PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



February 8, 2021

Paul Goldstein, Vice President Gas Transmission and Storage Southern California Gas Company 555 W. 5th Street, GT18A1 Los Angeles, CA 90013

Subject: Approval of Limited Waiver from the Aliso Canyon Withdrawal Protocol Pursuant to Southern California Gas Company's Request for Authorization of Limited Withdrawal at Aliso Canyon to Conduct Performance Flow Testing

Dear Mr. Goldstein:

California Public Utilities Commission (CPUC) staff has reviewed the Southern California Gas Company's (SoCalGas) letter dated January 12, 2021, requesting a limited waiver from the current Aliso Canyon Withdrawal Protocol and authorization to perform flow testing on specified wells at Aliso Canyon. Your letter indicates that the purpose of the flow testing is to develop more precise estimates of withdrawal capabilities at Aliso Canyon because well conditions have changed due to the well assessment work required by the California Geologic Energy Management Division (CalGEM). The letter includes an attachment with the proposed flow testing plan and priority list. The plan limits testing to one well at a time and no more than two wells per week. In subsequent discussions with CPUC staff, SoCalGas stated that each flow test will typically be of short duration (six hours) and the maximum volume withdrawn per test is not expected to exceed 12 million cubic feet (MMcf).

Your letter additionally notes that flow testing is performed by field operators in the underground storage field industry to verify individual flow rates, flowing wellhead pressure, choke size settings, and other factors impacting withdrawal deliverability.

CPUC staff agrees that SoCalGas should proceed with its proposed flow testing plan on specified wells at Aliso Canyon that have undergone reassessment. As noted in your letter, this request is consistent with previously approved requests for authorization to make limited withdrawals at Aliso Canyon.

On the basis of the above, this letter grants SoCalGas a limited waiver from the July 23, 2019, Aliso Canyon Withdrawal Protocol to conduct the performance flow testing described in its January 12, 2021 letter and attachment specifying the testing plan and priority list. When possible, SoCalGas should endeavor to conduct flow testing during periods when Aliso Canyon Withdrawal Protocol conditions have otherwise been met. This limited waiver will expire on February 8, 2022. SoCalGas must seek authorization if it needs to conduct further flow testing after the expiration of this waiver.

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SoCalGas must report the results of the performance flow test quarterly to the CPUC's Safety and Enforcement Division (SED) and CalGEM. SoCalGas must also post a notice to Envoy stating when these tests will occur.

Sincerely,

Rachel Peterson

Rachel Peterson Executive Director

CC:

Edward Randolph, Deputy Executive Director for Energy and Climate Policy Simon Baker, Director, Costs, Rates, and Planning, Energy Division, CPUC Dorothy Duda, Program Manager, Energy Division, CPUC Jean Spencer, Supervisor, Energy Division, CPUC Matthewson Epuna, Program and Project Supervisor, Safety and Enforcement Division, CPUC Uduak-Joe Ntuk, State Oil and Gas Supervisor, CalGEM