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**PRNC Comments on Draft 2019 IEPR**

*Additional submitted attachment is included below.*



November 27, 2019

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California Energy Commission  
Docket Unit, MS-4  
Docket No. 19-IEPR-01  
1516 Ninth Street  
Sacramento, California 95814-5512

RE: Comments on Draft 2019 Integrated Energy Policy Report (Docket No. 19-IEPR-01)<sup>1</sup>

Dear Commissioners:

The Porter Ranch Neighborhood Council (PRNC) appreciates the work of the California Energy Commission (CEC) staff in preparing the bi-annual Integrated Energy Policy Report (IEPR) per the requirements of SB 1389 (2002). The PRNC also appreciates the opportunity to submit comments on the draft 2019 IEPR, and we hope that the CEC will carefully consider them in the development of the final 2019 IEPR.

The Neighborhood Council (NC) system was developed by the City of Los Angeles about 20 years ago to provide communities within the City with a stronger representation that is focused on the unique needs of each community. NC members are elected by community members in a process managed by the Los Angeles City Clerk's office. The PRNC represents the interests of the 30,000+ residents in Porter Ranch, which is adjacent to the Aliso Canyon Gas storage facility owned and operated by the Southern California Gas Company (SoCalGas).

The October 2015 gas well blowout at the facility continuously exposed our community to crude-oil toxins for a period of four months or longer, and caused the evacuation of thousands of our families, the relocation of two public schools, and the disruption of life for an entire community. Since then, the PRNC has called for the expedited and responsible closure of the facility because it is a threat to public health and safety. The PRNC continues to work with the CEC and the CPUC towards achieving that goal. To that end, we offer the following comments on the draft 2019 IEPR.

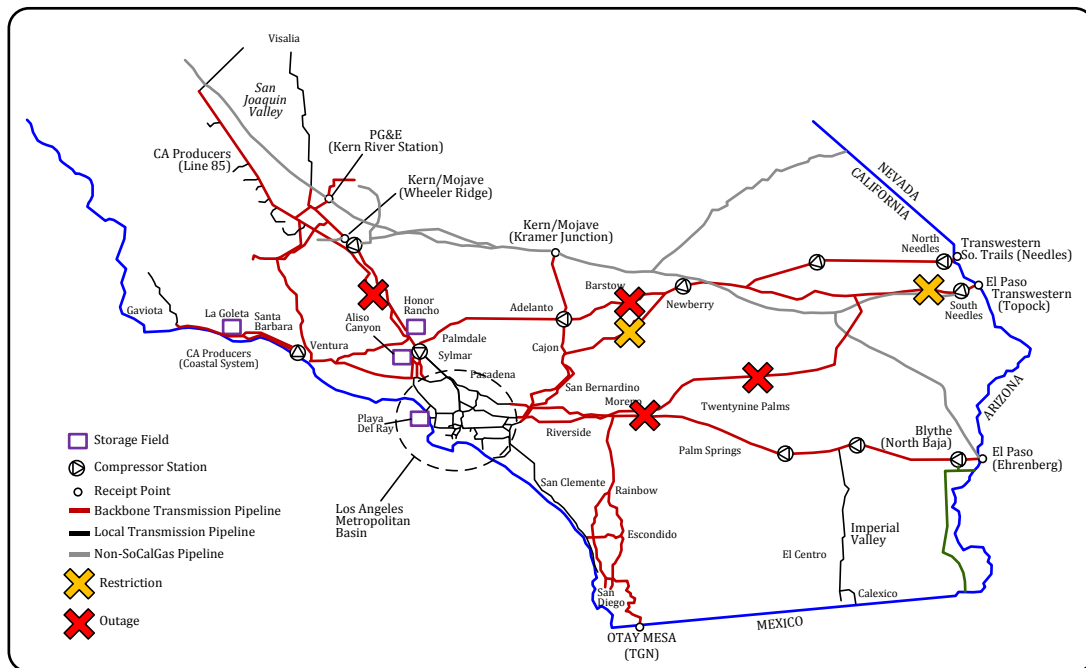
The fourth recommendation on page 160 states "*Continue developing a long-term strategy that would allow the eventual close of the Aliso Canyon natural gas storage field.*" This recommendation is out of step with the directives of both former Governor Brown and current Governor Newsom. In July 2017, Governor Brown directed the CEC to work with

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<sup>1</sup> The opinions expressed in this document are those of the Porter Ranch Neighborhood Council and not necessarily those of the City of Los Angeles

the CPUC towards the closure of the Aliso Canyon facility no later than 2027.<sup>2</sup> Then, on November 18, 2019, Governor Newsom requested additional action by the CPUC to “expedite planning for the permanent closure of the Aliso Canyon...facility” and expressed concern that the current CPUC proceeding process (I17-02-002) may be “insufficient to shorten the ten-year timeline for closure outlined in 2017.”<sup>3</sup> For the Governors’ goal to be realized, the 2019-IEPR should not just reference the “eventual” closure of the facility, but rather identify a specific timeline for when replacement energy resources need to be identified and implemented in order to comply with the Governor’s directive.

CEC staff correctly notes that the strain on the gas reliability during the winter of 2018-2019 was purely due to the reduction in pipeline capacity that began in 2017 and continues through today! Figure 1 below, which is a reproduction of Figure 22 in the draft 2019 IEPR, shows how significant the pipeline problems were in May 2019. It is clear that SoCalGas has ignored the deteriorating conditions of its pipelines for far too long. In his presentation at the Joint Agency Workshop on Energy Reliability in Southern California (May 23, 2019), Mr. Rod Walker advised the agencies that “Reliability focus should be on pipelines not the Aliso Canyon storage field which has masked infrastructure issues in the past”. Mr. Walker highlights the fact that these are “old pipelines with continuing issues reaching end of life”, which is also emphasized in the draft IEPR. Mr. Walker also notes that the system has “no redundancy for critical infrastructure, i.e., only one pipeline (instead of 2) in same pipeline corridor for continuity of operations during planned or unplanned maintenance.”



**Figure 1 – Status of the SoCalGas Transmission System in May 2019**

<sup>2</sup> [Letter from CEC Chair Weisenmiller to CPUC President Picker, dated July 19, 2017.](#)

<sup>3</sup> [Letter from Governor Newsom to CPUC President Batjer, dated November 18, 2019.](#)

It is clear that the gas transmission system lacks both reliability and redundancy. The Commission may want to include in the IEPR a more tangible guidance on the level of reliability and redundancy that the State should have in its gas conveyance and supply system. Specifically, considering the significance of the energy supply to the State economy, it would be highly appropriate for the IEPR to set in motion a process to develop quantitative reliability and redundancy goals for the gas transmission system, instead of leaving it to the privately-owned companies to make those determinations.

A resilient gas transmission system is required over the next several decades regardless of the reductions in the gas demand because the need for winter heating for existing homes and businesses will continue to exert a significant demand on the gas system, and the existing transmission system is already at the end of its useful life and has certainly passed its reliable life. However, SoCalGas, or any other for-profit entity for that matter, is not the right entity to undertake this effort because their priorities are not aligned with the State's priorities. To that end, we recommend including in the IEPR a recommendation to undertake a study on the technical and economic feasibility of planning and constructing a state-owned gas transmission system with the proper level of resiliency that is also designed to reduce reliance on storage, thus improving public health protection and moving closer to meeting the State's climate goals. This is no different than the water transmission system owned and operated by the State's Department of Water Resources, which then delivers the water to local municipalities who own and operate the local distribution system.

We thank the Commission for receiving our comments, and we hope they will be incorporated into the final IEPR.

Respectfully Yours,  
Porter Ranch Neighborhood Council



Issam Najm, Ph.D., P.E.  
Board President

cc: Office of California Governor Gavin Newsom  
State Senator Henry Stern  
Assemblymember Christy Smith  
Los Angeles County Board Supervisor Kathryn Barger, 5<sup>th</sup> District  
Los Angeles City Mayor Eric Garcetti  
Los Angeles City Councilmember John Lee, 12<sup>th</sup> District