



**Annual Report Number 6**  
**Work of the Safety Ombudsman**  
**July 2024 – June 2025**

**Report Date: August 31, 2025**

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## Table of Contents

<b>Overview .....</b>	<b>3</b>
<i>I. WSOC Meeting Participation .....</i>	<i>5</i>
<i>II. Safety Ombudsman Virtual Public Meeting – October 15, 2024 .....</i>	<i>6</i>
<i>III. Safety Ombudsman Data Requests .....</i>	<i>7</i>
<b>Data Request #22.....</b>	<b>7</b>
<b>Data Request #23.....</b>	<b>9</b>
<b>Risk Assessment Discussions .....</b>	<b>9</b>
<i>IV. California Public Utilities Commission (CPUC) and California Department of Conservation Geologic Energy Management Division (CalGEM) Audit Reports .....</i>	<i>11</i>
<i>V. Safety Ombudsman Review and Evaluation of Incidents Involving Methane Emissions Above Threshold Levels .....</i>	<i>11</i>
<i>VI. Review and Advise on the WSOC's Efforts, Findings, and Recommendations for Improvements .....</i>	<i>12</i>
<i>VII. Safety-related Concerns Reported by the Public .....</i>	<i>12</i>



## Overview

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SoCalGas (Defendant) and the State Attorney General, City Attorney for the City of Los Angeles, County Counsel for the County of Los Angeles, and the County of Los Angeles (collectively referred to as Government Plaintiffs) entered a Consent Decree to resolve claims raised by the Government Plaintiffs associated with the natural gas leak that occurred at the Aliso Canyon natural gas storage Facility (Facility) in October 2015. The terms and conditions of the Consent Decree required SoCalGas to, among other things, form an internal safety committee, and select and retain a third-party subsurface gas storage industry expert (Safety Ombudsman) who shall act as a safety advocate for the Facility. A copy of the Consent Decree may be accessed via this link: [Click Here](#)

Section 4.2 of the Consent Decree outlines the requirements for SoCalGas to establish a Well and Storage Operations Safety Committee (WSOC). The duties of the WSOC include but are not limited to the following:

- Meet quarterly to review safety issues at the Facility.
- Review operational safety issues and promote safe operations at the Facility consistent with applicable laws, rules, regulations, and orders.
- Review Facility-related information, materials, or work product to assess safety at the Facility.
- Make recommendations to SoCalGas for repairs, improvements, policies, and/or upgrades to the Facility or infrastructure therein.
- Facilitate the role of, and work in cooperation with, the Safety Ombudsman.
- In coordination with the Safety Ombudsman, conduct periodic safety audits or safety-related Strengths, Weaknesses, Opportunities, Threats (“SWOT”) analyses of the Facility.
- Review California Public Utilities Commission (CPUC) and California Department of Conservation Geologic Energy Management Division (CalGEM) audit reports of the Facility.

Section 4.3 of the Consent Decree outlines the requirements for SoCalGas to select and retain a Safety Ombudsman and the duties associated with that role. The duties of the Safety Ombudsman include the following:

- Participate in all Well and Storage Operations Safety Committee (WSOC) meetings.
- Have access to all non-privileged materials, information, records, and work product in SoCalGas’ possession, custody, and control necessary to accomplish the tasks required of the Safety Ombudsman.
- Review CPUC and CalGEM audit reports of the Facility.
- Review and evaluate all incidents reported to the public and State and local agencies pursuant to Section 4.1 of the Consent Decree.
- Review and advise on the WSOC’s efforts, findings, and recommendations for improvements.
- Serve as a non-exclusive repository for safety-related concerns reported by the public with respect to the Facility.
- Serve as a point of contact to receive safety complaints or concerns relating to the Facility from anyone who wishes to remain anonymous, and provide any anonymous reports of safety concerns to SoCalGas.

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- Maintain the privacy of the person or member of the public confidentially making safety complaints or concerns relating to the Facility.
- Generate annual reports (Annual Reports) that detail the following:
  - o The work of the Safety Ombudsman.
  - o The work of the WSOC.
  - o Recommendations, if any, for improvements related to safety and prevention of leaks at the Facility.
- Provide the Annual Reports to the Attorney General, the City Attorney, County Counsel, the CPUC and CalGEM. The Annual Reports shall also be made public via the Aliso Canyon Website and the local community shall be provided with an opportunity to comment on the Annual Reports. The Safety Ombudsman shall schedule at least one (1) public meeting each year to explain and respond to questions regarding the Annual Reports.

This report has been prepared in accordance with the requirements outlined in Section 4.3, (b), (ix), (2) of the Consent Decree, and summarizes the work of the Safety Ombudsman during the period of July 2024 – June 2025. It is the sixth such annual report.



## I. WSOC Meeting Participation

Four (4) WSOC meetings were held during the July 2024 – June 2025 period, as noted below:

- September 13, 2024 (virtual)
- December 6, 2024 (in person)
- March 20, 2025 (virtual)
- June 26, 2025 (in person)

The Safety Ombudsman participated in all meetings, including in person at the December and June meetings. The quarterly meeting agenda includes:

1. Review and approval of the prior meeting minutes.
2. Update from the Safety Ombudsman concerning public inquiries and other relevant topics.
3. Update from WSOC members concerning safety-related matters associated with the Aliso Canyon Facility.
4. PHMSA/CalGEM audit status.
5. Joint discussion of other relevant matters related to the Aliso Canyon Facility.

The meetings provide a forum for discussions between the WSOC members and the Safety Ombudsman on safety-related matters at the Facility. Topics vary from meeting to meeting depending upon current issues, maintenance and construction work activity at the Facility, and safety concerns. Members of the WSOC provide updates of construction and/or maintenance work at the Facility with the emphasis on safety, the status of ongoing discussions with CalGEM staff concerning SoCalGas' Risk Management Plan for the Facility, and the status of periodic audits of the Facility by CPUC and CalGEM staff. The WSOC meetings provide an opportunity for the Safety Ombudsman to probe any safety concerns, establish a dialog directly with the appropriate subject matter experts, and give feedback to the WSOC concerning committee work or other safety-related initiatives at the Facility.

During the period of July 2024 – June 2025, discussion topics included but were not limited to:

- Presentation and discussion of a general safety theme at the start of each meeting, including incidents from the natural gas pipeline and gas storage industry.
- The development of additional, and enhancement of existing, Gas Standards relevant to the safety of underground natural gas storage facilities.
- Status of Data Requests from the Safety Ombudsman and subsequent SoCalGas responses.
- Preparation of the Safety Ombudsman Annual Reports and public interactions, including any concerns, issues, or complaints submitted to the Safety Ombudsman by members of the public.
- Recommendations of the WSOC and/or the Safety Ombudsman and the status of SoCalGas plans in response to the recommendations.
- Audits performed by the WSOC examining adherence to SoCalGas' Gas Standards, and reviews and updates of SIMP (Storage Integrity Management Program) standards.
- Status of the CalGEM/PHMSA audits through the July 2024 – June 2025 period.



- Status of the Aliso Canyon Risk Management Plan (RMP), well integrity assessments, and individual well reassessment period adjustments granted by CalGEM.
- Discussion of well and reservoir risk assessment for the Aliso Canyon Facility.
- Overview of the facility during recent wildfires.

Individual links to the minutes of the WSOC meetings are included immediately below. Names of individuals have been redacted from the meeting minutes.

- September 2024 meeting minutes link: [Click Here](#)
- December 2024 meeting minutes link: [Click Here](#)
- March 2025 meeting minutes link: [Click Here](#)
- June 2025 meeting minutes link: [Click Here](#)

In alignment with the WSOC Charter, selected changes in membership occurred during the 2024-2025 period.

## **II. Safety Ombudsman Virtual Public Meeting – October 15, 2024**

The terms of the Consent Decree require that the Safety Ombudsman provide three Annual Reports to the Attorney General, the City Attorney, County Counsel, the CPUC, and CalGEM. The Safety Ombudsman is required to make available to the public for review and comment a copy of each of the three (3) Annual Reports and schedule at least one public meeting each year wherein the Safety Ombudsman shall explain and respond to questions regarding the Annual Reports. The three (3) reports provide an overview of the following:

1. The work of the Safety Ombudsman.
2. The work of the WSOC.
3. Recommendations for improvements related to safety and prevention of leaks at the Facility.

Previous Annual Reports One through Five inclusive were posted to the Safety Ombudsman website prior to the annual public meetings.

The July 2023 – June 2024 period Annual Reports were posted on September 18, 2024, and notice was provided on the same day via email to approximately two dozen representatives from the CPUC, CalGEM, and the city and county of Los Angeles; to other state agents as applicable; and to approximately three dozen groups/parties whose contact information was supplied by SoCalGas' Public Affairs Group. The individuals/groups who received the meeting notice included those in SoCalGas' public outreach initiative associated with the Aliso Canyon Facility incident. The email notice included information concerning a virtual public meeting to be hosted by the Safety Ombudsman on October 15, 2024, at 6:00 pm. The purpose of the meeting was to provide an overview of the work performed by the Safety Ombudsman during the July 2023 – June 2024 period, as detailed in three (3) Annual Reports.

The annual public meeting was held on October 15, 2024; several members of the public attended. The meeting lasted 1.5 hours, including a question-answer period following the Safety Ombudsman's summary presentation covering the Ombudsman's professional experience, the role of the Ombudsman, and a review of the three (3) annual reports. Meeting participants were invited to raise questions or concerns at any time

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regarding the Annual Reports, or any other relevant issue, and to post their questions directly to the Safety Ombudsman website. The public meeting materials were posted to the Ombudsman website and can be found at the following link: [Click Here](#). The recording can be found under the “Safety Ombudsman Virtual Townhall Meeting 2023” heading at this link: [Click Here](#)

One (1) meeting attendee provided feedback stating that the SoCalGas progress on planning for the installation of several deeper-set subsurface safety valves was, at least preliminarily, moving toward satisfying the input this individual had been urging for several years in regard to the risk of a well integrity event related to deep-seated fault displacement. The meeting attendee also thanked the Ombudsman for the interaction with SoCalGas to help promote the outcome.

Following the public meeting, and in order to obtain clarity on SoCalGas’ plans and decision-making process, the Safety Ombudsman developed Data Request #22, submitted to SoCalGas on December 2, 2024, and summarized below in [Section III](#) of this Report.

The Ombudsman will host a virtual meeting in Q4 of 2025 covering the Annual Reports posted for the period July 2024 – June 2025.

### **III. Safety Ombudsman Data Requests**

The Consent Decree stipulates that the Safety Ombudsman shall have access to all non-privileged materials, information, records, and work product in SoCalGas’ possession, custody, or control necessary to accomplish the Ombudsman’s tasks. SoCalGas is prohibited from unreasonably denying the Ombudsman access to such information or withholding information based on a privilege not supported by applicable law.

The Safety Ombudsman made Data Request #22 during the July 2024 – June 2025 period. Prior data requests and responses have been reviewed in previous annual reports and are not covered in this report.

#### **Data Request #22**

The Ombudsman delivered Data Request #22 on December 2, 2024. SoCalGas presented information on risk assessment and decision making during the June 2025 WSOC meeting and formally responded on July 25, 2025.

DR#22 contained four (4) questions relating to SoCalGas’ risk-based decision criteria for deep-set SSSV installation, including the estimated pre-installation and post-installation net risk, for any well in which SoCalGas decided to install modern deep-set subsurface safety valves. DR#22 asked SoCalGas to identify which wells were potential candidates for SSSV installation and which were not, based on SoCalGas’ most recent risk assessment; and for those wells that have been selected for installation, the proposed subsurface safety valve design, installation, operation, monitoring, and testing specifications and procedures.

SoCalGas’ responses, in combination with a more detailed presentation during the June 2025 WSOC meeting, were sufficient to address the Ombudsman’s questions. The DR#22 questions and responses can be found below:

- [Click Here](#)
- [Click Here](#)



- [Click Here](#)
- [Click Here](#)
- [Click Here](#)

The June 2025 WSOC meeting presentation can be found at this link: [Click Here](#)

***Summary analysis and opinion of the Ombudsman following DR#22 responses:***

Subsurface safety valves can mitigate consequences of well release but have the potential to fail, requiring intervention to repair. SSSV set depth impacts the degree to which threats are mitigated, as well as the valve reliability. SoCalGas uses quantitative risk analysis to estimate risks and benefits of valve installation (refer also to [Risk Assessment Discussions](#) in this report). As a result of SoCalGas' risk analysis, SSSV installation to moderate depths of 1700-3500+ feet in three (3) wells so far, and at several more wells, can have a net benefit to reduce environmental risk. The Ombudsman analyzed the information provided by SoCalGas at the June 2025 WSOC meeting and in response to DR#22.

SoCalGas has had four (4) shallow SSSV installations in operation for several years at Standard Sesnon 9 (457', installed 2018), Standard Sesnon 10 (372', installed 2020), Standard Sesnon 29 (374', installed 2019), and Fernando Fee 33 (367', installed 2018).

As a result of risk assessment summarized in response to DR#22, recent installations have been made:

- At shallow depths across the Topanga Formation to mitigate landslide risk in wells Porter 69C (462'), Porter 69F (468'), Porter 69J (479'), and Fernando Fee 35D (489') (waiting on a control panel for full functionality).
- At intermediate depths approximately 200' below the Younger Santa Susana Fault to mitigate fault displacement risk in wells Fernando Fee 35C (1707'), Porter 50C (3175'), and Fernando Fee 32F (3517'). These three (3) intermediate-depth installations are waiting on control panels for full functionality. At multiple well sites instrument control lines are being configured to ensure that activation of a surface-controlled SSSV will not result in a shut-down of all wells on the site.

Additional moderate-depth installations are planned at Fernando Fee G, Porter 68A, Porter 69D, Porter 69K, and Porter 72B.

The Ombudsman's opinion is that the SoCalGas risk assessment has reached a state of maturity to enable identification of those wells with greater susceptibility to fault displacement and/or to shallower-seated landslide mass movement. SoCalGas also has increased its well-specific testing to characterize each well's flow capability, which is a strong driver of the risk perspective, since a well that can flow only a little is, potentially, less consequential than a well that can flow very strongly. SoCalGas presented well-specific risk assessment estimates to the Ombudsman at the June 2025 WSOC meeting. SoCalGas' own risk analysis identifies those wells with higher environmental risk that would or could result from a well flowing uncontrollably to the surface or near surface, and the risk analysis identifies the net risk benefit to the SSSV installation, given potential decreases to environmental risk but potential increases to life safety risk due to an increased number of well workovers related to treating SSSV reliability issues. It is the Ombudsman's opinion that the current state of SoCalGas' well risk analysis methodology brings a credible clarity to the decision-making regarding SSSV installation. The ability to make risk-informed, values-based decisions





regarding installation and placement depth of SSSV, using enhanced knowledge of well-specific conditions, is a satisfactory safety improvement outcome.

The efficacy of the new SSSV installations depends on reasonably good reliability of the SSSV. SoCalGas' prior history with subsurface safety valve installations in the Aliso Canyon Facility and the reliability issues experienced were covered in Annual Report Number Five – Work of the Ombudsman, which can be found at this link: [Click Here](#). DR#22 asked how SoCalGas plans to operate and maintain the new SSSV installations and track reliability. In response, SoCalGas noted that SoCal's Gas Standard 224.0000 outlines the steps to test SSSVs every six (6) months. Results of SSSV tests are maintained in SoCalGas' maintenance management systems and any unresolved sub- or non-standard conditions are noted, with a requirement to repair or replace a failed or incompletely functioning SSSV within ninety (90) days or else temporarily plug the well. The tracking SoCalGas will do in their maintenance and records management systems will allow SoCalGas to compare the reliability of the new and recent installations to the reliability of the old systems used in the 1970s and 1980s.

### **Data Request #23**

The Ombudsman made a request to the WSOC at the June 2025 meeting to explain actions that occurred on the six (6) requests for integrity inspection time extensions that had been denied by CalGEM.

- What subsequent work was done on the five (5) wells that were initially denied and later approved?
  - o SoCalGas noted that of the six (6) original denials, five (5) wells have been approved in subsequent requests for extensions to eighty-four (84) months (seven (7) years) for integrity inspection re-assessment intervals. Two (2) wells, the Fernando Fee #34A and the Porter #24B, had new inner casing strings installed and baseline logged showing no anomalies; thereafter, CalGEM approved extensions to the timing of integrity re-assessment logging. One (1) well, the Porter 26B, showed less degradation when comparing a six-year inspection span than the potential degradation rate previously identified, and CalGEM granted an extension request based on the new information. Two (2) wells, Porter 32C and Standard-Sesonon 44B, were given extensions after CalGEM re-assessed integrity inspection information with CalGEM's learnings-revised model.
- How many wells at the Aliso Canyon Facility are still on a two-year assessment cycle?
  - o SoCalGas stated in their response that three (3) wells remain on the original CalGEM-mandated two-year integrity reassessment basis; however, SoCalGas plans to install new inner casing strings on two (2) of the wells. The Ombudsman expects that SoCalGas will re-apply to CalGEM for extensions on the two (2) wells once the inner strings have been installed and baseline assessments completed.

The SoCalGas response of July 25, 2025, can be found at this link: [Click Here](#)

### **Risk Assessment Discussions**

SoCalGas developed a quantitative framework for storage well risk assessments. At the June 2025 WSOC, members of the WSOC provided the Ombudsman with a summary of Aliso Canyon Facility well risk assessment work. The analysis to date continues to show that the likelihood of well failure can be related to specific hazards and threats which are required to be evaluated by PHMSA and CalGEM regulations, and that most Aliso Canyon Facility wells generally had comprehensive failure rates in line with general gas storage industry averages. However, modeled failures during workovers are a significant contributor to the

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likelihood of a significant fluid release, as are the threats of earth movements, due both to landslides in relatively shallow intervals up to ~500 feet of depth and to fault displacements at depths of several thousand feet. Meanwhile, the work SoCalGas has done since 2016 to add new or dual tubular barriers and increase pressure monitoring, casing inspection, and other repairs leads to lower likelihood of fluid release. The Ombudsman noted in Annual Report Number 4 – Work of the Safety Ombudsman, in response to Data Request 17-18, at this link: ([Click Here](#)), that many Aliso Canyon Facility wells had increased resistance and resilience to certain threats due to the installation of additional new cemented inner casing strings and/or tubing/packer strings.

SoCalGas' June 2025 update summarized that geohazard threats (landslides and fault displacement) contribute significantly to the likelihood of failure for some wells and many of those wells could have high release rate failures; therefore, significant environmental risk potential is driven by landslide and fault displacement threats. Because the immediate Aliso Canyon Facility well sites are not within a populated area, the life safety risk is relatively low during normal operations but could be elevated by frequent well interventions. The frequency of well interventions will be related to the SSSV reliability, which often is a function of installation depth and valve type.

SoCalGas demonstrated how they tested their risk model for net risk change due to SSSV for shallow, intermediate, and deep SSSV installations and no installations at all, and a range of low, medium, and high reliability. SoCalGas provided an example of one (1) well's risk profile given the matrix of scenarios above; whereas environmental risk was substantially reduced from a baseline of "no installation" to one order of magnitude for shallow installation and over 1.5 order of magnitude for both medium and deep SSSV installations in the example well, the life safety risk for shallow and medium-depth installations increased from baseline conditions marginally but by nearly an order of magnitude for deep installations. Thus, the net risk change favors medium-depth installations where fault displacement is a significant threat, and shallow installations where landslide potential is a significant threat.

At the Aliso Canyon Facility, wells have been plugged in accordance with CalGEM and PHMSA rules, essentially filling all voids with cement, and reducing the well count to fifty-nine (59) injection/withdrawal (I/W) wells by plugging fifty-five (55) wells since late 2016. As of June 2025, forty-two (42) out of fifty-nine (59) I/W wells have had complete new inner casing strings installed since 2016.

Work year-to-date June 2025 includes completion of two (2) reassessments, two (2) casing expansion/isolation tests and six (6) through-tubing integrity logs and shut in annulus pressure tests, with five (5) additional reassessments in progress and one (1) well to be plugged back within the storage zone.

The ongoing accumulation of well integrity findings from the surface monitoring and downhole inspections creates additional learning opportunities. The findings of the reassessments suggest to SoCalGas that the reassessment inspection period can be lengthened. As of June 2025, the Company had been granted seventy-five (75) reassessment extensions on fifty-three (53) unique wells, with the reassessment interval reset by CalGEM from twenty-four (24) months to as much as eight-four (84) months. For six (6) wells where reassessment extension requests had previously been denied, SoCalGas reworked two (2) wells, reinspected three (3) wells, and subsequently received reassessment extension permission from CalGEM. Refer to [Data Request #23](#).



#### **IV. California Public Utilities Commission (CPUC) and California Department of Conservation Geologic Energy Management Division (CalGEM) Audit Reports**

SoCalGas is subject to regulation by the CPUC, CalGEM, and PHMSA. The CPUC has safety jurisdiction over the operation of the surface equipment at the Aliso Canyon Facility. PHMSA at the federal level, and CalGEM at the state level, have safety jurisdiction over underground natural gas storage facilities including the wells and storage reservoir. CalGEM regulations for construction, operation and maintenance, monitoring, and safety requirements for the storage wells and storage reservoirs must meet the federal safety regulations that were implemented by the Department of Transportation (DOT) Pipeline and Hazardous Materials Safety Administration (PHMSA) in the interim rule of December 2016 and final rule of March 2021. Indeed, many CalGEM regulations exceed the federal minimum standards.

PHMSA, while retaining enforcement authority, permits CalGEM to act as PHMSA's agent for safety inspections of the Facility. PHMSA reviews CalGEM audit findings and recommendations prior to issuance of inspection reports to SoCalGas. The most recent CalGEM audit of the Aliso Canyon Facility was in May 2025 and comprehensively addressed 228 questions regarding the storage integrity management program and related construction, maintenance, inspection, testing, and documentation; there were no findings against SoCalGas' storage integrity management program in this audit.

SoCalGas submitted its RMP update to CalGEM on April 1, 2022, as required. SoCalGas demonstrated compliance with CalGEM requirements by referring to the various SIMP chapters in the RMP. SoCalGas maintains a standing monthly meeting with CalGEM and uses the meetings for a detailed look at quantitative risk analysis, communication of details of learnings and developments to CalGEM, and fostering question and answer sessions. Part of the process of continual improvement of the RMP is review of the procedures referred to in the SIMP chapters. Some documents require reviews every year, and others are reviewed every three (3) years.

#### **V. Safety Ombudsman Review and Evaluation of Incidents Involving Methane Emissions Above Threshold Levels**

The Safety Ombudsman is charged with review and evaluation of all incidents reported to the public and State and local agencies pursuant to Section 4.1 of the Consent Decree. Section 4.1 addresses methane emissions detected by a fence-line methane monitoring system installed at the Facility to detect and monitor methane emissions that may be associated with the leakage of stored natural gas from the Facility.

The monitoring system detects and records methane concentrations in real time. If methane concentrations exceed 25 parts per million (ppm) averaged over a 30-minute period, SoCalGas is required to provide public notice on the Aliso Canyon Website including a general explanation as to the cause of the detection and the responsive actions taken, if any. They are also required to notify the Government Plaintiffs of the detection(s), their responsive actions, and that they have posted the same information on the Aliso Canyon Website. Lastly, SoCalGas is required to submit quarterly reports to the Government Plaintiffs outlining each time during the quarter that the fence-line monitoring system detects methane concentrations in excess of 10 ppm averaged over any 30-minute period. The same reporting obligations exist for this level of exceedance as noted above, i.e., identification of the cause of the detection and responsive action(s). Normal background methane level is approximately 2 ppm.

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During the period of July 2024 – June 2025 there were no known fence-line monitoring methane concentration exceedance events.

The fence-line methane monitoring system is comprised of eight (8) monitoring areas offering 24/7 surveillance and are maintained with monthly checks, quarterly calibrations, and component replacement as necessary. There is also a public-facing website and updates to this webpage are performed at least twice monthly, which continues to make the system more reliable and helps avoid outages.

The Ombudsman previously made inquiry and addressed the reliability of the fence-line methane monitoring system as summarized in Annual Report Number 4 – Work of the Safety Ombudsman, available at this link: [Click Here](#)

## **VI. Review and Advise on the WSOC's Efforts, Findings, and Recommendations for Improvements**

The Safety Ombudsman duties include reviewing and advising the WSOC on their efforts, findings, and recommendations for improvements at the Aliso Canyon Facility. The specifics of this obligation are outlined in separate reports, Annual Report Number Six – Work of the Aliso Canyon Well and Storage Operations Safety Committee, Section III, and Annual Report Number Six – Recommendations for Improvements Related to Safety and Leak Prevention, Section II, and will not be repeated here.

The Safety Ombudsman maintains a compendium of all recommendation topics by the WSOC and/or the Ombudsman over the past five (5) years, the period over which the Consent Decree has been active. The summary of past and current recommendations and the progress of SoCalGas in response to the recommendations is contained in a Microsoft Excel file which can be found at the following link: [Click Here](#)

## **VII. Safety-related Concerns Reported by the Public**

The Safety Ombudsman functions as a non-exclusive, confidential repository for safety-related concerns related to the Facility and which are reported by the public, including employees of SoCalGas. The Safety Ombudsman maintains strict confidentiality of anyone who submits a safety concern or complaint regarding the Facility. Anyone who submits a concern or complaint has the option of providing their contact information or remaining completely anonymous. For those who elect to provide contact information, their identity and contact information is known only to the Safety Ombudsman and is never revealed. Providing contact information affords the opportunity for the Safety Ombudsman to contact the individual who submitted the complaint and clarify the issue, as necessary. This, in turn, helps facilitate the review/investigation process and response to the issue.

Comments provided to the Ombudsman at the October 15, 2024, public meeting were addressed previously in this Report.