



**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

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Application of Southern California Gas
Company (U 904 G) in Compliance with
Ordering Paragraph 6 of Decision 24-12-076

Application No. 26-01-009
(Filed January 15, 2026)

PROTEST OF ISSAM NAJM

February 20, 2026

Pursuant to Rule 2.6 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure (Rules), I, Issam Najm, timely¹ submit this protest to the *Application of Southern California Gas Company (U 904 G) in Compliance with Ordering Paragraph 6 of Decision 24-12-076* (Application).²

INTRODUCTION

In Decision (D.) 24-12-076 (Decision),³ the Commission established a clear criteria and detailed approach and calculation methodology for the biennial review process aimed at achieving the goal of proceeding I.17.02.002 of minimizing or eliminating reliance on the Aliso Canyon Gas Storage Facility (Aliso). The Commission tasked Energy Division staff (Staff) with implementing the approach and making recommendations to the Commission as to whether the storage level in Aliso should be maintained at its level at the time, decreased, or increased. The Commission set the maximum change in storage volume at 10 Bcf.

Staff implemented the approach outlined in the Decision and issued its biennial report on October 1, 2025.⁴ The report included detailed discussion of the four analyses required by the

1. My protest is timely filed under Rules 1.15 and 2.6(a). The notice of the filing of the Application first appeared on the Commission's Daily Calendar on January 21, 2026, accessed at:

<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M595/K978/595978296.PDF>.

2. Application (A.) 26-01-009, Application of Southern California Gas Company (U 904) in Compliance with Ordering Paragraph 6 of Decision 24-12-076, accessed here:

<https://docs.cpuc.ca.gov/SearchRes.aspx?DocFormat=ALL&DocID=595083702>

3. D.24-12-076: <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M551/K009/551009286.pdf>

4. California Public Utilities Commission, 2025 Aliso Canyon Biennial Assessment Report Pursuant to D.24-12-076, accessed at: https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/natural-gas/aliso-canyon/2025_aliso_canyon_biennial_assessment.pdf

Decision, and using the strict criteria established by the Decision, Energy Division determined that its analysis met the threshold for recommending a reduction in the maximum storage volume at Aliso. Because of the conservative limit set by the Decision, Staff's recommendation was to reduce the maximum storage volume by only 10 Bcf.

In its Application, SoCalGas rejected every Staff assumption and calculation that supported Staff's final recommendation. SoCalGas piled up one factor over another to force a conclusion that the maximum storage volume should be raised past 68.8 Bcf or the system operation will be unreliable. The Commission should take note of the fact that SoCalGas operated the system reliably with minimal interruptions ⁵ with only 15 Bcf after the blowout and with no injections into Aliso for all of 2016 and into 2017.

ANALYSIS

It is important to note that reducing the maximum volume to just 58.6 Bcf leaves far more gas in the field than required based on the Staff analysis. Specifically, the three criteria that determine the gas withdrawal needs from Aliso are:

1. Demand reduction analysis: Staff determined that the 1-in-10 peak demand for winter 2025-26 requires 441 MMcfd withdrawal from Aliso.
2. Gas balance reliability analysis: Staff determined that only 1% of Aliso's capacity would be required.
3. Hydraulic modeling analysis: Staff determined that fluctuations in demand can be served continuously during the coldest day in 10 years with a minimum Aliso withdrawal of 550 MMcfd

Working with these three findings, Staff's analysis thus says that Aliso needs to have enough volume to allow for the withdrawal of no less than 550 MMcfd on the statistical 1-in-10 coldest day. Unfortunately, Staff's analysis does not identify the volume required to provide this withdrawal rate. However, there are sufficient data in SoCalGas' Application to identify that volume. Specifically, Tables I-1b, I-1c, I-1d, I-2b, I-2c, and I-2d in Andrew Sawin's testimony in the Application include data pairs of Aliso Inventory and Aliso Withdrawal capacity using SoCalGas' own analysis. Those values are plotted in Figure 1 below as withdrawal capacity vs.

⁵. SoCalGas reported few "curtailment events" in each of 2014, 2015 (before the gas blowout), 2016, and 2017. Accessed here: <https://www.socalgas.com/sites/default/files/2020-10/Curtailment%20event%20log-%20September%202020.pdf>. However, not only is the cause of the curtailment unknown, but their occurrence is unrelated to Aliso since they occurred before and after the blowout, and with or without the availability of Aliso.

Aliso stored volume. SoCalGas' own data indicate that the withdrawal rate under all scenarios evaluated is far higher than the 550 MMcfd required on the 1-in-10 coldest day. Even at a gas volume of 40 Bcf, the withdrawal rate is approximately 900 MMcfd. Hence, Staff's recommendation of decreasing the maximum storage volume to 58.6 Bcf is extremely conservative and any uncertainties in Staff's assumptions would still allow for a withdrawal rate much greater than 550 MMcfd.

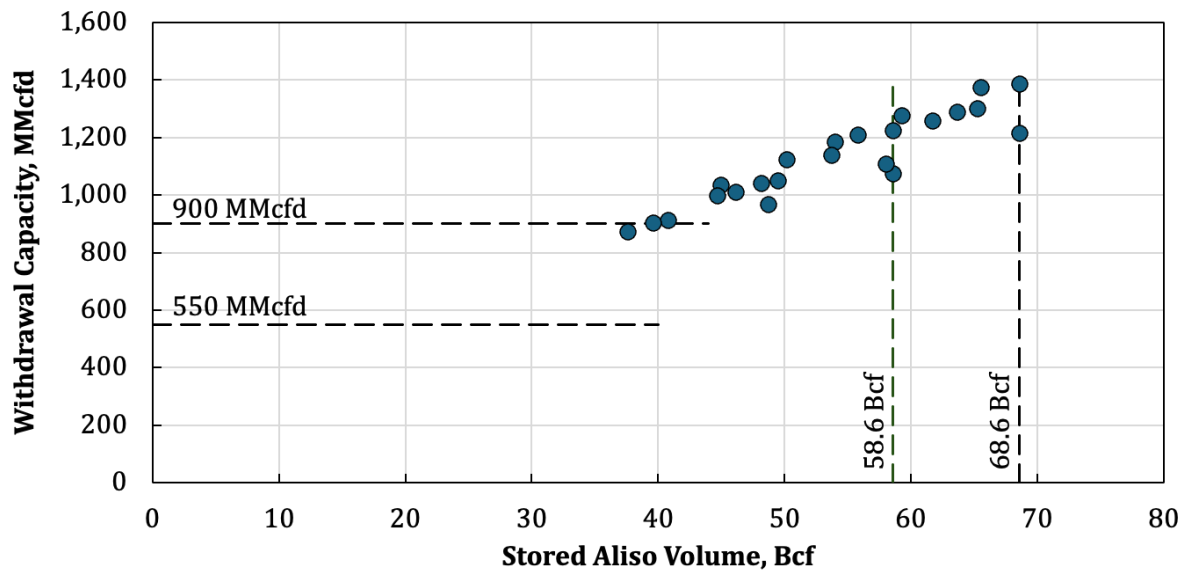


Figure 1 – Relationship between Gas Volume in Aliso and Gas Withdrawal Capacity

The above analysis clearly demonstrates that SoCalGas' self-serving claims and analysis in its Application are false. In fact, based on Staff's analysis and SoCalGas' own withdrawal data, the Commission could reduce the maximum storage capacity of Aliso by 20 Bcf which reduces it to 48.6 Bcf. This value still provides far higher withdrawal rate than the 550 MMcfd estimated by Staff.

CONCLUSION AND RECOMMENDATION

The Commission set the criteria for the recommendation, the Staff analysis determined that the threshold for reducing the storage in Aliso was met based on those criteria, and Staff recommended the reduction in the gas storage volume in accordance with the instructions of the Commission. Staff's recommendation of reducing the storage volume by only 10 Bcf is highly conservative because it still provides for a gas withdrawal rate from Aliso that is much higher than the required 550 MMcfd estimated by Staff. Yet SoCalGas wants the Commission to set aside

the analysis based on self-serving criteria and even ask the Commission to turn the clock back to 2015 by raising the storage volume back to 86.2 Bcf, which is far above the safety limit of 68.6 Bcf set by the State and adopted by the Commission.

I urge the Commission to reject SoCalGas' self-serving analysis, honor the criteria that it developed and voted on, and consider reducing the Aliso maximum storage volume by 20 Bcf which still leaves a large safety margin to cover any uncertainties in the Staff analysis.

Dated: February 20, 2026

Respectfully Submitted,

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