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19-IEPR-09 Southern Caifornia Energy Reliability

Much is being made of the need for $\hat{a}\in \hat{c}$ energy reliability $\hat{a}\in \bullet$ with the goal of bringing Aliso Canyon fully operational, but it would be irresponsible for the Department of Conservation to ignore the many engineering studies that have shown the site of the worst gas release in US history is NOT NEEDED.

Among these studies are the $\hat{a}\in \mathbb{C}$ ritical Review of Aliso Canyon Winter Risk Assessment and Action Plan $\hat{a}\in \mathbb{C}$ by Bill Powers, P.E. of Powers Engineering and the EES Consulting report, commissioned by the County of Los Angeles. By now all the agencies that are meeting every year should know about these studies.

We all know that Aliso and the other storage facilities operated by SoCalGas are purely for the purposes of storing gas that is bought at a low level, so that the utility can make a profit by selling it at a higher cost. Much of this gas is actually used in areas other than Southern California. Itâ \in TMs a profit center for SoCalGas.

Often, besides the cries of $\hat{a} \in \hat{c}$ blackout $\hat{a} \in \hat{c}$ that we keep hearing, there $\hat{a} \in \mathbb{T}^{M}$ s also supply manipulation. There $\hat{a} \in \mathbb{T}^{M}$ s been pipelines that have been out of service for more than a couple of years. Why is that? And yet, the Aliso storage site was basically offline for more than 640 days with nary a blackout. The only power shortage that hit the northern San Fernando Valley during that time, was due to a fire at a DWP receiving station. Unrelated to whether Aliso was online, offline, or even exists.

There is also the CCST study that has pointed out problems, including seismic and other risks, concerning the SoCalGas storage facilities. Why do the agencies that have a say in the existence of Aliso keep ignoring this risk. It needs to be pointed out that the Santa Susana fault transveses all of the wells at the site. If this fault erupts, some or all of the wells could collapse, just as one well did in 1994 as a result of the Northridge quake. One renown quake expert, Dr. Lucy Jones, says that if the southern end of the San Andreas fault erupts, the resulting energy could set off any faults in Los Angeles. In the case of Aliso Canyon, this could mean several well collapses at once, which could mean thousands, if not a million, lives, as well as the loss of any gas stored there. Given that one million and a half persons live in the northern San Fernando Valley in the shadow of Aliso, the loss of life would be catastrophic.

A possible result of these sudden well failures could have a devastating effect on the local area, especially as the city of Los Angeles as well as Los Angeles County would already have their first responders involved in the many fires and explosions that will happen throughout LA County. There could be much loss of life just due to Aliso Canyonâ€TMs wells. And if Southern California is so dependent on Aliso being in operation, that supply of gas will be gone. Any such facility should not be near communities just for the safety reason alone.

It would be much better not to rely on such a large facility, which is in a vulnerable area. As Congressman Brad Sherman has stated about Aliso: Too big to fail, too big to exist. There are also other issues regarding the continued existence of Aliso.

Just last month, the root cause analysis by Blade Energy was released, which proved that SoCalGas was negligent to the point that corrosion from ignored exposure to microbes led to well SS-25â€TMs blowout. The report also stated that there were two previous blowouts, as well

as at least sixty wells that had leaks and more than ninety well casing failures. And yet, the utility didnâ \in^{TM} t feel it should investigate ANY of these. I canâ \in^{TM} t imagine any company, upon hearing about a flaw product, wouldnâ \in^{TM} t try to figure out if the problem could be resolved, or if not, the product would be removed from the market.

Besides the constant methane leaks and annoying odors of mercaptans, the residents in the northern San Fernando Valley are being assaulted by a barrage of chemicals that are being emitted by the site, even after well SS-25 was sealed. Yet, despite many requests from the County Dept. of Public Health, SoCalGas has refused to comply to provide a list of chemicals it has used.

If the Gas Company feels it should operate in secret and can ignore basic maintenance, how could residents and even the state trust SoCalGas to operate a facility in a safe and responsible way?

I canâ \in^{TM} t predict what new technologies will be discovered in the coming months, years. But just think back ten years and see what was known back then, and what has been discovered since then. Alternative methods of generating energy have come a long way, baby.

What I can predict is that at this workshop, SoCalGas will claim Aliso is necessary. Many organizations such as chamber of commerces and special interest groups will parrot the same nonsense from a script written by someone at the gas company has given each one in $\hat{a}\in$ cedues and donations $\hat{a}\in\bullet$. If one look up the names of these groups on the GO-77M report for the past few years, the amount of money SoCalGas gave them for this pro quid pro can be found. And when the 2018 report gets released publicly any day now, we $\hat{a}\in^{TM}II$ see many of the same names. I also wouldn $\hat{a}\in^{TM}t$ be surprised to see written comments on the docket in support of Aliso that do not have a group association listed, but many of these people work for these organizations (employees of Biz Fed have been guilty of this misrepresentation in the past). If you look at the language of these comments, the words will be the same as in other pro-SoCalGas statements and are totally predictable.

If you read the comments of many of those who live in the northern SFV, you will learn about the family members developing asthma, severe skin rashes, almost daily nosebleeds, even forms of cancer that are generally caused by exposure to toxic chemicals. This is a reality if you live near Aliso. The affected area contains a range of socioeconomic groups and ages. This is Porter Ranch, Chatsworth, Northridge, Granada Hills, Winnetka, North Hills, Mission Hills, Sylmar, San Fernando, West Hills, Simi Valley, Santa Clarita, Arleta. According to the department of Public Health, the area being considered as having been affected by the 2015 blowout and subsequent leak is a 12 mile radius from the wells. Thatâ€[™]s 1.5 million people. And yet, after each major leak and spill that occurs at the Aliso site, IF SoCalGas bothers to release a notification to the public and to the media, the gas company claims there is no health or safety risk to the community. This is blatantly false and not based on any true medical knowledge. There hasnâ€[™]t been any studies that have been undertaken to prove their claims. SoCalGas has even blocked any real health studies in the affected area from being done. It was forced through the August 2018 consent decree to fund a study. And we know that the site's wells keep leaking. One onsite manager admitted this during the summer 2016 energy reliability workshopâ€and that was during the time the facility was off line. The SCAQMD brought a nuisance claim against SoCalGas after a leak registering 66.6 ppm on one onsite monitor occurred on December 18, 2017. This followed another major leak of 54.1 (check) on December 1. Every time, we residents near Aliso don't need to read these monitors, as our bodies tell us something is wrong.

SB-380 was passed to keep Aliso closed until at least a root cause analysis was completed. Yet, DOGGR somehow determined that the site was $\hat{a} \in csafe \hat{a} \in \bullet$ on SoCalGas $\hat{a} \in TMs$ say so. This is akin to Delta Airlines deciding, after a crash, that there $\hat{a} \in TMs$ no need to find out the cause of the accident. To ignore the clause $\hat{a} \in coto prevent$ damage to life, health, property and natural resources $\hat{a} \in \bullet$ goes against why this bill was passed. And now, that the Blade Energy report came out, the CPUC and DOGGR should be ashamed of jumping the gun and allowing the resumption of operations at Aliso.

As someone who has experienced what a mismanaged and poorly maintained facility can do to a large area of Los Angeles county, I implore the agencies involved to consider alternative methods of providing energy. Thousands of lives are at stake.