



Issam Najm,
President

Susan Gorman-Chang,
Vice President

Andrew Krowne,
Treasurer

Gabriel Khanlian,
Secretary

David Balen,
Signer

Asaad Alnajjar

Jason Hector

Alex Kim

Becky Leveque

Jennifer Milbauer

DRAFT PENDING BOARD APPROVAL

September 13, 2017

Mr. Timothy Sullivan
Executive Director
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102

Dear Mr. Sullivan¹:

The Porter Ranch Neighborhood Council continues to be gravely concerned about the resumption of any operation at the Aliso Canyon gas storage facility, and we implore the California Public Utilities Commission (PUC) to make a quick decision to phase out the use of this facility. Since the PUC gave permission to the Gas Company to inject gas into the field, two pieces of information have been made public that further confirm the fact that this facility does not belong in an urban environment and is a threat to public health and safety.

Since the Gas Company resumed injection into the field, the California Air Resources Board reports that the facility's methane emissions have exceeded the permitted amount of 250 kg/hr on two of the four days the measurements were taken.² On August 3, the facility was emitting close to 525 kg/hr of methane, and then on August 17, the facility was emitting close to 600 kg/hr of methane. Each of these is more than double the permitted release rate, and is the highest reported by ARB from any gas storage facility in California in all of 2017, including the McDonald Island facility, which has a capacity of 82 Bcf. All this with the volume in Aliso Canyon still below the target of 23.6 Bcf.

Then, on August 28, the Gas Company noted in a letter³ to you and to Mr. Kenneth Harris of DOGGR, that in spite of all the testing protocols that DOGGR has characterized as the most rigorous in the nation, as many as 13 out of the 39 wells that you allowed them to use for injection were found to be leaking gas into their annular space between the inner tube and the casing. The people of Porter Ranch have zero confidence in the ability of the Gas Company to keep this facility safe and under control.

The Neighborhood Council is also concerned about lack of certainty in the plan moving forward. Specifically, while the document posted on your Aliso website on July 21 titled "Summary of the Operational Constraints at the Aliso Canyon Natural Gas Storage Facility"⁴ instructs the Gas Company to continue to abide by the withdrawal protocols of your June 16 letter to Mr. Jimmy Cho⁵, that letter implies that those restrictions apply through October

¹ *The opinions expressed in this letter are those of the Porter Ranch Neighborhood Council, and not necessarily those of the City of Los Angeles.*

² https://www.arb.ca.gov/research/methane/NG_Chart_All.png

³ <http://www.cpuc.ca.gov/aliso/>

⁴ http://www.cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/News_Room/News_and_Updates/AC.pdf

⁵ <http://www.cpuc.ca.gov/aliso/>

31, 2017, and is silent on what those protocols are after October 31, 2017. We ask the PUC to make it clear in a written public communication to the Gas Company that the withdrawal protocols shall continue to be in place indefinitely. Specifically, the withdrawal protocols specified in the June 2, 2016 letter (which were adopted for 2017) state that “...*withdrawals will be made when:*

- a) *(i) SoCalGas has taken any and all appropriate actions it deems available and necessary to meet demand and avoid electric curtailments and/or gas curtailments of core customers. Such actions include the use of operational and emergency flow orders, curtailments of supply, and coordination with balancing authorities to limit/reduce demand in effected areas.*
(ii) The CASIO and LADWP, in coordination with SoCalGas, have taken all available actions consistent with their emergency action plans and the existing and forecast conditions to avoid electric curtailments; and
(iii) there remains an imminent risk that electric curtailments will occur without additional gas supply otherwise not available, or
- b) *Service to core customers is at risk due to emergencies on the gas pipeline system or when supply conditions require additional supply otherwise not available. Such emergencies include pipeline shutdowns or unplanned outages and equipment failures; and*
- c) *Withdrawals can be made consistent with safe operation of the field and the system and in compliance with any mandated protocols for production from the field.*

Furthermore, while the letter continues to require SoCalGas to provide the CPUC with a full description of the events that led to the withdrawal and certify that they took all actions consistent with these protocol, we ask that the PUC require SoCalGas to inform the community about any withdrawal within 24 hours from the start of the withdrawal.

In the final analysis, the Neighborhood Council firmly believes that the Aliso Canyon facility is a threat to public health and safety, and must be shut down. The people living in the LA Basin already have enough exposure to harmful chemicals, and we cannot afford to also have the largest methane-leaking gas storage facility in our midst. We urge the PUC to work expeditiously towards the goal of shutting down Aliso Canyon sooner than later. Southern California has been operating without any gas from Aliso Canyon for 574 days and counting.

Respectfully Yours,
Porter Ranch Neighborhood Council

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

cc: Henry Stern, State Senator, District 27
Dante Acosta, Assemblymember, District 38
Saul Gomez, Deputy Cabinet Secretary, Office of Governor Edmund G. Brown Jr.
Edward Randolph, Energy Division Director, CPUC
Kathryn Barger, Los Angeles County Supervisor
Mitchell Englander, Los Angeles City Councilmember, District 12