



Sullivan Solar Power
Leading the Solar Energy Revolution



Via Electronic Mail

June 15, 2018

President Michael Picker
Commissioner Martha Guzman Aceves
Commissioner Clifford Rechtschaffen
Commissioner Carla Peterman
Commissioner Liane Randolph

California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Support for Proposed Decision Denying Southern California Gas and San Diego Gas and Electric’s Application for a Proposed Pipeline in A. 15-09-013

Dear Commissioners:

We, the signatories, write to express support for Administrative Law Judge Kersten’s Proposed Decision denying Southern California Gas Company (SoCalGas) and San Diego Gas and Electric Company’s (SDG&E) application for the proposed new gas pipeline Line 3602.

As the Proposed Decision correctly finds, because gas demand is declining, Line 3602 is not needed to meet the Commission's reliability standards. Line 3602 would be a stranded asset from its first day of operation, result in an excessive level of slack capacity on the system, which would only increase as California continues to reduce its reliance on natural gas. SoCalGas and SDG&E's costly proposal to lock-in an expansion of the gas transmission system with the construction of this new pipeline would have Southern Californians paying it off until at least 2063 - making no sense in an era of declining demand and when California is moving away from fossil fuels. Locally, six cities making up 50% of San Diego County's population have committed to getting 100% of their electricity from clean energy sources by 2035, and this proposed pipeline shows it is out of touch and inconsistent with the values of the local region.

Line 3602 would also not meaningfully improve resiliency of the gas system. Line 3602 has no other purpose than to serve as backup in the highly remote likelihood there is an unplanned outage of Line 3010. In its over 60 years of operation, there has never been an outage of Line 3010 that resulted in a loss of customer service. The Proposed Decision recognizes that a redundant pipeline does not address the much more likely risks of gas curtailment that could arise from an inability for gas supplies to reach the northern receipt point, which Line 3602 would share with Line 3010. There are much better ways to improve resiliency that both help further our decarbonization goals and can mitigate for a range of events. To the extent additional infrastructure may be necessary to support energy resiliency in San Diego, the Proposed Decision correctly recognizes that investments that reduce dependence on gas – like energy storage, voltage support, and improved transmission – will help San Diego withstand unexpected gas shortages in a manner consistent with the state's commitments to clean energy.

The Administrative Law Judge's proposed decision rejecting Line 3602 in this proceeding ***is clear, convincing, and prevents ratepayer funds from being used in a manner inconsistent with state climate goals.*** We urge the Commission to adopt it.

Sincerely,

Nicole Capretz
Climate Action Campaign

Joyce Lane
San Diego 350

Karim Bouris
Business for Good San Diego
Represents over 230 small businesses

Daniel Sullivan
Sullivan Solar Power

Tara Kelly
California Solar & Storage Association, San Diego Chapter

Surfrider San Diego
Climate Change Committee

Peter Andersen
Sierra Club San Diego Chapter

Scott Borden
Uptown Tavern

Scott Borden
Borden Ranches

Matt O'Malley
San Diego Coastkeeper

Robin Ganahl
OC Clean Power

Karen Coyne
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Amanda Barth
Orange County Society of Conservation Biologists

Roger Gloss
OC for Climate Action

Kathleen Treseder
Women for American Values and Ethics (WAVE)

CC:

Suzanne Casazza, Public Utilities Regulatory Analyst
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James Ralph, Chief of Policy for President Picker
Jennifer Kalafut, Chief of Staff for Commissioner Peterman
Rachel Peterson, Chief of Staff for Commissioner Randolph
Michael Minkus, Chief of Staff for Commissioner Guzman Aceves
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