

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA



FILED
03/23/21
10:33 AM

ADMINISTRATIVE LAW JUDGES JESSICA T. HECHT and MARCELO
POIRIER, co-presiding

Order Instituting Investigation on) EVIDENTIARY
the Commission's Own Motion into the) HEARING
Operations and Practices of Southern)
California Gas Company with Respect)
to the Aliso Canyon storage facility)
and the release of natural gas, and)
Order to Show Cause Why Southern)
California Gas Company Should Not Be)
Sanctioned for Allowing the) Investigation
Uncontrolled Release of Natural Gas) 19-06-016
from its Aliso Canyon Storage)
Facility. (U904G))

REPORTERS' TRANSCRIPT
Virtual Proceeding
March 17, 2021
Pages 154 - 290
Volume 2

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VIRTUAL HEARING

MARCH 17, 2021 - 10:01 A.M.

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ADMINISTRATIVE LAW JUDGE POIRIER: We will be on the record.

This is ALJ Marcelo Poirier, and this is day two of the evidentiary hearings for Investigation 19-06-016, the Aliso Canyon Investigation. Again, this is March 17th, 2021, day two. We are continuing with evidentiary hearings.

Yesterday we left off with SoCalGas cross-examining Ms. Felts, witness for SED. We'll continue with that, but I want to check with everybody if there's any housekeeping matters before we start.

(No response.)

ALJ POIRIER: Okay. I don't see any.

One thing I wanted to close the book on was yesterday, Mr. Gruen, you made a motion to withdraw the motion to strike the motion to compel, I believe, that was on March 1st, 2021, motion to strike; is that correct?

MR. GRUEN: Yes, your Honor. That is indeed correct.

ALJ POIRIER: Okay. We'll go ahead and grant that motion to withdraw that motion to

1 strike. So that is set.

2 Mr. Stoddard, I saw your hand.

3 MR. STODDARD: Thank you, your Honor.
4 One other housekeeping question. Are there
5 -- for the court reporters, are there going
6 to be daily transcripts available by any
7 chance, or is it just going to be at the end
8 of the proceeding?

9 ALJ POIRIER: Could we get Mr. Stacey
10 to weigh in on that, please?

11 THE COURT REPORTER: Your Honor, it's
12 nearly impossible for me to talk and be on
13 the record. Can I request that we go off the
14 record?

15 ALJ POIRIER: Let's go off the record.
16 Thank you.

17 (Off the record.)

18 ALJ POIRIER: We'll be back on the
19 record.

20 While we were off the record, we had
21 a clarification on the timing of the daily
22 transcripts. They will be available in no
23 more than five days sometimes before.

24 Do we have any further housekeeping
25 matters?

26 (No response.)

27 ALJ POIRIER: Hearing none,
28 Mr. Stoddard, are you ready?

1 MR. STODDARD: Yes, your Honor.

2 ALJ POIRIER: Ms. Felts, are you ready?

3 THE WITNESS: Yes, I'm ready.

4 ALJ POIRIER: And, Ms. Felts, I want to
5 remind you of the attestation that you did
6 yesterday. Those terms continue to apply.

7 THE WITNESS: Okay.

8 Margaret Felts,
9 resumed the stand and testified further as
10 follows:

11 ALJ POIRIER: With that, Mr. Stoddard,
12 you can proceed.

13 CROSS-EXAMINATION RESUMED

14 BY MR. STODDARD:

15 Q Good morning.

16 A Good morning.

17 Q So, again, just to kind of
18 reiterate a few of the questions from
19 yesterday. Is there anybody in the room with
20 you today?

21 A No.

22 Q Okay. I'm asking that question, of
23 course, because we're holding these hearings
24 remotely.

25 Do you have any materials with you
26 today aside from your access to your
27 testimony and the exhibits that we're going
28 to be discussing?

1 A No.

2 Q And, Ms. Felts, we talked yesterday
3 about the attestation regarding the parties
4 recording, by video or audio, these
5 proceedings. And the parties have agreed not
6 to do that. However, that doesn't apply to
7 third parties that may be recording these
8 proceedings or may try to.

9 Ms. Felts, do you consent to having
10 these proceedings recorded by audio or video?

11 A No.

12 Q Thank you, Ms. Felts.

13 Ms. Felts, do you know which
14 agencies are involved with the regulation of
15 gas storage operations in the state of
16 California?

17 A The Department of Oil and Gas. I
18 think they're called CalGEM now. And the
19 Public Utilities Commission, The Regional
20 Water Quality Control Board, The Air
21 Resources Board, The Air Quality Management
22 District. Those are the ones in the state
23 that I can think of.

24 Q How about the federal level?

25 A PHMSA for aboveground piping and
26 Cal EPA. I'm not sure that there are any
27 others.

28 Q Okay. Thank you, Ms. Felts. And

1 what's your understanding of the PUC's
2 jurisdiction relative to DOGGR now CalGEM?

3 A Well, DOGGR now CalGEM has the
4 authority to regulate the underground storage
5 area and wells. Specifically the
6 construction and maintenance of the wells and
7 I suppose operation.

8 The PUC regulates the utility and
9 all of their activities including the
10 operations of the underground storage
11 facility, the aboveground piping, and the use
12 of the storage facility for storage of gas
13 injection and withdrawal.

14 Q To paraphrase DOGGR would be the
15 agency with primary jurisdiction over
16 downhole gas storage operations in
17 California; correct?

18 MR. GRUEN: Objection, your Honor.
19 Mischaracterizes testimony.

20 MR. STODDARD: If we could refer to
21 Exhibit 35, please. Lines -- page 234,
22 line 21. And I ask:

23 Ms. Felts, do you know
24 which agencies are involved
25 with gas storage operations
26 in the state of California?

27 And your answer was:

28 Department of Oil and Gas

1 is the primary agency. I
2 would expect the California
3 Energy Commission might
4 have some interest of the
5 secondary.

6 And then you refer to:

7 The Public Utilities
8 Commission because they're
9 operated by the utilities.
10 The Air Board probably has
11 an interest because of air
12 emissions and possibly
13 local water boards because
14 of potential water
15 discharge from separators
16 and that sort of thing on
17 the surface and probably
18 also for groundwater
19 contamination.

20 And then down on line 19:

21 "Question: Which agency do you
22 believe has primary jurisdiction over
23 downhole gas storage and gas storage wells?

24 "Answer, Department of Oil and Gas."

25 ALJ POIRIER: Mr. Stoddard, can you
26 please restate the original question, please?

27 MR. STODDARD: That I just read from?

28 ALJ POIRIER: No. Your original

1 cross-examination question.

2 MR. STODDARD: I'd have to have the
3 court reporter read it back to me.

4 ALJ POIRIER: Let's go off the record.
5 (Off the record.)

6 ALJ POIRIER: we'll be back on the
7 record.

8 I'm going to overrule the objection
9 and Ms. Felts can answer the question.

10 THE WITNESS: The Department of Oil and
11 Gas.

12 BY MR. STODDARD:

13 Q Thank you. Would you please refer
14 to Exhibit-73? Ms. Felts, do you recognize
15 this document?

16 A No.

17 ALJ POIRIER: Mr. Stoddard, can you
18 describe the document please?

19 BY MR. STODDARD:

20 Q Yes. This is a later dated
21 January 5th, 2016. And it's to Alan K.
22 Mayberry, the deputy and associate
23 administrator for policy and programs with
24 The Pipeline and Hazardous Material Safety
25 Administration.

26 And it is from Elizaveta
27 Malashenko. If you can please scroll down to
28 the last page. It is from Elizaveta

1 Malashenko, Director of Safety Enforcement
2 Division with the California Public Utilities
3 Commission.

4 And if you could go back to the
5 first page, please. In the lower right-hand
6 corner, it's marked SoCalGas-73.001 as the
7 first page, and it goes through 003.

8 And, Ms. Felts, this is a document
9 that's available from the PUC Aliso Canyon
10 web page. Have you not seen this document
11 before?

12 A No.

13 Q Okay. If we can please scroll down
14 to the bulleted list, and -- thank you. So
15 this describes the efforts to stop the leak
16 following the Aliso Canyon incident. Do you
17 see that, Ms. Felts?

18 A Yes.

19 Q Okay. And it describes the
20 California Department of Conservation
21 Division of Oil Gas and Geothermal Resources
22 as the lead agency on efforts to stop the
23 leak, and it's providing technical oversight
24 over the well kill efforts. Do you see that,
25 Ms. Felts?

26 A Yes.

27 Q And then if you move down to the
28 last bullet, it states:

1 The PUC is providing
2 overall industry expertise
3 and is particularly focused
4 on working with the CEC to
5 identify and pursue all
6 viable options to maximize
7 gas withdrawal rates at the
8 Aliso Canyon facility.

9 Do you see that,
10 Ms. Felts?

11 A Yes.

12 Q And then finally it says:
13 There are numerous
14 activities going on every
15 day to provide oversight
16 over SoCalGas's efforts to
17 stop the leak. These
18 include daily technical
19 briefings, data requests,
20 site visits, and directives
21 issued by agencies of
22 SoCalGas.

23 Do you see that?

24 A Yes.

25 Q Ms. Felts, were you generally aware
26 of the presence of regulators at the facility
27 and in relation to the leak following the
28 incident?

1 leak response?

2 A That's correct.

3 Q I wonder if you could please scroll
4 down, and you see here in the last paragraph
5 where it says: "At the conclusion of the
6 CPUC's staff investigation, the Commission
7 will have several enforcement options
8 depending on what violations, if any, are
9 identified.

10 "The options can include issuance
11 of a staff citation or opening a formal
12 Commission proceeding to determine fines and
13 penalties; however, at this point the
14 investigation is still in the very early
15 stages of the final assessment of the cause
16 of the leak. The damage generated will
17 necessarily need to wait until the leak
18 stops. The CPUC will release the results of
19 our staff investigation immediately upon its
20 completion."

21 Do you see that?

22 A Yes.

23 Q Are you aware of the results of the
24 PUC's staff investigation being released?

25 A No.

26 Q Okay. Thank you.

27 Ms. Felts, SED served, as part of
28 the exhibits in advance of these hearings, a

1 corrected or amended version of your
2 testimony; is that correct?

3 A That's the first one we looked at
4 yesterday?

5 Q I don't recall. You know, it's the
6 one that includes the redline to various
7 portions of the document.

8 A Yes.

9 MR. STODDARD: Yes.

10 Mr. Moshfegh, if we could refer to
11 SoCalGas Exhibit 47, please.

12 Q And, Ms. Felts, those redlines
13 included amendments related to withdrawal of
14 certain violations that had been identified
15 in your opening testimony; isn't that
16 correct?

17 A Yes.

18 MR. STODDARD: And, Mr. Moshfegh, if we
19 could please turn to page 38, but before we
20 do that, let me describe the document
21 briefly. Again, just because we've already
22 discussed this one yesterday, but just to
23 confirm.

24 Q Ms. Felts, this is a copy of your
25 opening testimony. It's marked, "SoCalGas
26 47.001," and this is the amended version of
27 it; correct?

28 A Yes.

1 Q If we could turn to page 38,
2 please. Ms. Felts, do you see here in this
3 paragraph that starts with "Section 451"?

4 "The Section 451 violation began
5 November 13, 2015, the day SoCalGas
6 unsuccessfully executed the second well-kill
7 attempt without modeling and continued
8 through February 11th, 2016, the day of the
9 successful relief well kill attempt.

10 "Because the second through sixth
11 well-kill attempts should have been
12 successful with proper modeling, shareholders
13 should be required to pay all expenses
14 associated with each one.

15 "Also, because relief well was
16 started December 4th, 2016, after the second
17 well-kill attempt, the relief well would not
18 have been needed had the second well-kill
19 attempt been properly modeled. As such,
20 shareholders should be required to pay all
21 expenses associated with the relief well."

22 And then the language that is
23 stricken there, "SoCalGas's failure to
24 provide well-kill programs for Relief Well
25 No. 2, Well SS-25A, and Well SS-25B. Each
26 constitute one violation of Section 451 for a
27 total of three violations."

28 Do you see that, Ms. Felts?

1 A Yes.

2 Q And that language there is stricken
3 because it is withdrawn; is that correct?

4 A Yes.

5 Q Okay. Isn't it the case,
6 Ms. Felts, that you withdrew this violation
7 because they were in your view potentially a
8 good idea, but not feasible in practice?

9 MR. GRUEN: Objection, your Honor. I'd
10 like to note this line of cross is moving
11 down the road of asking questions about an
12 issue which is now moot and no longer part of
13 the proceeding.

14 MR. STODDARD: Your Honor, this is a
15 violation that was included in her opening
16 testimony, which she's withdrawn, and the
17 decision-making and the reasons for that
18 withdrawal bear on both Ms. Felts'
19 credibility, SED's credibility, and the
20 process with respect to preparation of their
21 testimony.

22 MR. GRUEN: Your Honor, this is Darryl
23 Gruen for SED. If I may, apparently,
24 SoCalGas's view is that no good deed should
25 go unpunished. So, essentially, by
26 withdrawing and trying to streamline the
27 process, now SoCalGas would wish to punish
28 SED and Ms. Felts for its efforts to

1 streamline the proceeding. It's a moot
2 issue. We should move on. And your Honor
3 should not allow the line of cross.

4 MR. STODDARD: It will not take long.
5 So if streamlining is a concern, I don't
6 think that should be an issue.

7 ALJ POIRIER: Okay. Well, I will
8 overrule the objection and allow brief
9 questions on this.

10 THE WITNESS: Are you waiting for me?

11 MR. STODDARD: Yes.

12 THE WITNESS: You asked me this
13 yesterday, and we looked at my deposition, I
14 think, where you asked it in a deposition.
15 So I'm not sure what the difference is, but I
16 would just refer you to those answers.

17 BY MR. STODDARD:

18 Q Okay. We can do that. And it
19 wasn't a deposition. We didn't discuss it
20 yesterday, but this, again, is a separate
21 record. And so, you know, I apologize that
22 we have to go through this process, but we
23 will refer to your deposition if that's the
24 preference.

25 So if we can please refer to
26 Exhibit 51, 376 -- sorry. That's the
27 wrong -- Exhibit 54, page 376, line 11.

28 And, Ms. Felts, this is the

1 deposition we were discussing yesterday.

2 This was your second deposition from February
3 24th, 2021.

4 A Okay.

5 Q Which occurred remotely. And,
6 here, you'll see on line 11:

7 "QUESTION: Ms. Felts, moving on, in
8 your -- in your testimonies, since our last
9 deposition, you've withdrawn certain
10 violations; is that correct?

11 "ANSWER: Yes.

12 "QUESTION: In particular, this
13 includes violations 80 to 82 related to
14 failure to provide well-kill programs to
15 Relief Well No. 2, SS-25A, and SS-25B; is
16 that correct?

17 "ANSWER: Yes.

18 "QUESTION: Do you recall the reason
19 for the withdrawal of the violation?

20 "ANSWER: Two reasons: One is that
21 violation -- those violations were initially
22 based on statements or
23 opinions/recommendations inside the Blade
24 report that I felt were not -- were more good
25 practice recommendations, not statements of
26 fact.

27 "And then when I had an opportunity
28 to review data provided by or documents

1 provided by SoCalGas, I saw documents that
2 would fall into that category, and so I felt
3 like there was -- there was adequate standing
4 in that respect having to do with the
5 relief-well activities after January 2016."

6 Do you see that?

7 A Yes.

8 Q And to clarify, Ms. Felts, just
9 to -- there's two different reasons here, and
10 the part I want to confirm: With respect to
11 the kill plans for SS-25A and SS-25B, your
12 answer there is that having prepared kill
13 plans in advance for those wells, that was an
14 opinion or a recommendation inside the Blade
15 report that you felt was potentially good
16 practice, but not feasible; isn't that
17 correct?

18 A Yeah.

19 Q And with respect to the relief well
20 plan No. 2 -- or rather the plan for Relief
21 Well No. 2, on that one, your answer was that
22 you ended up finding documents provided by
23 SoCalGas evidencing that that had been done
24 and that was your basis for the withdrawal of
25 that violation; is that correct?

26 A Yes.

27 Q And if we can please refer to page
28 382 of the same document, and this relates to

1 the feasibility of having -- of having the
2 advance kill plans for SS-25A and SS-25B.

3 And, if I may ask, Ms. Felts, can
4 you explain briefly why that is not feasible
5 in your view?

6 MR. GRUEN: I'm sorry, your Honor. If
7 I may - this is Darryl Gruen for SED -
8 perhaps, counsel could read to Ms. Felts the
9 portion of the deposition transcripts he's
10 asking about or at least identify the line
11 number so she can read it.

12 ALJ POIRIER: Please do so,
13 Mr. Stoddard.

14 BY MR. STODDARD:

15 Q Ms. Felts, I asked on line 7 --
16 page 382, line 7: "Can you explain what you
17 mean by more good practice rather than
18 statements of fact?"

19 And you answered: "I think it's --
20 I think the idea is good. Everyone would
21 like to have great planning ahead of time,
22 but designing well-kill plans that are
23 specific to the wells prospectively might not
24 be the best use of time.

25 "QUESTION: Then why is that?

26 "ANSWER: Well, you can't really --
27 you can't really forecast all possible
28 problems that are going to arise. So you can

1 have a -- you can have a well-kill plan that
2 says basically the things that are in some of
3 the standards that SoCalGas already has, but
4 when you start trying to get your arms around
5 every possibility of what could happen when
6 you're trying to kill a well, I think you
7 might run into a problem of never being able
8 to cover all possibilities."

9 "QUESTION - starting line 2, on
10 page 383 - So plans that are generally used
11 would include plans like the routine
12 well-kill standard or the emergency well-kill
13 standard that SoCalGas has in place?

14 "ANSWER: Yes."

15 A Is there a question?

16 Q Yeah. I just asked, Did you see
17 that?

18 A Yes.

19 Q Okay. Thank you.

20 And, Ms. Felts, in terms of the
21 reason why -- with respect to your decision
22 to withdraw these violations, yesterday you
23 described, you know, considering the
24 violations that were identified in the
25 prepared testimony that you were provided by
26 SED. Did you ask questions about these
27 violations prior to sponsoring the testimony?

28 A No.

1 Q When do you recall coming to the
2 conclusion that these violations should be
3 withdrawn?

4 A Well, I don't remember the exact
5 date, but sometime right before we withdrew
6 those violations, I had relooked at that
7 after finding the well-kill plan for the
8 relief well, and then I took -- went back and
9 looked at the specific wording of that
10 violation and had a discussion with counsel,
11 and we decided pull the violation.]

12 Q Okay. So sometime shortly before
13 service of your sur-reply testimony?

14 A I don't know. I don't know when
15 communication with -- between SED and
16 SoCalGas occurred regarding that. I don't
17 get involved in those communications.

18 Q And, Ms. Felts, in part, your need
19 to withdraw these violations was because you
20 obtained new information that you previously
21 weren't aware of; correct?

22 A That is correct, in part.

23 Q Okay. And was that due, in part,
24 with the difficulties you had accessing data
25 on the Diamond Drive?

26 A No.

27 Q What was the difficulty with -- why
28 weren't you able to obtain that information

1 sooner?

2 A I think I came upon this
3 information -- it was attachments to e-mails.
4 And SoCalGas flooded SED with thousands of
5 e-mails. And so, as I was working through
6 them, I eventually came across the
7 information.

8 Q So those thousands of e-mails were
9 produced in response to discovery requests to
10 SED?

11 A I think probably in response to DR
12 16.

13 Q And that was the same data request
14 that we discussed yesterday as being one
15 where you were having difficulty accessing
16 the data because of issues with the Diamond
17 Drive; correct?

18 A It would have been one of the ones
19 that I needed to have downloaded in order to
20 look at the documents.

21 Q Okay. And you would agree -- by
22 withdrawing those violations, you would agree
23 that those violations shouldn't have been
24 asserted in the first place?

25 A Well, by withdrawing them, I agree
26 that they are not good violations. And I
27 thought they should be withdrawn.

28 Q Okay. Thank you.

1 Ms. Felts, if we can turn to
2 Exhibit 51, page 129?

3 And while Mr. Moshfegh is loading
4 that, Ms. Felts, you also withdrew violations
5 related to SoCalGas's alleged failure to
6 disclose to the Department of Public Health
7 in Los Angeles the natural gas contained
8 crude oil; is that correct?

9 A Yes.

10 Q And this related to what you
11 initially identified as violation 88 in your
12 opening testimony and reason 16 in your reply
13 testimony to SoCalGas's opening testimony; is
14 that correct?

15 A Yes.

16 Q And what we're showing here is your
17 prepared sur-reply testimony in response --
18 and this is a combined exhibit of all your
19 sur-reply testimony that was served. And the
20 cover page is showing Chapter 1.

21 If you can scroll down briefly for
22 the Bates number, Pejman?

23 And as you can see here, it's
24 marked SoCalGas Exhibit-51.001. And if we
25 can turn to page 129.

26 And here you state that you're
27 withdrawing violation 88 from your opening
28 testimony and reason 16 from your reply

1 testimony. And the reason that you're
2 withdrawing this is because DPH, you found,
3 did in fact have notice of the constituents
4 of the gas coming from the field; isn't that
5 correct?

6 A Yes.

7 Q Okay. Thank you.

8 Funnily, you also withdrew -- and
9 we'll see if we can speed through this one
10 rather than referencing the exhibit. But we
11 can if we need to.

12 You also withdrew violations 89 to
13 92 related to a production of documents to
14 Blade by SoCalGas, which SED and you
15 originally asserted in your opening testimony
16 was untimely and late; isn't that correct?

17 A Yes.

18 Q And you withdrew those violations
19 because you found that the production of
20 records to SoCalGas had made -- in an
21 allegedly untimely manner -- didn't impact
22 the Blade RCA Report; isn't that correct?

23 A I wasn't directly involved in
24 figuring this out. I think maybe I had a
25 conversation with Counsel about it. But my
26 recollection is that we asked Blade if that
27 was the case. And Blade said that they were
28 not impacted by the timeliness of the

1 responses to their requests, so -- or data
2 sent to them by SoCalGas. So that was the
3 basis of withdrawing it.

4 Q And you asked Blade after the
5 opening testimony alleged the violation; is
6 that correct?

7 A Yes.

8 Q Okay. Ms. Felts, is it possible
9 that there's additional information that you
10 may not have seen, whether it's on the
11 Commission's Diamond Drive or elsewhere,
12 potentially within the position of Blade,
13 that may warrant reconsideration of other
14 violations you've alleged?

15 A I suppose it's always possible.

16 Q Thank you. All right.

17 If we can turn to Exhibit
18 SoCalGas-47, pages 7 and 9?

19 Ms. Felts, do you see where it
20 states:

21 A root cause for the SS-25
22 incident was a lack of
23 detailed follow-up
24 investigation, failure
25 analyses, or RCA of casing
26 leaks, parted casings, or
27 other failure events in the
28 field in the past.

1 A Yes.

2 Q These are three different things;
3 right? Follow-up investigation, failure
4 analyses, and root cause analysis?

5 A Well, I mean, they are stated as
6 three items in that sentence.

7 Q Okay. Can you explain what your
8 understanding of follow-up investigation is?

9 A If you have a leak, then you would
10 investigate the cause of it, that being a
11 root cause of the leak.

12 Q Okay. So if you have a leak, you
13 would investigate the root cause through the
14 follow-up investigation?

15 A Yes.

16 Q Okay. And failure analyses?

17 A Failure analyses would be the --
18 one of many types of analyses that you could
19 perform to determine the root cause of the
20 leak.

21 Q And root cause analysis?

22 A Well, I think that just says it
23 all. It's the basic cause of the leak.

24 Q On failure analysis, you said it's
25 one of many types analyses that you could do
26 to determine the root cause analysis; is that
27 correct?

28 A Yes.

1 Q What are the other types?

2 A Well, you can do lab testing of the
3 seal, if you have access to the casing -- for
4 instance, if you take a piece of the pipe out
5 of the ground. You can also do logs in --
6 with the piping in place, that could
7 determine the -- whether or not there was
8 corrosion, external or internal, erosion
9 internal, whether or not there's water on the
10 outside of the casing, and it's impacting the
11 casing. I don't know. There's probably any
12 number of types of tests or logs that you
13 could do in the well. And --

14 Q It doesn't all have to do with, you
15 know, corrosion or water; right? It could
16 have to do with, potentially, a mechanical
17 issue.

18 Would you agree?

19 A It could be a mechanical issue. It
20 could be, say, a water shutoff, perforation
21 that was sealed at the beginning of the well
22 that had -- the cement had maybe degraded, so
23 that was a leak that was in the bottom of the
24 well, could be a parted casing, could be
25 various parts of the well casing that just
26 came apart. You know, it could be a bend in
27 the casing that was there all along, that had
28 caused part of the steel to be thin over

1 time. I mean, there's just a lot of
2 different things that you could be looking
3 for in the well.

4 Q And it could be an operational
5 issue, as well?

6 A It could be overpressurization,
7 yes.

8 Q All right.

9 In the way that you define these
10 three terms, for follow-up investigation, you
11 described it as if you have a leak, you would
12 investigate the root cause. Failure
13 analyses, you described as one of the many
14 types of analyses to determine root cause.
15 And root cause analysis you describe as
16 saying it all.

17 Are these all the different ways of
18 saying "Root cause analysis"?

19 A I -- I would say it might be -- I
20 think it's depending on how you define "cause
21 analysis," I guess. So I kind of think that
22 investigation is the -- has a larger scope
23 than just root causal analysis. The root
24 cause analysis, as Blade used it, included
25 investigation. So I can't really give you
26 any more definition than that.

27 Q Okay. And briefly, Ms. Felts, it
28 might help for the purposes of those that

1 haven't been living this case for the past
2 few years to kind of walk through the
3 configuration of a well, so -- and where --
4 how you might look at different pieces of
5 that well.

6 Ms. Felts, can you briefly
7 describe, kind of, the relationship of the
8 various casings within -- or casings and
9 tubulars within the wellbore?

10 A Okay.

11 First, you start a well by drilling
12 a surface casing and drilling a wire hole and
13 putting in a surface casing and cementing it
14 in. And that is the largest diameter piece
15 of pipe that will go in the ground. And it
16 should go to the bottom of groundwater to
17 seal off groundwater from potential
18 contamination, and in the future during the
19 operation of a well.

20 Then, you put a smaller
21 circumference -- smaller-diameter drill
22 inside of that and drill the next level,
23 which will go all the way down to your
24 production zone and install casing as you're
25 drilling to the bottom of where you're going
26 to ultimately install a packer and a tube and
27 then perforate it.

28 The third string in this case is

1 going to be a tubing that you would install
2 inside of the casing that then goes down to
3 the bottom of the well and goes through the
4 packer and into the storage zone, where
5 you're going to be injecting and withdrawing
6 gas. Then there's all kinds of pieces of
7 equipment that you could put inside of the
8 tubing. So, you know, without drawing it...]

9 Q I'm sorry, Ms. Felts. I need to
10 pause for a moment, because I think the court
11 reporter -- no? No issues?

12 I am sorry to interrupt. I saw his
13 hand up, and I thought he needed a moment.

14 A Okay.

15 Q Continue unless you were finished.

16 A Well, I think, you know, without a
17 drawing -- so if you're looking at a drawing,
18 you would see the largest circumference -- I
19 mean the largest diameter pipe at the top is
20 the surface casing. Then you would see the
21 next pipe casing that goes down to the bottom
22 of the well. And then you would see the
23 tubing that goes through the casing. And
24 then at where you want do close off the
25 production zone, there would be a packer, and
26 the tubing extends through the packer down
27 into the reservoir. And then you perforate
28 the tubing to be able to inject gas into and

1 withdraw gas out of the storage reservoir.

2 Q What do you mean by "perforate"?

3 A They send a gun down and that
4 literally shoots holes into the tubing so
5 that you can push gas into the surrounding
6 sand, which is the gas reservoir. Or if
7 you're withdrawing, then you would pull gas
8 out of that reservoir into the tubing.

9 Q So you intentionally put holes into
10 the tubing in order to facilitate the flow of
11 gas?

12 A Yes.

13 Q Is there any other reason a gas
14 storage operator might intentionally put
15 holes into either tubing or production
16 casing?

17 A Okay. So as you're drilling a well
18 or nearing the completion of the casing, you
19 might put holes in the casing at a shallower
20 span in order to determine if there's -- put
21 holes in the casing at a shallower span in
22 order to determine if there's a viable
23 production zone.

24 So in the original construction of
25 a well, you would do that to see if you could
26 get gas out of that shallower zone. If you
27 can't, then you would seal it off. And
28 that's to keep water from that zone from

1 flowing into the well.

2 There's -- you might perforate --
3 in the case of Aliso Canyon, you might
4 perforate the tubing above the packer for
5 crossover ports. Or you might have a sliding
6 valve there to allow them to open or shut
7 that crossover port. I'm not sure. There's
8 probably other reasons why you would do --

9 Q Sure. We can walk --

10 (Crosstalk.)

11 Q I'm sorry. I didn't mean to
12 interrupt.

13 A Go ahead.

14 Q So you mentioned water shutoff
15 perforations. Can you briefly describe what
16 the purpose of a water shutoff hole?

17 A To prevent water from coming into
18 the well, the casing.

19 Q That's what the purpose of the
20 water shutoff hole is?

21 A Well, I think so. I think these
22 are perforations that you put in there to
23 determine if there is a viable sand. And
24 then you want to shut it off if it's not
25 viable, and you're going to drill deeper to
26 cement those.

27 Q Ms. Felts, can you describe -- you
28 referenced a sliding valve or a sliding

1 sleeve; is that correct? I don't want to mix
2 up your terminology.

3 A Sliding sleeve, yes.

4 Q What would be the purpose of a
5 sliding sleeve?

6 A I think they -- at Aliso they were
7 installing a sliding sleeve on the tubing in
8 order to allow them to have communication
9 between the tubing and the casing or to shut
10 that off.

11 Q Okay. So can you describe what a
12 sliding sleeve looks like?

13 A No. It would be pretty hard to
14 describe that. But I think it kind of
15 explains itself. You can use a wireline to
16 adjust it to open or close.

17 ALJ POIRIER: Mr. Stoddard, this is ALJ
18 Poirier. I think it's time for our morning
19 break.

20 MR. STODDARD: Okay.

21 ALJ POIRIER: So we will take a break
22 for 15 minutes. So until 11:05.

23 And we will be off the record.

24 (Off the record.)

25 ALJ POIRIER: We will be back on the
26 record. We just returned from a short
27 morning break. And before we left,
28 Mr. Stoddard was cross-examining Ms. Felts.

1 And we will continue that.

2 Please go ahead Mr. Stoddard.

3 BY MR. STODDARD:

4 Q Thank you, your Honor.

5 Ms. Felts, I think where we left
6 off we were discussing the use of a wireline
7 to open or close a sliding sleeve. Can you
8 explain under what sorts of circumstances
9 that might be done?

10 A I think you asked me that already.
11 But if you want to have communication between
12 the tubing and the casing for instance if you
13 want to inject gas through the casing, it has
14 to ultimately end up in the tubing. So you
15 would want to open the sliding sleeve so the
16 gas would go into the tubing and then into
17 the reservoir.

18 Or the other way if you wanted to
19 extract through the casing, then you would
20 have to pull it up through the tubing first
21 and then have it go into the casing above the
22 packer and then extract the gas from the
23 casing.

24 Q And would you need to conduct a
25 workover in order to open and close those
26 sliding sleeves?

27 A I don't think so.

28 Q Ms. Felts, the sliding sleeve which

1 you've explained was there in order to enable
2 communication between the annulus with the
3 production casing and the tubing in order to
4 access the reservoir; correct?

5 A Yes.

6 Q Isn't it the case that the casing
7 also extends into the reservoir?

8 A It can extend into the reservoir,
9 but there is -- in a tubing packer completion
10 like they had in SS-25, there's a packer in
11 there that makes it necessary to inject and
12 remove gas via the tubing.

13 Q Earlier we were discussing water
14 shutoff perforations. And I believe you
15 described them as being there in order to
16 keep water out; is that correct?

17 A Yes.

18 Q Isn't the purpose of a water
19 shutoff perforation in order to put water
20 into the annulus in order to pressure test
21 it?

22 A I'm not sure. I don't know how you
23 would do that. The perforations would be the
24 casing between the sand and the casing. So I
25 don't know how you would control leaving
26 those open and -- I don't know how you would
27 do that. That doesn't make any sense.

28 It's possible that it might be

1 useful in a horizontal well for that purpose.

2 Q But you're not sure?

3 A Well, I just -- I can't see how
4 that could be possible.

5 Q Okay. So for holes whether water
6 shutoff or other types of perforations that
7 an operator would want to plug up in order to
8 keep water out or gas in, they would do that
9 with cement?

10 A That's one possibility. They more
11 recently used a gel that they pump into them.
12 Again, I think that's probably more
13 horizontal wells. But maybe a regular
14 production well you could do that.

15 Q And are there circumstances where
16 operators for the -- would leave these holes
17 there?

18 A Well, they wouldn't be water
19 shutoff valves -- or holes if you leave them
20 open. Then they would be allowing whatever's
21 in the sand behind the holes to flow into the
22 well.

23 Q Also we discussed the sliding
24 valve. Is that different or the same thing
25 as a sliding sleeve?

26 A Same thing. I called it a valve.
27 I think you corrected me to sliding sleeve.
28 I think that's the term that SoCalGas uses.

1 Q But is it a valve?

2 A Not technically. Technically it's
3 not. But anything that opens or closes, a
4 pathway, can be considered a valve.

5 Q Ms. Felts, so these sorts of, you
6 know -- let's just take an example first.
7 The sliding valve if that were open and an
8 operator ran a log, a temperature log, they
9 might get an indication of a leak; is that
10 correct?

11 A It's possible that that could cause
12 an indication of a leak but not likely I
13 wouldn't think. But -- because the
14 temperature if it's been open it should --
15 the temperature of the gas and the tubing and
16 the casing annulus should be the same.

17 So where you get a temperature
18 anomaly is when you have gas leaking through
19 the hole in the casing not in the tubing.
20 Your sliding sleeve is in the tubing.

21 Q And how about for perforations? If
22 you have perforations, could that result in
23 the indication of a leak?

24 A If you have perforations above the
25 packer, yes. For instance if a water shutoff
26 perforation had degraded and was leaking,
27 then that would show up as a leak.

28 Q And by "degrading," what do you

1 mean?

2 A The cement that they've put in
3 there in 1954 or '53 had just degraded over
4 time. So it's no longer completely shutting
5 off those holes.

6 Q Okay. And what about collars? Can
7 you explain what collars are?

8 A Collars are a mechanical part of
9 the well construction, the casing. So those
10 could be the source of leaks. Usually it's
11 -- I think it's just a matter of tightening
12 them up maybe. I'm not sure. Maybe
13 replacing them.

14 Q So it's a mechanical issue?

15 A Yes.

16 Q And it wouldn't have anything to do
17 with corrosion; correct?

18 A I wouldn't think so.

19 Q And degradation of cement in
20 perforations wouldn't have anything to do
21 with corrosion; correct?

22 A It could. Because -- it could be
23 one of those things where you've lost some of
24 the protection of the casing around the holes
25 from water because the cement has degraded.
26 So then the water could potentially cause
27 corrosion on the external part of the --
28 like, even internal -- around the hole. So

1 then you could aggravate or hasten the
2 leakage problem.

3 Q Okay. And is it usually apparent
4 if there's an issue with a sliding sleeve
5 about a position, is it usually apparent to
6 the operator when they're working on that
7 well if that's an issue?

8 A What do you mean by working on the
9 well?

10 Q Well, if they're inspecting the
11 well if they are running a log, how would
12 they know if a sliding sleeve is out of
13 place?

14 A Well, it's either open or closed I
15 suppose. And so they either have gas in
16 tubing only or they have gas coming up
17 through the annulus via that sliding sleeve.

18 So, you know, I think they can
19 detect whether it's open or closed. But
20 honestly I don't know what their procedures
21 were at SoCalGas, their operating procedures.

22 They could -- when they install the
23 tubing and the sliding sleeve, they could
24 annotate that on their operating records so
25 that they know the position of it when they
26 put the well back in operation. If they do
27 decide to do a workup from the well, they can
28 pull the tubing and see it. Or they can --

1 (Crosstalk.)

2 Q Sorry. Continue.

3 A No, go ahead.

4 Q Putting aside SoCalGas's
5 procedures, I think I'm asking how you -- if
6 you need to figure out whether a sliding
7 sleeve were out of position, how you would go
8 about it?

9 A By looking at data you mean?

10 Q Well, I mean in any manner. I
11 mean, how would you go about figuring out
12 whether a sliding sleeve was out of position
13 on a gas storage well?

14 A What do you mean by "out of
15 position"?

16 Q Open when you don't intend it to be
17 open.

18 A Okay. So if it's -- if that's the
19 only way that gas can get into the annulus
20 between the tubing and the casing and you
21 have gas coming out of the casing that you
22 can assume that that sliding sleeve is open.

23 Q And otherwise you consult records
24 and see whether or not it notes it was left
25 open or whether it was left closed?

26 A That's an option to look back at
27 records. Because if you look at records and
28 it says, "The sliding sleeve was installed

1 but closed." But you have gas coming up
2 through the casing and there's no other
3 crossover port, which is not true in SS-25.

4 But in a normal well, then you --
5 you know, you could assume that the gas is
6 coming through a sliding sleeve that was open
7 or some sort of leak in the tubing.

8 Q And if you ran a temperature log,
9 you wouldn't be able to tell from that based
10 on your prior statement whether it was a
11 sliding sleeve or not?

12 A I don't think that would show up on
13 a temperature log.

14 Q What about a noise log?

15 A Possibly you could get noise. They
16 should note what it is if they're seeing
17 noise at the depth of the sliding sleeve.

18 Q And in order to put it back in
19 place, you simply run a wireline down, hook
20 it, and put it back into place; is that
21 correct?

22 A That's my understanding of how they
23 were doing it on the wells.

24 Q Okay. Are there other ways that
25 you're aware of to do it?

26 A Pull the tubing.

27 Q Okay.

28 A My lights just came on. They've

1 been off for three days. Somebody fixed
2 them.

3 Q Ms. Felts, your testimony alleges
4 60 violations related to failure to
5 investigate what -- casing failures, prior
6 casing failures. And the dates of these
7 violations range from 1969 through the date
8 of the incident; is that correct?

9 A Yes.

10 Q And do you review the circumstances
11 of each of these failures?

12 A No. I defer to Blade on those
13 failures. I have looked at some of the
14 records and some of the wells -- most of the
15 well files for those failures. But I didn't
16 make an effort to check Blade's work.

17 Q You did make an effort or you
18 didn't? I'm sorry. I couldn't hear that.

19 A I did not.

20 Q You did not.

21 A I have checked a couple of them,
22 and I didn't really see any real problems
23 with what they did.

24 Q Okay. Again, the type of failure
25 notification that we're talking about here
26 that you contend SoCalGas should have done is
27 a root cause analysis; that's correct?

28 A I think that's a fair statement.

1 Q Okay. And, Ms. Felts, would it be
2 relevant to your assessment of those
3 violations if some of those failures were
4 sliding sleeves that were open when they
5 should have been closed?

6 A Well, I say that's a determination
7 of a cause. So that would be something to
8 consider.

9 Q And if SoCalGas's well record
10 indicates that that's the cause, would that
11 be a sufficient investigation in your view?

12 A Are you talking about the leaks
13 that Blade identified? Or are you just
14 talking in general?

15 Q Hypothetically.

16 A Hypothetically, if you think you
17 have a leak and you've determined that it's a
18 sliding sleeve, then, yes, that should be
19 sufficient. You might want to figure out why
20 it was open if it should have been closed.

21 Q And you mean in terms of kind of
22 like interviewing people?

23 A I don't know. I don't know how you
24 would -- how the investigation would go. But
25 I guess interviewing people, looking at
26 records, looking at well data might be
27 involved.

28 Q And would it be relevant to your

1 assessment of those violations if some of the
2 alleged failures occurred in the course of
3 drilling the initial -- of installing the
4 initial casing?

5 In other words, if it was a
6 mechanical issue related to the installation
7 of the casing?

8 A Yes.

9 Q That would be relevant?

10 A Yes.

11 Q Why?

12 A Well, if it was shown as a leak and
13 it was repaired during the installation of
14 the well, then there's probably some cause
15 that you could determine fairly readily.

16 But still I think determining the
17 cause of any leak is a worthwhile effort so
18 that you don't repeat the problem in the
19 future.

20 Q Right. And so a cause could
21 include here -- the immediate cause, right,
22 which would mean a sliding sleeve was out of
23 place; correct?

24 A Yes.

25 Q And it could also include that
26 there was a perforation with failing cement;
27 correct?

28 A Yes.

1 Q That would be a cause; correct?

2 A That's the immediate cause of why
3 there would be gas leaking or water leaking
4 into the well. But it doesn't necessarily
5 tell you what caused that. So you have to
6 step back further to find out what the root
7 cause is.

8 Q And so what are some potential root
9 causes in your view of degrading cement?

10 A I would say mostly impingement of
11 water on the cement. But possibly any kind
12 of movement jarring or equipment going up and
13 down the casing for say scraping it, erosion
14 from the inside from producing gas that has
15 sand in it. I don't know. There's probably
16 a lot of ways that you could degrade cement
17 and holes in a casing.

18 Q Understood. You mentioned sand.
19 Can you explain a little bit about what sand
20 would do in a well?

21 A Just like sandpaper. If you have
22 gas entrained with sand, it's like a little
23 sand blaster, and it just blasts the inside
24 of the casing.

25 Q And was that an issue at Aliso
26 Canyon?

27 A Yes. At least on some wells it's
28 an issue and SoCalGas was monitoring it. And

1 then --

2 (Crosstalk.)

3 Q I am sorry. I interrupted you.
4 Please finish your statement.

5 A I show that they had to remove sand
6 from the wells.

7 Q So that was a risk that SoCalGas
8 was aware of?

9 A Yes.

10 Q And in your view, did they address
11 that risk?

12 A How do you mean?

13 Q Well, did you review records
14 related -- let me ask this differently.

15 Did you consider SoCalGas's
16 assessments and response to sand erosion in
17 the course of your investigation?

18 A Yes.

19 Q And as you said a moment ago, it
20 was a risk that SoCalGas was aware of?

21 A They were monitoring it.

22 Q And what did they do about it?

23 A Well, it's -- they were monitoring
24 the impact of the sand erosion on the inside
25 of the well casing all the way up to, I
26 believe, the piping at the top of the well.
27 And I assume if they determined that there
28 was significant erosion which would thin the

1 casing or piping, then they would have to go
2 in and either do some sort of patching on the
3 casing or piping -- replace piping. But
4 honestly I didn't look beyond their program
5 to monitor it.

6 Q Okay. So, Ms. Felts, some of these
7 examples we've been discussing, which include
8 mechanical issues, right, issues due to
9 corrosion and issues due to erosion, sand
10 erosion, in your view all of these warrant an
11 RCA?

12 A Well, we're talking about doing an
13 investigation on this when there is a leak.
14 And SoCalGas would annotate on their record
15 that they provided to us that the cause of a
16 leak was a leak. Basically it didn't look
17 into what the root cause of it was. It might
18 say "casing" or "cause unknown."

19 But there isn't a record of any
20 sort of failure analysis or extensive
21 investigation into why a leak occurred in one
22 well or whether or not it's likely to occur
23 in other wells.

24 Q So if SoCalGas's records indicate
25 degraded cement in a perforation that needed
26 to be replaced, that would be an
27 identification or cause; correct?

28 A Yes. But then they would have to

1 determine why it was degraded, whether that
2 was unique to that well, or whether or not
3 it's something they should consider for all
4 the other wells that had cemented
5 perforations in them.]

6 Q Okay. So take a systematic look at
7 how that issue is presented across the field?

8 A Yes.

9 Q Ms. Felts, you indicated that you
10 reviewed certain of the failures that were
11 alleged failures that were identified by
12 Blade, but not all of them; correct?

13 A I have by now probably looked
14 through all of the well files, but I didn't
15 specifically go through the process of
16 identifying all of the leaks that were
17 identified for the wells in each of the well
18 files because those were already annotated on
19 tables in the Blade report. So they'd
20 already been through the well files and
21 identified all of that.

22 I think I only found one where I
23 thought that they may have missed something
24 or gotten their facts not exactly right, and
25 I think that was on one of the three wells.

26 Q Do you recall which three wells?

27 A Could be three.

28 Q Do you recall what you thought they

1 got wrong?

2 A I think the dates of the leak may
3 be off. They didn't -- ultimately, they got
4 the fact that it -- there were leaks correct.

5 I thought that there might be some
6 inconsistency as far as the dates of the
7 report. Nothing that would change the
8 outcome of their assessment.

9 Q Okay. Ms. Felts, what you
10 described as the failure investigation that
11 would have been required here for all of
12 these incidents, which include the
13 determination of not just the immediate
14 cause, but the root cause plus an evaluation
15 of whether or not is it a systemic condition
16 throughout the field.

17 To confirm, you allege that this
18 should have been done for all 60 of these
19 incidents dating back to beginning, and I
20 think it includes 1952; is that correct?

21 A Yes.

22 Q And for I believe it's 11 of these
23 leaks, they predate either SoCalGas's
24 ownership and operation of the field or at
25 least conversion to gas storage. You include
26 those as well and you contend that that same
27 level of investigation should be done to
28 those leaks as well; is that correct?

1 A Well, here's my reasoning on that,
2 and that is that SoCalGas I think asked for a
3 CPCN around 1972, but there were records
4 provided by SoCalGas that showed the owners
5 of the reservoir were preparing data to
6 assist in convincing the Commission to allow
7 SoCalGas - then I think it was Pacific
8 Lighting - to acquire the gas reservoir for
9 gas storage.

10 So that gives you about -- I
11 figured SoCalGas had at least 10 years before
12 they acquired this storage area to look at
13 data for all of the wells that they were
14 about to buy.

15 And, of course, I didn't see any
16 records from the proceedings, the CPCN
17 proceeding, or any proceeding thereafter
18 involving this, but I'm just assuming that
19 there had to be some due diligence and there
20 had to be -- well, obviously, there were well
21 files that contained all of this early
22 information.

23 So SoCalGas or Pacific Lighting had
24 ample opportunity to look into the condition
25 of the well casings that were acquiring; and,
26 therefore, they should have looked into leaks
27 that were leaks of record.

28 Q And isn't it the case that SoCalGas

1 considered -- addressed the condition of
2 those well casings in the course of
3 converting the field to gas storage
4 operations?

5 A I have not seen any -- anything,
6 any report, that would indicate that would
7 indicate that that's the case.

8 Q What's your understanding of what
9 conversion to gas storage operations
10 entailed?

11 A Well, for wells that they acquired,
12 they opened up the wells. I don't know what
13 kind of maintenance they did on the wells,
14 but, hopefully, they did their -- they
15 installed the tubing with the proper
16 equipment; they probably cleaned out the
17 well; they made sure that the perforations
18 were adequate for their purposes for using
19 the reservoir for gas storage; they would
20 have pressure tested the casings at the time
21 that they converted it over.

22 I think that would be a requirement
23 from DOGGR, and if there was a leak, if
24 they -- if it couldn't hold pressure, then
25 they would have to remedy that, probably by
26 patching a casing, and then they would put it
27 in service. If it didn't have packer and
28 tubing, they'd install packer and tubing.

1 Q So for a prior operator, before
2 SoCalGas took control of the field, if the
3 prior operator had repaired a leak, how would
4 SoCalGas investigate that leak?

5 A They would have had to look at the
6 records that were provided, which appear to
7 be in every well file for early production of
8 oil and gas.

9 And I think that it would be,
10 again, a matter of using the right tools to
11 evaluate the thickness of the casing, the
12 bonding of cement behind the casing, water
13 impingement on the casing.

14 I think they could investigate all
15 of that and come to some conclusions about
16 what the condition of the well is and
17 possibly extend that to other wells in the
18 area.

19 Q What sort of tools would be run to
20 inspect water impingement on the casing?

21 A The log that shows the cement
22 bonding on the -- on the wells should also
23 show if there's water or liquid behind the
24 casing instead of cement.

25 Q And you're testifying that SoCalGas
26 should have done this as part of a conversion
27 of gas storage operations between 1972 and
28 19- -- and later in the 1970s?

1 A I'm not saying they should have.
2 I'm saying that they had an opportunity for
3 those leaks. You -- I think you said seven
4 or 10 leaks. They could have used various
5 technologies to investigate that, those
6 leaks, including records that would be
7 provided with the wells.

8 Q But you're not saying they should
9 have?

10 A Well, we are saying they should
11 have. Blades says they should have. And we
12 have picked up that as a violation. Those
13 are two different questions. You asked me
14 specifically if they should have used this
15 technology. And then you asked me if they
16 should have investigated. So they should
17 have investigated. That's the bottom --

18 Q Should have investigated.

19 But then I asked you what that
20 investigation would entail. And you
21 indicated use of certain tools, including
22 something to inspect water impingement;
23 correct?

24 A Well, I was telling you a range of
25 possibilities that they could have used.
26 It's up to SoCalGas to do the investigation.

27 The violation is for not doing a
28 Failure Analysis. So, I mean, if we had even

1 seen one report of a Failure Analysis of a
2 leak on any well at SoCalGas, I'd have a
3 better idea of what that Failure Analysis
4 might look like, but since there were none, I
5 don't know what SoCalGas had in the way of
6 capabilities or what they would have chosen
7 to do.

8 Q So yesterday you told us that you
9 believe you had information that wasn't in
10 Blade's possession; correct?

11 A Yes.

12 Q And you disagreed with Blade on
13 certain issues, correct?

14 A What issues are those?

15 Q Specifically, the preexistence of a
16 leak within the SS-25 well casing.

17 Do you want me to repeat the
18 question?

19 A No. I'm just -- I don't remember
20 the context with which I said specifically
21 that.

22 Q Let's speak generally.

23 As you sit here today, do you
24 believe that there was a leak in the well
25 casing of SS-25 prior to October 23, 2015?

26 A Yes.

27 Q And that was an area where you
28 differed from Blade in your view; correct?

1 A I think I said that my
2 understanding was that Blade only considered
3 leaks that were relevant to their Failure
4 Analysis, and I was looking at all of the
5 leak records for the well SS-25.

6 Q Which you didn't believe Blade may
7 have -- may have not had access to; correct?

8 A I think they had had access to all
9 of temperature records, the temperature
10 surveys, and the noise survey.

11 Q So you don't believe that -- that
12 you had more information than Blade had?

13 MR. GRUEN: Your Honor, if I may - this
14 is Daryl Gruen for SED - this line of
15 questioning is going down a similar road that
16 yesterday's line is in that it is calling for
17 Ms. Felts to speculate as what information
18 Blade had.

19 I'd note that that objection was
20 sustained yesterday, and then I noted
21 yesterday that Blade will be available next
22 week to testify as to what facts it had and
23 how it came up with its findings and
24 recommendations in its own report.

25 So I'd renew the objection from
26 yesterday.

27 MR. STODDARD: Your Honor, I'm
28 following up on testimony that Ms. Felts

1 provided in terms of her understanding and
2 reasons for believing that there was a
3 preexisting leak in SS-25, and this is
4 relevant to my prior line of questioning.

5 I didn't expect -- you know,
6 frankly, I think it's a pretty
7 straight-forward question. I won't spend
8 more than another couple questions on it.

9 ALJ POIRIER: I'll allow questions, but
10 I do want to remind counsel that there's no
11 need for Ms. Felts to speculate on Blade's
12 testimony. They'll be available. So if
13 questions go to that, then you should move
14 on, but if it's not on that, you can ask some
15 additional questions.

16 MR. STODDARD: Understood, your Honor.
17 I'll limit these to Ms. Felts' understanding
18 and the basis for her opinion.

19 I'm sorry. Since I don't have the
20 transcript, and I will ask the court reporter
21 to read back, and so I don't want to
22 mischaracterize Ms. Felts' testimony, but I
23 do believe at the beginning of this line of
24 questioning, she said she believed she had
25 access to information that Blade did not have
26 access to.

27 I can go -- we can take a moment for
28 the court reporter to read that back if

1 needed, unless, Ms. Felts, you just want to
2 answer that question directly.

3 A The question is, do I have
4 access --

5 (Crosstalk.)

6 BY MR. STODDARD:

7 Q Do you believe that you have access
8 to information that Blade did not?

9 A I think I do. I think I told you
10 that yesterday.

11 Q Thank you.

12 In light of that, why wouldn't you
13 want to go back and review Blade's assessment
14 of these specific alleged failures to
15 determine whether or not they had sufficient
16 information to categorize them as failures
17 that SoCalGas should have investigated that
18 you're basing your alleged violations on?

19 A Are you talking about violations 1
20 through 60?

21 Q Yes.

22 A Those violations are related to
23 leaks that occurred in the past, and my new
24 information that I referred to yesterday is
25 only related to SS-25 and it's recent.

26 Q So can you please describe what it
27 is? What do you mean by "recent"?

28 A Well, it's data that was generated

1 or became available around or during the time
2 of the well kills.

3 Q And you don't believe Blade has
4 information that you have related to the
5 well-kill operation?

6 A Yeah, I guess we could ask Blade.
7 I just have come upon it recently; so I
8 hadn't had an opportunity to do that.

9 Q Can you please describe the
10 information and what it is.

11 A There's information about
12 additional perforations at the bottom of the
13 well either in the tubing or the casing or
14 possibly both.

15 And then, of course, I think other
16 things were available to Blade before last
17 report, and there was another report that was
18 generated by some engineers who were present
19 at the time -- at the time of the -- I think
20 it's the seventh well kill, and then -- I
21 think Blade had that report.

22 There's another modeling report
23 or at least reported in a series of e-mails
24 by Mr. Haghshenas in late December. Taken
25 together, all of those things are just the --
26 something was happening in the -- in SS-25
27 that Blade did not consider.

28 Q Thank you.

1 If we could, please turn to Exhibit
2 34, SoCalGas 34.

3 ALJ POIRIER: Mr. Stoddard, let's go
4 off the record for a minute.

5 (Off the record.)

6 ALJ POIRIER: Back on the record.

7 And we'll continue with
8 cross-examination of Ms. Felts.

9 MR. STODDARD: Thank you, your Honor.

10 Q This is the SoCalGas Exhibit
11 No. 34. This is the Reply Testimony of
12 SoCalGas in this proceeding. It's dated
13 March 20, 2020. Do you see that, Ms. Felts?

14 A Yes. You know, my exhibit list
15 starts at Exhibit 35, the ones you sent out.

16 MR. STODDARD: Your Honor, do you mind
17 if we go off the record for a second?

18 ALJ POIRIER: Let's go off the record.

19 (Off the record.)

20 ALJ POIRIER: Back on the record.

21 While we were off the record, we
22 discussed the fact that we want to provide
23 Ms. Felts an opportunity to look at the
24 document prior to the line of questioning.

25 So we're going to take a lunch break
26 now, and we'll reconvene at 1:00 p.m. Thank
27 you, and we'll be off the record.]

28 (Whereupon, at the hour of 11:52

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a.m., a recess was taken until 1:00
p.m.)

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AFTERNOON SESSION - 1:03 P.M.

* * * * *

ALJ POIRIER: We will be back on the record. We just returned from a lunch break. Before we were on break, SoCalGas was cross-examining Witness Felts. Let's go ahead and continue that.

Mr. Stoddard, please move ahead.

MR. STODDARD: Thank you, your Honor.

MARGARET FELTS,

resumed the stand and testified further as follows:

CROSS-EXAMINATION RESUMED

BY MR. STODDARD:

Q Ms. Felts, before we broke, we were discussing your alleged violations related to SoCalGas's alleged failure to investigate prior casing leaks dating back to -- well, the violations date back to 1969. Do you recall?

A Yes.

Q And in our discussion, you'd indicated that you reviewed the well files generally, but did not specifically go back to check and validate Blade's assessment of those particular leaks; correct?

A That's correct.

MR. STODDARD: Mr. Moshfegh, if we

1 could put up Exhibit 34, which we presented
2 as a Direct Exhibit of SoCalGas's. This is
3 the Reply Testimony of SoCalGas, and we took
4 a break during lunch and Ms. Felts had an
5 opportunity to review it. This is dated
6 March 20th, 2020, and this is the combined --
7 I'm sorry. This is specifically the combined
8 reply testimony.

9 If you could please turn to page 13,
10 and just because it was kind of a technically
11 thorny issue, for sake of the discussion,
12 Ms. Felts, I'm not going to question you
13 about MHA's testimony because it's their
14 testimony, but to help kind of ground our
15 discussion, I wanted to talk some specifics.

16 And so on page 13 at the bottom, do
17 you see the bullet that reads: "Seven of the
18 casing leaks."

19 A Yes.

20 Q And then it identifies wells
21 "FF-32F, SS-25A, FF-32E," and then it goes
22 on?

23 A Yes.

24 Q And then it says: "Identified by
25 Blade and forming the basis of seven SED
26 violations were actually leaking stage
27 collars. Stage collars are devices used for
28 multi-stage cementing of production casings

1 in wells. The stage collar is essentially a
2 sliding valve in the casing that can be
3 opened to allow cement to be pumped outside
4 of the casing into the annulus between the
5 production casing and the wellbore.

6 "It's quite common for stage
7 collars not to seal completely upon closing
8 the sliding valve after the cementing
9 procedure. This situation is easily remedied
10 with a simple casing repair."

11 Ms. Felts, for a stage collar of
12 this sort where it hasn't sealed completely,
13 once you determined that the stage collar has
14 not sealed completely, would you agree that
15 you've determined the cause?

16 A Yes. I'm -- yeah, I think I'll
17 defer to Blade to discuss why these wells
18 were identified with leaks, specific leaks,
19 but if you looked in their table, there are
20 multiple leaks identified over a period of
21 time for several -- most of the wells
22 actually.

23 And so where there may be ones that
24 identified as stage collar leaks, there may
25 be another leak that was a casing leak, and
26 that might be the ones that Blade was
27 referring to. So there is a little bit of
28 confusion in those tables, and I would

1 suggest that you talk to Blade about that.

2 Q Because you don't know and you
3 haven't confirmed; correct?

4 A Well, I can't -- I mean, I could --
5 I could go in and look at that table and show
6 you where there's a casing leak versus a
7 stage collar leak, but I think it would be
8 better discussion for you to have with Blade
9 so that you're sure of what they did there.

10 Q That wasn't my question. My
11 question was: But you haven't confirmed;
12 correct?

13 A "Confirmed"?

14 Q You haven't confirmed -- earlier
15 you said there might -- it might be because
16 there was some other leak in a different
17 period of time. And I was asking -- saying,
18 but you haven't confirmed; correct?

19 A I did not ask Blade. I did notice
20 that the leaks that are identified
21 specifically are casing leaks in Blade's
22 report, and those were the ones that were
23 picked up as violations, so I think -- I
24 think where there's a casing leak, that's
25 what was intended.

26 Q Ms. Felts, I still don't think I
27 have an answer to my question. You didn't go
28 and check SoCalGas's well records to confirm

1 whether it was, in fact, a stage collar that
2 was out of place or whether it was, in fact,
3 a casing body leak; correct?

4 A I can't actually -- the truth is, I
5 looked at the well files, but I did not
6 specifically look for casing collar leaks. I
7 was watching for casing leaks. So where
8 Blade identifies collar leaks, I did not go
9 back and verify those.

10 Q And you didn't go back and verify
11 the other leaks either; did you?

12 A Not -- some of them, I did. Some
13 of them I did not.

14 Q Which ones did you verify?

15 A I can't tell you. I was just spot
16 checking as I was going through well files,
17 but I'm basically relying on Blade's
18 assessment of the well files and their
19 identification of leaks in the identification
20 of those violations.

21 Q Hypothetically, if it were the case
22 that the leaks were a misplaced stage collar
23 or rather -- let's use the exact language.

24 If it were the case that the stage
25 collar had not sealed completely and it was
26 quickly repaired, would that require any
27 further investigation?

28 A Well, let's hypothetically say that

1 that turned out to be the case for multiple
2 wells, and it resulted in leaks that had to
3 be remedied in those multiple wells, and they
4 all appeared to be the same problem, then I'd
5 say there might be good reason to look
6 further into why that situation occurred and
7 if it's likely to exist on other wells.

8 Q Ms. Felts, we were also discussing
9 the -- if you turn back to page 13. Sorry.
10 If we can refer back to Exhibit 34. If you
11 turn back to page 13 at the top, and you'll
12 see here it says: "Eleven casing leaks
13 identified by Blade were actually discovered
14 in wells before SoCalGas operated the field
15 or during initial conversion of the field to
16 underground gas storage."

17 MR. GRUEN: Your Honor, this is Daryl
18 Gruen. If I may, just a clarification for
19 the record, in terms of reference to the page
20 numbers. I believe Mr. Stoddard is
21 referencing page 13 as shown at the bottom of
22 the page, but not the SoCalGas Bates
23 No. 34.0015.

24 And just to clarify that that's the
25 nomenclature that SoCalGas is using for the
26 purpose of identify page number in this
27 cross.

28 MR. STODDARD: That's correct. Thank

1 you, Daryl. I was using a hard copy of the
2 document, and I'll try to read the Bates
3 number.

4 MR. GRUEN: Thank you.

5 ALJ POIRIER: Please continue,
6 Mr. Stoddard.

7 MR. STODDARD: Thank you.

8 Q So, again, it says: "Eleven casing
9 leaks identified by Blade were actually
10 discovered in wells before SoCalGas operated
11 the field or during initial conversion of the
12 field to underground gas storage. One of the
13 leaks happened in 1952 and occurred during
14 the original drilling of an oil and gas
15 production well by SoCalGas's predecessor 20
16 years before the conversion of the field to
17 gas storage."

18 Do you have that, Ms. Felts?

19 A Yes.

20 Q And earlier we were talking about
21 what sort of investigation might be done by
22 an operator related to leaks that occurred
23 before it took control of the field, and you
24 referenced review of records as one
25 possibility; is that correct?

26 A Yes.

27 Q Is that the sort of investigation
28 that would be appropriate for other leaks

1 that occur while SoCalGas is controlling and
2 operating a field?

3 A Looking at records?

4 Q Yeah.

5 A That would be part of an
6 investigation.

7 Q That would be something more like
8 in the course of -- strike that.

9 Review of records prior to
10 acquisition of a field is a form of due
11 diligence; is that correct?

12 A Yes.

13 Q All right. And it doesn't entail
14 the same steps of investigation necessarily
15 that you described before, which would
16 include inspection of the particular leak,
17 plus assessment more broadly for a root
18 cause, and then assessment for whether or not
19 it's a systemic issue throughout the field?

20 A Are you asking me if due diligence
21 could include all of those things?

22 Q I'm asking whether they're two
23 different things.

24 A Well, it's possible that if the
25 well leaks occurred very early on in the
26 production of, say, an oil well, it's
27 possible that the best they could do
28 initially was if, you know, interview the

1 current owner of the wells and look at well
2 records because they probably would not have
3 access to the well to do any further
4 investigation until they owned the well.]

5 But, you know, I guess they could look
6 into it as much as they have the
7 documentation available.

8 Q Thank you.

9 And earlier you referenced some
10 tools that might be used for purposes of
11 evaluating incidents dating back to when
12 SoCalGas first acquired the field. And I
13 think you included in that cement bond
14 logging; is that correct?

15 A Yes.

16 Q Do you have any knowledge of when
17 cement bond logging became available?

18 A No, not specifically as I sit here
19 today. I would have to look it up.

20 Q Is that relevant, in your view, to
21 the determination of whether or not it should
22 have been used?

23 A Well, yes. If they don't -- if
24 they don't -- if they didn't have the
25 technology in the time when they acquired the
26 field, then they would have had to use some
27 other verification technique.

28 Q Like what?

1 A I don't know. I mean, without
2 researching it against the dates, I can't
3 answer that. That is a question that I think
4 I could defer to blade, however.

5 Q Okay. And, again, you are
6 deferring to Blade here. And these
7 violations are based on Blade's
8 identification of what they characterize as
9 leaks that require further investigation.

10 Given that you didn't go back and
11 independently confirm the records to support
12 these leaks, how did you make a determination
13 that these should be violations Of Public
14 Utilities Code Section 451?

15 (Crosstalk.)

16 MR. GRUEN: Your Honor, if I may, this
17 is walking down the road, again, of calling
18 for legal conclusion here. And I'll note
19 that we had a lengthy discussion at the
20 Prehearing Conference that in exchange for of
21 identifying violations in opening testimony,
22 that SoCalGas would not ask the legal basis
23 of how they were determined to the witness.
24 So I note that and strongly urge -- and
25 strongly object to this line of questioning
26 as calling for legal conclusion.

27 MR. STODDARD: Your Honor, the witness
28 is alleging violations of 451. And more than

1 that, she is specifically arguing points on
2 451 in her testimony. And if we -- we can
3 bring it back up if we need to. But this
4 issue was brought -- SED brought a motion on
5 this issue and a motion for protective order
6 in advance of hearings. It was denied. I
7 don't think that this question gets anywhere
8 close to the line in light of the testimony
9 that Ms. Felts is offering here.

10 ALJ POIRIER: I'm going to overrule the
11 objection. Please continue.

12 THE WITNESS: Can you remind me of the
13 question?

14 MR. STODDARD: Can the court reporter
15 please read back the question?

16 ALJ POIRIER: I would prefer it if you
17 could restate, Mr. Stoddard. We can go off
18 the record if you need a moment.

19 MR. STODDARD: I do need a moment.
20 Thank you.

21 ALJ POIRIER: We are off the record.
22 (Off the record.)

23 ALJ POIRIER: Back on the record.
24 Mr. Stoddard, please continue.

25 BY MR. STODDARD:

26 Q Ms. Felts, you indicated that you
27 were relying on Blade and deferring to Blade
28 for purposes of these violations. And you

1 did not independently go back and verify the
2 facts and the record supporting these
3 violations.

4 How did you assess whether or not
5 to violate -- to allege these violations of
6 451?

7 A The -- if -- I did review volume 4
8 of the Blade report. And in volume 4, there
9 are two different tables that include very
10 similar facts. And they are the accounting
11 that Blade recorded of the well -- wells by
12 well name, and the dates and types of issues
13 identified in the well files for each of
14 those wells. So what I did was, I looked at
15 those tables to understand what Blade was
16 counting as a leak -- or casing leak,
17 specifically. And so it's those records that
18 I was utilizing.

19 Q So you -- and, again, you were
20 relying on those tables, you didn't check
21 SoCalGas's records?

22 A Well, so let's go back to opening
23 testimony, which is where the violations are
24 identified. And in that opening testimony,
25 there's an accounting of leaks based on the
26 Blade Report. And, at the time, I did not
27 have access to well files. So if you're
28 asking me if I verified that before the

1 report was filed, the answer is no. Because
2 I didn't have access to those well files.

3 Q But based on your prior testimony,
4 you haven't verified it prior to today
5 either; correct?

6 A I had. And I believe I cited to
7 one, Frew 3, this morning. And there are
8 probably others. I would have to go back and
9 look in my notes and my -- not my notes, but
10 my file folder -- to see which ones I had
11 looked at and cross-referenced.

12 Q And, Frew 3, you recall identifying
13 an issue where you actually disagreed with
14 Blade as to the date of the leak; correct?

15 A I think there was a difference
16 between 1984 and 1986.

17 Q But you didn't consider whether you
18 might have other differences with Blade if
19 you went back and checked the well records?

20 MR. GRUEN: Objection, your Honor.
21 Calls for speculation.

22 ALJ POIRIER: Sustained.

23 THE WITNESS: After looking at the
24 Blade Report, especially volume 4 on casing
25 leaks, I determined that they had the
26 capabilities and the documentation all under
27 control, and there was no need for me to
28 fact-check all of their work.

1 BY MR. STODDARD:

2 Q Even though they are not alleging
3 violations of 451?

4 A It really wasn't in Blade's
5 contract to identify violations of 451.

6 Q I understand that. I -- I'm asking
7 whether -- what additional work did you do
8 other than consult the Blade Report to
9 determine that you were comfortable alleging
10 violation of 451 against SoCalGas related to
11 these failures?

12 A I think I just answered that.

13 Q I'm not sure -- I mean, I've asked
14 you, and I've heard both you checked the
15 Blade Report and -- specifically Volume 4 and
16 some tables. And then I heard after that,
17 "But maybe I went back and checked some well
18 records," including on Frew 3, but there may
19 be some others as well. I'm just trying to
20 figure out, specifically, whether you did or
21 you didn't. Because I feel like I've gotten
22 two different answers here.

23 A I didn't do any fact-checking in
24 order to discount any of the leaks that Blade
25 identified. And if I found discrepancies,
26 then they weren't significant. They weren't
27 even worth a data request. And I am relying
28 entirely for those violations on Blade's

1 identification of leaks.

2 Q And, just to confirm, you didn't
3 personally check the well records at any time
4 prior, aside from Frew 3, to confirm the
5 existence of a leak?

6 MR. GRUEN: Your Honor, I must object.
7 This has been asked and answered several
8 times.

9 MR. STODDARD: Your Honor, I'm not --
10 it's a very simple question. And the witness
11 is not answering it.

12 ALJ POIRIER: I think we've covered it
13 to some degree. But I'll allow one
14 clarification, yes or no, if possible. And
15 then we can move on.

16 Please, Mr. Stoddard, go ahead and
17 ask one more time.

18 BY MR. STODDARD:

19 Q Ms. Felts, aside from checking
20 volume 4 of the Blade Report, and putting
21 aside well Frew 3, did you otherwise check
22 any well records to validate the particular
23 leaks that are the basis of violations 1
24 through 60?

25 A I think I told you I looked at
26 other well files and cross-referenced them.
27 But I just can't, off the top of my head,
28 tell you which wells.

1 MR. STODDARD: Can we request that SED
2 provide a list of those wells if Ms. Felts
3 can identify them, please?

4 ALJ POIRIER: Mr. Gruen, do you have
5 any response to that?

6 MR. GRUEN: I'm sorry. Your Honor, I
7 had to go off of mute for a second.

8 Your Honor, I think this is going to
9 be a -- an unduly burdensome request. We're
10 right in the middle of hearings. SoCalGas
11 has had ample opportunity to ask Ms. Felts
12 during a year and half of discovery for this
13 information. And they are choosing to do it
14 now. So I -- at this point, we'd object to
15 that request as unduly burdensome.

16 ALJ POIRIER: Mr. Stoddard?

17 MR. STODDARD: Your Honor, the witness
18 is specifically telling us on the stand that
19 she reviewed some certain, but not clear,
20 number of well files to validate the leaks
21 that she's basing her violations on. You
22 know, if she's not able to answer the
23 question today, I think we're entitled to an
24 answer very quickly. Otherwise, I just think
25 that that testimony should be stricken.

26 MR. GRUEN: Your Honor, if I may. I
27 have to strenuously object to that.

28 Your Honor, this is tantamount to

1 additional discovery. The witness, Ms.
2 Felts, has testified she's relying on Blade.
3 SoCalGas is going to have ample opportunity
4 to conduct robust cross-examination on Blade
5 for the factual basis for those violations.
6 There simply is no basis to move to strike.
7 And the request is unduly burdensome.

8 We were given permission to focus on
9 hearings. That's what we would propose to
10 do. Ms. Felts is here to answer questions to
11 the best of her ability. She's testified and
12 provided one example.

13 What SoCalGas is doing is placing an
14 immense burden on her to go through multiple
15 well files on top of hearings and basically
16 require her to extensive work when she's not
17 in hearings during the evenings, I suppose.
18 And that is an unduly burdensome request, and
19 we object.

20 (Crosstalk.)

21 MR. GRUEN: Your Honor --

22 ALJ POIRIER: Go ahead, Mr. Stoddard;
23 briefly, please.

24 MR. STODDARD: I just -- briefly,
25 again, to respond to Mr. Gruen, we're not
26 asking her to go back and confirm the leaks
27 right now, definitely not. We just wanted to
28 understand whether -- as far as she recalls

1 and understands, whether she did that. And
2 it sounds like the answer to that is, "no."
3 And if that's the case, I'm fine with it.
4 And we can move on.

5 MR. GRUEN: And I object to that
6 characterization. Mr. Stoddard has heard the
7 witness testify multiple times there were
8 several well files, and that she's testified
9 she's given one example. So I object to that
10 last point as mischaracterization of her
11 testimony.

12 ALJ POIRIER: Okay. Here's what we're
13 going to do, I'm going to sustain the
14 objection. Mr. Stoddard can re-ask the
15 question. And the witness can answer to the
16 best of her ability.

17 Okay?

18 Please, Mr. Stoddard, move ahead.

19 BY MR. STODDARD:

20 Q Ms. Felts, prior to today, which
21 wells have you reviewed in order to validate
22 Blade's assessment of leaks that are the
23 basis for violations 1 through 60?

24 A As I sit here today, without my
25 records in front of me, I can only tell you
26 that Frew 3 is one of the wells and that I
27 looked at others.

28 Q At approximately how many?

1 A Where I hesitate is, the number of
2 well files I looked at versus the ones that I
3 was able to cross-reference to something that
4 was in Blade Report Volume 4, the leaks. And
5 I can't differentiate between the two without
6 more information. I can tell you that I have
7 looked at, my guess is, around 80 to
8 90 percent of all of the documents and all of
9 the well files that SoCalGas provided.

10 Q Yeah. I wasn't asking that. I was
11 just asking if you can recall approximately
12 how many wells you specifically went back to
13 check to validate the particular facts
14 related to the leak?

15 A I can't answer that. The answer
16 is, "no."

17 Q Thank you. We'll move on.

18 Ms. Felts, there aren't any
19 regulations that require failure
20 investigations of leaks, are there?

21 A Not that I'm aware of.

22 Q There weren't any at the time of
23 the leak either; correct?

24 A At the time of what leak?

25 Q The October 23rd, 2015 leak.

26 A No, not that I know of.

27 Q And you did review regulations and
28 requirements in the course of your work for

1 SED; correct?

2 A No, not extensively. My focus was
3 to look at documents that were provided by
4 SoCalGas, records in response to data
5 requests.

6 Q Do you recall the scope of the
7 contract we were discussing yesterday, Ms.
8 Felts, that you engaged in?

9 A I know the scope of the contract.
10 I'm telling you what I did and didn't do.

11 Q Okay. Are you aware of, like,
12 pending rulemakings related to gas storage
13 regulations?

14 A Current pending rulemakings?

15 Q Yes, current.

16 MR. GRUEN: Objection, your Honor.
17 Overly broad.

18 THE WITNESS: I'm not really up on
19 that. I would have to go to the websites to
20 see what the status of pending legislation
21 and pending regulations are.

22 BY MR. STODDARD:

23 Q So you're not aware of whether
24 there's any currently, you know, pending
25 regulations or rulemakings related to the
26 well failure investigations?

27 A No.

28 Q Okay. Thank you.

1 ALJ POIRIER: This is ALJ Poirier.

2 Ms. Felts, just, if you can hesitate
3 a little bit before -- so I can rule on the
4 objection, that would be appreciated.

5 Thank you.

6 THE WITNESS: Sure.

7 ALJ POIRIER: Please continue, Mr.
8 Stoddard.

9 BY MR. STODDARD:

10 Thank you, your Honor.

11 Q Ms. Felts, for a leak that is
12 mechanical in nature -- we've discussed leaks
13 that are mechanical in nature.

14 Are you okay with that term to
15 refer to, a sliding sleeve or a collar?

16 A Yes.

17 Q Okay.

18 Would you agree that those leaks
19 have -- would you agree that those leaks are
20 different in nature from leaks that are due
21 to corrosion in terms of the type of
22 assessment that would be necessary to
23 determine cause?

24 A It would be different -- a
25 different analysis, yes.

26 Q Would you run a casing inspection
27 tool to determine the cause of the sliding
28 sleeve that was out of place?

1 A Probably not, unless you didn't
2 know that's what it was and you were looking
3 for something else.

4 Q If you didn't know that there was a
5 sliding sleeve out of place you mean?

6 A Yes. If you just have an
7 indication that there is a leak or something
8 wrong with the well, you may be doing some
9 other sort of assessment until you figure out
10 what's wrong.

11 Q But if you have a hole, is it -- in
12 your view, if you have a hole and you don't
13 know what the cause is, then you might run a
14 sort of casing inspection tool that is either
15 a temperature log, a noise log, or a -- or
16 can otherwise assess the condition of the
17 well --

18 A Yeah.

19 Q -- is that correct?

20 A Yes.

21 Q Okay. And would running that sort
22 of log be a sufficient investigation?

23 A For --

24 Q Would that satisfy the requirement
25 that you seem to be alleging that a failure
26 investigation is conducted?

27 Would running a casing inspection
28 tool satisfy the requirement?

1 A No.

2 Q Why not?

3 A Because that doesn't get at the
4 actual cause of the leak. That only tells
5 you there's a leak.

6 Q You mean to determine the root
7 cause?

8 A If that's the term you want to use,
9 "root cause," yes.

10 Q I'm -- this is the term that you
11 used in the beginning and is in your
12 testimony.

13 A Well, it's the title that's given
14 to Blade's report. So that's why we're using
15 it.

16 Q And it's also used in your
17 testimony; correct?

18 A Yes, but --

19 Q And earlier you indicated that the
20 types of failure investigations we were
21 discussing could generally be described as
22 root cause analysis; correct?

23 A Yes. I think this is just a matter
24 of semantics. We are generally calling it a
25 "root cause"; could be a failure analysis,
26 could be an analysis or an investigation.

27 Q And -- okay. We can move on.

28 If we can turn to exhibit

1 SoCalGas-51, please?

2 Chapter 5, page 2.

3 ALJ POIRIER: Let's go off the record
4 until we've got the spot.

5 (Off the record.)

6 ALJ POIRIER: We'll be back on the
7 record.

8 BY MR. STODDARD:

9 This is identified as SoCalGas
10 Exhibit-51. This is page SoCalGas-51.0095.

11 Q Ms. Felts, this is your -- if we
12 can move up. This is your sur-reply
13 testimony. And this chapter is your response
14 to the testimony of Mr. Travis Sera.

15 A Yes.

16 Q Do you recognize this document?

17 A Yes.

18 Q Okay. And if we can please scroll
19 back down to page 2.

20 Ms. Felts, do you see there --
21 there's a block quote of Mr. Sera's testimony
22 discussing wall-loss anomalies and -- and in
23 the context of risk assessment. And he's
24 talking about leaks versus ruptures --

25 A Yes.

26 Q And your character -- and below the
27 block quote, your first sentence says:

28 This elaborate explanation

1 of leak versus rupture,
2 quoted in italics, goes
3 well beyond standard
4 definition in the industry
5 as illustrated by PHMSA's
6 glossary definitions.

7 Do you see that, Ms. Felts?

8 A Yes.

9 Q But initially you had a more
10 favorable impression of Mr. Sera's testimony;
11 isn't that correct?

12 A What do you mean?

13 MR. STODDARD: Can we please introduce
14 Exhibit 55, Mr. Moshfegh?

15 ALJ POIRIER: Let's go off the record
16 until the exhibit is ready.

17 (Off the record.)

18 ALJ POIRIER: Back on the record.

19 Go ahead, Mr. Stoddard.

20 BY MR. STODDARD:

21 Q Ms. Felts, can you see the
22 document?

23 A No, barely. But I have it open on
24 my computer.

25 Q Okay. This is an e-mail -- the
26 bottom chain e-mail is an e-mail from you to
27 Mr. Gruen. And the Bates number is
28 SoCalGas-55.001.

1 A Yeah.

2 Q And it's dated Friday, March 27th,
3 2020.

4 Do you see that?

5 A Yes.

6 Q And the response is:

7 Darryl, Sera does a good
8 job of presenting basics on
9 pressure MAOP, leaks versus
10 ruptures, and assessing
11 risks. I guess his
12 testimony is primarily
13 refuting PAO. He is a SCG
14 metallurgist. A division
15 of subjects for testimony
16 between him and Carnahan is
17 really odd.

18 Now, there when you refer to MAOP,
19 can you please explain what you mean?

20 A Max Allowable Operating Pressure.

21 Q And "SCG" there refers to SoCalGas;
22 correct?

23 A Yes.

24 Q So you indicate that Mr. Sera did a
25 good job of presenting the basics on leaks
26 versus ruptures. And it's the same issue
27 that you appear to be dismissive of in your
28 testimony.

1 Would you agree with that?

2 A Two different things.

3 Q Two different things? Leaks versus
4 ruptures.

5 How is that different?

6 A No -- the -- his presentation of
7 pressure MAOP leaks versus rupture and
8 assessing risk comes directly from
9 regulations of pipelines -- surface lines,
10 not wells. And, you know, his recitation of
11 regulations is good. I mean, he knows what
12 it is. It comes out of CFR 192.

13 So, you know, here I -- this is
14 probably based on initial read. I felt like
15 he's a person who understood that. They --
16 okay --

17 (Crosstalk.)

18 THE WITNESS: The other -- in my
19 testimony, I would have to go back to look at
20 that one.

21 MR. STODDARD: Ms. Felts --

22 MR. GRUEN: I'm sorry, your Honor. I
23 don't think Ms. Felts is done answering the
24 question. She's looking back to the other
25 exhibit that's not currently shown on the
26 screen. If she can be given a moment so she
27 can complete her answer.

28 THE WITNESS: Can you remind me --

1 ALJ POIRIER: Let's go off the record.

2 (Off the record.)

3 ALJ POIRIER: Back on the record.

4 Ms. Felts, please go ahead.

5 THE WITNESS: Okay.

6 So looking back at my testimony, I
7 quoted the paragraph out of Mr. Sera's
8 testimony. And then I added some italics to
9 call attention to the last half of that
10 paragraph. And then I said that that's an
11 elaborate explanation of leak versus rupture
12 that goes beyond the glossary definition that
13 PHMSA has on their website. So I think that
14 I was just pointing that out that there --
15 these are related to 49 CFR. So --

16 BY MR. STODDARD:

17 Q I -- sorry.

18 A -- I don't see that there's one
19 more favorable discussion of point than the
20 other. I think the one in the e-mail that
21 you're showing on the shared screen was just
22 an initial assessment of Mr. Sera's
23 presentation in terms of the basics.]

24 Q Sounds like you didn't mean
25 "elaborate" necessarily to mean -- to be used
26 in a negative sense in your testimony?

27 A No. I don't think I meant it to be
28 a negative term.

1 Q Okay. So not inconsistent was
2 good?

3 A Well, these are two different
4 things. One is a really short statement
5 about the basics in 49 CFR pressure MAOP leak
6 versus ruptures and assessing risk.

7 And the discussion in my testimony
8 is a more extensive assessment of Mr. Sera's
9 statement.

10 Q Do you consider yourself to be --
11 to have more expertise in the area of risk
12 assessment than Mr. Sera?

13 A Actually, I don't know --

14 MR. GRUEN: Objection. If I may. I am
15 sorry, Ms. Felts. And I realize I'm speaking
16 -- I've picked up the pace of my speech so
17 I'll try to slow down.

18 Your Honor, if I may object to that.
19 That question calls for speculation from
20 Ms. Felts as to Mr. Sera's knowledge. I
21 object to it for that reason.

22 ALJ POIRIER: Sustained. Please move
23 on.

24 BY MR. STODDARD:

25 Q Ms. Felts, what expertise do you
26 have in the area of risk assessment for gas
27 storage operations?

28 A Well, I would say I have minimal

1 experience as risk assessment for gas
2 storage. But this particular discussion is
3 about risk assessment for pipelines, and I
4 have extensive experience in that.

5 Q And do you think that because it's
6 risk assessment in the context of pipelines
7 here, that it should be -- that Mr. Sera's
8 testimony should be discounted on that basis?

9 A Yes. Because these regulations
10 don't apply to downhole wells.

11 Q If we can turn to page -- sorry.
12 If we can turn back to Exhibit-51 and turn to
13 page 4 of this Chapter.

14 And I should read the bates number,
15 SoCalGas-510097. Scan up to where it says:

16 Mr. Sera has failed to
17 consider the age of the
18 Aliso wells despite the
19 fact that SoCalGas's recent
20 general rate case testimony
21 recognizes the possibility
22 of a well-related incident
23 given the age of the wells
24 and their heavy
25 utilization.

26 And above that do you see there:
27 Mr. Sera failed to consider
28 the age of the Aliso wells,

1 the lack of inspection, the
2 absence of corrosion
3 control on many of the
4 wells, and the increasing
5 frequency of leaks
6 identified by SoCalGas
7 engineers who are familiar
8 with the Aliso wells.

9 Do you see that, Ms. Felts?

10 A Yes.

11 Q And if we look down to footnote 15,
12 do you see footnote 15 there?

13 A Yes.

14 Q You can see that?

15 A Yes.

16 Q Do you recall what that document
17 is?

18 A Not without looking at it.

19 Q Okay. Let's pull it up. It's a
20 1985 memo, but we're going to switch back to
21 this document after we look at it just so
22 we're prepared.

23 ALJ POIRIER: Let's go off the record
24 while we bring that document up.

25 (Off the record.)

26 ALJ HECHT: We'll be back on the
27 record.

28 This is ALJ Jessica Hecht. I am

1 going to be leading for the next little
2 while. And while we were off the record, we
3 were finding exhibits for the
4 cross-examination of Witness Felts.

5 Mr. Stoddard, if you would like to
6 continue.

7 MR. STODDARD: Yes, your Honor. Thank
8 you.

9 Q Ms. Felts, we were discussing, just
10 for context again, in your sur-reply
11 testimony that states that:

12 Mr. Sera failed to consider
13 the age of the Aliso well,
14 the lack of inspection, the
15 absence of corrosion
16 control on many of the
17 wells, and the increasing
18 frequency of leaks
19 identified by SoCalGas
20 engineers who were familiar
21 with the Aliso wells.

22 And you cited in Footnote 15 to a
23 document that you didn't recognize. We
24 pulled it up, and if we could please present
25 that.

26 MR. GRUEN: I am sorry, your Honor.
27 I'm going to object to the statement that
28 Ms. Felts didn't recognize the document when

1 she hasn't been shown it yet.

2 MR. STODDARD: The footnote.

3 MR. GRUEN: I'll reserve judgement on
4 the objection.

5 ALJ HECHT: Objection sustained.

6 Let's continue.

7 MR. GRUEN: Thank you.

8 BY MR. STODDARD:

9 Q Do you see the document, Ms. Felts?

10 A Yes, I have it up on my computer.

11 Q All right. This is identified --
12 if you can see here, this is page 1,852 of a
13 2,746 page PDF. It's SED sur-reply 001850.
14 And if you can scroll up, Mr. Moshfegh. This
15 is an interoffice memo to a Mr. Stevenson
16 from a Mr. Mansdorfer dated April 2nd, 1985.
17 And the subject line is "1985 Aliso Canyon
18 Well Repair Activity."

19 Ms. Felts, this is the only
20 document that you cited in support of the
21 statement I read back earlier. Can you
22 identify in here where it discusses the
23 absence of corrosion control?

24 A This document only goes to the last
25 point in that sentence.

26 Q So this goes to the increasing
27 frequency of leaks identified by SoCalGas
28 engineers who were familiar with the Aliso

1 wells?

2 A Yes.

3 Q Okay. And can you explain what --
4 why you believe it supports that statement?

5 A There's -- initially there's listed
6 four wells that were taken out of service and
7 are waiting for repair.

8 Specifically this interoffice
9 correspondence says that it -- these were
10 deferred to 1985. In fact at least three was
11 eventually deferred to 1986.

12 Then if you go down, the next -- I
13 think it's a continuation of paragraph 1.
14 But the four other wells had been -- are
15 permanently out of service.

16 But then the next paragraph says:
17 The number of well leak --
18 well leakage problems in
19 the storage field during a
20 given year seems to be
21 somewhat proportional to
22 the magnitude of the
23 pressure reversal of that
24 year. Reserve reservoir
25 pressure in Aliso Canyon is
26 at the lowest it's been in
27 12 years. If inventory
28 goes up to 50 billion cubic

1 feet or higher, I would
2 expect to find a number of
3 leaks this year. If we
4 lose three good wells or
5 five mediocre wells, we
6 will be down to 80 percent
7 capacity.

8 So my sense is that this statement
9 shows that even though they've had leaks
10 occurring, those leaks had been occurring
11 over 12 years of low pressure in the
12 reservoir. And if they increased the
13 inventory, which would increase the pressure
14 in the reservoir, they're going to have even
15 more leaks.

16 Q Because of the increase in the
17 pressure in the reservoir; correct?

18 A Yes.

19 Q Not because of an increasing rate
20 of corrosion or any other issue; correct?

21 A Well, the increase in the reservoir
22 does not cause the leaks. It's a factor in
23 causing wells that have leaks to show their
24 leaks, or they may have thin walls in places
25 which then will blow out as a result of the
26 higher pressure.

27 Q But this didn't say -- this doesn't
28 say anything about an increasing frequency of

1 leaks over time, Ms. Felts, does it?

2 A Well, it -- that's what it
3 indicates to me. That's how I read it. You
4 may read it differently.

5 Q And this dates from 1985; correct?

6 A Yes.

7 Q And so in citing this in support of
8 your statement, is it your contention that
9 SoCalGas should have been doing some form of
10 a risk assessment based on an increasing
11 frequency of leaks in 1985?

12 A I think they should have been on
13 top of what was causing wells to leak.

14 Q Well, you say, "Mr. Sera failed to
15 consider."

16 And, again, Mr. Sera's testimony
17 relates to risk assessment; correct? And
18 foreseeability of a leak; correct?

19 A Right.

20 Q And you're saying that he failed to
21 consider the age of the Aliso wells, the lack
22 of inspections, absence of corrosion control
23 on many of the wells, and the increasing
24 frequency of leaks identified by SoCalGas
25 engineers who are familiar with the Aliso
26 wells; right?

27 A Right.

28 Q And that suggests that the

1 increasing frequency of leaks that's
2 identified in this memo is relevant to the
3 prediction of SS-25?

4 A I didn't say that.

5 Q Okay. It doesn't have to do with
6 foreseeability of SS-25 then?

7 A I would say that if there had been
8 a history of risk assessment at Aliso Canyon
9 similar to -- for instance the SIMP Program
10 that was implemented in 2016. They probably
11 would have found and averted the leak in
12 SS-25. Or at least they would have found
13 some conditions in SS-25 that may have caused
14 them to look further at the condition of the
15 casing. So in that sense, it's possible that
16 if they had good risk assessment, they would
17 have not had a failure on SS-25.

18 Q And are you contending then that
19 SoCalGas should have implemented a SIMP-like
20 program in 1985?

21 A I think they should have had some
22 sort of program to inspect their casings.
23 You can call it a SIMP-like program or give
24 it another name. But from when they first
25 acquired an old field full of old wells until
26 present, they should have been doing
27 something like that.

28 Q And because, in your view, of the

1 increasing frequency of leaks?

2 A Well, that's -- this is one
3 component.

4 Q Does it matter whether -- so let's
5 talk about the other components then. When
6 you're referring there to the lack of
7 inspections, that's also -- there you're
8 referring to wall thickness inspections or
9 all inspections?

10 A All inspections. So what SoCalGas
11 was doing, which I believe Baker even
12 referred to in his testimony in the rate
13 case, is they were just waiting for wells to
14 fail before they looked at them. And even
15 when they did fail, and then they went in to
16 look for the leak and repair the leak.
17 That's all they did.

18 They never did look into what's the
19 -- what's the real cause of why the leak
20 occurred? Or what does this say about other
21 wells in Aliso Canyon.

22 Q So, again, we're referring there to
23 failure of investigations? Is that what
24 you're talking about?

25 A Yes.

26 Q The root cause analysis?

27 A Yes.

28 Q And then the first part where you

1 say:

2 Necessarily failed to
3 consider the age of the
4 Aliso wells.

5 That might be actually -- it might
6 be helpful since I'm asking about your
7 testimony to bring it back up.

8 Ms. Felts, if you want to go back to
9 Exhibit-51, page 4. So you see there,
10 Ms. Felts, where you say:

11 Mr. Sera failed to consider
12 the age of Aliso wells.

13 In your view, the age of wells
14 correlates with risk?

15 A I think it does in my view.

16 Q And an older well is more likely to
17 have a leak?

18 A I guess you can't say that as a
19 straight-line argument. But I think there's
20 -- you have to consider that an older well
21 casing has been in the ground for a longer
22 period of time. It's just older, and so it
23 has earlier technology. Maybe a different
24 type of seal in the casing. So there's a
25 number of reasons why you would want to be on
26 top of the condition of your older wells.

27 Q In fact, didn't Blade find,
28 however, that older wells -- there was no

1 necessary correlation between risk and age?

2 A I do believe that in there when
3 they looked at the failures across Aliso
4 Canyon, that was a conclusion that they came
5 to was they didn't see a correlation between
6 the age of the wells and the leaks.

7 However, that was one of the
8 arguments for -- in the rate case for getting
9 money to do investigations, SIMP
10 investigations, of the wells at Aliso.

11 Q If we could please turn to Exhibit
12 No. 75. We will be introducing an exhibit if
13 your Honor would prefer to go off the record.

14 A Is this your exhibit?

15 ALJ HECHT: Yes. We'll be off the
16 record.

17 (Off the record.)

18 ALJ HECHT: We'll be back on the
19 record.

20 BY MR. STODDARD:

21 Q Ms. Felts, I can't see you. But
22 I'm guessing you're still there.

23 A I'm here.

24 Q Okay. Do you see that this says
25 the cover page of the Blade Root Cause
26 Analysis Manual Report dated May 16th, 2019?

27 A Yes.

28 Q Titled, "Root Cause Analysis of the

1 Uncontrolled Hydrocarbon release at Aliso
2 Canyon --

3 (Reporter clarification.)

4 ALJ HECHT: We'll be off the record.

5 (Off the record.)

6 ALJ HECHT: We'll be back on the
7 record.

8 MR. STODDARD: Okay. I'm going to
9 start over with identification of the
10 document for the court reporter since I was
11 speaking too quickly.

12 This is the cover page of the Blade
13 Root Cause Analysis Main Report. In the
14 lower right-hand corner, it has SoCalGas
15 750001 as the Bates Number. It's dated May
16 16th, 2019.

17 And if we can turn down, this is an
18 excerpt that's from page 167. And you'll see
19 that this is a chart that shows, kind of, a
20 graphical analysis of Blade's identification
21 of what they've identified as casing leaks.

22 Q Ms. Felts, can you see that?

23 A Yes, I see it.

24 Q Do you recognize this document?

25 A Yes, I recognize it.

26 Q Okay.

27 MR. GRUEN: And, your Honor, if I may,
28 this is Darryl Gruen. Just for the record,

1 if we could identify the Bates Number on this
2 page as well if that's acceptable to
3 SoCalGas.

4 ALJ HECHT: Yes. Please do so.

5 MR. STODDARD: If we can scroll down,
6 please. It's SoCalGas 750004.

7 ALJ HECHT: Thank you.

8 BY MR. STODDARD:

9 Q And, again, this shows the Aliso
10 Canyon gas storage wells leaks, as
11 characterized by Blade, from 1973 to 2015.
12 And you'll see here at the bottom, Ms. Felts,
13 the lowest occurrence of leaks is from 1998
14 to 2008. Do you see that?

15 A Yes, I see that.

16 Q Okay. And so this shows a decrease
17 in frequency of leaks doesn't it?

18 A From 1972 to 2016?

19 Q Yes.

20 A I'm going to look at my copy.

21 ALJ HECHT: We'll be off the record for
22 a moment.

23 (Off the record.)

24 ALJ HECHT: We'll be back on the
25 record.

26 Please continue.

27 THE WITNESS: Okay. So this shows a
28 lower number of leaks between 1998 and 2008.

1 And then an increase again between -- looks
2 like 2008 and 2016.

3 Q Relative to the lowest occurrence
4 of leaks, which is again 1998 to 2008;
5 correct?

6 A That's correct based on this chart,
7 yes.

8 Q Right. And you viewed the
9 increasing frequency of leaks in 1985 as
10 relevant to risk assessment although perhaps
11 not relevant to the prediction of the SS-25
12 leak. Would you also agree that a decreasing
13 frequency of leaks should be considered in
14 risk assessment as well?

15 MR. GRUEN: Your Honor, I'm going to
16 object to that as a misstatement of
17 testimony. Counsel is starting to testify
18 rather than asking questions again.

19 ALJ HECHT: Let's rephrase the question
20 and continue from there, please.

21 BY MR. STODDARD:

22 Q Ms. Felts, in your testimony you
23 state that:

24 Mr. Sera failed to consider
25 the increasing frequency of
26 leaks.

27 Which based on your exhibit was as
28 of 1985; correct?

1 A Yes.

2 Q Would it be fair to say that you
3 failed to consider the lowest period of leaks
4 between 1990 -- I am sorry. We've taken the
5 exhibit down. But 1998 and 2008?

6 A Well, I wasn't considering this
7 particular graph when I wrote my testimony.
8 I was considering other documents that I had
9 looked at including the one that I attached.

10 Q So I -- you mean -- I guess you're
11 right. The 1985 document predates the 1998
12 to 2008 period of time. But I don't think
13 this line of questions that you're asking has
14 really any impact on the need to do risk
15 assessment over the life of the Aliso Canyon
16 well fields.

17 Q Thank you for your answer. All
18 right. Ms. Felts, would you agree that risk
19 assessment generally -- you said you're very
20 familiar with the concept of risk assessment
21 in other contexts; correct?

22 A Yes.

23 Q And generally it considers the
24 likelihood of a failure, kind of, by the
25 consequences of failure; correct?

26 A Let's see. Underlying concepts at
27 PHMSA. But, yes.

28 Q And can you explain a little bit of

1 what that means?

2 A Well, you look at the -- you look
3 at the likelihood of a failure. And then you
4 look at the risk to basically draw a circle
5 around a certain area and see what the scale
6 of the risk is within that circle of impact.
7 And then you weigh the likelihood of failure
8 and the likelihood of risk and basically the
9 results of failure. How it will impact the
10 area around where it's likely to fail and end
11 up with a factor risk.

12 Q And SoCalGas has historically had
13 to setup in addressing any repairing issues
14 as they arose; correct?

15 A They delayed some. But, yes. They
16 did seem to be able to repair leaks.

17 Q Thank you. And the consequences of
18 a larger leak or a near surface casing
19 rupture were not understood until the SS-25
20 event; correct?]

21 A I think the consequences of a well
22 that blows out is fairly well understood in
23 the industry. I mean, it happened before.
24 Maybe not at a storage area, but, certainly,
25 in well fields all across the United States
26 and probably around the world.

27 MR. STODDARD: If we could, please,
28 turn to Exhibit 47.

1 ALJ HECHT: We'll be off the record.
2 (Off the record.)

3 ALJ HECHT: We'll be on the record.
4 Please, continue, Mr. Stoddard.

5 BY MR. STODDARD:

6 Q Ms. Felts, is this your opening
7 testimony?

8 A Yes.

9 Q Okay. If we could, please, turn to
10 page 8 of this document and scroll down and
11 see the Bates number. It's marked
12 SoCalGas-47.0012. Scroll back up, please, to
13 the second full paragraph.

14 Ms. Felts, you see there where it
15 says: "The consequences of a larger leak or
16 a near-surface casing rupture were not
17 encountered until the SS-25 event."

18 Do you see that?

19 A I see that. Yes.

20 MR. STODDARD: Thank you. We can move
21 on. All right. Turning back to Ms. Felts'
22 opening testimony, but if we can turn to
23 page -- the table at the front, Mr. Moshfegh,
24 with the violation summary. Thank you.

25 If you can go up to 1 through 6.

26 Q Ms. Felts, we were discussing the
27 failure, what we were calling "the failure to
28 investigate violations," and these were the

1 ones that start with "no investigation of";
2 correct?

3 A Yeah.

4 (Crosstalk.)

5 ALJ HECHT: Please don't speak over one
6 another. Ms. Felts, you go ahead, please.

7 THE WITNESS: One through 60; right?

8 BY MR. STODDARD:

9 Q Yes.

10 A Okay.

11 Q Okay. And, again, these are the --
12 the violations we were discussing earlier was
13 the failure to investigate violations. And
14 these violations have a begin date and an end
15 date there; do you see that?

16 A Yes.

17 Q And the begin dates are associated
18 with some particular incident or at least
19 Blade assessment of an incident; is that
20 correct?

21 A I believe so.

22 Q But you're not sure because you
23 didn't confirm it?

24 A Actually, I'm probably the one that
25 picked off the dates. I'm just not sure that
26 your representation is exactly correct.

27 Q So you're saying you're the one
28 that picked off the dates; is that what you

1 said?

2 A Well, I found the begin date, and
3 then the end date is the same for all of
4 them. So I would have gone into either the
5 Blade report or well records to find the
6 start date for these.

7 Q Okay. If we could, please, turn to
8 Exhibit 35.

9 ALJ HECHT: We'll be off the record.

10 (Off the record.)

11 (Exhibit 35, page 218, line 12.)

12 ALJ HECHT: All right. We'll be back
13 on the record, Mr. Stoddard.

14 BY MR. STODDARD:

15 Q Ms. Felts, this is Exhibit No. 35,
16 SoCalGas. The Bates stamp on the lower,
17 right-hand corner says, SoCalGas 35.0218, and
18 this is our deposition transcript from
19 February 2020. If you could please go to
20 line 12 -- 11.

21 Ms. Felts, do you see where the
22 question states: "Do you see the columns in
23 this table titled, 'Begin Date' and 'End
24 Date'?"

25 A Yes.

26 Q And the answer is "Yes."

27 "QUESTION: Did you validate the
28 begin date and end date for each of these

1 categories of violation?

2 "ANSWER: No. I can tell you right
3 off the bat that I just resist doing the
4 violation calculations. So I usually say to
5 the PUC, Unless you need my help figuring it
6 out, figuring out a start and end date, go
7 ahead and fill it in."

8 Do you see that?

9 A Yes. Yeah. Then that's probably a
10 better memory than I have today.

11 Q Okay. So, Ms. Felts, do you recall
12 doing any particular due diligence with
13 respect to those start and end dates?

14 A No.

15 Q Okay. You're aware that those are
16 continuing violations as alleged?

17 A Yes. I'm aware of that.

18 Q And that those continuing
19 violations effectively operate as though you
20 were violating a law every day; correct?

21 A That is it how it works at the PUC.
22 That's my understanding.

23 Q Do you know who did identify those
24 or select those dates?

25 A The person who wrote the report I
26 suppose. They must have been in there when I
27 agreed to author it or to sponsor it.

28 Q And in light of the continuing

1 nature of these violations, the length of
2 these dates, you understand, is one of most
3 significant factors in this termination of
4 any penalty; would you agree?

5 A I understand that. The same thing
6 occurred in the San Bruno case.

7 Q And in the San Bruno case, did you
8 also not identify or substantiate the begin
9 date and end date of your violations?

10 A I don't remember if I was involved
11 in that or not.

12 Q Have you had any other cases where
13 you have alleged violations, continuing
14 violations?

15 A I think in other cases that I
16 worked on, they were reasonableness cases and
17 the issue was different. The issue was
18 whether or not money was going to be covered
19 by the ratepayers.

20 Q So it didn't involve continuing
21 violations?

22 A I don't remember. Just as I sit
23 here today, I don't remember that.

24 Q Okay. When you said you resist --
25 in your deposition, when you said that you
26 resist doing the violation calculations, "So
27 I usually say to the PUC, unless you need my
28 help figuring out a start date and end date,

1 go ahead and fill it in."

2 What you do mean by "resist" -- why
3 do you resist doing the violation
4 calculation?

5 A Well, I kind of see the -- the
6 violations as falling in the legal camp, and
7 I was just doing technical consultation here.
8 So this is something that other people at the
9 PUC are capable of doing.

10 Q But you're the person who is
11 providing the testimony here - correct -
12 Ms. Felts?

13 A I have agreed to sponsor this
14 testimony, and, you know, primarily because
15 it's usually a technical document and relies
16 on underlying highly technical documents. So
17 I assume that that was -- my purpose was to
18 assist with the technical aspects of it.

19 Q Would you agree that one of the
20 technical aspects of it includes assessment
21 of whether or not there were leaks in wells?

22 A That's pretty much the point of the
23 Blade testimony.

24 Q The Blade report?

25 A Yes.

26 Q Right. But you're indicating that
27 you're providing, as an expert, technical
28 expertise; correct?

1 A Typically, when I'm hired by the
2 legal office at the PUC, it's because they
3 need somebody to assist in understanding
4 technical jargon, technical aspects, that
5 have come up in a case and to review
6 technical documents.

7 So that's the role that I play in
8 the -- in the case. In past cases, I have
9 also hired, located and hired, experts or
10 recommend that they be brought on contract
11 separately so that we had everyone. And I'm
12 sort of the interpreter between the experts
13 and the attorneys at the PUC.

14 And in this case, the opening
15 testimony came with experts so I didn't have
16 to find experts.

17 Q I'm confused by your answer,
18 Ms. Felts. "The opening testimony came with
19 experts"; who are you referring to there?

20 A Blade.

21 Q Blade is the Independent Root Cause
22 Analysis Investigator in this case; correct?

23 A Yes.

24 Q And they've alleged specific facts
25 that includes some analysis, but it doesn't
26 identify violations of law; correct?

27 A That's correct.

28 Q Is it your view that your testimony

1 doesn't require -- that your testimony as to
2 violations of 451 doesn't require anything
3 more than what's in the Blade report?

4 MR. GRUEN: Your Honor, I'm going to
5 note an objection as calling for legal
6 conclusion. We've been over Ms. Felts' views
7 of 451, and SoCalGas is belaboring the point
8 and this is turning into quite a robust cross
9 on the 451 question.

10 And, again, I've got to reiterate,
11 SoCalGas -- we had talked about SoCalGas not
12 asking the basis for the violations in the
13 testimony in the prehearing conference; so
14 I'd object to calling for legal conclusion.

15 ALJ HECHT: Mr. Stoddard.

16 MR. STODDARD: Thank you, your Honor.

17 Again, Ms. Felts' testimony doesn't
18 just simply have 451 slapped on it. It
19 argues 451 in certain places.

20 If it would help, we should pull up
21 her opening testimony and I can point to an
22 example of that, but I believe in one place,
23 she specifically says in response to MHA:
24 "The table presented by Hower and Stinson
25 shows no information that could be useful in
26 relieving SoCalGas of its obligations toward
27 safety under Section 451."

28 That's Ms. Felts' testimony and

1 we're trying to understand what that means.
2 And what we've just heard is that she
3 believes that Blade, the Blade report is
4 sufficient, it sounds like, and that she is
5 there to interpret the technical aspects of
6 documents, not supply independent testimony
7 as to any sort of fact, expert or otherwise,
8 to support a 451 violation. That's what
9 we're trying to understand.

10 ALJ HECHT: I think it is reasonable to
11 ask the reasoning that led to a determination
12 that something is a violation. I think that
13 that is a specific, not a broader legal
14 interpretation, and I am going to -- I am not
15 sustaining the objection. Please, continue
16 the cross.

17 MR. STODDARD: Your Honor, would it be
18 okay to have the last question read back?

19 MR. GRUEN: Your Honor, if I may as
20 well, I appreciate the court reporter doing
21 her diligence. Would it be a good time to
22 take a break? I know we've been doing this
23 since about 1:00 or so with admittedly some
24 breaks just to gather information, but,
25 perhaps, we could give everybody a chance to
26 catch their breath.

27 Would that be acceptable?

28 MR. STODDARD: Your Honor, if we can

1 let the witness answer the question first and
2 then take a break, it would be appreciated.

3 ALJ HECHT: We have only been going for
4 about 40 minutes and I would like to go a
5 little bit longer before we take a break.

6 MR. GRUEN: Understood, your Honor.

7 THE REPORTER: "QUESTION: Is it your
8 view that your testimony doesn't require --
9 that your testimony as to violations of 451
10 doesn't require anything more than what's in
11 the Blade report?"

12 THE WITNESS: Okay. Thank you.

13 The short answer is yes, but the
14 Blade report did not identify violations; so
15 there has to be someone, I assume in legal,
16 who could draw the line between the findings
17 in the Blade report and a violation of 451.

18 BY MR. STODDARD:

19 Q Ms. Felts, to be clear, you're not
20 adding anything through your testimony to
21 this proceeding beyond providing a conduit
22 for somebody - you don't know who - in the
23 legal department to attach violations of 451
24 to the Blade report?

25 MR. GRUEN: Objection, your Honor.
26 That's assuming facts not in evidence if
27 there's anyone in the legal department who
28 had a role in the preparation of the

1 testimony.

2 ALJ HECHT: Do you have a response to
3 that, Mr. Stoddard?

4 MR. STODDARD: Again, I can rephrase
5 the question if it would help.

6 ALJ HECHT: Why don't you try that and
7 we'll go from there.

8 BY MR. STODDARD:

9 Q Ms. Felts, again, and I think one
10 of the reasons I'm pushing on this is because
11 there's certain places in your testimony
12 where you do -- at least yesterday, what you
13 said was you offer your own opinion in
14 certain places; correct?

15 A That's correct.

16 Q All right. And so the fact that
17 you said there's nothing -- nothing needed
18 besides the Blade report for purposes of 451,
19 seems inconsistent with that statement.

20 As to the calculation of the
21 violations, you have stated that someone in
22 legal, I believe is what you said, but you
23 don't know who, selected those dates;
24 correct?

25 A I don't know who selected the
26 dates, but, you know, I can assume that it's
27 somebody at the PUC. And I can't tell you
28 because I don't have those facts.

1 And I would say that -- also point
2 out that we're only in my mind talking about
3 the opening testimony here. And where I've
4 rendered opinions or further comments is in
5 reply or sur-reply testimony that I wrote.

6 So when we're talking just strictly
7 about the summary of violations in the
8 opening testimony, that was all prepared
9 before I was seriously involved in this case,
10 and it's my understanding that all of the
11 violations are based on findings by Blade and
12 that Blade did not engage in any legal
13 assessment of determining whether or not the
14 violations as they're represented on the
15 summary of violations or in the violations of
16 451. So someone else had to have made that
17 determination.

18 Q Okay. It's a mystery. We will
19 move on.

20 Ms. Felts, I don't want to waste
21 time on this, and so I'm just going to ask it
22 categorically, and if we need to go back and
23 do it piece by piece, we can.

24 Does your testimony today regarding
25 the date calculation for violation apply to
26 all violations 1 through 330 or actually --

27 MR. GRUEN: Your Honor, if I may
28 object, that's a question that's beyond the

1 scope of hearings. The scope of hearings, I
2 believe, is - correct me - violations one
3 through 92, I believe, and 3/27 to 3/31.

4 ALJ HECHT: Sustained. We should stick
5 to the violations that we are having hearings
6 about here.

7 MR. STODDARD: Okay.

8 ALJ HECHT: Thank you, Mr. Stoddard.

9 BY MR. STODDARD:

10 Q Ms. Felts, do the -- your testimony
11 regarding the calculation of violations apply
12 to all of the violations that are within the
13 scope of these evidentiary hearings?

14 A The testimony I just stated?

15 Q I'm sorry. I didn't mean to
16 interrupt you. Can you --

17 A So as far as the statement that I
18 just made about the division between Blade
19 and 451 violations, that applies to all of
20 them.

21 Q And your lack of knowledge as to
22 the basis for the date calculation applies to
23 all of them as well?

24 A I'm just looking at the records
25 violations, and I may have participated in
26 the start date of the records violation 3/27
27 through 3/30. I don't have any specific
28 memory of that, but I wrote that testimony;

1 so it's possible that I was asked when a
2 start date would be for those.

3 Q Okay. Thank you.

4 ALJ HECHT: This is ALJ Hecht. If we
5 are at a pausing point, this might be a good
6 time to take a break. I am going to say we
7 are going to take a 15-minute break and we'll
8 come back at 3:05. We'll be off the record.

9 (Recess taken.)

10 ALJ HECHT: We'll be back on the
11 record. We took a 15-minute afternoon break
12 and now we'll continue with cross-examination
13 of Witness Felts.

14 Mr. Stoddard.

15 MR. STODDARD: Thank you, your Honor.
16 Before we proceed with cross-examination,
17 SoCalGas would like to make an oral motion to
18 strike the testimony of Ms. Felts in her
19 opening testimony as to the start dates and
20 end dates of the violations that are
21 specifically within the scope of these
22 hearings. May I do so?

23 ALJ HECHT: You may make a motion, yes.

24 MR. STODDARD: Thank you, your Honor.

25 Pursuant to Rule 11.1(b) of the
26 Commission's Rules of Practice and Procedure,
27 SoCalGas is moving to strike portions of
28 Ms. Felts' testimony that provide the start

1 date and end dates for violations, and these
2 are on pages 3 -- actually, they're
3 throughout because they're also in the
4 testimony as well.

5 Before we went on break, we heard
6 testimony from Ms. Felts indicating she did
7 not write, verify or substantiate the start
8 date and end dates for the violations. She
9 further testified that she did not know who
10 prepared them. She simply accepted them, and
11 she speculated that these dates were based on
12 information received from Blade or,
13 potentially, SED, but took no steps to
14 substantiate them.

15 On that basis her testimony as to
16 start and end dates do not constitute
17 testimony of the witness and should be
18 stricken.

19 ALJ HECHT: And I expect we'll have a
20 response from Mr. Gruen.

21 MR. GRUEN: Yes, your Honor. Thank
22 you. Daryl Gruen for Safety and Enforcement
23 Division. We oppose the motion to strike.

24 Ms. Felts has testified that the
25 testimony is based on the Blade report. The
26 dates rely on information from the Blade
27 report. Blade will be available for
28 cross-examination next week.

1 SoCalGas has incorrectly stated
2 several things in its motion. First of all,
3 your Honor clarified that the hearings are
4 not focusing on the entirety of all
5 violations in testimony. It is only limited
6 to violations 1 through 92 and 3/27 to 3/31.

7 ALJ HECHT: I'm going to ask you to
8 slow down slightly for the benefit of the
9 court reporter.]

10 MR. GRUEN: Yes, your Honor. I
11 appreciate that. Okay.

12 I'm seeing the court reporter saying
13 to go ahead. Shall I restate anything?

14 THE REPORTER: We're good. Thank you.

15 MR. GRUEN: Okay.

16 The second inaccuracy is with
17 regards to Ms. Felts' statement regarding
18 violations 327 through 330. She did talk
19 about stating the dates there.

20 The third thing is with regards to
21 the point about speculation. Your Honor,
22 throughout this line of cross throughout the
23 day, Ms. Felts has deferred to Blade
24 regularly. And now SoCalGas would have us
25 believe that this testimony is speculation.

26 She's been clear from the outset
27 that the facts that are the basis for finding
28 violations for -- with the exception of the

1 record-keeping ones come from Blade. There
2 will be an opportunity for SoCalGas to
3 cross-examination Blade to look at the basis
4 for those dates. I would suggest the motion
5 to strike should be patently denied.

6 The other thing that I'd say is, you
7 know, your Honor, this is what I would
8 consider -- I would submit that your Honor's
9 consider this is an eleventh-and-a-half hour,
10 another line of motions in a series of motion
11 practices that SoCalGas has blitzed us with,
12 one motion after the next. This is clearly
13 based on information that they have had in
14 the deposition from -- I believe it was
15 January. They could have raised this at the
16 outset about Ms. Felts' knowledge of the
17 Blade Report and given us a meaningful chance
18 to digest their arguments.

19 Instead, they would have us respond
20 on the record with no chance to digest what
21 they are proposing, very little chance for
22 your Honors to digest it. And this is, I
23 think, frankly -- it's just -- there are
24 multiple reasons why it should be denied.
25 But if your Honors are going to entertain the
26 motion, what we would request is that we at
27 least have a chance to brief it.

28 ALJ HECHT: I am going to not rule

1 today. So I want to say we're going to take
2 it under advisement.

3 If you would like to make another
4 statement, Mr. Stoddard, and then we can have
5 a brief response from Mr. Gruen. And my
6 co-presiding Judge and I will confer and
7 consider this motion.

8 MR. STODDARD: Thank you, your Honor.

9 There were a number of statements in
10 Mr. Gruen's response that either, you know --
11 I wouldn't say mischaracterized my motion,
12 but it may have been that he didn't
13 understand the points I was making. I wasn't
14 suggesting that the date ranges were based on
15 Ms. Felts' speculation. They are not based
16 on her knowledge at all.

17 Frankly, I think that this is a --
18 you know, this is an issue that is concerning
19 from a legal perspective that we have a
20 witness offering testimony that she has no
21 knowledge of. Reliance on the Blade Report
22 here is misplaced.

23 The Blade Report may identify leaks
24 that Blade says should have been
25 investigated. They don't include date
26 ranges. They don't say when the
27 investigation should have occurred relative
28 to the -- you know, October 23rd, 2015. And

1 they don't allege violations of 451. SED and
2 the witness sitting here today are the ones
3 alleging violations of 451.

4 Now, I don't have any objection with
5 SED's proposal of briefing this issue. And
6 it may be the best way to handle it. But I
7 do take issue with SED's characterization of
8 the motion that we made and the suggestion
9 that we have been sitting on this.

10 Under Commission Rule 11.1(b), you
11 are allowed to bring motions at any time in
12 the course of a proceeding. There's no
13 requirement that this be made at an earlier
14 date. And, frankly, the testimony we heard
15 today went beyond anything we have heard in a
16 deposition.

17 ALJ HECHT: Mr. Gruen, a brief
18 response?

19 MR. GRUEN: Thank you, your Honor.

20 And I think this is one reason why
21 it may be appropriate to brief this. Without
22 turning this into anything -- into
23 allegations of what's accurate, I think
24 giving parties a chance to digest the record
25 -- I'll make a couple of points though, if I
26 may, on the substance.

27 One is, if memory serves -- and I
28 studied the Scoping Memo last night, I

1 believe. The Scoping Memo instructed SED's
2 testimony to cite to violations and to
3 reference the Blade Report in support of
4 them. The testimony has done exactly as the
5 Scoping Memo instructed. It's referenced the
6 Blade Report thoroughly. The dates are
7 identified -- the basis for the dates are
8 identified in the testimony, as well. They
9 are provided, and they are referenced.

10 Ms. Felts has been asked about
11 several of the bases for them. And she's
12 provided the bases for the 451 violations.
13 This has turned into a robust set of
14 testimony, not just on the dates, but of the
15 451 violations. And she's given answers to
16 that.

17 So I would suggest, just in all of
18 this, that SED -- the testimony follows what
19 the Scoping Memo does. And now SoCalGas --
20 they may not like it, but to move to strike
21 it when we've done -- the testimony's done
22 exactly what the Scoping Memo has required
23 seems to me to be inappropriate.

24 As to the merits of the dates, you
25 know, we can all look at that. It may well
26 be that that's a briefable issue. If
27 SoCalGas wants to argue about that dates in
28 briefs, rather than moving to strike and make

1 it -- another option here is to look at the
2 evidentiary value of them, based on the
3 testimony and what's in the record as to the
4 merits of the dates, and just leave this for
5 briefing. And in the spirit of what your
6 Honor instructed us to do the other day, let
7 us focus on hearings. And leave the briefing
8 for when that's -- when that's scheduled to
9 be due. And we would be happy to follow your
10 Honor's instructions --

11 ALJ HECHT: For a last statement, Mr.
12 Stoddard, briefly.

13 MR. STODDARD: Your Honor, again, I
14 think it would make the most sense to brief
15 this expeditiously, not wait for briefing at
16 the end of the proceeding. This is -- it's a
17 significant -- as I pointed out in my
18 questioning of Ms. Felts, this is extremely
19 significant in terms of the scope of
20 penalties relative to the potential for even
21 settling this case, to the degree settlement
22 were possible. These scopes of violations
23 probably would be the biggest impact.

24 And so I think this needs to be
25 resolved expeditiously in order to be able to
26 move forward in this proceeding, whether it's
27 through evidentiary hearings, settlement, or
28 something else. But I do think that we

1 should decide the issue soon. And I leave it
2 to your Honors to decide how that will be
3 done.

4 ALJ HECHT: Thank you.

5 I will say that I think it's likely
6 we will end up briefing this issue. I don't
7 yet know on what schedule. I will note that
8 we do not have the transcripts immediately.
9 And I think the transcripts might be relevant
10 to considering this, if it is briefed.

11 I will take this under advisement.
12 And my co-assigned presiding officer and I
13 will provide more instructions on how to
14 address this in the coming days.

15 MR. STODDARD: Thank you, your Honor.

16 ALJ HECHT: Thank you.

17 MR. GRUEN: Understood. Thank you,
18 your Honor.

19 ALJ HECHT: I hate to end on that note,
20 but I think we're going to end on that note.

21 I would like to do some of the
22 housekeeping stuff. I was going to go for
23 another 10 or 15 minutes, but I'm not
24 convinced that it's worth actually doing that
25 right now. I don't know that we'll get
26 through enough. So I would like to do some
27 housekeeping and then take up the
28 cross-examination again tomorrow.

1 So, the first thing we need to do is
2 to identify the cross exhibits that were used
3 today.

4 MR. STODDARD: Yes, your Honor. If
5 you'll give me a couple minutes.

6 ALJ HECHT: Of course. We'll be off
7 the record.

8 (Off the record.)

9 ALJ HECHT: We'll be back on the
10 record.

11 Mr. Stoddard, we're going to
12 identify the exhibits.

13 MR. STODDARD: Thank you, your Honor.

14 The exhibit numbers are 34, 55 --
15 actually, hold on. I have to read the
16 descriptions, as well. I apologize.

17 ALJ HECHT: Just a brief description is
18 fine so that we can match it to the document.

19 MR. STODDARD: Okay. I'm going to
20 start with 55.

21 So SoCalGas-55, e-mail chain between
22 Margaret Felts and Darryl Gruen March 27,
23 2020. Re: Sera (Chapter 5) on Leaks, MAOP,
24 et cetera.

25 (Exhibit No. SoCalGas-55 was marked
26 for identification.)

27 MR. STODDARD: Next is 73, letter from
28 Elizaveta Malashenko to Alan Mayberry,

1 January 5th, 2016, Re: CPUC response to
2 natural gas leak at Aliso Canyon Storage
3 Facility.

4 (Exhibit No. SoCalGas-73 was marked
5 for identification.)

6 (Reporter clarification.)

7 ALJ HECHT: Could you please spell
8 those names, Mr. Stoddard?

9 MR. STODDARD: Yes. This was a letter
10 from E-l-i-z-a-v-e-t-a, last name,
11 M-a-l-a-s-h-e-n-k-o, to Alan Mayberry,
12 A-l-a-n, M-a-y-b-e-r-r-y.

13 And 75, SoCalGas-75, excerpt of
14 Blade Energy Partners root cause analysis of
15 uncontrolled hydrocarbon release from Aliso
16 Canyon SS-25.

17 (Exhibit No. SoCalGas-75 was marked
18 for identification.)

19 MR. STODDARD: And Exhibit 34, prepared
20 reply testimony of Tim Hower and Charlie
21 Stinson of MHA Petroleum Consultants, March
22 20th, 2020, redline version.

23 (Exhibit No. SoCalGas-34 was marked
24 for identification.)

25 ALJ HECHT: All right. Let me check
26 and make sure that we have those identified
27 and see whether there's anything else we
28 need.

1 In the meantime, I would like to ask
2 about how much additional cross-examination
3 time Mr. Stoddard expects SoCalGas to have of
4 this witness. I would like to be planning
5 for the hearings tomorrow and the next day,
6 and to know when we can expect other
7 witnesses to be needed.

8 MR. STODDARD: I'll need to review my
9 outline to provide a specific -- a more
10 specific -- but I think we can probably
11 conclude by the end of the day tomorrow.

12 ALJ HECHT: Thank you. That's all I
13 need right now. I just wanted to get a sense
14 of that.

15 (Crosstalk.)

16 ALJ POIRIER: This is ALJ Poirier. I
17 just wanted to make sure to note too that Cal
18 Advocates' witnesses would be coming after
19 that on Friday. So just so Ms. Bone is aware
20 of that so that they're ready, potentially,
21 at the end of the day tomorrow.

22 MR. STODDARD: Your Honor, I have a
23 question.

24 ALJ HECHT: Yes.

25 MR. STODDARD: If tomorrow -- are we
26 going to have a hard stop? Or if we need to,
27 can we go closer to 4:30?

28 ALJ HECHT: Tomorrow, I believe we have

1 a hard stop at around 3:45. I will consult,
2 but do not expect to go past then.

3 MR. STODDARD: Okay.

4 ALJ POIRIER: It looks like Ms. Bone
5 has a comment.

6 MS. BONE: Traci Bone for Cal
7 Advocates. And our witnesses would be
8 prepared to go on on Friday, unless cross
9 exhibits can be made available to them today.
10 They wouldn't be able to go on tomorrow.

11 ALJ POIRIER: This is ALJ Poirier.

12 One thing I note is, I assume SED
13 will have some redirect. So it's probably
14 safe to assume Cal Advocates is going to be
15 on Friday.

16 I -- Mr. Gruen, I make that
17 expectation on your behalf. But if you could
18 comment on that?

19 MR. GRUEN: Your Honor is -- I can
20 confirm the accuracy of that. Your Honor is
21 -- I believe that is correct. Thank you,
22 your Honor.

23 ALJ HECHT: Yes, Ms. Bone.

24 MS. BONE: Yeah. I will also note that
25 the cross-examination exhibits have been
26 arriving not on or before 1:00 o'clock, but
27 more like 3:00 o'clock in the afternoon, and
28 that we've had quite a bit of difficulty

1 accessing them and downloading them. Today
2 was a good day in that I could quickly
3 download them. Other days it takes half an
4 hour sometimes to download them.

5 So I just want to flag those as
6 continuing issues. It seems to be a little
7 better today. But I just wanted the Court to
8 be aware of those concerns and how that could
9 also impact our ability to be cross-examined.

10 ALJ HECHT: Thank you for raising that,
11 Ms. Bone. We have had a little trouble with
12 access as well. We are able to access
13 things, but it can take a little bit of
14 doing.

15 I will say that everybody should
16 please try to serve things by 1:00 p.m.
17 There's a reason that I set that time. And
18 that's so that upcoming witnesses will have a
19 chance to look at it, and so that our
20 proceeding support people can make sure to
21 have accurate notes and information and can
22 get us the things that we need. So that is
23 my request to you all.

24 All right. Are there any other
25 housekeeping issues that we should address
26 before we adjourn for the day?

27 (No response.)

28 ALJ HECHT: Okay. I have us starting

1 tomorrow at 10:00 a.m. But my IT people have
2 us starting tomorrow at 9:00 a.m.

3 Does anybody have any thoughts on
4 that?

5 ALJ POIRIER: It might be a result of
6 the daylight savings that the time is
7 different.

8 ALJ HECHT: Okay. That makes a lot of
9 sense how that could have occurred. Sorry to
10 put that on the record.

11 All right. We are going to finish
12 today. And we'll be back tomorrow at 10:00
13 a.m. We'll be off the record.

14 (Whereupon, at the hour of 3:28 p.m.
15 this matter having been continued to
16 10:00 a.m., March 18, 2021, the
Commission then adjourned.)]

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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

CERTIFICATION OF TRANSCRIPT OF PROCEEDING
I, JASON STACEY, CERTIFIED SHORTHAND REPORTER
NO. 14092, IN AND FOR THE STATE OF CALIFORNIA DO
HEREBY CERTIFY THAT THE PAGES OF THIS TRANSCRIPT
PREPARED BY ME COMPRISE A FULL, TRUE, AND CORRECT
TRANSCRIPT OF THE TESTIMONY AND PROCEEDINGS HELD IN
THIS MATTER ON MARCH 17, 2021.

I FURTHER CERTIFY THAT I HAVE NO INTEREST IN THE
EVENTS OF THE MATTER OR THE OUTCOME OF THE PROCEEDING.

EXECUTED THIS MARCH 22, 2021.



JASON A. STACEY
CSR NO. 14092

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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

CERTIFICATION OF TRANSCRIPT OF PROCEEDING
I, KARLY POWERS, CERTIFIED SHORTHAND REPORTER
NO. 13991, IN AND FOR THE STATE OF CALIFORNIA DO
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THIS MATTER ON MARCH 17, 2021.

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EXECUTED THIS MARCH 22, 2021.



KARLY POWERS
CSR NO. #13991

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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

CERTIFICATION OF TRANSCRIPT OF PROCEEDING
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EXECUTED THIS MARCH 22, 2021.



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CSR NO. 8916

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