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California Natural Resources Agency
1416 Ninth Street, Suite 1311
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Email: safeguarding@resources.ca.gov

RE: Safeguarding California Plan: 2017 Update

To Whom It May Concern:

SoCalGas appreciates the opportunity to submit these comments on the Safeguarding California: 2017 Update draft prepared by the California Natural Resources Agency (CNRA). We applaud CNRA's continued efforts to study and guide the state's efforts to address vulnerabilities to the impacts of climate change. We share the concern about the impacts climate change will have on California in the coming decades, particularly on the state's vulnerable populations. We continue to offer our support, expertise and partnership to CNRA to deepen the understanding of climate adaptation and mitigation strategies of energy systems.

To that end, we strongly support the report's Recommendation E:1, to continue to support climate research for the energy sector, including adaptation of the natural gas system. Understanding the resiliency of the state's natural gas systems is particularly important because of its interconnection with electric generation. Natural gas is used not just for base-load central power plants, but also for flexible peaking technologies that balance the intermittency of renewables, helping integrate them into the grid, and grow the state's renewable generation portfolio over the long term. Further study of the energy systems will allow California to understand the strengths and vulnerabilities of the natural gas system, and how it can be relied upon during a climate change-induced event to provide an alternate energy source.

SoCalGas also supports recommendations E-3, on incorporating climate change into utility planning efforts, and EM-1, to continue to review recent disasters to understand how they were exacerbated by climate change. A report by the U.S. Department of Energy studying the impacts of hurricanes on energy infrastructure noted that Hurricanes Irene and Sandy did not have a major impact on the natural gas system in the Northeast during Hurricanes Irene or Sandy.¹ These events demonstrated that the

¹ In 2013, the U.S. Department of Energy released *Comparing the Impacts of Northeast Hurricanes on Energy Infrastructure*: "Hurricanes Irene and Sandy did not have a major impact on natural gas infrastructure and supplies in the Northeast, the

natural gas system, because it is underground, is inherently resilient to climate change impacts and can provide an alternative energy source when other systems fail. Buildings and residents that were connected to the gas grid were able to retain power as the underground gas system was largely unaffected.

Responding to SoCalGas' Risk Assessment and Mitigation Phase filing, the California Public Utilities Commission (CPUC) noted, "When threat assessment focuses only on extreme weather events (severe storms, wind storms, etc.) it would appear that gas systems might be relatively more resilient because much of the infrastructure is underground."² Given this existing resiliency, natural gas-fueled distributed generation technology, such as fuel cells and combined heat and power plants, can provide electric reliability for critical customers such as health care facilities during grid outages caused by climate-induced extreme weather. We suggest this consideration in ongoing efforts to improve public health preparedness and emergency response efforts mentioned in Recommendation P-5.

As mentioned in the report, California is leading the world in its efforts to avoid the worst effects of climate change by reducing greenhouse gas emissions. As part of our efforts to support California in meeting its emissions reduction goals, SoCalGas is working to reduce greenhouse emissions, not just from our own system through our long-standing commitment to modernizing our system infrastructure to increase safety and reliability, but also from the state's existing organic waste streams. We offer our expertise and assistance to customers and project developers who want to convert organic waste material into biogas or renewable natural gas (RNG). Through our network of climate-safe infrastructure, SoCalGas offers the opportunity for RNG to be accepted into our transmission and distribution system and delivered to our customers. Using our pipeline infrastructure to distribute carbon-neutral energy will help to slow climate change and meet state goals for increasing use of renewable energy.

This summer, as part of a project with waste management company CR&R Environmental, SoCalGas will complete a 1.4-mile pipeline that will bring carbon-neutral renewable natural gas into the SoCalGas distribution system, marking the first time that renewable natural gas supply will be directly interconnected with and piped into the SoCalGas system. The anaerobic digestion facility in Perris, California, utilizes source-separated organic waste collected in cities' green collection carts to produce renewable natural gas. SoCalGas is also committed to working towards the success of the dairy pilots required as part of Senate Bill 1383 (Lara) implementation, mentioned in Recommendation A-3. SoCalGas strongly supports efforts to find synergies between renewable energy and making greenhouse gas emissions reductions from dairies and other sources of organic waste.

To that end, we also encourage the expansion of Compressed Natural Gas (CNG) infrastructure in order to support the adoption of near-zero-emission natural gas engines. These engines provide a commercially-proven and cost-effective strategy to immediately achieve major reductions in emissions of greenhouse gases from California's on-road heavy-duty transportation sector. Although heavy-duty

interstate transmission pipelines continued to operate during the storm but monitored low-lying areas of their systems for flooding."

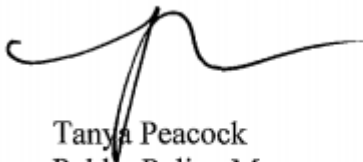
² See CPUC Risk and Safety Aspects of Risk Assessment and Mitigation Phase Report of San Diego Gas & Electric Company and Southern California Gas Company, March 2017, available at <http://www.cpuc.ca.gov/WorkArea/DownloadAsset.aspx?id=8931>.

trucks only represent 1 percent of vehicles on the road, they account for 14 percent of on-road vehicle greenhouse gas emissions. When powered by renewable fuels, near-zero emission trucks can reduce greenhouse gas emissions by at least 70 percent.³ We believe this clean technology can help catalyze California's transition to a clean air future by jump-starting the market for these extremely carbon-low — and in some cases, carbon-negative — renewable fuels. Recommendation T-4 mentions ongoing actions to expand electric and hydrogen fueling infrastructure; we suggest the inclusion of expanded CNG/RNG fueling infrastructure to take advantage of this new engine technology.

The plan identifies numerous working groups and task forces that will help accomplish the important goal of creating a more resilient and sustainable energy sector. SoCalGas encourages CNRA to work closely with utility partners to assess existing implementation plans as well as future opportunities for collaboration. For example, we support efforts to improve emergency preparedness through interagency coordination, and to that end SoCalGas offers its expertise to advance the goals of the Cal OES' Climate Change Working Group mentioned in Recommendation EM-2, or any other team or task force that would benefit from our participation.

SoCalGas appreciates your consideration of these comments and your willingness to meet with us to further discuss the issues raised in this letter. If you have any questions, please do not hesitate to contact me by telephone or email. Thank you.

Sincerely,



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³ Game Changer Technical White Paper, Gladstein, Neardross & Associates, May 3, 2016.
http://ngvgamechanger.com/pdfs/GameChanger_FullReport.pdf.