-18 Supplement**

Please find attached comments on the Aliso Canyon Winter Risk Assessment Technical Report 2017-18 Supplement.

*Additional submitted attachment is included below.*



## PASADENA WATER AND POWER

December 4, 2017

Robert B. Weisenmiller, Chair  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

Dear Chair Weisenmiller:

On behalf of Pasadena Water and Power ("PWP"), I would like to thank you for the opportunity to submit comments on the Aliso Canyon Winter Risk Assessment Technical Report 2017-18 Supplement dated 11/28/17 ("Assessment") and the proposed mitigation measures to address electric reliability in the absence of three inoperable natural gas pipelines used to serve customers of the Southern California Gas Company ("SoCalGas").

As a non-core SoCalGas customer with transmission import limitations, PWP relies on local natural gas-fired generators during peak times to ensure electric reliability and is in constant need of a dependable natural gas supply. We are encouraged by the recent Aliso Canyon Withdrawal Protocol dated 11/2/17 that allows SoCalGas to execute emergency withdrawals in order to protect public health and safety, and we appreciate your influence in adding this important contingency to the plan. However, the curtailment threat associated with the inoperable pipelines creates new uncertainty and there is concern that the inventory at Aliso Canyon will be insufficient to satisfy demand during the coldest months. In Pasadena, this could have an impact on public health and safety due to potential blackouts. While established rolling blackout protocols protect high-risk facilities such as hospitals and critical infrastructure from service outages, general residences, particularly where the elderly and infirm are concerned, could be subject to significant safety risks. Furthermore, power outages that affect the operation of traffic signals, street lighting, or machinery could result in unsafe road, neighborhood, and industrial conditions.

We support the potential risk mitigation measures defined in the Assessment; specifically, that which proposes to increase slightly the volume of gas that can be stored at Aliso Canyon in order to maintain energy reliability. As stated, the facility has reached its maximum inventory of 23.6 Bcf, which was calculated with earlier assumptions of only one offline gas line and single day withdrawals. With three pipelines out of service, the proposed 1 Bcf increase could mitigate the risk of depleting reserves during a colder-than-normal winter.

Robert B. Weisenmiller, Chair  
California Energy Commission  
December 4, 2017

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While other proposed mitigation efforts - such as engaging the public to reduce usage should definitely be implemented, an operational Aliso Canyon represents a real and dependable solution to the electric reliability needs of cities like Pasadena. As always, PWP will make extraordinary efforts to call for energy conservation and voluntary demand reduction as needed to mitigate fuel shortages and reduce the risk of blackouts on peak days.

Again, we thank you for the opportunity to share our concerns and look forward to participating in a feasible solution that ensures electric reliability while protecting the safety of all affected citizens.

Sincerely,



GURCHARAN S. BAWA  
General Manager

Cc: The Honorable Anthony Portantino, California State Senate  
The Honorable Chris Holden, California State Assembly  
Terry Tornek, Mayor – City of Pasadena  
Steve Mermell, City Manager – City of Pasadena  
David Jones, Emanuels Jones and Associates