

June 1, 2020

Governor Gavin Newsom  
1303 10th Street, Suite 1173  
Sacramento, CA 95814

Dear Governor Newsom,

**RE: Reverse Aliso Canyon Withdrawal Protocols and Propose Timeline for Shut Down**

We appreciate your latest call for the “expedited” closure of Aliso Canyon, but we remain concerned because it lacks an actionable timeline. **The use of Aliso Canyon has increased by nearly 3000% since you took office despite your calls for its closure.** Worse yet, a recent article by [S&P Global Platts](#) announced SoCalGas’ intention to refill Aliso Canyon to its full storage capacity at 86 bcf (billion cubic feet).

We urge you to reconcile this contradiction in your policy on Aliso Canyon in three ways:

- 1) First, reverse the withdrawal protocols at Aliso Canyon that removed the “last resort” withdrawal regulations and gave SoCalGas increased authority to utilize Aliso Canyon despite its need.
- 2) Second, we urge you to prohibit SoCalGas from increasing its storage capacity at Aliso Canyon beyond its current limit of 34 bcf. Increasing storage to as much as 86 bcf increases the facility’s pressure putting nearby communities at greater risk of leaks and loss of containment incidents.
- 3) Finally, we respectfully request that as Governor you issue an Executive Order by the end of 2020 to shut down Aliso Canyon within one year. Unfortunately, your letter to the CPUC calls for an “expedited” shut down, but does not define what expedited means.

The community will not get the justice it deserves without your leadership on these three necessary and critical steps.

When the gas blowout was stopped, SB380 was soon thereafter signed by Governor Brown putting a moratorium on the use of Aliso Canyon to meet energy demand. There was a buffer of gas in reserve at Aliso Canyon available for “last resort” or “emergency” demand response. The CPUC, the CEC, CAISO, LADWP and SoCalGas quickly worked to establish 31 mitigation measures that would restructure the gas ordering system and adopt clean energy measures to ensure energy reliability without Aliso Canyon. But from the very start, SoCalGas claimed that anything short of the full return of Aliso Canyon to normal operations would result in catastrophic blackouts for Southern California. However, these mitigation measures were extremely successful. Despite SoCalGas’ hyperbolic claims that Southern California would face up to 14 days of blackouts without Aliso Canyon, the region faced no such risk in the summer of 2016, nor anytime after. The mitigation measure most cited for the success in providing energy reliability without Aliso Canyon was better coordination and balancing of the gas supplies.

Prior to the blowout, SoCalGas balanced demand and supply on a monthly basis. 90% of gas consumed by California industries and customers comes from out of state via pipelines. Previously, SoCalGas would project gas use for a month ahead based on weather and customer history. If supplies fell short of the demand on a daily basis, gas storage would quickly be utilized. If supplies exceeded demand, the excess would be stored in facilities like Aliso Canyon.

After the blowout, the CPUC required SoCalGas to implement tighter gas balancing rules requiring balancing on a daily basis and within 5% of projected demand. SoCalGas had the pipeline capacity to cover energy demand in Southern California, and if well coordinated, this would alleviate the need for the use of gas storage facilities. The CPUC also took pride in quickly providing the funding and approval for the installment of battery storage in Long Beach. Tesla, Greensmith and AES proved that battery storage could be installed within a six month window and under budget to provide up to 70MW of backup energy in times of crisis<sup>1</sup>.

Despite this immediate success, SoCalGas worked to erode and disobey key mitigation measures while lobbying to loosen regulations that limited the use of Aliso Canyon. Predictably, over the last four years we've seen a steady uptick in manufactured crises and excuses by SoCalGas to justify the use of Aliso Canyon, regardless of actual need.

The first frivolous withdrawal happened in Winter 2016-2017, when SoCalGas used Aliso Canyon to meet demand on two days when there was no need. Food & Water Watch helped uncover this, resulting in an exposé by the LA Times in which SoCalGas blamed its supplier for the shortage despite evidence from the supplier that SoCalGas didn't order enough gas supplies<sup>2</sup>. SoCalGas effectively let their system fall 30% out of balance. LA County commissioned a report agreeing with Food & Water Watch's assessment that these withdrawals were unnecessary and demonstrating 31 mitigation measures, if followed, will eliminate the use of Aliso Canyon altogether<sup>3</sup>.

In October 2017, an explosion on SoCalGas' pipeline, L235-2, and consequent impact on L4000 led to legitimate concerns over gas supply. However, SoCalGas, CPUC, CEC, CAISO and LADWP diligently worked to continue the mitigation measures and reserved Aliso Canyon as an asset of last resort. In the Winter of 2017-2018, SoCalGas withdrew from Aliso Canyon on seven different gas days totalling withdrawals of 1.33 billion cubic feet (Bcf). See the attached spreadsheet for reference. Food & Water Watch contested these withdrawals as unnecessary and demanded the CPUC put a return to service date for the pipelines for which they did not. After a year with these major pipelines offline, and no clear date when these pipelines would

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<sup>1</sup> [Tesla, Greensmith, AES Deploy Aliso Canyon Battery Storage in Record Time, GreenTechMedia, January 31, 2017](#)

<sup>2</sup> [Southern California Gas taps Aliso Canyon amid conservation warnings, LA Times, January 24, 2017](#)

<sup>3</sup> [L.A. County study decries state claims for need of Aliso Canyon storage plant, LA Times, March 31, 2017](#)

return to service, the following Winter of 2018-2019 saw a substantial increase in the use of Aliso Canyon. In this timeframe, SoCalGas justified withdrawing gas from Aliso Canyon 37 gas days for a total of 14.086 Bcf. This represented a 1406% increase in total volume withdrawn from Aliso Canyon between the two Winter seasons of 2017-2018 and 2018-2019. Again, see the attached spreadsheet for reference.

SoCalGas' pipeline outages had significant impacts on rates and reliability in Southern California. A report by CAISO showed that gas shortages led to a massive increase in electric energy prices, costing California ratepayers upwards of \$1 billion. As Aliso Canyon was used more than it had been before, we questioned whether these repairs were slow-walked intentionally to help SoCalGas fortify its case that Aliso Canyon should be returned to normal operations. As soon as the pipelines blew, SoCalGas petitioned the CPUC to allow them to lift all restrictions on the use of Aliso Canyon. Nationally, it takes on average weeks or months to repair critical pipelines, not years<sup>4</sup>. Independent experts joined in the chorus calling on the CPUC to require return to service dates and better accountability for these prolonged outages.

Finally, SoCalGas was able to bring L235-2 back into service on October 15, 2019 and L4000 back online by November 5, 2019. Despite the return to service and dramatic shifts in shoring up supply, the CPUC succumbed to SoCalGas and relaxed the strict withdrawal protocols that till then, left Aliso Canyon as an asset of last resort. CPUC weakened the Aliso Canyon withdrawal protocols far earlier in the year on July 23, 2019 and did not revisit them despite the pipelines' return to service.

The weakened withdrawal protocols allowed by the CPUC have had devastating impacts on the surrounding community. This season to date, SoCalGas used Aliso Canyon for 56 gas days, already totalling 20.582 Bcf. Compared to this time last year, that's a 146% increase in the use of Aliso Canyon between this Winter season and last. Under your administration, SoCalGas got what it wanted, unfettered use of Aliso Canyon. Overall, your administration's increased use of Aliso Canyon is devastating and represents a 2913% increase of Aliso from Brown's administration to yours. The community surrounding this noxious facility has flocked to social media to report an increase in bloody noses, dizziness, rashes, itchy skin, nosebleeds, heart palpitations, headaches, migraines, nausea and an increase in sulfur odors in their neighborhoods.

With the pipelines back online gas supplies have returned to normal. Additionally we've seen a downward shift in gas use during the Winter. But the weakened withdrawal protocol now allows SoCalGas to act as they please, and your administration has done nothing to curb their use of Aliso Canyon. By all appearances it seems your administration is aligned with SoCalGas, not public health. **As Governor, we call on you to direct your CPUC Commissioners to reverse**

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<sup>4</sup> [Reliability of the Natural Gas System in Southern California, Presentation by Rod Walker, Walker & Associates, IEPR Presentations, May 21, 2019](#)

**the weakened withdrawal protocols and return to using Aliso Canyon only as an asset of last resort.**

While we write to you in the midst of the Coronavirus pandemic, the shock to oil and gas markets should not negatively impact the health of Californians, especially in this precarious time. SoCalGas wants to store excess gas at Aliso Canyon as the gas market faces oversupply problems. If you allow this, you will literally favor SoCalGas profits over public health. Currently, the gas storage limit at Aliso Canyon is set to 34 bcf by the CPUC. Any increase in storage capacity increases the pressure of the field which will lead to more leaks and chances of loss of containment incidents. As Aliso Canyon sits within a massive fault line, more pressure risks slippage and earthquakes that can lead to catastrophic loss of life. **As Governor, we urge you to prohibit SoCalGas from increasing their storage capacity by any amount, and especially to the full amount of 86 bcf.**

As a candidate and as Governor, you promised to shut down the Aliso Canyon Gas Storage Facility, yet the dangerous gas field remains open. In November 2019, you asked the CPUC to study permanently closing Aliso Canyon. Yet, this amounts to another inactionable study without a deadline, kicking the can down the road while neighboring families suffer the effects of toxic emissions. **As Governor, we urge you by the end of 2020 to set a deadline of no more than one year to shut down Aliso Canyon through an Executive Order directing the CPUC to take swift action.**

Sincerely,

Jane Fowler, Aliso Moms Alliance  
Cheryl Auger, BAN SUP  
Heidi Harmon, City of San Luis Obispo  
RL Miller, Climate Hawks Vote  
Gina K. Thornburg, Coalition for Valley Neighborhoods  
Jodie Evans, CODEPINK  
Liza Tucker, Consumer Watchdog  
Andrew Krowne, Environmental Health Tracker  
Dr Suzanne DeBenedittis, FrackFreeLACounty  
Kyle Ferrar, FracTracker Alliance  
Nicole Ghio, Friends of the Earth  
Alexandra Nagy, Food & Water Action  
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Rosemary Jenkins, North Valley Green Alliance  
Collin Rees, Oil Change International  
Michael Thaller, PDA-CA (Progressive Democrats of America - California)

Andrea Miller, People Demanding Action  
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 Scott Murray, SanDiego350  
 Matt Pakucko, Save Porter Ranch  
 Jack Eidt, SoCal 350 Climate Action  
 Mary Zeiser, Stand.earth  
 Shoshana Wechsler, Sunflower Alliance  
 Eve Simmons, TheGreenFlash.org  
 Rabbi Michael Lerner, Tikkun Magazine  
 Julie A Levine, Topanga Peace Alliance, MLK Coalition of Greater Los Angeles, 5G Free California

	<b>Season</b>	<b>Withdrawal Days from Aliso</b>	<b>Withdrawal Amounts from Aliso (billion cubic feet)</b>
Gov. Brown	<b>W2016-2017</b>	2	0.050
	<b>W2017- 2018</b>	7	1.140
Gov. Newsom	<b>W2018-2019</b>	37 (3/11/19)	14.086 (3/11/19)
	<b>W-2019-2020</b>	56 (4/10/20)	20.582 (4/10/20)

	<b>Winter Seasons</b>	<b>Withdrawal Days from Aliso</b>	<b>Withdrawal Amounts from Aliso (billion cubic feet)</b>	<b>Increase from previous administration (%)</b>
Gov. Brown	<b>2016-2017 + 2017-2018</b>	9	1.190	
Gov. Newsom	<b>2018-2019 + 2019-202</b>	93	34.668	2913%

Attachment: Food & Water Action Aliso Canyon Withdrawals Data Sheet

CC:

Secretary Jared Blumenfeld, California Environmental Protection Agency  
Secretary Wade Crowfoot, California Natural Resources Agency  
Senior Advisor to the Governor for Energy Alice Reynolds, Governor's Office  
Executive Director Alice Stebbens, California Public Utilities Commission  
President Marybel Batjer, California Public Utilities Commission  
Commissioner Liane M. Randolph, California Public Utilities Commission  
Commissioner Martha Guzman Aceves, California Public Utilities Commission  
Commissioner Clifford Rechtschaffen, California Public Utilities Commission  
Commissioner Genevieve Shiroma, California Public Utilities Commission  
Senator Dianne Feinstein, United States Senate  
Congressman Brad Sherman, United States House of Representatives  
Supervisor Kathryn Barger, LA County Board of Supervisors  
Mayor Eric Garcetti, Los Angeles  
Senator Henry Stern, California State Senate  
Assemblymember Christy Smith, California State Assembly  
Councilmember John Lee, Los Angeles