



A  Sempra Energy utility

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January 12, 2021

Rachel Peterson, Acting Executive Director
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102

RE: Revised Request for Authorization for Limited Withdrawals at Aliso Canyon to Conduct Performance Flow Testing

Dear Ms. Peterson:

On July 23, 2019, the Energy Division of the California Public Utilities Commission (Commission) issued a revised Aliso Canyon Withdrawal Protocol (Withdrawal Protocol).¹ The Withdrawal Protocol specifies the conditions under which Southern California Gas Company (SoCalGas) may withdraw gas from the Aliso Canyon Storage Field (Aliso Canyon). The conditions are intended to allow withdrawals to address gas reliability challenges, mitigate electric and gas price impacts in Southern California, or respond to an emergency condition that would impact public health and safety or result in curtailments.

On May 27, 2020, the Commission approved SoCalGas's request for authorization to make limited withdrawals at Aliso Canyon for the cleanup flow process pursuant to SoCalGas's Storage Integrity Management Program (SIMP). As described in greater detail in the enclosed *Proposed Flow Testing Plan for Aliso Canyon*,² SoCalGas requests additional authorization to perform flow testing on specified wells at Aliso Canyon.³ The purpose of the flow testing is to develop more certain estimates of withdrawal capabilities at Aliso Canyon in support of reliability. Flow testing is performed by storage field operators throughout the industry to verify individual flow rates, flowing wellhead pressure, choke size settings, and other important factors impacting deliverability.

¹ The July 23, 2019 Aliso Canyon Withdrawal Protocol was revised on April 1, 2020 to add two additional reporting requirements. These changes did not alter the conditions under which SoCalGas may withdraw gas from Aliso Canyon.

² The priorities listed in Table 1 are based on reassessment status. Phase 1 wells have been reassessed and returned to service; Phase 2 wells are currently undergoing reassessment; and Phase 3 & 4 are wells are pending reassessments and/or are otherwise out of service due.

³ The additional authorization is necessary since withdrawals for the clean-up flow process do not produce flow rates that are representative of well withdrawal capabilities.

Since prior flow testing was performed at Aliso Canyon, well reassessments have been completed and well conditions have changed. These changes which include, but are not limited to, tubing string redesign, wellhead valve changes, and well lateral redesigns, can reduce well deliverability. At Aliso Canyon, observed flow rates in some wells seem to be lower than pre-reassessment rates. Without the ability to conduct the requested performance testing, the most current field wide withdrawal capabilities are less certain.

SoCalGas would like to begin this performance flow testing in early January. The intent is for the program to continue for the duration of the Aliso Canyon Withdrawal Protocol. The Commission's approval of this request supports reliability and enables the continued prudent and safe operations at Aliso Canyon, and is consistent with previously approved requests for limited withdrawals from Aliso Canyon.⁴

Please let me know if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Paul Goldstein". The signature is fluid and cursive, with a long horizontal stroke at the end.

Paul Goldstein
Vice President
Gas Transmission and Storage

Enclosure

cc: Edward Randolph, CPUC, Energy Division
Dorothy Duda, CPUC, Energy Division
Jean Spencer, CPUC, Energy Division
Matthewson Epuna, Safety and Enforcement Division

⁴ See previously approved requests for limited withdrawals of gas from Aliso Canyon in July 2016 and November 2017, available at <https://www.cpuc.ca.gov/aliso/>.