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January 30, 2017

Submitted via email to:

[Public.advisor@cpuc.ca.gov](mailto:Public.advisor@cpuc.ca.gov)

**[DRAFT – PENDING BOARD APPROVAL]**

Attn: Public Advisor's Office  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, California 94102

Re: Comments on the "Aliso Canyon Working Gas Inventory, Production Capacity, Injection Capacity, and Well Availability".

***The opinions expressed in this document are those of the Porter Ranch Neighborhood Council, and not necessarily those of the City of Los Angeles***

To Whom It May Concern:

The Porter Ranch Neighborhood Council (PRNC) appreciates the opportunity to submit these comments to the California Public Utilities Commission (CPUC) on the report titled: "Draft Update to Aliso Canyon Working Gas Inventory, Production Capacity, Injection Capacity, and Well Availability for Reliability". The PRNC is comprised of 11 publicly elected representatives of the Porter Ranch community within the City of Los Angeles. As you are well aware, Porter Ranch is the community of 30,000 citizens of the State of California who endured through four months of the worst gas blowout in the United States, and who continue to endure through episodes of uncontrolled gas releases from the Aliso Canyon gas facility, and persistent health ailments by a large number of our community members.

The PRNC has reviewed the above-referenced report released by the CPUC on Tuesday, January 17, 2017 and wishes to address the following main areas of concern regarding the findings:

1. Volume Calculation
2. Lack of a Risk Analysis Component
3. Status of the Facility

We ask that you seriously consider our concerns as you finalize your report. In addition, the PRNC prepared a detailed analysis of the natural gas supply and demand in the SoCalGas service area and concluded that the system can be reliability operated without the need for gas withdrawal from the Aliso Canyon facility. The report is incorporated into our submittal as an attachment to this document and we ask that it be made part of the record.

### **Volume Calculation**

On page 9, the report states “...SoCalGas could support a gas demand of 4.1 Bcf without the use of Aliso Canyon”. The report references the Winter Technical Assessment report as the source of this value. In our examination of that report, we noted that this value is based on limiting the supply to 85% of capacity. We see no reason to make this assumption for the one max-day demand. SoCalGas already states in the report (page 29) that even with line 3000 out of service, it can deliver 4.5 Bcf into the system without Aliso Canyon, and without losing system pressure. If this value were used, the total storage volume required in Aliso Canyon decreases to only 18.2 Bcf. Furthermore, the relationship between volume and withdrawal rate is based on the assumption that only 31 wells are available for withdrawal. When the number of wells that pass the battery of tests increases to 38, the emergency max-day supply from Aliso can be met with only 15 Bcf in the field.

Considering the lack of rationale for limiting the receipts to 85% of capacity, and the fact that DOGGR’s website already shows that SoCalGas has 35 wells that have passed all tests, we see no reason to increase the storage volume to any value greater than the current value of 15 Bcf.

### **Lack of a Risk Analysis Component**

We are concerned that all the decisions being made regarding the use of Aliso Canyon are based on a mere mathematical calculations of supply, demand, and cost. However, considering the event that led to this point, we find it imperative that any decision regarding Aliso Canyon must include and incorporate a thorough Risk Analysis that provides a reasonable weight to the potential health risk to the community and damage to the environment that is incurred with the re-opening of this facility. Clearly, the impact of any CPUC decision on the community and the environment must be taken into consideration.

### **Status of the Facility**

We recognize that CPUC’s primary goal is to maintain the reliability of gas supply into Southern California, and we very much support that goal. We understand that this goal is the driver behind the need to maintain a specific gas volume in the field. However, this does not mean that the facility needs to be returned into service as an operating facility. The

current status of Aliso Canyon is an “emergency supply” facility. Whether the volume is 15 Bcf or 29 Bcf, there is no reason to change its status.

Therefore, we ask that the PUC mandate that the facility remain as an emergency supply facility only until further notice, and that any emergency withdrawal from the facility must be accompanied by a full accounting of demand and supply and an explanation of why the withdrawal was needed, and a confirmation that all other mitigation measures had been considered before the emergency withdrawal was implemented. This information should be provided to the PUC and the public within 24 hours of the withdrawal.

Respectfully Yours,  
Porter Ranch Neighborhood Council

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

cc: The Honorable Edmund G. Brown, Jr., Governor, State of California  
Mr. Jason Marshall, Chief Deputy Director, Department of Conservation  
Senator Henry Stern, California 27<sup>th</sup> District  
Mr. Dante Acosta, California Assembly Member, 38<sup>th</sup> District  
Ms. Kathryn Barger, Supervisor, Los Angeles County Board of Supervisors  
Mr. Mitchell Englander, Councilman, Los Angeles City Council  
Mr. Eric Garcetti, Mayor, City of Los Angeles  
Mr. Steve Knight, United States Representative, CA-25  
Mr. Brad Sherman, United States Representative, CA-30