

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA



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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 19, 2021
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VIRTUAL PROCEEDING

MARCH 19, 2021 - 10:00 A.M.

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MARGARET FELTS

resumed the stand and testified further as follows:

ADMINISTRATIVE LAW JUDGE POIRIER: We will be on the record. Good morning, everyone. This is the evidentiary hearing for Investigation 19-06-016 on Aliso Canyon. This is Friday, March 19, 2021, day four of evidentiary hearings. Happy Friday, everyone. We left off yesterday with the cross by SoCalGas of SED witness Margaret Felts. We are going to continue with that this morning.

And with that, I will direct Mr. Stoddard to begin. Thank you.

MR. STODDARD: Sorry. I was on mute. Thank you, your Honor. Do we need to reiterate the attestations or should we just proceed?

ALJ POIRIER: Ms. Felts, I just want to remind you of the attestations that you made on Tuesday; okay?

THE WITNESS: Okay.

ALJ POIRIER: Okay. Let's move ahead.

1 Thank you.

2 CROSS-EXAMINATION RESUMED

3 BY MR. STODDARD:

4 Q Ms. Felts, again, those
5 attestations -- the parties have made
6 attestations to agree that they will not be
7 recording these proceedings by a video or
8 audio. That applies to the parties. It does
9 not apply to potential third parties that may
10 be observing these proceedings.

11 Do you consent to being recorded
12 today?

13 A No.

14 Q Thank you, Ms. Felts. You're
15 participating remotely. Is there anybody
16 else in the room with you?

17 A No.

18 MR. STODDARD: So I have a question for
19 the technical folks at the Commission. I'm
20 not able to see -- oh, there we go. Now I
21 can see Ms. Felts. Thank you.

22 Q Turning to your opening testimony,
23 Exhibit Number 47 on page 6 of the document.
24 This is Bates Number SoCalGas-47.0010.
25 Please scroll up to the table. Stop there.
26 Thank you.

27 Ms. Felts, I believe you testified
28 that you were responsible for substantiating,

1 and you did substantiate, the calculation of
2 begin date and end dates on violations
3 related to recordkeeping; is that correct?

4 A Yes.

5 Q And that would include Violation
6 Numbers 327 through 330; correct?

7 A Yes.

8 Q Thank you. If we could please turn
9 to page 70. This is SoCalGas-47.0074. If we
10 could please scroll up to the second full --
11 or the first full paragraph, the second
12 paragraph here.

13 Ms. Felts, do you see where it
14 says:

15 Since SED does not know
16 what records might have
17 been created but then lost
18 for well SS-25, it looks to
19 SoCalGas Well Files for
20 SS-25, SS-25A, and SS-25B
21 for examples of the types
22 of records that might have
23 existed in well SS-25 prior
24 to October 23, 2015.

25 Do you see that?

26 A Yes.

27 Q And then it goes on to say:
28 In comparing the contents

1 of these files, a striking
2 finding is that SS-25 lacks
3 interoffice memos,
4 integrity investigations,
5 logs, and inspection
6 reports that should have
7 been created between 1973
8 and 2015.

9 Do you see that?

10 A Yes.

11 Q And to clarify there, by "integrity
12 investigations," you're referring to casing
13 inspection logs such as USIT and Vertilog; is
14 that correct?

15 A Yes.

16 Q And by logs, are you referring to
17 temperature and noise logs, Ms. Felts?

18 A Temperature and noise surveys --
19 some -- there are some that have actual logs.
20 A noise survey usually looks like a log. The
21 rest of them were slightly different and
22 there appears to be a complete set of
23 temperature (inaudible), temperature surveys
24 in the SS-25 Well File.

25 Q And these other items related to,
26 again, casing inspection logs and inspection
27 reports; right? This re -- strike that.

28 The last item, "Inspection reports

1 that should have been created between 1973
2 and 2015," this relates to the item that we
3 were discussing both yesterday and the day
4 before, which is your alleged violations
5 regarding SoCalGas' failure to conduct
6 investigations of prior casing leaks; isn't
7 that correct?

8 A I hadn't specifically linked the
9 two as you have in that statement.

10 Q What did you mean?

11 A What did I mean by this statement
12 that we're looking at?

13 Q "Inspection reports that should
14 have been created between 1973 and 2015."

15 A I meant any inspection reports for
16 well SS-25. There's hardly any history
17 reports. Actually, there's none after 1997
18 through the date of the incident, 2015,
19 October 23, 2015. So without the history
20 records, it's not -- it's not possible to
21 determine exactly what might be missing in
22 terms of investigations, logs, or inspection
23 reports.

24 There were no interoffice memos
25 after the replacement of the FSC in, I think
26 it was 1979. Generally there's just not much
27 information about what's been going on with
28 that well.

1 Q Ms. Felts, is 1979 the date of the
2 last work-over on SS-25; is that correct?

3 A I think that's correct.

4 Q Okay. And when you referred to
5 the -- I believe you referred to kind of the
6 daily -- when you said the investigation
7 reports that terminated in 1997, you're
8 referring to the daily activities log that
9 was included and it terminated in 1997 when
10 SoCalGas stopped that practice; is that
11 correct?

12 A I actually stated history, not -- I
13 don't know if you used a different word, I --
14 but it was history records there are and
15 SoCalGas has repeatedly told us that they're
16 folders in the SS-25 and other Well Files,
17 specifically for history. Other Well Files
18 continue those history records, but in SS-25,
19 they end in 1997. There's also a record,
20 daily activities log, that seems to serve the
21 same purpose but is not filed on a form with
22 DOG, or DOGGR, I'm sorry.

23 Q So Ms. Felts, if those records go
24 to 1997, why does this violation for this
25 element go back to 1973?

26 A Well, because we don't know what's
27 missing in that Well File. It appears to be
28 missing different types of records that I see

1 in other Well Files, so I can't really tell
2 you what's missing because I don't know. I
3 can just tell you that it appears to be an
4 incomplete record in SS-25 compared to other
5 well records that are being kept in other
6 Well Files.

7 Q Thank you. So moving on. For
8 example, on page 71 below. SoCalGas-47.0075.
9 Please scroll up.

10 On the last paragraph, second
11 sentence, you state:

12 One would think that the
13 similarity in design,
14 construction, operation,
15 maintenance, and the fact
16 that they are next to each
17 other, completed in the
18 same zones and exposed to
19 the same external
20 environments would lead
21 SoCalGas to share the
22 information with those who
23 would review the SS-25 Well
24 File for purposes of
25 managing that well. Yet no
26 cross references are in the
27 file.

28 Ms. Felts, this first statement

1 about -- that starts "one would think,"
2 that's just speculation; correct?

3 A Yes.

4 Q Okay. And the SS-25A and B Well
5 Files would be stored in the same location as
6 the SS-25 file; correct?

7 A I assume so.

8 Q And the engineers working on the
9 well had access to those files; correct?

10 A I think so. I don't think we ever
11 confirmed that Boots & Coots actually had
12 access to for files, but I would assume so.

13 Q So here you're just talking about a
14 well kill?

15 MR. GRUEN: Sorry, your Honor, I'm
16 going to object to that last question as
17 misstating testimony.

18 MR. STODDARD: I asked her a question
19 about whether the engineers would have access
20 to the files, and then she said I don't think
21 Boots & Coots had it. I'm asking her to
22 clarify.

23 ALJ POIRIER: I'm going to overrule.

24 Mr. Stoddard, can you restate the
25 question a bit and Ms. Felts can answer.

26 MR. STODDARD: Yes. I'll back up two
27 questions.

28 Q Ms. Felts, the engineers working at

1 the facility would have access to the Well
2 Files for SS-25A and B; correct?

3 A Yes.

4 Q Okay. Thank you. And, Ms. Felts,
5 you indicate that you determined what might
6 be missing in your view from well access 25,
7 but by comparing it with the Well Files for
8 SS-25A and B?

9 A Those and other Well Files.

10 Q And if we can scroll to the top of
11 page 71. You state:

12 Also, well patches were
13 documented for SS-25A and
14 SS-25B but there was no
15 mention of such or the
16 potential for one in the
17 Well File record for SS-25.

18 Do you see that?

19 A Yes.

20 Q So, Ms. Felts, here you're saying
21 that essentially there's a missing record for
22 a patch that was never installed on SS-25; is
23 that correct?

24 A I think I just put this in as a
25 potential example of what seemed to be going
26 on on the three wells. And at the time that
27 I wrote this testimony, I was pointing out
28 that there was a -- there were a series of

1 temperature surveys that showed a potential
2 leak at the bottom of the well.

3 Q This is just more speculation;
4 isn't that correct?

5 A Well, the temperature surveys
6 aren't speculation --

7 Q I understand --

8 A (Inaudible.)

9 Q -- and you've addressed -- and
10 we've discussed that --

11 ALJ POIRIER: Mr. Stoddard, I think the
12 witness was not done answering the question.
13 Let's wait.

14 Please go ahead, Ms. Felts.

15 THE WITNESS: Thank you. I think it --
16 in this statement I just says that there's no
17 mention of repair in well SS-25. I suppose
18 more accurately I might have said there's no
19 mention of investigation or repair.

20 BY MR. STODDARD:

21 Q So then this would be related to
22 your allegations that SoCalGas did not
23 adequately investigate well failures; is that
24 correct?

25 A Not well failures, but potential
26 leaks specifically here on SS-25.

27 Q Okay.]

28 But, again, this is about your

1 allegation that SoCalGas didn't adequately
2 investigate issues or potential leaks within
3 wells not about records; isn't that correct?

4 MR. GRUEN: Objection, your Honor.
5 Misstates testimony.

6 MR. STODDARD: Your Honor, the witness
7 just explained that this is about her
8 testimony, that there was a preexisting leak
9 in SS-25, and I'm trying to get her to
10 clarify whether this is, in fact, a records
11 violation or simply a restatement of the
12 argument regarding a preexisting leak and
13 SoCalGas' failure to investigate it.

14 MR. GRUEN: Your Honor, if I may
15 respond to that. What counsel has done is
16 ask her -- ask Ms. Felts about one paragraph
17 and her interpretation of it in a violation
18 of records that spans for pages, and he's
19 asking to make a statement to characterize
20 her testimony that's reflecting her views on
21 records and now to recharacterize it as
22 related to the lack of investigations.
23 That's why it's a misstatement of testimony.

24 MR. STODDARD: Your Honor, the witness
25 is free to reference any of her testimony.
26 She's reviewed her testimony. She can
27 testify here today. I'm asking her about her
28 preparing written testimony which SoCalGas

1 has a right to conduct cross-examination on
2 which is the purpose of these hearings.

3 ALJ POIRIER: Okay. I'm going to
4 overrule the objection and allow you to
5 continue, Mr. Stoddard. If you can restate.

6 One thing I would like for parties
7 before -- we'll have the objection stated,
8 and then please let me ask parties to respond
9 so we don't have a lot back-and-forth. Thank
10 you.

11 MR. GRUEN: Understood, your Honor.

12 MR. STODDARD: Understood, your Honor.

13 Q I'm going to move to a different
14 example. If we can please turn to page 73.
15 This is SoCalGas-47.077. Please scroll up to
16 Missing Failure Analysis Reports, unsafe
17 practice.

18 Do you see that, Ms. Felts?

19 A Yes.

20 Q And you see the second sentence,
21 "Maintenance of such studies, as
22 well as Failure Analysis reports on
23 well pipe failures would normally be
24 kept indefinitely but not
25 necessarily in a well file. It
26 would, however, be normal to see a
27 memo or a reference to a such a
28 study in the relevant well file.

1 SoCalGas had numerous opportunities
2 to create such reports."

3 Do you see that, Ms. Felts?

4 A Yes.

5 Q Again, this is related to your
6 allegation that SoCalGas failed to conduct
7 adequate failure investigations or leak
8 investigations; is that correct?

9 A This entire section -- and I'm
10 assuming it's continuous -- about -- in the
11 section about records, it is just a series of
12 examples of what appears to be missing or
13 expected to be in well files or in records in
14 general. So in this particular example, what
15 I'm saying is that we think that SoCalGas
16 should have been preparing and storing
17 Failure Analysis reports. We tried to find
18 any of those in the records, and we asked
19 whether they were being kept in well files or
20 somewhere else in SoCalGas. We never got an
21 answer. So I'm including this as missing
22 reports. Now, SoCalGas hasn't told us they
23 didn't do Failure Analysis, but we didn't
24 find any reports.

25 Q Correct. And again, Ms. Felts,
26 this isn't based on any requirement, correct?

27 MR. GRUEN: Objection, your Honor.
28 Vague. I'm unclear what "this" means in

1 this -- in the context.

2 ALJ POIRIER: Can you restate, Mr.
3 Stoddard.

4 MR. STODDARD: Yes, your Honor.

5 Q Ms. Felts, your testimony regarding
6 the maintenance of Failure Analysis studies
7 and reports isn't based on any specific
8 requirement, correct?

9 A The recordkeeping violations are
10 451 violations, and so for citing the lack of
11 and the disorganization of records as
12 violations of 451 as an unsafe practice.

13 Q I understand that. Where you
14 capitalize here "Failure Analysis," do you
15 see that, Ms. Felts?

16 A Yes.

17 Q Is that -- I mean, that seems to be
18 a reference to some form of a formal term.
19 Is that something that is defined in a
20 regulation or industry standard somewhere?

21 A No. That was not important to us.
22 I'm not aware of any requirement. Although
23 SED may have some sort of requirement for
24 keeping records, I'm not aware of that, and I
25 don't think it's relevant here.

26 Q The requirements aren't relevant
27 here?

28 A That's correct.

1 Q And Ms. Felts, you're not aware of
2 any record that was created here for well
3 SS-25 on failure investigation and then
4 destroyed? That's not what you're alleging,
5 right?

6 A I'm saying they weren't produced,
7 and we are assuming -- because SoCalGas has
8 not said, in response to our questions, that
9 they did not do Failure Analysis. In fact,
10 every time we asked in the earlier data
11 request, we were pointed to well files
12 repeatedly. There are no Failure Analysis
13 reports in the well file. So while I can't
14 tell you what was created and then either
15 destroyed, lost or filed away somewhere where
16 SoCalGas can't find them, I am saying that
17 they should be there. If they are not in the
18 well file, then they might be on a shelf
19 somewhere. This is bad recordkeeping. If
20 SoCalGas can't put their hands on them and
21 produce them, then it's bad recordkeeping.

22 Q Ms. Felts, we described yesterday
23 how the well files do include annotations of
24 costs, right, a sliding sleeve out of place.
25 You're not disputing that, correct?

26 A When we talked about a sliding
27 sleeve out of place, the only reason that you
28 could end there and say that that is the

1 cause of a leak is if for sure that is
2 exactly what it was and you know why it was
3 out of place. If you don't know why it's out
4 of place and it's potentially a problem
5 across -- with construction of the other
6 wells, then you have to go further to
7 investigate the cause. So your statement is
8 not correct, and I think we have to look at
9 the broader investigation. And that's what
10 we're looking for here.

11 Q So you then -- just to confirm,
12 SoCalGas would need to determine the root
13 cause of a sliding sleeve out of place; is
14 that correct?

15 A I think that's a good example of an
16 opportunity for SoCalGas to investigate
17 further, yes. And I don't know if you want
18 to call it a root cause, but certainly an
19 analysis of why it's in a failed position.

20 Q And let's turn to another example.
21 If you please turn to page 74. And this is
22 SoCalGas-47.0078. And if we can please
23 scroll to the middle, this one says,
24 "Operating records missing and unsafe
25 practice."

26 Do you see that in the header?

27 A Yes.

28 Q And then in the middle it says,

1 "For instance, SoCalGas was not
2 monitoring wellhead pressure
3 continuously or even daily for the
4 injection extraction wells. In
5 SoCalGas' words, underground storage
6 wells at Aliso Canyon were not
7 equipped with continuous pressure
8 monitoring. Pressure measurements
9 were collected on a weekly basis."

10 Do you see that, Ms. Felts?

11 A Yeah.

12 Q Ms. Felts, we discussed this
13 yesterday, and it's established that SoCalGas
14 did not have realtime pressure monitoring on
15 Well SS-25. We aren't disputing that.

16 MR. GRUEN: I'm sorry. Your Honor,
17 objection. Counsel's now testifying once
18 again. This needs to be cross-examination
19 and a question there.

20 ALJ POIRIER: Okay. Mr. Stoddard, if
21 you can restate and also a reminder to -- not
22 to speak too quickly when reading material
23 into the record. Thank you.

24 MR. STODDARD: Thank you, your Honor.

25 Q Ms. Felts, you are alleging
26 violations related to SoCalGas' failure to
27 have realtime pressure monitoring on Well
28 SS-25, correct?

1 A That's correct.

2 Q And now you're also alleging
3 records violations related to the failure to
4 maintain realtime pressure monitoring
5 records?

6 MR. GRUEN: Objection, your Honor.
7 Misstates testimony. The witness said that
8 the prior question was not correct, and he's
9 presuming she agreed.

10 ALJ POIRIER: Ms. Felts, can you
11 confirm what the answer to the previous
12 question was.

13 THE WITNESS: I don't remember the
14 previous question. I'm sorry.

15 MR. STODDARD: Your Honor --

16 ALJ POIRIER: It was a little unclear
17 to me whether she said "correct" or "not
18 correct." So Mr. Stoddard, can you re-ask
19 that question, and then we'll go from there.

20 MR. STODDARD: Okay.

21 Q Ms. Felts, you're alleging
22 violations related to SoCalGas' failure to
23 have realtime pressure monitoring on the
24 SS-25 well, correct?

25 A Yes.

26 Q Okay. Thank you. But you're also
27 alleging violations here related to SoCalGas'
28 failure to have realtime monitoring --

1 realtime pressure monitoring records; is that
2 correct?

3 A Can you scan up to the top of the
4 document so I can see where we are or give me
5 a minute, and I'll just look in mine.

6 ALJ POIRIER: We'll go off the record.
7 (Off the record.)

8 ALJ POIRIER: We'll be back on the
9 record.

10 Please go ahead, Ms. Felts.

11 THE WITNESS: Violation 330 is
12 imprudent and unreasonable recordkeeping
13 practice associated with Well SS-25, failure
14 to record continuous wellhead pressure. And
15 this was a start date of 10-15-15 -- 2015,
16 and that was the last measurement that
17 SoCalGas had recorded before the incident
18 that occurred on the end date of this
19 violation, 10-23-2015.]

20 BY MR. STODDARD:

21 Q That wasn't my question, Ms. Felts.
22 My question was -- and, again, if I may just
23 briefly restate. And if you can tell me if
24 you disagree.

25 You're alleging violations related
26 to have -- related to SoCalGas's failure to
27 have a realtime pressuring monitoring system
28 on SS-25, alleged failure.

1 (Crosstalk.)

2 A Excuse me.

3 ALJ POIRIER: First, I think you need
4 to state that as a question, and let
5 Ms. Felts answer.

6 Let's proceed from there. Thank
7 you.

8 MR. STODDARD: I'm going to get to the
9 ultimate question so we can move on here.

10 Q Ms. Felts, isn't this just a
11 restatement of the violation as a records
12 violation related to realtime pressure
13 monitoring?

14 MR. GRUEN: Your Honor, I'm going to
15 object as vague.

16 If counsel wants to refer to the
17 actual violation that he claims is being
18 restated, he should show it to her.

19 ALJ POIRIER: Mr. Stoddard?

20 MR. STODDARD: I think my question is
21 actually fairly clear.

22 ALJ POIRIER: I'm going to overrule and
23 say let the witness answer to the best of her
24 ability.

25 THE WITNESS: I'm looking for the
26 violation.

27 Violation 87 is failure to have
28 continuous pressure monitoring system for

1 well surveillance because of prevented and
2 immediate identification of the SS-25 leak
3 and accurate estimation of a vast flow rate
4 (indecipherable) violation.

5 The other one that we've been
6 talking about that you have up on the screen
7 is a record keeping violation.

8 BY MR. STODDARD:

9 Q I understand that. Again, there
10 was no regulatory requirement that SoCalGas
11 have realtime pressure monitoring system on
12 SS-25; correct?

13 MR. GRUEN: Objection. Asked and
14 answered.

15 MR. STODDARD: Your Honor, counsel is
16 getting in the way of questioning by
17 objecting to questions as asked and answered.
18 And then objecting for inadequate foundation
19 and mischaracterization of testimony. It
20 requires restating a few of these principles
21 when we have constant interruptions for
22 Ms. Felts to review her testimony.

23 ALJ POIRIER: I'll allow this question.

24 Let's move ahead.

25 THE WITNESS: Can you ask the question
26 again?

27 BY MR. STODDARD:

28 Q Yes. Ms. Felts, there was no

1 regulatory requirement that would require
2 SoCalGas to have realtime pressure monitoring
3 on Well SS-25; correct?

4 A That is correct.

5 Q And there was no requirement that
6 SoCalGas have records of realtime pressure at
7 SS-25; correct?

8 A That's correct. But we're talking
9 about safe practices here.

10 Q And, Ms. Felts, there were no
11 realtime records generated for Well SS-25;
12 correct?

13 A Well, to be exact, after the well
14 had -- pressure monitor was installed after
15 the well failed, then they did generate
16 records.

17 Q Okay. Prior to the incident,
18 Ms. Felts, and apart from realtime pressure
19 reads on the pressure gauges on the well
20 head, there were no realtime pressure
21 monitoring pressure reads via a
22 SCADA-equipped system on SS-25; correct?

23 A That's true.

24 Q So these records they weren't lost,
25 they weren't destroyed, they weren't a
26 failure to record data that was being
27 generated; correct?

28 A I think this violation is a failure

1 to record well head pressures on a regular
2 basis. They were being recorded supposedly
3 weekly, but it turns out not so -- not as
4 frequently by hand on a table. So this
5 violation is for the period between
6 October 15th and October 23rd, 2015.

7 Q All right. Lets move on. If we
8 could please turn to Exhibit-49.

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

10 (Off the record.)

11 ALJ POIRIER: Back on the record.

12 Please go ahead.

13 MR. STODDARD: Thank you, your Honor.

14 This is this SoCalGas Exhibit-49.
15 It is the reply testimony of Ms. Felts in the
16 instant proceeding. And it was submitted on
17 March 20th, 2020. It's Bates Stamped
18 SoCalGas-49.0001.

19 If we could please scroll down to
20 page 20. And this is page 20. And this page
21 is Bates marked SoCalGas-49.0023.

22 Q If we could please scroll up above
23 to the paragraph toward the top under the
24 block quote, you'll see there it reads:

25 SED questions why SoCalGas
26 waited 19 days before it
27 began withdrawals from the
28 Aliso Canyon Storage

1 Facility to reduce the
2 reservoir pressure to
3 support well-kill efforts
4 and to reduce the amount of
5 gas released.

6 Do you see that, Ms. Felts?

7 A Yes.

8 Q Ms. Felts, have you ever been --
9 you've never been involved in a well-kill
10 operation to -- strike that.

11 Ms. Felts, I believe you said a few
12 days ago -- and forgive me because I don't
13 have reference to the transcript at this time
14 -- that you don't have any experience of
15 well-kill operations; correct?

16 A No. I haven't been directly
17 involved in well-kill operations.

18 Q How have you been indirectly
19 involved?

20 A Just reviewing these records.

21 Q So this is your only experience
22 with well-kill operations; correct?

23 A I have knowledge of well-kill
24 operations from being a petroleum engineer.

25 Q I am sorry. Can you explain?

26 A Well, you know, I took a lot of
27 courses in petroleum engineering. And I
28 specialized, I guess you could say, in my

1 senior year -- or the last two years of
2 engineering courses, in reservoir
3 engineering. And a course with that also
4 drilling engineering, which would involve
5 studies of wells that go out of control and
6 what to do about them.

7 Q But, again, Ms. Felts, you've never
8 actually been involved in gas or oil;
9 correct?

10 A That's correct.

11 Q Okay. And what experience do you
12 have with gas storage -- with gas system
13 balancing?

14 A Gas system balancing in terms of
15 supply and demand? Is that what you're
16 asking me?

17 Q Yeah.

18 A When I was working for the
19 California Energy Commission in the Fuels
20 Office, I was in charge of overseeing data
21 that was coming in from all of the gas
22 producers and storers in California.

23 So on a day-to-day basis, we were
24 monitoring the supply and demand of natural
25 gas. Also responsible for forecasting demand
26 for natural gas. The forecast went into the
27 Biennial Report. I actually don't know what
28 they're doing with that data now.

1 Q Okay. So then you understand that
2 the system needs to be balanced in terms of
3 supply and demand. Otherwise if you have too
4 much supply and not enough demand, it could
5 result in overpressurization of the system;
6 is that correct?

7 A I understand that they managed the
8 pressure in the reservoir for various
9 reasons.

10 Q I'm not talking about the gas
11 storage reservoir, I'm talking about the
12 entire gas system.

13 A Are you talking about the pipeline
14 supply system?

15 Q Pipeline supply system, which is
16 connected to the gas storage system; correct?

17 A Yes.

18 Q And, again, at system level, if you
19 force too much supply out of the system
20 without enough demand, you result in
21 overpressurization of the system; correct?

22 A You could.

23 Q And that would be unsafe, wouldn't
24 it?

25 A There would be something that you
26 would have to consider there in terms of
27 safety.

28 Q And in order to -- and would you

1 agree that the rate of withdrawal from the
2 field is dependent upon the available
3 capacity in the system?

4 A It would be depending on more
5 factors than that. So you would have to look
6 at demand, where the gas can go. Possibly it
7 could be sent northward to PG&E or to another
8 storage area that was not full.

9 Could be sent southward I think.
10 I'm not sure. But I think it could have been
11 sent southward to Mexico. So I think
12 SoCalGas had options. I don't know how long
13 it would take them to figure out where the
14 gas could go. But I do think that it's
15 possible to do that in much less than
16 19 days.

17 Q And you didn't conduct any of that
18 analysis did you?

19 A No. I say here that SED questions
20 why SoCalGas waited 19 days. It's not a
21 violation. Just a question.

22 Q Not even a statement of fact
23 really. It's just speculative questioning;
24 is that right?

25 A No. SoCalGas waited 19 days before
26 it started withdrawing gas. In fact it was
27 in the early days still injecting gas.

28 Q And you're aware that the

1 withdrawal operations, Ms. Felts, were
2 conducted in close concert with the Public
3 Utilities Commission?

4 A I'm sure it was, yes.

5 Q Yeah. Did you talk to Executive
6 Director Timothy Sullivan related to
7 preparation of your testimony?

8 A No.

9 Q And you didn't talk to anybody else
10 involved with the withdrawal operation did
11 you?

12 A No.

13 Q Okay. Thank you. Circling back
14 briefly on the records discussion we were
15 having a moment ago related to realtime
16 pressure monitoring records. Ms. Felts, do
17 you recall that, or do you need us to bring
18 your testimony back up?

19 A I recall --

20 MR. GRUEN: Your Honor, SED -- I am
21 sorry. Go ahead.

22 THE WITNESS: Okay.

23 ALJ POIRIER: Let's bring up the
24 testimony for my edification. It would be
25 helpful.

26 Thank you.

27 BY MR. STODDARD:

28 Q If we could please turn back to

1 Exhibit 47, page 74. And this, again, is
2 Bates numbered SoCalGas 47.0078.

3 And, Ms. Felts, we were discussing
4 here whether or not this was a -- I was
5 asking you whether or not this was the same
6 violation, in essence, as the violation
7 related to SoCalGas not having realtime
8 pressure monitoring on SS-25.

9 Ms. Felts, just to clarify, this
10 violation is related to a failure to have
11 records of something that didn't occur;
12 correct?]

13 A I don't understand that question.

14 Q Ms. Felts, you are faulting
15 SoCalGas here for not retaining records of
16 something that didn't occur; correct?

17 A I actually don't know that.

18 Q So SoCalGas may have had a realtime
19 pressure monitoring system on SS-25?

20 A The way it's worded it refers to
21 continuously, wellhead pressure continuously
22 being monitored. And I -- you know, that may
23 be an incorrect way to phrase it. But what
24 we were looking for was regular, maybe not
25 continuously, but regular recording of the
26 wellhead pressure so that that information
27 would be readily available when they began
28 the process of killing the well.

1 Q Would you like to correct your
2 testimony, Ms. Felts?

3 A Well, it says "SoCalGas was not
4 monitoring wellhead pressure continuously,"
5 comma, "or even daily."

6 So even though, I believe, SoCalGas
7 has told us that they were monitoring
8 pressure daily, they apparently weren't
9 recording it daily. And it's true that they
10 also were not recording it continuously
11 because a monitor wasn't installed at that
12 time.

13 The daily records, I think, should
14 have been recorded on the schedule that
15 SoCalGas was using, but we see that the last
16 entry is 10-15-2015. So I don't want to
17 change my statement here. I just want you to
18 understand what I'm saying.

19 Q Ms. Felts, did you review Cal
20 Advocates' testimony? Did you see that they
21 reviewed the weekly pressure readings?

22 A I have not read their testimony
23 since it came out, and I couldn't tell you
24 what's in it today without looking at it
25 again.

26 Q We can move on.

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

28 (Off the record.)

1 ALJ POIRIER: Back on the record.

2 Please continue, Mr. Stoddard.

3 MR. STODDARD: Thank you, your Honor.

4 Q Ms. Felts, you recall yesterday we
5 were discussing gas safety plans?

6 A Yes.

7 Q If we could please introduce
8 Exhibit Number 136.

9 Ms. Felts, do you see this is the
10 Pacific Gas and Electric Company 2021 Gas
11 Safety Plan. It's Bates marked
12 SoCalGas-136.0001, and it's dated March 15,
13 2021, which was just this Monday.

14 Do you see that, Ms. Felts?

15 A Yes.

16 Q If we could please turn to the
17 table of contents briefly.

18 Ms. Felts, you'll see that this
19 includes all of the elements of the PG&E Gas
20 Safety Plan and that the table of contents
21 identifies at subsection 4, "Asset
22 management," and below that, "gas storage."

23 Do you see that?

24 A Yes.

25 Q Let's please turn to page 25.

26 MR. GRUEN: Your Honor, I'm going to
27 note an objection for lack of foundation.
28 He's walking the witness through a document

1 that's just been published and hasn't asked
2 whether she recognizes the document.

3 ALJ POIRIER: Mr. Stoddard, can you lay
4 some foundation, please.

5 MR. STODDARD: Your Honor, if I may, we
6 were directed to serve cross exhibits in
7 advance. So counsel's suggesting that she
8 may not have seen the document, frankly
9 doesn't make sense procedurally. I can
10 circle back if we need to lay a foundation to
11 go back through the questioning on gas
12 storage system safety plans, or we can refer
13 back to the transcript from yesterday, but
14 this was a document that relates to a line of
15 questioning from yesterday.

16 ALJ POIRIER: Can you circle back just
17 to refresh our memories just because it was
18 yesterday and I think it would be useful for
19 the record to do so. Thank you.

20 MR. STODDARD: Yes, your Honor.

21 If we could turn back to Exhibit
22 Number 124, please.

23 Q Ms. Felts, you'll see that this was
24 an e-mail from you or, sorry, the top e-mail
25 is from Mr. Gruen to you saying thank you.
26 The bottom e-mail is an e-mail from you to
27 Darryl, subject line, "Gas Safety Plans."

28 Do you see that?

1 A Yes.

2 Q And it attached two documents that
3 we discussed yesterday, including a CPUC Gas
4 Safety Plan and a SoCalGas 2012-2013 Gas
5 Safety Plan.

6 Do you recall?

7 A Yes.

8 Q And there's these page references
9 here that refer to the page of the documents
10 that reference gas storage; is that correct?

11 A Yes. But in that particular
12 instance, storage was referring to
13 underground storage tanks and storage in
14 pipelines. This was back in 2013.

15 Q Ms. Felts, if we need to, we can go
16 back and redo this cross-examination, but as
17 you might recall, we specifically referred to
18 a gas standard that was referenced in the
19 SoCalGas 2012-2013 Gas Safety Plan and that
20 you also referenced in your testimony that
21 related to reservoir and well integrity
22 monitoring and verification practices.

23 Do you recall that?

24 A Vaguely.

25 Q Vaguely. Thank you. I believe
26 also when we were discussing this document,
27 Ms. Felts, we discussed whether this work
28 that you're describing in your e-mail was

1 done because of a data request from SoCalGas
2 seeking gas safety plans or whether it was
3 related to some independent and unrelated
4 interest you had in a PG&E Gas System Safety
5 Plan.

6 Do you recall that?

7 A I recall that I was confused about
8 the two, yes. I wasn't sure which one
9 applied to what I was doing back in
10 April 2020.

11 Q Okay. Thank you.

12 If we can please turn back to
13 Exhibit 136, page 25, bottom of the page.

14 MR. GRUEN: I'm sorry, your Honor, so
15 now we're back to the 2021 Gas Safety Plan
16 after laying foundation for the 2012-2013 Gas
17 Safety Plan? Your Honor, objection. Lack of
18 foundation for the 2021 Gas Safety Plan,
19 Exhibit SoCalGas-136.

20 ALJ POIRIER: Mr. Stoddard?

21 MR. STODDARD: Your Honor, I just
22 established that she was specifically
23 interested in PG&E Gas Safety Plans, that gas
24 safety plans are related to gas storage
25 operations, and I'm referencing the PG&E Gas
26 Safety Plan, and in particular to document
27 the regulatory requirements that may
28 currently be in existence and that are

1 relevant to the requirements that were in
2 existence previously, and I'm going to ask
3 her a question about that.

4 ALJ POIRIER: Okay. Objection
5 overruled.

6 Please continue.

7 MR. STODDARD: Thank you, your Honor.

8 Q Last paragraph, Ms. Felts. Do you
9 see where it says -- and this is PG&E and
10 their Gas Safety Plan:

11 In response to these
12 regulatory changes, PG&E's
13 Gas Storage Asset Family
14 completed an evaluation of
15 both PHMSA's and CalGEM's
16 final regulations, amended
17 its Well risk and Integrity
18 Management Plan, and in
19 March 2019 filed a
20 seven-year plan for review
21 and approval by CalGEM to
22 meet the deadlines
23 established by the
24 regulations to periodically
25 inspect wells and retrofit
26 all of its storage wells by
27 tubing and packer by 2025.
28 Do you see that?

1 A Yes.

2 Q And just to note, 2025 would be an
3 entire decade after the Aliso Canyon
4 incident; isn't that correct?

5 A Yes.

6 Q And what this says is PG&E is still
7 operating and configuring their wells as of
8 today, at least some of them, in a dual flow
9 configuration; correct?

10 MR. GRUEN: Your Honor, if I may, I'd
11 like to note another objection. This line of
12 questioning is outside the scope of this
13 investigation. They're now trying to
14 introduce evidence in 2021 in the future when
15 this is a backward-looking investigation into
16 SoCalGas, the problem related to SS-25 in the
17 Aliso Canyon gas storage facility.

18 ALJ POIRIER: Mr. Gruen, I do think
19 it's relevant to some of the questions we had
20 yesterday so I'm going to overrule that
21 objection.

22 Please continue.

23 BY MR. STODDARD:

24 Q Do you need me to restate the
25 question, Ms. Felts?

26 A Well, I don't see the wording that
27 you used in the question and highlighted
28 section of the page.

1 Q Okay. Allow me to restate.

2 Ms. Felts, what this says is PG&E has not
3 completed reconfiguration of its wells to
4 tubing and packer as of this past Monday.

5 Do you see that?

6 A I don't see the word
7 "reconfiguration" in there.

8 Q Ms. Felts, are you holding yourself
9 out to be an expert in this proceeding?

10 A Yes, but I mean you have -- you
11 just said that this section says that they
12 have not reconfigured their wells to tubing
13 and packer. I don't see that in that
14 statement.

15 Q Okay. How about retrofit?

16 A Okay. I see that.

17 Q How is retrofit different from
18 reconfigure in your view?

19 A I don't know what reconfigure would
20 be --

21 Q Okay.

22 A -- but I can understand retrofit.

23 Q Would you agree that this sentence
24 states and indicates that as of this past
25 Monday, PG&E had not retrofitted all of its
26 storage wells to tubing and packer?

27 A Well, it says they were filing a
28 seven-year plan for review and approval to

1 periodically inspect wells and retrofit all
2 of the storage wells to tubing and packer by
3 2025, so it appears like the deadline in the
4 regulations is to do so -- is to have a
5 seven-year plan to do so by 2025. It doesn't
6 actually say what the schedule is for PG&E to
7 do that retrofit.

8 Q Ms. Felts, if you'll turn to
9 page 26. This is Bates marked
10 SoCalGas-136.0031.

11 Do you see that?

12 A Yes.

13 Q This, again, has Table 2, Gas
14 Storage Asset Management Plan, Strategic
15 Objectives, and Progress-to-Date.

16 Do you see that, Ms. Felts?

17 A Yes.

18 Q And here in the first column it
19 described the status of their casing
20 inspection -- their casing inspections
21 they've completed at their facility.

22 Do you see that?

23 A Are you talking about the first?
24 I'm not sure where we're looking.

25 Q Yes. Where it says "complete
26 baseline well production casing assessment on
27 109 wells by 2025."

28 Do you see that?

1 A Yes.

2 Q And you'll note in the next column
3 that it says that they will be completing 20
4 wells -- or they did complete or were
5 planning to complete 20 wells in 2020.

6 Do you see that?

7 A I see that, yes. I understand.

8 Q And that they planned to complete
9 their baseline well production casing
10 assessments by 2025; correct?

11 A Yes.

12 Q Okay. Thank you.

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

14 (Off the record.)

15 ALJ POIRIER: Back on the record.

16 We are going to take a 15-minute
17 break until 11:15 and we will be back. Thank
18 you.

19 (Off the record.)

20 ALJ POIRIER: We will be back on the
21 record. We just returned from a 15-minute
22 break. Prior to the break, SoCalGas was
23 crossing Ms. Felts.

24 Please go ahead, Mr. Stoddard.

25 MR. STODDARD: Thank you, your Honor.

26 If we could please turn to
27 Exhibit 51, Chapter 8. This is marked
28 SoCalGas-51.0001. This is Chapter 1 Prepared

1 Sur-Reply Testimony of Margaret Felts in
2 Response to the Reply Testimony -- I'm sorry.
3 I'm reading the cover page and I'm just
4 trying to get the Bates number in there
5 because we're not going to reference this
6 section of the document. Okay.

7 If we can please turn to Chapter 8.
8 This is SoCalGas-51.0127. This is Prepared
9 Sur-Reply Testimony of Margaret Felts in
10 Response to Reply Testimony of Darrel
11 Johnson, dated June 30, 2020.

12 Q Ms. Felts, this describes what we
13 are calling violation 331.

14 Please scroll down.

15 Ms. Felts, as we discussed a couple
16 days ago, initially you had alleged a
17 violation of 88 related to failure to
18 disclose the constituents of gas to BPH, but
19 you withdrew that; correct?

20 A Yes.

21 Q And at the same time that you
22 withdrew that violation, you asserted a new
23 Violation 331; correct?

24 A Yes.

25 Q And violation 331, as stated there
26 in the header, is:

27 SoCalGas purposefully
28 extracted and vented oil

1 into the atmosphere during
2 the SS-25 incident on
3 November 13, 2015, which is
4 a 451 violation because it
5 exposed people near the
6 well, and the public, to
7 hazardous substances.

8 Do you see that?

9 A Yes.

10 Q Thank you.

11 And if we could please turn to the
12 last page of this section, page 4, concluding
13 sentence, "In conclusion, records suggest
14 that a purposeful release of oil and gas
15 occurred and that SoCalGas subsequently
16 attempted to cover up the facts surrounding
17 this release in Violation 451."

18 Do you see that?

19 A Yes.

20 Q Ms. Felts, I think you'll recall
21 that we discussed this at your deposition
22 last month; correct?

23 A I think so.

24 Q And I asked you whether the
25 violation was as stated in the header or as
26 stated here in the concluding sentence. And
27 you indicated it was as stated in the header;
28 correct?

1 A That is a violation stated in the
2 header.

3 Q And that it is not a violation as
4 stated in the concluding sentence; correct?

5 A I don't really remember our
6 conversation --

7 Q Okay.

8 A -- in the deposition.

9 Q All right. Let's please refer to
10 Exhibit Number 54. This is SoCalGas Exhibit
11 Number 54, deposition of Margaret Felts from
12 Wednesday, February 24, 2021. If we could
13 please turn to page 412, top of the page,
14 please. I asked:

15 Ms. Felts, then, if you can
16 read the last sentence
17 again, which states, 'In
18 conclusion, records suggest
19 that a purposeful release
20 of oil and gas occurred and
21 that SoCalGas subsequently
22 attempted to cover up' --
23 Sorry, I'll slow down.

24 -- 'cover up facts
25 surrounding this release in
26 violation of 451.'

27 Would you agree that that
28 language suggests that that

1 statement there regarding
2 the cover-up is a violation
3 of 451?
4 Mr. Gruen objects. Ms. Felts:
5 I think there's maybe a
6 couple of ways that you
7 could interpret the
8 concluding sentence.
9 And I asked:
10 It's your testimony,
11 Ms. Felts. How do you
12 interpret it?
13 And you answered:
14 I -- I would interpret it
15 to read -- if you were to
16 line out 'subsequently
17 attempted to cover up the
18 facts,' that you would
19 still have a correct
20 statement. And so I guess
21 my concern is that
22 structure of this sentence
23 should be 'surrounding this
24 release in violation of
25 451' does not modify
26 'subsequently attempted to
27 cover up the facts.' Does
28 that make any sense?

1 Question: I'm not sure.

2 Answer: I'll agree that
3 it's a poorly constructed
4 sentence.

5 Question: Did you write
6 this sentence?

7 Answer: I probably did
8 but it doesn't -- that
9 doesn't mean I'm not --
10 that I'm perfect in
11 constructing sentences. I
12 try to be better than this.

13 Question: I understand and
14 appreciate that, Ms. Felts.
15 What I'm trying to get at
16 here is I'm trying to focus
17 on what the conduct at
18 issue is that you're
19 alleging is a violation of
20 451.

21 Answer: I think the --

22 Question: Based -- sorry.
23 Can I -- I'm going to
24 finish my question.

25 Answer: Okay.

26 Question: Based on what
27 you just said now, would it
28 be correct to state that it

1 was the purposeful release
2 that was the action or
3 conduct that you allege was
4 the conduct at issue in the
5 alleged violation.

6 Mr. Gruen objects.

7 I then said:

8 I'm not going to go back.

9 It's a question the witness
10 can answer. The objection
11 is noted.

12 And then the witness answers:

13 Okay. Just a minute. I'll
14 go back to saying that
15 the -- the actual violation
16 is as it's stated in the
17 header for No. 3, lines
18 20 -- starting at line 20
19 on page 1 of this section.

20 Question: Okay. So the
21 violation is as it's stated
22 in the header, not in the
23 concluding sentence?

24 Answer: Yes.

25 That's correct, Ms. Felts?

26 A Yes, I agree with that.

27 Q Okay. Would you like to revise
28 your testimony to clarify the concluding

1 sentence and remove the reference to "a
2 cover-up is a violation of 451"?

3 A I don't think I need to do that
4 because the violation is stated correctly.

5 Q Do you need me to review the
6 transcript again, Ms. Felts? I believe you
7 said it wasn't stated correctly and it was a
8 poorly-crafted sentence.

9 A Well, let me look at the testimony
10 again. I think I had it up on my computer.
11 Can you tell me which page it was that we
12 were just looking at.

13 Q Yes, it's Chapter 8, page 4.

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

15 (Off the record.)

16 ALJ POIRIER: Let let's go back on the
17 record.

18 THE WITNESS: Okay. So the testimony
19 goes through discussion of what records we
20 had, what records we're giving to the public.
21 I mean you can read it. It's my testimony.
22 The "In conclusion" paragraph simply is a
23 concluding paragraph for the entire
24 discussion above it, not a restatement of the
25 violation.

26 The violation itself is stated in
27 the table in my opening testimony and
28 restated in the heading of this section, so I

1 don't really think there's any conclusion
2 about what the violation is.

3 BY MR. STODDARD:

4 Q Ms. Felts, you were under oath at
5 your prior deposition; correct?

6 A I was.

7 Q Do you want me to read back your
8 deposition testimony again? I believe you
9 specifically said that the statement would be
10 accurate if you lined out the language
11 regarding a cover-up, didn't you?

12 A Well, I also said it was a
13 poorly-crafted sentence. And I -- if you
14 want to line out every poorly-crafted
15 sentence in my testimony, you know, we would
16 have some work to do.

17 Q Fair enough. Let's move on.

18 Ms. Felts, the substance of this
19 allegation, again, is that this alleged
20 violation, as stated in the header, is that
21 SoCalGas -- that there was a geyser of fluid
22 and gas that came out of the kill site on
23 November 13, 2015; correct?

24 A That's the underlying information
25 that we had, yes.

26 Q And your allegation is that that
27 was a purposeful event; correct?

28 A Yes.

1 Q And, Ms. Felts, you were not there
2 on November 13th, were you?

3 A I was not.

4 Q And you didn't speak to anyone that
5 was present there on November 13th, did you?

6 A No.

7 Q Including the DOGGR personnel that
8 were on-site that day, did you?

9 A No.

10 Q And who agreed that SoCalGas should
11 keep pumping on the well because it may be
12 the best opportunity to kill the well; isn't
13 that correct?

14 A Well, if you're going to start
15 quoting people, we probably should look at
16 the underlying documents that you're getting
17 that from.

18 Q Ms. Felts, do you have a
19 recollection of the discussion regarding the
20 DOGGR update and the e-mails and the
21 description of the event from DOGGR?

22 A I recall there are two descriptions
23 from DOGGR.

24 Q And they both described a geyser;
25 correct?

26 A I think one did and one might have
27 been modified. I can't remember exactly what
28 the wording was, but I remember --

1 Q Okay. Let's reference the --
2 (Crosstalk.)

3 BY MR. STODDARD:

4 Q Sorry. I didn't mean to interrupt
5 you. Sorry. Continue.

6 A Oh, I just remember that there were
7 some issue about the two possibly statements
8 in an earlier one than appeared to be revised
9 by DOGGR or someone else.

10 Q Okay. If we can please reference
11 SoCalGas Exhibit Number 31. And this is a --
12 these are the exhibits provided in support of
13 Mr. La Fevers' testimony provided in response
14 to Ms. Felts' alleged violation 331. If you
15 could please turn to the second page. The
16 Bates number here is SoCalGas 31.0002.

17 If we could please go back up to
18 the top. It's from Benjamin Turner at the
19 Department of Conservation to Lauren Wollman,
20 and the subject is "Aliso update," and it's
21 dated November 13, 2015, at 11 p.m. at night.

22 Do you see that?]

23 A Yes.

24 Q And it's described as an update
25 from DOGGR field staff. Do you see that?

26 A Yes.

27 Q Okay. And if we could please
28 scroll down to the second page. Well, yeah,

1 let's read that first. "Subject, Aliso
2 update." Here's an update from a field
3 engineer, and then it goes on to describe the
4 events of the day. It's quite lengthy, so I
5 will not read the entirety of the document.
6 But if we can scroll to page 2, you'll see
7 there in the top paragraph here, it says,

8 "The well continued to blow around
9 the wellhead for the next 300
10 barrels of pumping, which should
11 have been about 40 minutes of time
12 elapsed. At this point, the site
13 began to run out of kill fluid as
14 the theoretical wellbore volume of
15 318 barrels had been pumped. More
16 fluid was pumped into the well, and
17 the well continued to blow into the
18 return tank and around the wellhead.
19 The dust column reached an estimated
20 60 feet in height."

21 Do you see that, Ms. Felts?

22 A Yes.

23 Q Then down in the third paragraph,
24 it says,

25 "We then walked back to the SS-25
26 site. After speaking with Brett
27 Lane and Danny Clayton with Boots
28 and Coots, it was agreed that the

1 operator should continue to pump the
2 well despite the surface gas leakage
3 as this may be the best opportunity
4 to kill the well."

5 Do you see that?

6 A Yes.

7 Q Does this refresh your recollection
8 in terms of the description that was given in
9 the DOGGR report?

10 A I think there is another DOGGR
11 report that had different verbiage or maybe
12 it was the timeline.

13 Q You agree that this email describes
14 a 60-foot geyser or dust column, correct?

15 A Well, I wouldn't say that a dust
16 column is the same as a geyser.

17 Q It reached 60 feet in height. You
18 would agree with that, correct?

19 A Well, that's what -- that's what
20 this says.

21 Q Okay. And based on the
22 description, it also was related to the
23 pumping of fluid into the well, correct?

24 A I'm actually not sure what he meant
25 by a dust column reached an estimated 60 feet
26 in height. It doesn't seem to be tied to the
27 rest of the statement.

28 Q Because you didn't talk to anybody

1 about this, did you, Ms. Felts?

2 A No. I was reviewing records that
3 were related to this incident.

4 Q And where you see records
5 describing the same incident in a slightly
6 different way, but again, both describing a
7 well-kill operation with a release of 60
8 feet, you aren't convinced that they were
9 talking about the same thing unless they used
10 the exact same language; isn't that correct,
11 Ms. Felts?

12 A Well --

13 MR. GRUEN: Your Honor, I'm going to
14 note an objection. Counsel is pushing limits
15 here. We have a concern that I'm going to
16 note for the record about badgering the
17 witness. This is -- the tone and aggression
18 with which counsel is pushing this line of
19 the witness is -- I will acknowledge
20 (inaudible), and it's been unseen before, but
21 I ask for counsel to take a slightly more
22 measured tone from your Honor's.

23 ALJ POIRIER: Mr. Stoddard, if you can
24 restate the question and see if you can be a
25 little -- moderate the tone a little bit,
26 please.

27 MR. STODDARD: Yes, your Honor.

28 Q Ms. Felts, if needed, we can go

1 through and do the entire exchange that we
2 did at the prior deposition, and I think it's
3 going to take us the better part of the day
4 or -- and if you don't recall -- if you just
5 genuinely don't recall exactly how that went,
6 I think maybe we can do that. But otherwise,
7 you know, again, I think we've covered this
8 ground before.

9 The question here is, Ms. Felts, is
10 it your belief that the description here
11 isn't consistent with descriptions you've
12 seen elsewhere from the DOGGR personnel
13 on-site?

14 A Is not consistent?

15 Q Correct.

16 A I think some of the facts are not
17 the same as stated. Without looking at the
18 other documents, I can't say what, but I do
19 know that this is the only document that
20 refers to a dust column.

21 Q And because of the different use of
22 language, in your view, you doubt that DOGGR
23 personnel were on-site for the release that
24 occurred that day; is that correct?

25 A No.

26 Q Okay. Do you want to explain why
27 you believe the difference in description
28 matters?

1 A I'm not sure it does matter,
2 because there's a record of a release. It's
3 all stated in the MCR message, and that's
4 what the violation is based on.

5 Q Okay. We'll get to that. So then
6 you do not dispute that DOGGR personnel was
7 on-site the day -- to witness the release?

8 A I believe I saw a deposition more
9 recently where this person was asked if he
10 was there, and he said yes. So I can't
11 dispute that.

12 Q Thank you. Thank you, Ms. Felts.
13 Okay. And again, they were not just there to
14 witness it, but they also agreed that
15 SoCalGas should keep pumping on the well
16 because it may be the best opportunity to
17 kill the well, correct?

18 A That is what it says in this
19 updated memo.

20 Q And you rely on documents
21 exclusively, don't you, Ms. Felts?

22 A As an investigator, I also compare
23 documents and look for facts that I can
24 substantiate, and when there are conflicting
25 facts, then I have to call that out.

26 Q So where are the conflicting
27 facts --

28 ALJ POIRIER: Excuse me. This is ALJ

1 Poirier. I think -- I wasn't sure if Ms.
2 Felts was done with her answer.

3 Ms. Felts, do you have anything
4 else?

5 THE WITNESS: I think I just said
6 that's part of an investigation.

7 ALJ POIRIER: Okay.

8 Go ahead, Mr. Stoddard.

9 BY MR. STODDARD:

10 Q Ms. Felts, are you contending that
11 there are conflicting facts with the sentence
12 highlighted here?

13 A I don't know without looking back
14 through the records, and I don't think
15 that -- I really just don't think that this
16 is that relevant to the violation. If there
17 was a purposeful release from the well,
18 whether or not they decided to continue
19 pumping the well is really not relevant
20 because they could have purposely released
21 pressure because they thought that it was
22 overpressured and they needed to release the
23 pressure. And if they did that, then they
24 could continue to try to kill the well. So
25 lacking facts around why that decision was
26 made and why that event occurred, I can't
27 really answer the types of questions you're
28 asking in a way that would be useful in the

1 cross-examination.

2 Q And, Ms. Felts, again, you're
3 lacking the facts because you didn't think it
4 was necessary to speak to the people who were
5 present for what was a highly dynamic
6 incident, correct?

7 A Well, we did not go out and start
8 lining up interviews with people for any part
9 of my investigation. I was asked to review
10 data that was provided by SoCalGas, and
11 that's what I did.

12 Q Okay. We can turn to the MCR now.
13 If we can turn back to sur-reply Chapter 8,
14 page 2 -- sorry -- Exhibit Number 51. Ms.
15 Felts -- if we can quickly read the Bates
16 number here. This is Bates
17 No. SoCalGas-51.0130. If we can please
18 scroll up.

19 Ms. Felts, the basis for this
20 allegation is this MCR, which states,
21 "On November 13th, 2015, SoCalGas
22 sent an internal message that
23 stated, 'per Incident Commander
24 Glenn La Fevers, during the repair
25 process, to mitigate the leak at the
26 wellhead in Aliso Canyon, oil was
27 extracted and was vented into the
28 atmosphere. There's an oily mist

1 that may potentially be moving into
2 the Porter Ranch area. Customer
3 service field distribution and meter
4 reading employees who are or may be
5 headed to work in the area have been
6 given instructions to avoid the
7 Porter Ranch area until further
8 notice. The Customer Contact Center
9 has been notified.'"

10 And Ms. Felts, isn't it correct
11 that the reason you believe this is a
12 purposeful release is because of the
13 statement "oil was extracted and was vented
14 into the atmosphere"?

15 A Yes.

16 Q And you believe that the grammar of
17 that sentence suggests that this was
18 purposeful or intentional; is that correct?

19 A Yes.

20 Q And you have no other evidence
21 whatsoever, besides the grammar of that
22 sentence, that this was a purposeful or
23 intentional release; isn't that correct?

24 A It was restated a few times by
25 others in the same manner.

26 Q You mean additional MCRs?

27 A Yes.

28 Q That duplicate the language of this

1 MCR?

2 A Yes.

3 Q Yeah. But aside from the
4 grammatical framing of this sentence, you
5 don't have any other evidence that this was a
6 purposeful or intentional release of fluids;
7 isn't that correct?

8 A Well, we did ask for recordings or
9 transcripts of Glenn La Fevers calling into
10 the MCR to get this message to see if maybe
11 he had said something differently, but
12 SoCalGas informed us that they couldn't find
13 the records. However, they did tell us later
14 that they do keep -- they do record those
15 conversations. So we were -- we were
16 basically left with no -- no additional
17 information, which we did ask for, to
18 determine what the nature of this
19 communication was.

20 Q Ms. Felts, I'm not asking about the
21 absence of evidence or what you may have
22 hoped to find or what you think SoCalGas
23 should report and be able to provide. I'm
24 asking simply "yes" or "no," do you have any
25 other evidence other than the grammatical
26 statement here, which is, "oil was extracted
27 and was vented into the atmosphere" to
28 support your contention that this was a

1 purposeful release?

2 A No. I'm relying on this message
3 and that language.

4 Q Thank you. Ms. Felts, do you know
5 how one might purposefully extract and vent
6 oil into the atmosphere in the course of an
7 emergency well-kill operation?

8 A I think we discussed this in my
9 deposition, and if we're going to look at my
10 deposition, we should probably do that now so
11 that I don't say additional things.

12 Q Okay. We can turn to Exhibit 54.
13 It may make sense to go off the record since
14 it may take me a moment to locate the right
15 place.

16 ALJ POIRIER: Off the record.

17 (Off the record.)

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

20 While we were on the record, we
21 provided additional instruction as to the
22 witness and their accessibility of testimony
23 specifically to make sure that that is
24 readily available and that it's -- that
25 witnesses are familiar with that. We also
26 provided time for SoCalGas to get exhibits
27 ready. Let's go ahead and reconnect.

28 Mr. Stoddard.

1 BY MR. STODDARD:

2 Q Exhibit Number 54, please. This is
3 the February 24th, 2021 Deposition of
4 Margaret Felts. I'm referencing page 420,
5 which is Bates marked SoCalGas-54.0094, and
6 I'll start at line 18,

7 "Question: So aside from this
8 method, you have no basis for
9 alleging that the extraction was
10 purposeful; is that correct?

11 Answer: It's my interpretation of
12 this message.

13 Question: And that's the sole
14 basis for your testimony on this
15 issue; is that correct?

16 As far as it being purposeful, yes.

17 Question: Putting aside how a
18 purposeful extraction and venting
19 would have occurred, do you have any
20 idea as to why SoCalGas would have
21 purposefully extracted and vented
22 fluid into the atmosphere?

23 Objection from counsel: This is
24 speculation.

25 Answer: I don't have specifics
26 because, again, I don't have all the
27 specific information that I would
28 need, but I would think that there

1 could be a situation that there's
2 overpressuring occurring in the --
3 in a well that they wanted to
4 release.

5 Question: What information would
6 you need?

7 Counsel: Objection. Vague.

8 Question from me: Ms. Felts, you
9 testified that you don't have the
10 specifics because you don't have all
11 the specific information that you
12 would need. I'm asking what
13 information you would need?

14 Answer: Well, you'd have to have
15 all of the realtime operating data,
16 what was happening in the well. I'm
17 not even sure that that data was
18 reported or retained.

19 Question: Are you sure that that
20 data was generated?

21 Answer: No.

22 Objection from counsel: Calls for
23 speculation. Go ahead.

24 Ms. Felts: I don't know what data
25 was generated.

26 Question: Thank you. So on this
27 issue and regarding -- where we're
28 at, we're discussing why SoCalGas

1 might have intentionally extracted
2 and vented oil into the atmosphere,
3 you don't know; is that correct?

4 Answer: Ask that question again.

5 Question: Ms. Felts, you don't know
6 why SoCalGas, as you alleged, might
7 have intentionally extracted and
8 vented oil into the atmosphere;
9 isn't that correct?

10 Answer: That's correct."

11 And then I think we can skip
12 down to page 423, line 2.

13 "Ms. Felts, you indicated that one
14 possible reason for intentionally
15 extracting and venting fluid into
16 the atmosphere would be that if the
17 well were overpressure; is that
18 correct?

19 Answer: I can think of a
20 possibility there.

21 Question: Do you have any
22 particular knowledge of instances
23 where that's occurred?

24 Answer: Instances where?

25 Question: Are you aware of any
26 precedent for that occurring in a
27 gas storage field operation?

28 Answer: That's a pretty broad

1 question.

2 Question: I'm asking you whether
3 you have any experience or knowledge
4 of your statement regarding that
5 being a possibility.

6 Counsel: Objection as overly
7 broad. Go ahead.

8 Ms. Felts: It's based on
9 engineering background.

10 Question: Is it based on any
11 particular experience from a similar
12 occurrence in the past?

13 Answer: No.

14 Question: Thank you."

15 Ms. Felts, do you recall that
16 discussion about overpressurization?

17 A Yes. It seems like it went on even
18 further than that.

19 Q Do you want me to keep reading?

20 A I can -- I can figure out what page
21 you're on. I can look.

22 Q I'll keep reading. One moment.
23 Actually, let me just -- I mean -- you know
24 what -- we can keep reading, but I think it
25 might be more efficient if I just ask you the
26 same question now, and if we need to, we can
27 refer back because this is based on your --
28 I'm not asking about things you've written.

1 I'm asking about your general recollection
2 and knowledge.

3 Ms. Felts, as to the
4 overpressurization of the well, why would
5 that be a concern?

6 A Well, you could damage equipment in
7 the tubing or the casing. You could damage
8 the casing further. You could damage a sand
9 formation. So it could affect possibly
10 wellhead equipment if that's a -- subject to
11 the pressure. There's various reasons why
12 you would not want to have an overpressure
13 situation.

14 Q So, again, putting aside whether
15 it's even possible for this to be purposeful,
16 if this were an overpressurized well, there
17 may be safety concerns that would present a
18 reason for wanting to release the pressure,
19 correct?

20 A That's true.

21 Q Okay. In terms of the -- how you
22 would go about with that release, are you
23 familiar with how you might operate a leaking
24 well in order to cause a release that would
25 result in a geyser that would go 75 feet to
26 the air?

27 A I don't know what was going on with
28 the well or why it would be overpressured

1 like that, but I do know that while they were
2 working on this well after it failed that
3 frequently they would release pressure from
4 the casing or the tubing to reset it back
5 down to a low pressure. So it's possible
6 they didn't -- for some reason, the pressure
7 was just too high and they needed to make an
8 immediate decision to release it. I just
9 don't know.

10 Q No. You're speculating, correct?

11 A Yes.

12 Q This is all speculation, isn't it?

13 MR. GRUEN: Your Honor, objection.

14 That's overly broad, and it's misstating her
15 testimony.

16 ALJ POIRIER: I think she's answered
17 it. She's answered the question before. So
18 let's move on.

19 BY MR. STODDARD:

20 Q Ms. Felts, do you recall that at
21 the time that this occurred the surface
22 around the wellhead was fractured?

23 A Yes.

24 Q The ground had fissures in it
25 emanating from the wellhead, correct?

26 A Yes.

27 Q And at this point in time, the
28 casing was parted, correct?

1 A Yes.

2 Q So the casing that you contend
3 should -- could have possibly needed to be
4 depressurized resulting in a geyser was
5 parted, correct?

6 A It would be more likely that it was
7 a tubing issue if it was released.

8 Q And Ms. Felts, do you recall seeing
9 anything about the flow path of gas?

10 A Are you asking me as the gas was
11 flowing out they parted casing into the soil?

12 Q Into the formation, yes.

13 A Yes.

14 Q Yeah. And the geyser that you have
15 been describing, the 75-foot geyser, it could
16 have come out of the earth; isn't that
17 correct?

18 A Possibly. If it had -- if it was
19 related to materials that they were pumping
20 at high pressure down the well.

21 Q That's correct. And Ms. Felts, are
22 you aware of any valve or lid or cap that
23 they would have had over the well site that
24 would have allowed them to control the
25 release of fluids and gas?

26 A Well, the tubing was still
27 connected to valves. So if you wanted to
28 release -- release pressure, I think there

1 may have been a way to do that. I'm not
2 familiar with what their options were on that
3 day.

4 MR. STODDARD: Okay. That's the end of
5 that line of questioning, your Honor. I
6 think we have one more line of questioning,
7 aside from some cleanup, which could be very
8 quick, or it could take a little while. I'm
9 just not sure.

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

11 (Off the record.)

12 ALJ POIRIER: We'll be back on the
13 record.

14 Mr. Stoddard, please -- while off
15 the record, we talked about the schedule for
16 the rest of the day.

17 Mr. Stoddard, please continue.

18 BY MR. STODDARD:

19 Q Okay. If we could please turn
20 to -- give me one second -- Exhibit 69. And
21 this is the Sur-Reply Testimony of Ms.
22 Margaret Felts, and it's related to Violation
23 331, dated November 24th, 2020. And it's
24 marked SoCalGas-69.0001. And this was --
25 although it's titled Sur-Reply, this is
26 supplemental sur-reply testimony that was
27 provided in response to the reply testimony
28 of Mr. La Fevers on Violation 331, correct,

1 Ms. Felts?

2 A Yes.

3 Q And if we could please turn to
4 pages 18 and 19 of the pdf. If we can scroll
5 down to 17. Thank you. And the Bates
6 number here is SoCalGas-69.0019.

7 Do you see that?]

8 A Yes.

9 Q Ms. Felts, again, I think you'll
10 recall we discussed this at your recent
11 deposition, and we can go through that if we
12 need. We can either, you know, do it the
13 hard way or you can try and recap this now.

14 But you recall in your testimony,
15 in this testimony, that you discussed an
16 article prepared by the Livermore National
17 Lab; correct?

18 A Yes.

19 Q And it was related to their
20 analysis of the SS-25 well-kill event,
21 correct?

22 A Yes.

23 Q And if we could please scroll back
24 down to 17 and Ms. Felts what you stated was
25 your conclusion and this related to the
26 geyser that occurred; correct?

27 A Yes.

28 Q And your conclusion and

1 interpretation of this study is that it
2 explains that normal well-kill procedures
3 could not kill the well because there were
4 holes in the tubing from a safe subsurface
5 safety valve that had been removed from years
6 before; is that correct?

7 A Yes.

8 Q And also according to the study
9 when SoCalGas installed the plug just above
10 those holes and perforated the tubing above
11 the plug, the configuration was you such that
12 the column with kill fluid could not be
13 created at reservoir depths; correct?

14 A Yes.

15 Q And, Ms. Felts, you confirmed that
16 you agreed with this; correct?

17 A I do agree with what they wrote,
18 yes.

19 Q Okay. And do you recall the SSV
20 that created a port and a communication path
21 between the tubing and the casing, that had
22 been removed, again, several years prior to
23 the incident; correct?

24 A Somewhere around 1981.

25 Q Because it wasn't operationally
26 working; correct?

27 A Yes. The insides of the SSV were
28 removed.

1 Q And to clarify what you mean -- I'm
2 sorry. Did you not finish?

3 A Go ahead.

4 Q And to clarify what you mean here
5 in the first sentence, "normal kill
6 procedures," you mean top-kill operations;
7 correct?

8 A Yes. The article was just about
9 top kills.

10 Q Right. Light kills 1 through 7
11 performed by 1, SoCalGas; and 2 through 7, by
12 Boots & Coots. Those are top-kill
13 operations; correct?

14 A Yes.

15 Q Okay. Ms. Felts, you also argue in
16 your opening testimony -- and if we need to,
17 we can refer back to it. But let me just see
18 if we can get this done quickly.

19 You also argue in your opening
20 testimony that SoCalGas could have killed the
21 well on the second kill attempt had it
22 properly modeled the well kill; isn't that
23 correct?

24 A Yes. That's based on the Blade
25 model. And I'm not sure what the difference
26 is between these two models. I think we did
27 ask Blade if they had seen it. And I'm just
28 going on memory. I think Blade said that

1 they had received this study. I'm not sure
2 whether it was factored into their models.

3 Q Ms. Felts, if you no longer believe
4 that the well was killable by top kill, would
5 you like to modify your opening testimony?

6 A No. I don't think I'd modify it.
7 Because the opening is based -- excuse me.
8 Let me get some water.

9 The opening testimony is based on
10 the Blade Report and Blade findings. And it
11 was -- excuse me. It was published before
12 this report was available at least to us. So
13 I don't know. I don't think I need to modify
14 it and since it's in the record.

15 Q Let's please refer to Exhibit-54,
16 Depo No. 2. This -- sorry. Ms. Felts'
17 deposition from February 2021. And this is
18 SoCalGas Exhibit No. 54. If we could please
19 turn to page 540, line -- I guess we can
20 start just for context at line 7:

21 "Question: Ms. Felts, is it your
22 understanding that the LBNL study indicates
23 that Well SS-25 could not be killed by top
24 kill after the SSSV was removed?

25 "Answer: What was the last part of
26 your statement?

27 "Question: Is it your
28 understanding -- I'll repeat the question.

1 Is it your understanding that the
2 Lawrence Berkeley technical document is
3 saying that Well SS-25 could not be killed by
4 top kill after the subsurface safety valve
5 was removed?

6 "Answer: I think that's what
7 they're saying, yes.

8 "Question: Is that your
9 contention?

10 "Answer: Based on the data that
11 they presented in their report, I would agree
12 that this -- it would be impossible to kill
13 the well.

14 "Question: You agree that it would
15 be impossible to kill the well if after
16 removal of the subsurface safety valve?

17 I'm trying to confirm what you just
18 said because you gave me part of the answer.

19 "Answer: The "after the removal of
20 the subsurface safety valve" is troubling to
21 me because that valve was gone back in 1980,
22 maybe '81. So it's not like they went in and
23 removed the valve any time recently.

24 "Question: Right. I'm asking
25 whether in your testimony, again, you state
26 that, 'this study explains that normal kill
27 procedures could not kill the well because
28 there were holes in the tubing from a safety

1 valve that had been removed from years
2 before.'

3 Are you referencing there a
4 subsurface safety valve?

5 "Answer: Yes. The one that was --
6 the guts were removed from it.

7 "Question: And by normal kill
8 procedures, do you understand that to mean a
9 top-kill operation?

10 "Answer: Yes.

11 "Question: Okay. And you
12 indicated that you would agree with the
13 authors. Agree that if a subsurface safety
14 valve had been removed, the well could not be
15 killable by a top-kill operation; is that
16 correct?

17 "Yes.

18 "Question: Okay. In the next
19 statement, you indicate that, 'According to
20 the study when SoCalGas installed the plug
21 just above those holes and perforated the
22 tubing above the plug, the configuration was
23 such that a column of kill fluid could not be
24 created at reservoir depth.'

25 Is this also indicating to you that
26 the well could not be killed by top kill due
27 to the prescribed plug and perforations?

28 "It couldn't be killed with the

1 configuration that -- the configuration of
2 the well when they were trying to kill it in
3 each attempt.

4 "It couldn't be killed by top kill?

5 "Answer: Yes.

6 "Question: And what do you mean by
7 'configuration'?

8 "Answer: The slots and the safety
9 valve or the safety valve that was partially
10 removed plus a plug plus perforations above
11 the plug.

12 "Question: And when were those
13 plugs and perforations put in place?

14 "November 13th --

15 "Answer: November 13th, 2015."

16 Your Honor, at this time, SoCalGas
17 would like to move to strike violations
18 related to the well kill in the opening
19 testimony, No. 79 and 83.

20 The witness is offering conflicting
21 factual theories. You can't argue facts in
22 the alternative. This isn't a legal
23 argument.

24 ALJ POIRIER: Mr. Stoddard, I'm not
25 saying you can't. I just think right now --
26 I think that AC Hecht can weigh in. But I
27 think the time to make this is when we're
28 moving the exhibits later. I don't think we

1 want to entertain this now. I'd want to
2 continue with cross.

3 ALJ Hecht, do you have any input on
4 this?

5 ALJ HECHT: I think that if we can
6 finish cross in the near future, that we
7 should do that and move on to redirect.

8 ALJ POIRIER: So, Mr. Stoddard, when
9 the exhibits are moved by SED, I think that
10 would be the time to raise this.

11 Understood?

12 MR. STODDARD: Understood, your Honor.
13 I have no further questions.

14 ALJ POIRIER: Okay. We're going to go
15 -- let's go off the record.

16 (Off the record.)

17 ALJ POIRIER: Back on the record. We
18 are going to take a break, a lunch break.
19 And we will be back at 1:20.

20 Off the record.

21 (Whereupon, at the hour of 12:11
22 p.m., a recess was taken until 1:20
p.m.)

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AFTERNOON SESSION - 1:20 P.M.

* * * * *

MARGARET FELTS

resumed the stand and testified further as follows:

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

This is the afternoon of the fourth day of hearings in Investigation 19-06-016. I am ALJ Jessica Hecht and I'm joined by ALJ Marcelo Poirier.

We, I believe, this morning finished cross-examination of the SED witness, Ms. Felts. And this afternoon we're going to continue with redirect of Ms. Felts.

Are there any questions or issues or housekeeping before we go forward?

MR. GRUEN: Your Honor, Darryl Gruen for SED. Thank you. Just a potential housekeeping matter. Does Ms. Purchia have access to the exhibit sharing device?

MS. PURCHIA: I do --

ALJ HECHT: Yes.

MS. PURCHIA: Sorry. I do have that button available. Thank you.

MR. GRUEN: Very good.

ALJ HECHT: With that we will begin

1 with redirect.

2 Mr. Gruen.

3 REDIRECT EXAMINATION

4 BY MR. GRUEN: Thank you, your Honor.

5 Q Good afternoon, Ms. Felts.

6 A Hello.

7 Q Okay. So, Ms. Felts, as a first
8 matter if we could ask you, do you recall
9 Mr. Stoddard was asking you -- both yesterday
10 and today -- about calculations underlying
11 the dates of the violations in Table 1 of
12 your testimony?

13 A Yes, I remember that.

14 Q And what was your understanding of
15 his question when he asked for those
16 calculations?

17 A Well, I think yesterday -- excuse
18 me. Yesterday I got -- I think I got a
19 little confused about what he was asking
20 about. I was thinking he was asking about
21 the process of calculating from the start to
22 the end date and how that came about. And I
23 viewed that as a Commission or a CPUC process
24 not something that I designed myself.

25 And then -- and I'm thinking about
26 it last night. It's possible that he was
27 actually asking me to go back and recount how
28 those dates have been selected.

1 So, you know, at the time I guess I
2 was thinking back then the testimony is
3 pretty clear. But maybe it's not. Maybe
4 it's not clear. So I thought we should
5 probably revisit that.

6 Q Okay. So with that if we could
7 turn to Exhibit SoCalGas-47. And just as a
8 reminder for the record, this is -- if you
9 could scroll back up just so I can read for
10 the record.

11 This is the opening testimony. And
12 just as shorthand, Ms. Felts, do you
13 recognize this as your opening testimony in
14 this proceeding?

15 A Yes.

16 Q Okay. If we scroll down just to
17 identify it for the record and the Bates
18 number in the lower right corner, Exhibit
19 SoCalGas 47.0001, which is the cover page of
20 Ms. Felts' opening testimony.

21 Okay. So with that if we could
22 scroll to the page No. SCG-47.0007. And if
23 you see here, it's just a small excerpt
24 because of the screen size. But, Ms. Felts,
25 do you see Table 1 here with the summary of
26 violations shown?

27 A Yes. The top part of the table on
28 the first page. Page 7 I think it is. And

1 this is just a summary of the violations
2 begin dates and end dates.

3 Q Yes. And so there are certain
4 begin and end dates related to violations
5 that do not in fact rely upon the Blade
6 Report; is that correct?

7 A Yes.

8 Q Okay.

9 A Those would be my -- the records
10 violations and 330 and -- which is the
11 pressure record. And 331 which is Violation
12 331.

13 Q Yes. Okay. So let's go to those
14 if we could just scrolling down to SoCalGas
15 Exhibit --

16 A Okay.

17 Q -- 47. And just bear with us a
18 second. I think it's the next page. And
19 just for technical matters, I'm wondering if
20 it's possible to enlarge this -- the window.

21 Should we go off the record for a
22 moment, your Honor? Your Honor, may we have
23 a moment off the record just to adjust?

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

25 (Off the record.)

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

28 While we were off the record, we

1 discussed some technical issues and found, I
2 believe, the right page in the exhibit.

3 Please go ahead.

4 MR. GRUEN: Thank you, your Honor.

5 Q Okay. So if we look at the Bates
6 number at the bottom of this page, we see
7 that it's marked SoCalGas 47.0010.

8 If we scroll back up, Ms. Felts, do
9 you see the record keeping violations you
10 referred to a moment ago?

11 A Yes. 3.7 through 330.

12 Q Great. Okay. And you see the
13 begin and end dates referenced in those
14 violations as well?

15 A Yes. So for those -- for the
16 violations 3.7, 3.8, and 3.9, these are
17 record keeping violations for the wells
18 SS-25, 25-A, and 25-B. The start date I did
19 identify and they are basically the date that
20 each well went into operation. And so those
21 dates are just pulled out of the well file.
22 And that would be operational for SoCalGas
23 not the original well date, which would be
24 back in the '50s for at least SS-25.

25 Q Okay.

26 A And the end dates are the dates of
27 the incident on SS-25.

28 Q Okay. Great. And Violation 330,

1 what about the begin date and end date there?

2 A Okay. So we talked about that a
3 little bit earlier in cross-examination. The
4 10/15/15 is the date when the last recording
5 of attempt of a pressure for SS-25 occurred
6 on -- it was manual reporting on schedule
7 that was provided to us. And the end date is
8 the date of the incident.

9 Q Thank you. Okay. If we could
10 scroll up one page, scroll up just a little
11 bit more. Sorry. It may be that we have to
12 scroll to the second page. Pardon me. One
13 more page, please.

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

15 (Off the record.)

16 ALJ HECHT: We'll be back on the
17 record.

18 MR. GRUEN: And referring to this Bates
19 No. SoCalGas 47.0008. And if you scroll up
20 here. Scroll up just a bit more. I am
21 sorry. Maybe if you scroll down just a
22 little bit. Pardon me. Could you scroll up
23 two pages, please. Oh, here. Stop. Okay.
24 Scroll down just slightly. Okay.

25 Ms. Felts, do you recognize --

26 ALJ HECHT: Let me know when you're
27 ready to go back on the record.

28 MR. GRUEN: Ready, your Honor.

1 ALJ HECHT: Is the reporter ready?

2 Yes.

3 We'll be back on the record.

4 Please continue.

5 MR. GRUEN: Thank you, your Honor.

6 Q 74, 75, and 76, do you see those?

7 A Yes, I do.

8 Q And --

9 (Crosstalk.)

10 Q Please explain if you would. What
11 are those violations in summary? And it's
12 the same exercise as before. What are the
13 begin dates, what's the basis for them, and
14 the end dates if you would?

15 A Okay. These are three violations
16 that -- I guess you could read them yourself.
17 Failure to implement a risk and integrity
18 management program for Aliso Canyon, failure
19 to detect corrosion on SS-25, failure to
20 start Well Integrity Program in 2009. These
21 all have the same start dates of 12/31/2009.

22 And that goes back to a Mansdorfer
23 e-mail, and you could find that if we went to
24 page 17. There's a reference in footnote 83
25 and also in footnote 88.

26 Q Okay. And just referencing -- if
27 you'll scroll down a little bit more,
28 Ms. Purchia.

1 Page 17 for the record has Bates
2 No. SoCalGas 47.0021. And if we scroll up --
3 I am sorry. I think the footnotes you
4 referenced there --

5 (Crosstalk.)

6 A Are 63 and 88.

7 Q Do you see those shown on the
8 screen?

9 A Yes.

10 Q And what are those referencing to?

11 A They reference the transcript of
12 Mansdorfer. So that wouldn't be an e-mail.
13 That would be his EUO September 13th, 2018.
14 And it gives you the page numbers where he
15 discussed this issue.

16 Page 88 is the same transcript.
17 And then if you go to page 20, footnote 14.
18 Page 20 --

19 Q And for the record just reading the
20 Bates number page 20. It is Bates No.
21 SoCalGas 47.0024.

22 (Crosstalk.)

23 Q And go ahead. Do you see the
24 footnote there?

25 A Yes. So 104 reads:

26 Thursday April 23, 2009

27 2:12 p.m., Mansdorfer to

28 Weibel e-mail.

1 And then more reference. And this
2 is the e-mail that -- that's the 2009 date.

3 Q Okay. And so, Ms. Felts, with the
4 reference you just mentioned of April 23rd,
5 2009, which violations then does that -- do
6 those -- does that e-mail and transcripts
7 that you just discussed, which violations --
8 if we could go back to the table at the
9 beginning. I think it starts on --

10 A I think it's 74, 75, and 76.

11 Q But, Ms. Felts, the begin date of
12 74, 75, 76 is actually 12-31 of 2009. Not
13 April 23rd. Can you explain the reason for
14 that?

15 A So almost all of the violations
16 except for the records violations that were
17 set on specific dates, all of the others we
18 took a more conserve -- I say conservative
19 view. But liberal, I guess, is a better
20 view. For -- to give the benefit of the
21 doubt to SoCalGas and use the last date of
22 each year to set those violations.

23 So instead of April, these
24 violations we moved to a start date at the
25 end of the year, 12/31/2009.

26 Q Thank you. And, again, the end
27 dates you see that for these violations they
28 are for the October 23rd, 2015; is that

1 right?

2 A Yes. The date of the incident.

3 Q Okay. Thank you. All right. If
4 we go to the top of this page, so violation
5 -- if I could ask you about violations -- the
6 dates related to Violation 1. You see the
7 beginning and end dates referenced there?

8 A Yes.

9 Q And --
10 (Crosstalk.)

11 A Go ahead. Each of these days,
12 again, start at the end of the year that's
13 shown. And if to determine -- to find the
14 year, I go back to pages -- page 8 I think it
15 is. We could start there.

16 Q If we could go to page 8. And
17 we're referencing -- Ms. Felts, are you
18 referencing page 8 of the testimony there?
19 Or are you referencing the Bates number?

20 A No. Page 8, Bates No. SoCalGas
21 47.0012.

22 Q Okay.

23 A And it should be in the first full
24 paragraph.

25 Q And where are you referencing
26 specifically?

27 A The paragraph beginning:
28 In addition to Aliso

1 Canyon, wells had already
2 experienced underground
3 blowouts from casing leaks:
4 Frew-3 in 1984 and FF-34A
5 in 1990.

6 Q Okay.

7 A And we discussed earlier in cross,
8 these violations have to do with the failure
9 to investigate and perform failure analysis.

10 Q Thank you.

11 A The end date then is the date of
12 the incident.

13 Q Okay. Thank you. I guess you
14 jumped a little bit ahead. But you see the
15 exercise we're walking through, which is the
16 beginning and end dates, the basis for them.

17 So which violations do these
18 particular dates that you referenced refer to
19 if we go back to the table?

20 A I think these are violations 1 and
21 2.

22 Q Okay. And turning then to
23 Violations 3 through 6, do you see those?

24 A Yes. And I believe those are all
25 on the same page, page 8.]

26 Q Okay. If we go back there.

27 A Okay, in the next paragraph.

28 (Interruption in proceedings.)

1 ALJ HECHT: We'll be back on the
2 record. We had a technical issue, which is
3 why we were off the record.

4 MR. GRUEN: Thank you, your Honor.

5 Q So Ms. Felts, I believe we were
6 referring to violations 3 through 6. Do you
7 recall discussing that before the technical
8 issue arose?

9 A Yes. So we're looking at the page
10 we were looking at before, which I believe is
11 page 8 at the paragraph that begins, "between
12 1969 and 1964, four wells were discovered to
13 have parted casings." We found that one
14 parted casing occurred in 1969, and three
15 others were identified in 1994.

16 So we identified Violation Number 3
17 as a start date of 1969 and Violations 4
18 through 6 as a start date of 12-31-1994.
19 Again, we selected the last day of the year
20 to start those violations, and the end date
21 is the date of the incident, 10-23-2015. I
22 think that I was explaining that these were,
23 again, violations having to do with not
24 investigating parted casings, no failure
25 analysis was found.

26 Q Thank you. If we go back to
27 Table 1 that we've been referencing on I
28 believe it's page 7 -- excuse me, page 3 --

1 A Page 3.

2 Q -- which is -- excuse me, I have
3 the Bates number confused --
4 SoCalGas-47.0007. Continuing on then, if we
5 go to Violations 7 through 60, can you
6 explain in the same fashion your thinking
7 there.

8 A Okay. So those were 54 well leaks.
9 Again, no investigation or failure analysis
10 on these specific leaks that were identified
11 by Blade, and we did not have the dates of
12 those leaks and so we -- or we elec -- or I
13 elected and recommended just one day
14 violation for each starting at 10-22-2015 and
15 ending on the date of the incident.

16 I would say that these leaks are
17 identified by and for Blade in tables, so we
18 could have picked off earlier dates if we had
19 asked more questions of Blade to pinpoint
20 those dates, but we went with the one-day
21 penalty instead.

22 Q Thank you. And continuing down to
23 table Violations 61 through 72, if you can
24 continue, please.

25 MR. STODDARD: Your Honor, I'm going to
26 object. I've been listening to this line of
27 questioning. This directly contradicts sworn
28 testimony. We heard from the witness on

1 Wednesday that she had no involvement in the
2 selection of these dates and accepted them as
3 they were handed to her by SED.

4 We understand that she's capable of
5 reading her prepared testimony. And if
6 that's what this exercise is about, I can sit
7 back and we can continue. But she is using
8 the words of "we" and "I" selected and making
9 it her own knowledge. She either was lying
10 then or she's lying now. I'm not sure which
11 it is, but this contradicts her testimony on
12 Wednesday.

13 MR. GRUEN: Your Honor -- I'm sorry.

14 ALJ HECHT: Mr. Gruen, what is your
15 response?

16 MR. GRUEN: I must strenuously object
17 to the words chosen. I assume they were
18 carefully chosen and prepared at this point.
19 But to assert that the witness was lying is
20 simply -- I object to that characterization.
21 What Ms. Felts is doing is refreshing --
22 she's had a chance to look at this testimony
23 and refresh her recollection.

24 She's testified that she was
25 confused by the line of questioning, a robust
26 line, I might add, that went for three and a
27 half days that was asked again. I think she
28 should have an opportunity to explain why --

1 she's explained why she was confused. She
2 should have an opportunity to explain her
3 understanding of the basis for the dates.

4 MR. STODDARD: Your Honor, may I
5 respond?

6 ALJ HECHT: Yes.

7 MR. STODDARD: Your Honor, I don't
8 think my questioning was limited to do you
9 understand the basis for the dates based on
10 your reading of the testimony. I
11 specifically asked her as to her involvement
12 in this. She's now stating it as though she
13 were involved. Frankly, I'm pretty concerned
14 about this being offered right now as sworn
15 testimony in light of both the deposition
16 testimony we had, as well as the testimony
17 that we heard on Wednesday.

18 If we are going to continue down
19 this line, I would ask that -- again, we
20 don't have the transcript right now and so
21 it's difficult to determine what was said,
22 but I would like to note the objection. And,
23 again, if all we're -- if we want to limit
24 this to reading testimony and saying what it
25 says, it can proceed, but she is
26 contradicting herself.

27 MR. GRUEN: Your Honor, may I respond
28 to that?

1 ALJ HECHT: Only very briefly.

2 MR. GRUEN: This is not the witness
3 reading her testimony. She's explaining the
4 basis for the dates. She's providing insight
5 as to why they're there. If SoCalGas would
6 like to recross her on these, we would have
7 no objection.

8 MR. STODDARD: Your Honor, may I
9 respond?

10 ALJ HECHT: That's all right. I think
11 I'm going to move forward without another
12 response. Before the objection was
13 registered, I had noticed some pauses in the
14 witness' testimony where it appeared to me
15 the witness was saying "they chose" and then
16 "I chose" or "we chose," and it felt to me
17 like that was being used interchangeably.

18 I also have concerns about this line
19 of testimony. I do not have the transcript
20 in front of me. I acknowledge that the
21 witness is discussing the basis for these
22 numbers and I am fine with the witness going
23 through the basis for these numbers, but I
24 will say that there is a concern about
25 credibility to the extent that the witness
26 has said "they" and "we" and "I" at different
27 times. So I am overruling the objection with
28 that caution.

1 MR. GRUEN: Understood, your Honor.

2 ALJ HECHT: Are there any other
3 questions or comments before we move on?

4 (No response.)

5 ALJ HECHT: All right.

6 Mr. Gruen, please continue.

7 MR. GRUEN: Thank you, your Honor. And
8 with that, I'll proceed.

9 Q Continuing on, Ms. Felts, with
10 Violations 61 through 72, can you explain the
11 basis for those dates and the violations.

12 A So 61 through 72, actually
13 through 73, refer to a 1988 memo that we've
14 referred to several times during the
15 cross-examination. This memo called for the
16 investigation of wells, I think we can find
17 the memo, but let me try and remember. I
18 think it's around page 10 of the testimony
19 and it was attached as an exhibit.

20 Q If we go to the bottom just to read
21 the Bates number, page 10 refers to Bates
22 Number SoCalGas-47.0014.

23 Go ahead, Ms. Felts.

24 A If you can scroll up a little bit
25 where there is discussion about this memo.
26 Okay. So SoCalGas had a two-year plan in
27 1988 to determine the condition of the casing
28 of 20 wells and that was based -- so the plan

1 was provided to us by SoCalGas and we
2 identified the violations, failure to follow
3 company's internal 1988 plan to check casing
4 on 12 wells for (inaudible) wells and that's
5 based on the fact that they looked at some
6 wells but did not complete their two-year
7 plan.

8 Q Okay.

9 A And just for reference, the full
10 memo is attached as one of the exhibits to
11 the opening testimony.

12 Q And when you say the full memo, can
13 you describe it in more detail.

14 A It's a memo that recommends a
15 two-year plan to do an investigation of
16 certain wells that are ranked from high
17 priority to low priority. And at the time I
18 think they were recommending doing Vertilog
19 investigations of the well casings to see if
20 they -- well, to investigate the integrity of
21 the well casing.

22 Q Okay. And so --

23 ALJ HECHT: This is Judge Hecht. I
24 would like a reference to what exhibit this
25 is. You don't have to provide it now but
26 before we finish this afternoon.

27 MR. GRUEN: I defer to Ms. Felts. I
28 think Ms. Felts may be able to answer your

1 Honor's question.

2 ALJ HECHT: I'd like to know which
3 exhibit that memo is so that I can look at
4 it.

5 THE WITNESS: I'm not sure I remember
6 the exhibit.

7 ALJ HECHT: Then I will reiterate that
8 you can find it later and you can give me the
9 exhibit number then, but I do want to be able
10 to see the memo to which you refer.

11 MR. GRUEN: Yes, your Honor. We will
12 do that.

13 ALJ HECHT: Thank you.

14 Please continue, Mr. Gruen.

15 MR. GRUEN: Thank you. I'm noting down
16 your Honor's instruction. Pardon for the
17 delay.

18 Q Ms. Felts, you've referenced the
19 1988 plan or the 1988 memo. Could you tell
20 us -- the initial question was relating it to
21 the start date of -- I think it was
22 Violations 61 through 73 you had mentioned.

23 A Right.

24 Q Can you explain the basis for the
25 start date if we go back up to Table 1 and
26 find Violations 61 through 73.

27 A I think the start date of those
28 violations is the date of the memo or the

1 plan.

2 Q Okay.

3 A Where it says 8-31-1988.

4 Q Okay. And continuing on now, I
5 think if you'd scroll down just slightly.
6 Thank you.

7 So Ms. Felts, do you recall -- I
8 believe you already explained your thinking
9 behind Violations 74 through 76 for the
10 record.

11 Do you recall that?

12 A Yes.

13 Q Okay. So let's continue on to
14 Violation 77, please, and 78. What is the
15 basis of those violations?

16 A Those are --

17 Q I should say the dates of those
18 violations that relate to them. Pardon me.

19 A Violations 77 and 78 have the same
20 date, 8-31-1988, and they are linked back to
21 the same memo we were just talking about.

22 Q Okay. Thank you. All right.
23 Continuing down to Violation 79.

24 Do you see that?

25 A Yes. So Violation 79 is failure to
26 successfully execute well SS-25 kill attempt
27 numbers 2 through 7 due to a lack of proper
28 modeling, so this is not specifically failure

1 to kill the well, but failure to have proper
2 modeling to achieve that.

3 Q Do you see the dates linked with
4 that violation?

5 A The start date is 11-13-2015, which
6 is the date of the first well kill by Boots &
7 Coots, which was attempt number 2, and the
8 end date is the date that the well was
9 actually killed using the relief well,
10 2-11-2016.

11 Q Thank you. Continuing to the next
12 page, and you see Violation 83 there. Can
13 you explain the basis for the -- if you can
14 read the summary for the record and then
15 explain the basis for the dates.

16 A The summary says, "Prevention of
17 surface plumbing failures on SS-25 from
18 enabling that well to be kept filled."
19 That's shorthand. Blade identified this
20 problem associated with, I believe, well kill
21 attempt 6 when there was a problem with the
22 plumbing on -- plumbing being used to pump
23 fluid into the well and they had to stop
24 early, so Blade identified this as an issue.

25 It was picked up as a violation and
26 the begin date, 11-25-2015, is the date of
27 that occurrence, and the end date is the date
28 the well was killed.

1 Q Thank you. Ms. Felts, continuing
2 to Violation 84, please. What is the summary
3 there and what are the bases for the dates on
4 that one?

5 A 84 is allowance of groundwater to
6 cause corrosion on the 7-inch and
7 11-and-3/4-inch casings on SS-25 and this
8 violation, as well as 85 and 86, are all also
9 tied to the 1988 memo, August 31, 1988, that
10 we were previously discussing. The end date
11 is the date of the incident.

12 Q Thank you. If you'd scroll down
13 just slightly. Thank you. Continuing on to
14 Violation 87 and the basis for the dates
15 linked with that one.

16 A Violation 87 says:
17 Failure to have continuous
18 pressure monitoring system
19 for well surveillance
20 because it prevented an
21 immediate identification of
22 the SS-25 leak and accurate
23 estimation of the gas flow
24 rate.

25 The beginning date is the date of
26 the incident and the end date is the date
27 that the well was killed.

28 Q I think 88 has been withdrawn so

1 we'll move on to the next page. Okay. And
2 continuing on to the next page. It's the
3 scope of hearings. It's within the scope of
4 hearings. Excuse me. So the one piece, and
5 forgive me, if we could talk about that's not
6 on this table, the other violation is 331.

7 Do you recall being asked about
8 that?

9 A Yes. Violation 331 was just one
10 day, November 13, 2015.

11 Q And why that day?

12 A That is the date of the MCR message
13 from Mr. La Fevers stating that they had
14 released oil into the air and created a mist.

15 Q Thank you. Turning, if we could --
16 I'd like to turn to another line of
17 questioning. Do you recall Mr. Stoddard
18 asking you what documents you found that you
19 thought Blade had not seen?

20 A Yes, I remember that.

21 Q And in response, you began to list
22 some of the documents, just talk about some
23 of them.

24 Do you recall that?

25 A Yes. It's kind of hard to talk
26 about them without showing them.

27 Q So if we could go to Exhibit
28 SED-218, please, if that could be pulled up.

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

2 (Off the record.)

3 ALJ HECHT: We'll be back on the
4 record.

5 MR. STODDARD: Your Honor, I have a
6 question or an objection about this document.

7 ALJ HECHT: Yes.

8 MR. STODDARD: Was this document
9 included in any testimony that was served by
10 SED?

11 ALJ HECHT: That is a question.

12 Mr. Gruen.

13 MR. GRUEN: Yeah, I -- not to my
14 knowledge, but it's within the scope of
15 cross. This is --

16 MR. STODDARD: It's redirect.

17 MR. GRUEN: -- redirect. It's a
18 redirect exhibit and I might note that
19 Rule 13.7 -- nothing in that rule, which
20 provides the rules for exhibits, prohibits
21 exhibits from being proffered like this on
22 redirect, particularly when they're within
23 the line of cross, when they're within the
24 scope of cross.

25 So, your Honor, I'd ask for
26 indulgence, a bit of indulgence, to show how
27 this relates to a line of cross.

28 ALJ HECHT: I am displeased that this

1 was not served in advance. I don't remember
2 the wording of my instruction to provide
3 exhibits in advance. I may have only said
4 cross exhibits, but I think that not serving
5 something that one intends to use is not
6 within the spirit of what I meant.

7 MR. GRUEN: Your Honor, I'm terribly
8 sorry. I think I may have misunderstood
9 Mr. Stoddard's question. This was served
10 yesterday before 1 o'clock in a timely
11 fashion as were the other redirect exhibits.
12 We have served them in a timely fashion in
13 compliance with your Honor's ruling. Please
14 pardon me for the misunderstanding.

15 ALJ HECHT: Thank you for that
16 clarification.

17 Mr. Stoddard.

18 MR. STODDARD: Thank you, your Honor.
19 Yeah, the general rule is that you're not
20 allowed to introduce new exhibits in redirect
21 that you didn't include with your testimony
22 when served. I agree with Mr. Gruen that
23 they served these exhibits in advance of
24 today's questioning, except this is redirect.
25 It's not cross-examination. You can use all
26 sorts of documents in cross-examination.
27 They didn't include this as an exhibit in
28 support of any of their several rounds of

1 testimony.

2 If this is going to be allowed, we
3 would ask that we also be allowed to
4 introduce new exhibits on redirect.

5 MR. GRUEN: Your Honor, may I respond
6 to that?

7 ALJ HECHT: Very briefly.

8 MR. GRUEN: Your Honor, as shown by the
9 nature of Mr. Stoddard's question, counsel's
10 cross of Ms. Felts was wide open. He asked
11 her to list documents and she did and this
12 fits within the scope of that question.
13 That's the nature of the redirect. We're
14 staying within the scope of his questioning.

15 ALJ HECHT: I would like to take this
16 under advisement. I think we are going to
17 take our afternoon break and we will be back
18 in about 15 minutes. I appreciate that this
19 was served in advance. I still have major
20 concerns with new exhibits being made
21 available in this fashion.

22 We will be back at 2:20 p.m. We'll
23 be off the record.

24 (Off the record.)]

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

27 While we were off the record, I
28 looked at some exhibits that were sent

1 yesterday, some proposed exhibits, and
2 conferred with my co-assigned administrative
3 law judge. I have a few questions about this
4 document, these four, we continue the
5 discussion of it. This document was served
6 yesterday.

7 Is this document included anywhere
8 with the testimony or attachments that SED
9 provided?

10 MR. GRUEN: To the best of my
11 knowledge, no, your Honor.

12 ALJ HECHT: Thank you. My concern here
13 is this goes (inaudible) and clarification.
14 This is providing new testimony essentially,
15 and that is not, I think, what the redirect
16 is for. I have already allowed a number of
17 questions about the basis for some dates that
18 may or may not be in testimony somewhere, and
19 I suspect there are underlying documents in
20 an exhibit that contains some of that
21 information, and then I was willing to allow
22 it and to the point for clarification, not
23 for adding completely new exhibits or
24 documents or anything like that. SED and all
25 other parties may, of course, have
26 cross-exhibits for other peoples. But I do
27 not believe it is appropriate to do that, and
28 I am sustaining the objection to this.

1 MR. GRUEN: Understood, your Honor. I
2 just note that I see Public Advocates
3 Office's counsel has her hand raised. So I
4 just wanted -- but your Honor will certainly
5 proceed with that instruction.

6 ALJ HECHT: Thank you. I do not see
7 the Public Advocates Office representative
8 with her hand raised. So I am going to
9 refresh my screen, and I am certainly willing
10 to take a question about that. All right.
11 Now I have refreshed my screen. Sorry for
12 all the narratives on the transcript. All
13 right. I cannot hear Ms. Bone, and so that
14 is a problem.

15 Are we on or off the record at this
16 point?

17 THE REPORTER: We've been on the whole
18 time.

19 ALJ HECHT: That's what I suspected.
20 Thank you.

21 We'll be off the record.

22 (Off the record.)

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

25 (Interruption by reporter.)

26 MS. BONE: Your Honor, thank you for
27 taking the time to allow us to comment on
28 this ruling. I just wanted to be on the

1 record that Cal Advocates believes that it's
2 perfectly appropriate to use redirect
3 exhibits when counsel on cross-examination
4 opens the door to that, which Mr. Stoddard
5 has done here. He asked Ms. Felts which
6 documents she considered, and now she is
7 providing them on redirect. Mr. Stoddard
8 should be provided the opportunity to
9 re-cross on those exhibits. This has been my
10 experience in hearings.

11 Further, I don't believe that it's
12 reasonable to require that all redirect
13 exhibits be provided at 1:00 o'clock on the
14 day before a witness is giving testimony, but
15 kudos to Mr. Gruen for doing so. If there
16 had been redirect occurring on the same day
17 as the testimony was provided, there would be
18 no way to preserve the exhibits, and so they
19 should still be allowed in.

20 So I just wanted to share these
21 thoughts on what we believe to be appropriate
22 procedures within the courtroom. But we
23 understand that you have decided differently,
24 and we will respect that to the extent that
25 you stay with that holding.

26 ALJ HECHT: Thank you. Thank you,
27 Ms. Bone.

28 Are there any other comments on

1 this?

2 Mr. Stoddard.

3 MR. STODDARD: Thank you, your Honor.
4 First of all, I don't think we -- opening the
5 door to questioning on whether she reviewed
6 documents isn't the same thing as allowing
7 her to supplement her direct testimony and
8 including documents in support of exhibits.
9 However, to the degree your Honor rules
10 otherwise, we would simply ask that our
11 witnesses be given an opportunity to address
12 these same documents on direct as well and
13 that we be permitted to enter documents into
14 the record on redirect.

15 MR. GRUEN: Your Honor, may I --

16 ALJ HECHT: Briefly.

17 MR. GRUEN: We're prepared to move
18 forward with your ruling. Those terms that
19 Mr. Stoddard proposed are not acceptable. We
20 would object to them.

21 ALJ HECHT: Mr. Stoddard.

22 MR. STODDARD: This isn't a
23 negotiation. We defer to the judge's
24 discretion.

25 ALJ HECHT: This is not a negotiation.
26 I see a line between something that clarifies
27 and something that's adding completely new
28 information, and I think that this is --

1 appears to be adding completely new
2 information. If it had been in the
3 supporting attachments to the testimony, if
4 it had been somewhere in the record already,
5 I believe that I would make a different call.
6 But in this instance, I don't think this is
7 clarification. I think it is potentially new
8 evidence, and I'm not willing to go there and
9 to open this to doing that with all of the
10 witnesses over the rest of the hearing.

11 So while I appreciate very much what
12 Ms. Bone is saying -- and I'm sorry that this
13 issue has come up in this way -- I am
14 standing by my ruling. The objection is
15 sustained. You cannot use the exhibits. You
16 can certainly ask questions if you would
17 like.

18 Ms. Bone.

19 MS. BONE: Thank you, your Honor.
20 Traci Bone for Public Advocates Office.

21 Can the reporter hear me?

22 THE REPORTER: Yes, I can.

23 MS. BONE: So we would just like a
24 clarification that we can use new exhibits so
25 long as they've been served on the witnesses
26 ahead of time that may not be in our
27 testimony or supporting attachments or
28 somebody else's testimony or supporting

1 attachments.

2 ALJ HECHT: You may -- I'm having
3 trouble envisioning a situation in which that
4 makes a lot of sense to do. I think, again,
5 that there is a line between clarifying
6 testimony someone has given and providing new
7 documents.

8 (Interruption by reporter.)

9 ALJ HECHT: I would say that if
10 something is truly clarifying that I would
11 probably allow that. But this is not a time
12 for putting in new evidence, and I don't
13 think this is close to that time.

14 Ms. Bone.

15 MS. BONE: Your Honor, I apologize. I
16 wasn't clear enough. I meant for purposes of
17 cross-examination. We would still be able to
18 use documents that have not been provided in
19 other people's testimony or our own testimony
20 or supporting attachments.

21 ALJ HECHT: Yes. Cross-exhibits we
22 have a structure for. They are being
23 provided a day in advance when possible. I
24 recognize that may not always be possible,
25 but certainly they can be used in
26 cross-examination. The issue here is that it
27 is on redirect, and I feel like it is a
28 second bite at the apple on giving testimony

1 on this particular issue. And we have the
2 testimony before us, and I believe it would
3 be prejudicial to let that in at this late
4 time. I do not wish to allow recross over
5 the new documents. So if we need recross, I
6 will certainly allow it, but I don't want to
7 set up a system where we can go back and
8 forth.

9 MS. BONE: Thank you, your Honor.

10 ALJ HECHT: All right. We are, I
11 believe, still on the record. And if we are,
12 let's continue with redirect.

13 MR. GRUEN: (Speaker on mute.)

14 ALJ HECHT: And Mr. Gruen, I cannot
15 hear you. I --

16 MR. GRUEN: I'm so sorry. I was on
17 mute. Can you hear me now? Okay. Very
18 good. Your Honor, I note that before the
19 break your Honor had asked us to identify the
20 location of the 1988 demo that Ms. Felts was
21 referring to. And if you'd like, we can
22 identify that for you, where it is in the
23 testimony supporting attachments at this
24 time.

25 ALJ HECHT: Thank you. Yes. That
26 would be helpful so I can review it.

27 MR. GRUEN: Ms. Felts, would you like
28 to do that?

1 THE WITNESS: (Speaker on mute.)

2 ALJ HECHT: And now I think Ms. Felts
3 is on mute.

4 THE WITNESS: (Speaker on mute.)

5 MR. GRUEN: While Ms. Felts is on mute,
6 I can give you the document. It's -- your
7 Honor, it's Exhibit SED 201, which is the
8 supporting attachments to the opening
9 testimony of Ms. Felts, and the page number
10 where it begins is pdf page 1952.

11 ALJ HECHT: Thank you for that. Now I
12 can review it myself when we are out of
13 hearing. I appreciate that.

14 MR. GRUEN: Yes, your Honor.

15 ALJ HECHT: Now, if we can please
16 continue with redirect.

17 MR. GRUEN: Yes, your Honor.

18 Q Ms. Felts, are you -- just to be
19 sure that we can hear you, can you hear me?

20 A Yeah. I'm back on, and I apologize
21 for being on mute.

22 Q Not at all. Okay. Ms. Felts, do
23 you recall that Mr. Stoddard had asked you
24 about the testimony of Mr. Carnahan and
25 Blade's response to SED Data Request 58?

26 A Yes.

27 Q And if we can pull up that exhibit
28 that Mr. Stoddard used in his

1 cross-examination of you, which is Exhibit
2 SoCalGas 70, do you recall seeing this
3 exhibit as we're scrolling through the cover
4 page?

5 A Yes.

6 Q And I note that this is the cover
7 page of Blade's response to SED Data Request
8 58, and it is -- the Bates number is
9 SoCalGas -- on the cover page -- is
10 SoCalGas-70.0001. Okay. If we could turn to
11 page 13, which is -- has a Bates-stamp ending
12 in the same number. Bates-stamp
13 SoCalGas-70.0013. And I'm sorry. It's the
14 next page. Excuse me. Could you scroll to
15 the next page and scroll down just a bit more
16 to point five. Right there. I'm going to
17 scroll up just a bit. I'm sorry. Keep
18 going. Up to Statement 5. Okay. And scroll
19 down. I'm terribly sorry. If you could
20 scroll down slightly.

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

22 (Off the record.)

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

25 Please continue.

26 BY MR. GRUEN:

27 Q And for the record, this is the
28 page with Bates-stamp SoCalGas-70.0014. And

1 if we scroll back to just where we were. And
2 if you see there -- Ms. Felts, do you recall
3 being asked about the statement shown here,
4 point 3,

5 "Is there any context either in or
6 outside of Mr. Carnahan's testimony
7 that Blade wishes to add in order to
8 explain its answers? If so, please
9 provide it and explain."

10 And the answer says,

11 "In Blade's opinion, the Vertilog
12 may overstate metal loss in
13 multi-string casing configurations
14 where an outer casing exists over
15 part of the casing being inspected.
16 This is discussed in the Aliso
17 Canyon Shallow Corrosion Analysis
18 supplementary report."

19 And there's a site there, "11, page
20 34." Do you see that?

21 A Yes.

22 Q And do you recall Mr. Stoddard
23 asking you questions about that statement?

24 A Yes. He asked me about this, and I
25 just wanted to add a comment and that is that
26 overstating the metal loss is not a bad
27 thing. But certainly understating metal loss
28 on a log like this is much worse because then

1 the utility would not be inclined to look
2 into it, and error in all logs occurs. I
3 believe that Blade discusses that in their
4 report. So I just wanted to say that
5 overstating metal loss is not -- not
6 particularly a bad thing.

7 Q Thank you. Ms. Felts, while we're
8 on this particular document, Blade's data
9 response to SED Data Request 58, do you
10 recall Mr. Stoddard asking you why Blade's
11 data responses to this document was not
12 completely in its entirety in your sur-reply
13 testimony?

14 A Oh. Right. He pointed to -- I
15 guess, part of this response was included in
16 my sur-reply instead of the whole response,
17 but I had attached this as an exhibit. So I
18 felt like that was adequate.

19 Q Just to understand, when you say
20 you've attached it as an exhibit, where can
21 it be found in your testimony, your
22 supporting attachments?

23 A I should have a footnote for it.

24 Q Just --

25 A I think I've lost track of that
26 exact site.

27 Q But it's provided in your
28 supporting attachments; is that correct?

1 A Yes. So with that, I guess exhibit
2 and supporting attachments, in my mind, are
3 the same thing.

4 MR. GRUEN: Okay. Your Honor, that's
5 going to conclude our redirect at this time.

6 ALJ HECHT: Thank you very much.

7 We'll be off the record.

8 (Off the record.)

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

11 While we were off the record, I
12 noted that we have a bunch to do with
13 housekeeping or exhibits from both SED and
14 SoCalGas including the direct testimony for
15 SED and the cross-exhibits from SoCalGas. We
16 will continue with those a little bit this
17 afternoon, and we're going to take a
18 10-minute break until 2:55, and then we will
19 pick up there.

20 We'll be off the record.

21 (Off the record.)

22 ALJ HECHT: We'll be back on the
23 record.

24 Now it's time to identify and mark
25 the exhibits and to discuss which of the
26 parties asked to move into evidence and
27 should be moved into evidence. I would like
28 to start with the SED exhibits. It looks

1 like there might be a question for Mr. Gruen
2 first.

3 Please go ahead.

4 MR. GRUEN: No, your Honor. Just
5 volunteering to go first.

6 ALJ HECHT: Good. Let us start there
7 then.

8 MR. GRUEN: Your Honor, we have several
9 revisions to the direct exhibits that we've
10 made in the course of hearings and to note
11 those now. Exhibit SED 205 has been amended
12 to be now Exhibit SED R 205. That is Chapter
13 1 Prepared Sur-Reply Testimony of Margaret
14 Felts in Response to Reply Testimony of Tim
15 Hower and Charlie Stinson, and that exhibit
16 was served on March 18th. We also have
17 Exhibit 208, Chapter 4 of the Prepared
18 Sur-Reply Testimony of Margaret Felts in
19 Response to Reply Testimony of Mr. Walzel and
20 Mr. -- Dr. Arash Haghshenas. Excuse me. And
21 that amended version was served March 16th.
22 We also have Exhibit SED 217, the updated
23 resume -- updated Margaret Felts' resume --
24 excuse me -- which was served March 15th.
25 SED 218, an email from Jim Lagrone to Hilary
26 Petrizzo served March 18th. This was one of
27 the sur-reply exhibits, your Honor, that was
28 not used in -- I'm sorry -- not sur-reply.

1 One of the redirect exhibits that was not
2 used after our redirect, but we are
3 identifying it just for the record and
4 purposes of marking.

5 ALJ HECHT: Yes. Thank you. And I
6 recognize the number.

7 MR. GRUEN: Thank you. And the last
8 thing to submit is SED 219, the email from
9 Bret Lane to John Wright re SS-25
10 illustration, and that was served on March
11 18th as well.

12 And with that, your Honor, SED would
13 move -- would request to move Exhibits SED
14 200 through SED 216 into the record.

15 MS. PATEL: Your Honor, may I comment
16 on that?

17 ALJ HECHT: Yes, please go ahead.

18 MS. PATEL: For SoCalGas.

19 Your Honor, a couple of days ago we
20 advised SED that Exhibit 204, which is a
21 series of attachments to Ms. Felts'
22 testimony -- they had attempted to comply
23 with your Honor's direction that confidential
24 information be redacted if possible. SED
25 submitted this exhibit without redacting
26 non-public information. So we requested that
27 SED redact that information and provide
28 another version of 204.

1 And then on that same version, it
2 appears that a confidential version of that
3 exhibit will be required as well.

4 ALJ HECHT: We did not refer to any
5 confidential versions that I know of during
6 these hearings, but that doesn't mean that
7 there isn't confidential information in the
8 testimony or attachments or other exhibits.

9 Mr. Gruen, are you aware of this
10 issue?

11 MR. GRUEN: I see the court reporter
12 with his hands up. I'm happy to answer that,
13 your Honor.]

14 ALJ HECHT: I believe that they're just
15 switching court reporters and that's how they
16 do it.

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

19 Your Honor, this is coming to a
20 surprise. I'm understanding that -- from
21 co-counsel that SED served the confidential
22 version. I'm not aware of having received
23 communication offline from SoCalGas. But we
24 can certainly double check.

25 I see Ms. Purchia is on and she may
26 have -- be closer to the issue. May
27 Ms. Purchia speak for SED, Your Honor?

28 ALJ HECHT: Yes. Go ahead.

1 MS. PURCHIA: Thank you, your Honor.

2 Ms. Patel, so are you talking about
3 the public version of SED-204? And you're
4 saying that that has a confidential portion
5 to it that has not been properly redacted?

6 MS. PATEL: That's correct. My e-mail
7 to Darryl and you was sent yesterday,
8 Thursday, at 1:26 p.m.

9 MS. PURCHIA: I apologize. With the
10 hearing it's hard to -- so if we could just
11 talk about this offline, we would be happy to
12 provide the redaction.

13 MS. PATEL: Okay. As they are
14 submitted at the moment, we do not stipulate
15 to them being entered into the record without
16 seeing them first.

17 ALJ HECHT: Can we take that one out of
18 this group and handle that Monday presumably
19 when we have the corrected version and can
20 all be assured that we are looking at the
21 final and any confidential information is
22 redacted.

23 MR. GRUEN: No objections for that,
24 your Honor. We can certainly work to do
25 that. We don't want to run afoul of
26 confidential information being divulged.
27 We're happy to work with that.

28 ALJ HECHT: Thank you. And does

1 SoCalGas have any objection to doing it that
2 way?

3 MS. PATEL: That's fine with us.

4 ALJ HECHT: So can SED state their
5 moving -- we have marked and identified
6 Exhibits 200 through 216. We are now
7 discussing whether they should be entered
8 into the record.

9 It appears there is a dispute about
10 confidential information. Not even a
11 dispute. There is an issue about
12 confidential information in one of them.
13 That will be resolved.

14 So now, Mr. Gruen, can you repeat
15 what you want to move into evidence now?

16 MR. GRUEN: Yes, your Honor. With the
17 exception of what Ms. Patel noted, with
18 regards to SED-C-204, we will clarify and
19 make sure that we have the confidential
20 version of that exhibit. So that's an
21 exception to the exhibits that we move in.

22 And with that we would move -- SED
23 would request to move Exhibits SED-200
24 through SED-203. And SED-R205 through
25 SED-216 into the record.

26 ALJ HECHT: And, Mr. Stoddard?

27 MR. STODDARD: Thank you, your Honor.
28 Earlier we had made an oral motion to strike,

1 and we were told to wait until the time that
2 exhibits were being moved into the record for
3 that. So I can state it now if it's the
4 appropriate time.

5 And it goes to SED Exhibit No. 200.
6 And this is in relation to Violations 79
7 through 82 regarding well kill operations.

8 ALJ HECHT: Yes. Go ahead and state
9 that now.

10 MR. STODDARD: Okay. Your Honor, if I
11 may, this is a technically complex issue. Is
12 it okay if I bring out the exhibit before I
13 state the motion to strike?

14 ALJ HECHT: Does anybody have an
15 objection to doing that? I would find it
16 helpful.

17 MR. GRUEN: No objections, your Honor.

18 MR. STODDARD: Okay. If we could
19 please bring up SED Exhibit No. 200, Opening
20 Testimony of SED.

21 MR. MOSHFEGH: Mr. Stoddard, I just
22 need the share feature back in order to do
23 so. This is Pejman Moshfegh.

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

25 (Off the record.)

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

28 We went off the record to make sure

1 that we can all view this exhibit.

2 Go ahead, Mr. Stoddard.

3 MR. STODDARD: Thank you, your Honor.

4 If we could please bring up SED's
5 opening testimony Exhibit SED-200. And
6 please turn initially to page 6 -- or page 3
7 of the document that has the table of summary
8 of violations.

9 And you'll see here Violation
10 No. 79: Failure to successfully execute well
11 kill SS-25 kill attempts numbers 2 through 7
12 due to lack of proper modeling.

13 And Violation No. 83, Prevention of
14 surface plumbing failures on ss-25 from
15 enabling that well to be kept filled.

16 If we could please turn to page 30
17 of this document which explains these
18 violations. And you'll note up here that it
19 states in the second sentence of the
20 paragraph, of the first full paragraph:

21 The well could have been
22 killed by pumping 12 ppg
23 fluid at 10 bpm or a 15 ppg
24 fluid at 7 bpm.

25 The basis of SED's case here is that
26 had proper modeling been done, the well could
27 have been killed during top-kill operations
28 and prior to completion of a relief well.

1 If we can turn to page 31, please.
2 And You'll see there it states at the top of
3 the page after Footnote 204:

4 Also, the well could have
5 been killed by pumping 15
6 ppg fluid at 6 bpm.

7 And further down in this paragraph:
8 The well could have been
9 killed with either 12 ppg
10 or 15 ppg kill fluid at
11 realistic pump rates.

12 The entire basis for these
13 violations -- and then this basis -- sorry --
14 for Violation No. 83, which relates to
15 prevention of surface plumbing failures is
16 that if the surface plumbing that connected
17 and to the well-kill operation in SS-25
18 hadn't filled, then the final well top,
19 top-kill attempt might have been successful.

20 Earlier today in connection with
21 Violation 331, we heard from SED's witness,
22 that it is now her opinion that the well is
23 not -- was not killable by top-kill
24 operation. And that it appears to relate to
25 her theory regarding the geyser that came out
26 of the ground.

27 But either way she has now testified
28 in conflict with her opening testimony on

1 critical facts underlying Violations 79 and
2 83. And on that basis, SoCalGas moves to
3 strike her testimony.

4 ALJ HECHT: And earlier when you first
5 raised that motion, we did not give an
6 opportunity yet for Mr. Gruen to respond
7 because we weren't prepared to address it
8 then.

9 Mr. Gruen, does SED have a response?

10 MR. GRUEN: Yes, your Honor. Thank
11 you. Your Honor, the first thing I mentioned
12 is that this motion to strike is premature.
13 There has not been an opportunity to hear
14 Blade's testimony regarding modeling or for
15 SED to cross-examine witnesses. The
16 appropriate place to address this should be
17 in briefs. There's no reason for urgency
18 here.

19 I note that SoCalGas, your Honors,
20 weren't prepared. Neither were we. It came
21 as a surprise. They wanted to do it right
22 after their cross-examination.

23 We think that there is an
24 opportunity here to see how this -- how this
25 moves. So we would suggest waiting until
26 briefs to address the issue.

27 Substantively, I just note that
28 there are a couple of things that the motion

1 is lacking. One is with regards to Violation
2 79. What's deficient about this is the
3 timing of the modeling problem.

4 Now, Boots & Coats is going to be
5 available to testify. And thus far, their
6 testimony shows that they can't even find a
7 model.

8 And what SoCalGas's cross hasn't
9 shown is the timing of when it was learned
10 that in fact the well wasn't killable using a
11 model from -- for top kill. When that all
12 occurred, that discovery seems to have
13 occurred after the modeling and the top
14 killing was done. So it's still the failure
15 to successfully execute well -- those kill
16 attempts 2 through 7 without a model is still
17 -- there was still a failure to do that. And
18 we think we can point to facts that are going
19 to show this in brief.

20 I'm not seeing SoCalGas, with
21 regards to Violation 83, tie the failure --
22 the prevention of surface plumbing failures
23 to the lack of modeling violation directly.

24 Their cross doesn't show that there
25 was a prevention of surface plumbing failures
26 that they -- that they failed to prevent the
27 surface plumbing failures.

28 So I would say, your Honor, this is

1 -- this should all wait until briefs. They
2 can argue it then and it is premature.

3 ALJ HECHT: Mr. Stoddard?

4 MR. STODDARD: Thank you, your Honor.
5 On the first point regarding waiting to hear
6 from Blade and for cross-examination, I would
7 note that SED bears the burden of proof in
8 this case, and it's not -- it can't be left
9 to Blade to backfill SED's case.

10 In addition cross-examination of our
11 witnesses isn't relevant to the issue of
12 whether their internal testimony -- their
13 testimony is internally contradictory.

14 Second of all just to clarify -- and
15 this is technically, you know, for those of
16 us I'm sure have been in many cases it may be
17 more obvious, so it may make sense to brief
18 this.

19 But from a technical perspective
20 just to explain what Ms. Felts testified to
21 earlier today, she was indicating that it's
22 because the SSSV had been removed, there was
23 an empty port between the tubing and the
24 casing down the well. That happened a long
25 time ago. It didn't happen in the middle of
26 these operations. So the timing
27 consideration that Mr. Gruen raised just is
28 irrelevant.

1 And Ms. Felts's testimony is that
2 wasn't killable the day -- that it wasn't
3 killable in any configuration because of the
4 fact -- at any time because of the fact that
5 there was communication whether through the
6 SSSV port of perforation between the tubing
7 and the casing.

8 And so, again, I think the important
9 point here is you can't both have it be the
10 case that the well was killable by top kill.
11 And if SoCalGas had modeled it, they would
12 have killed it on the second or seventh
13 attempt. And also that the well wasn't
14 killable at all by top kill.

15 You can't argue facts in the
16 alternative. And that's what SED's doing
17 here in effect with Violation 331 in
18 comparison with Violation 79 and 83.

19 However, to the degree that it would
20 be helpful, I would suggest that the parties
21 brief this issue so we don't need to address
22 it through the remainder of these
23 proceedings.

24 In fact when I ask to brief it, I
25 would say that we brief it expeditiously.
26 Not at the end of the proceeding in briefs
27 post hearing.

28 ALJ HECHT: Mr. Gruen?

1 MR. GRUEN: Your Honor, I would object
2 to SoCalGas characterizing Ms. Felts'
3 testimony as internally contradictory.

4 I'm also still failing to hear the
5 urgency from raising this now. There's no
6 reason why we can't all focus on hearings and
7 address the matter during briefs. If
8 SoCalGas wants to address it at that point,
9 so -- and when I say "briefs," I mean briefs
10 after hearings.

11 Your Honor's ruling from a prior
12 motion to strike that SoCalGas raised, this
13 is the second one, was that we should focus
14 on hearings. And that's -- your Honor, we
15 agree with that. This is the purpose. The
16 urgency that SoCalGas seems to have here is
17 misplaced.

18 I think also that we'd like to take
19 a very close look given this surprise that
20 SoCalGas is saying that the SSSV was removed,
21 and therefore modeling wasn't necessary.
22 We'd like to see that in writing, have a good
23 chance to digest that, and have a chance to
24 respond to it. Not just in hearing. Not
25 orally for the first time. I want to have a
26 chance as an attorney to consult with the
27 engineer, with Ms. Felts, and see if there
28 are merits to it and what responses we would

1 want to bring to that.

2 That would be the response, your
3 Honor. Thank you.

4 ALJ HECHT: Mr. Stoddard.

5 MR. STODDARD: Thank you, your Honor.
6 I'll keep this brief. It is absolutely
7 beyond dispute that it will become apparent
8 to your Honor if we're permitted to brief
9 this sooner rather than later. It is
10 absolutely beyond dispute that their
11 testimony is internally contradictory on this
12 point and that both things can't be true.

13 ALJ HECHT: Thank you.

14 With that --

15 Oh, I see we have Ms. Bone from Cal
16 Advocates. Please go ahead, Ms. Bone.

17 MS. BONE: Thank you, your Honor.
18 Briefly Cal Advocates agrees that there is no
19 urgency for this matter, and that it should
20 be deferred to in final briefs on the issues
21 and not briefed in the middle of hearings.

22 Thank you.

23 ALJ HECHT: Thank you.

24 Yes, Mr. Stoddard.

25 MR. STODDARD: Again, your Honor, I'll
26 keep it brief. To address the reason for
27 urgency here and again it goes to SED's
28 burden. If they're permitted to wait and go

1 through cross-examination and, again,
2 question Blade in a way to try and backfill
3 the deficiencies in their testimony and again
4 with two internally contradictory factual
5 theories, they (inaudible) pick a horse
6 between these two.

7 We are not going to have a fair
8 opportunity to address this. And it should
9 be addressed now so that it's clear what the
10 violation is that we're addressing. And it
11 will be become clear, again, through briefing
12 that their testimony is internally
13 contradictory and that should be cleared up
14 sooner rather than later so that they can't
15 use cross-examination and questioning of
16 Blade to try and backfill the issue.

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

19 MR. GRUEN: Your Honor, just a
20 clarification. We were advised -- we were
21 instructed by ALJ Poirier at the very
22 beginning in the status conference that we
23 were not to cross-examine Blade. That would
24 be friendly cross. We agreed not to do so.
25 There is no cross reserved for Blade.
26 There's no prejudice like Mr. Stoddard is
27 asserting. That's erroneous.

28 ALJ HECHT: I'm going to soon call this

1 to a halt.

2 Mr. Stoddard, do you have a brief
3 response?

4 MR. STODDARD: Yes, your Honor.

5 SED's counsel's last point. I don't
6 need -- SED's last point, I'm not sure he
7 understands exactly what I was arguing there.
8 It wasn't about cross-examination of Blade.
9 He says let's wait until we hear from Blade
10 on this.

11 And the point is is that it's SED's
12 testimony that matters. SED is alleging the
13 451 violation. Not blade. Blade is not
14 going to come in and make SED's case for
15 Blade. It was for SED to make its case. And
16 the ALJ scoping ruling at the beginning of
17 this proceeding after a discussion in the
18 prehearing conference made it crystal clear
19 that it was SED's obligation to identify all
20 facts in support of the 451 violations.

21 ALJ HECHT: Mr. Gruen.

22 MR. GRUEN: Your Honor, if SED is given
23 an opportunity to brief this issue after
24 hearings, that is precisely what SED intends
25 to do. Once again there's no urgency here.

26 ALJ HECHT: I am not willing at this
27 moment to strike these violations. I am
28 going to deny this without prejudice as my

1 colleague, Judge Poirier, denied without
2 prejudice an earlier motion to strike.

3 We will continue with the hearings
4 and see how things go. That is what I am
5 going to say about that, and we will see
6 throughout hearings in briefing.

7 I will note that the burden of proof
8 is on the Safety and Enforcement Division in
9 this case, and it will need to be met.

10 MR. GRUEN: Understood, your Honor.
11 Thank you.

12 ALJ HECHT: Thank you.

13 With that, we were talking about
14 putting evidence into the record.

15 Yes, Ms. Patel.

16 MS. PATEL: I should have raised this
17 earlier. I have one more issue with the
18 exhibits. Exhibit-216, the cover page of the
19 testimony does not match the actual testimony
20 attached. So that may require corrections.

21 The cover page purports to be Safety
22 and Enforcement Division's Sur-Reply
23 Testimony of Ms. Felts. The Violation 331.

24 The testimony that is attached
25 appears to be Ms. Felts' reply testimony.

26 ALJ HECHT: It is very important that
27 we have all of the exhibits correct and
28 described correctly and that they match. We

1 need that for our record and for the
2 potential of an appeal.

3 SED, is there a wrong cover page or
4 wrong exhibit?

5 MR. GRUEN: Your Honor, we can
6 certainly check to be sure. This is the
7 first I'm learning about this. So we'll take
8 a look at SED-216 as well over the weekend if
9 your Honor would like. And we can see if
10 that exhibit needs to be re-served.

11 ALJ HECHT: All right. It sound to me
12 as though we have SED Exhibits 200, 201, 202,
13 203. Not 204. But 205 through 215 that no
14 one has yet objected to entering into the
15 record; is that correct?

16 MR. GRUEN: That matches SED's
17 understanding, your Honor.

18 ALJ HECHT: Then we are going -- we
19 have already identified and marked those
20 exhibits. We are going to accept them into
21 the record.

22 (Exhibit Nos. SED-200 through
23 SED-203 was received into evidence.)

24 (Exhibit Nos. SED-205 through
25 SED-215 was received into evidence.)

26 ALJ HECHT: And we are going to hold
27 off on the ones that require corrections. I
28 am not comfortable putting something into the
record until we have the correct version of

1 it and we know what we're putting in. So
2 that's something that we're going to have to
3 revisit early next week. I hope we do not
4 have to disrupt the time we have set aside
5 for Blade's testimony any more than we have
6 to.

7 MR. GRUEN: Your Honor, if your Honor
8 would like, we can -- we'll try to serve
9 those as soon as possible and see if we could
10 get that remedied.

11 ALJ HECHT: That would be great. And
12 it is possible that at that point, parties
13 will be able to stipulate that they can be
14 entered in that form given the ruling so far
15 on motions to strike and the issues that we
16 have set to be briefed. If that happens,
17 then that might expedite things when we do
18 reconsider those two or enable us to
19 reconsider them on paper rather than taking
20 hearing time.

21 MR. GRUEN: Understood, your Honor.

22 ALJ HECHT: All right. Thank you.

23 So that means that we have
24 identified SED Exhibits 200 through 219. We
25 have entered a subset of those that I said a
26 minute ago into the record. And we are still
27 pending a decision on entering into the
28 record 204 and 216.

1 With that I would like to continue
2 with the cross exhibits of which I think
3 there are many.

4 And I will note it's 3:20, and I
5 want to find out if my court reporters are
6 available to go until 4:00 o'clock?

7 (Court reporter confirms.)

8 ALJ HECHT: Okay. I believe that they
9 are. So we will hope that we can get this
10 done in that time.

11 Mr. Stoddard.

12 MR. STODDARD: Yes, your Honor. Should
13 I relist and rename all of the exhibits we've
14 named over the past several days as well or
15 just the ones for today?

16 ALJ HECHT: Please list the ones for
17 previous days that you have already
18 identified. Definitely list and describe the
19 ones from today.

20 I see that Ms. Bone is now joining
21 us in video. So she may have a comment on
22 that. So I'm holding on off on actually
23 answering that question.

24 Ms. Bone?

25 MS. BONE: It's a separate question.
26 We have Cal Advocates witnesses standing by
27 to potentially be clocked today. But it
28 looks like they're not going to be on. Would

1 it be safe for me to excuse them?

2 ALJ HECHT: Yes.

3 MS. BONE: Thank you, your Honor.

4 ALJ HECHT: You're welcome. Thank you
5 for asking and I'm sure that your witnesses
6 appreciate you having asked.

7 All right. With that we identified
8 -- we did not formally identify, but we
9 described the exhibits the other day. If you
10 can name those again. We will ask if there's
11 any dispute about them. You do not have to
12 describe them. You should describe the ones
13 for today that we can formally identify and
14 mark all of those cross exhibits and consider
15 any objections to them.

16 MR. STODDARD: Yes, your Honor.

17 All right. For the prior day
18 exhibits, they include Exhibits No. 35, 36,
19 37, 40, 43, 44, 46, 47, 51, 52, 54, 70, 82,
20 34, 55, 73, 75, 126, 127, 58, 59, 60, 135,
21 Cal PA-401, 145, 146, 143, 124, 125, 61, 128,
22 147, 144.

23 And then the new exhibits introduced
24 today are Exhibit SoCalGas-31, Exhibits to
25 Prepared Supplemental Rebuttal Testimony of
26 Glen La Fevers October 26, 2020.

27 Exhibit SoCalGas-49, SED's Reply
28 Testimony Dated March 20th, 2020.

1 SoCalGas-69, Sur-Reply Testimony of
2 Ms. Margaret Felts Related to Violation 331,
3 November 24th, 2020.

4 And SoCalGas-136, Pacific Gas &
5 Electric Company 2021 Gas Safety Plan
6 March 15th, 2021.

7 And one correction on what I read
8 earlier on CalPA-401. I have a specific on
9 CalPA-401. Although actually when I
10 originally read the description on that one,
11 I included a pin site. So it's the same pin
12 site that I originally read into the record
13 for that one. I don't know if that was noted
14 or not yesterday. But we will confirm. I
15 believe it was.

16 ALJ HECHT: Thank you. Are there any
17 objections to entering these into --
18 actually, let me start again.

19 Are there any objections to
20 identifying and marking those exhibits
21 formally?

22 MR. GRUEN: No, your Honor. Not from
23 SED.

24 ALJ HECHT: Great. With that they have
25 been identified and marked. We were keeping
26 track of all of them, and we will have the
27 exhibit list.

28 (Exhibit Nos. SoCalGas-35 through
 SoCalGas-37 were marked for

1 identification.)

2 (Exhibit No. SoCalGas-40 was marked
3 for identification.)

4 (Exhibit Nos. SoCalGas-43 through
5 SoCalGas-44 were marked for
6 identification.)

7 (Exhibit Nos. SoCalGas 46 through
8 SoCalGas-47 were marked for
9 identification.)

10 (Exhibit No. SoCalGas-54 was marked
11 for identification.)

12 (Exhibit No. SoCalGas-70 was marked
13 for identification.)

14 (Exhibit No. SoCalGas-82 was marked
15 for identification.)

16 (Exhibit No. SoCalGas-34 was marked
17 for identification.)

18 (Exhibit No. SoCalGas-55 was marked
19 for identification.)

20 (Exhibit No. SoCalGas-73 was marked
21 for identification.)

22 (Exhibit No. SoCalGas-75 was marked
23 for identification.)

24 (Exhibit Nos. SoCalGas-126 through
25 SoCalGas-127 were marked for
26 identification.)

27 (Exhibit Nos. SoCalGas-58 through
28 SoCalGas-60 were marked for
identification.)

(Exhibit No. SoCalGas-135 was marked
for identification.)

(Exhibit No. CalPA-401 was marked
for identification.)

(Exhibit Nos. SoCalGas-145 through
SoCalGas-146 were marked for
identification.)

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(Exhibit No. SoCalGas-143 was marked for identification.)

(Exhibit Nos. SoCalGas-124 through SoCalGas-125 were marked for identification.)

(Exhibit No. SoCalGas-61 was marked for identification.)

(Exhibit No. SoCalGas-128 was marked for identification.)

(Exhibit No. SoCalGas-147 was marked for identification.)

(Exhibit No. SoCalGas-144 was marked for identification.)

(Exhibit No. SoCalGas-31 was marked for identification.)

(Exhibit No. SoCalGas-49 was marked for identification.)

(Exhibit No. SoCalGas-69 was marked for identification.)

(Exhibit No. SoCalGas-136 was marked for identification.)

ALJ HECHT: With that, is there a motion to put them in the record?

MR. STODDARD: Yes, your Honor.

ALJ HECHT: Now I'll ask the question I started to ask prematurely. Is there any objections to that motion?

Yes, Mr. Gruen?

MR. GRUEN: Yes, your Honor. The first objection I note is for Exhibits SoCalGas-31 and SoCalGas-34. SoCalGas-31 is SoCalGas supplemental rebuttal testimony Chapter 1

1 exhibits.

2 And SoCalGas-34 is the prepared
3 expert testimony of Mistery Hower and
4 Stinson.

5 That is premature because SCE has
6 not yet had a chance to do cross-examination.
7 And those exhibits may indeed pertain to
8 SED's cross. And so until after SCE can do
9 its cross-examination and test the merits and
10 voracity of that testimony, it would be
11 premature to enter those into the record at
12 this time.

13 Does your Honor want me to identify
14 all of the objections up front, or how would
15 you like me to do it?]

16 ALJ HECHT: Let's take them a couple at
17 a time, and I will ask Mr. Stoddard.

18 MR. STODDARD: Yes, your Honor, these
19 are cross-examination exhibits and they are
20 being used as cross-examination exhibits and
21 that's the basis for which we are moving them
22 into the record. SED will absolutely have
23 the ability to cross-examination these
24 witnesses on their testimony before its moved
25 into the record as an exhibit in support --
26 in the context of direct.

27 ALJ HECHT: Yes, Mr. Gruen.

28 MR. GRUEN: Your Honor, that doesn't

1 make sense. They can't be admitted once and
2 then be admitted again. Until we have the
3 chance to cross-examine, it's not appropriate
4 to answer -- to address this. We can address
5 the merits of what can be admitted after
6 cross-examination, but it's premature to do
7 it now.

8 ALJ HECHT: I am going to hold off on
9 admitting those into the record right now.
10 Basically when there are objections today, I
11 am likely to hold off unless there is a very
12 clear answer. In this instance, I think it
13 is not harmful for us to hold off a little
14 bit longer and leave them. So they have been
15 identified and marked and there is a motion
16 to move them into evidence and they are not
17 yet being moved into evidence.

18 Mr. Gruen, any --

19 MR. GRUEN: Thank you, your Honor. I'm
20 sorry.

21 ALJ HECHT: Any other objections?

22 MR. GRUEN: Yes, your Honor. Thank
23 you. SED also objects to the entry of
24 Exhibits SoCalGas-61 and SoCalGas-143. For
25 the record, Exhibit SoCalGas-61 is identified
26 on its exhibit table, I believe, as the
27 letter from Timothy Sullivan to Roger
28 Schwecke dated March 15, 2017, and

1 Exhibit 143 is listed as the letter from
2 Roger Schwecke to Timothy Sullivan RE Safety
3 Plan, March 30, 2017.

4 Your Honor, the basis of these
5 objections is that SoCalGas did not lay
6 foundation for these documents. They were
7 communications between Mr. Schwecke and
8 Mr. Sullivan. Ms. Felts did not recognize
9 them, and SoCalGas further asked on
10 cross-examination today whether Ms. Felts had
11 consulted with Mr. Sullivan with regards to
12 the preparation of testimony and she said no.
13 So there hasn't been foundation laid and we
14 would object on that point in the record.

15 ALJ HECHT: I'm assuming Mr. Stoddard
16 has a response.

17 MR. STODDARD: I do, your Honor. Thank
18 you. I don't have the transcript in front of
19 me so I can't confirm, but I believe
20 Mr. Gruen made the same objection yesterday
21 and was overruled, and we did in fact ask
22 Ms. Felts questions on this issue on the
23 limited item regarding tubing flow only and
24 deliverability in the impact and she answered
25 questions about it.

26 And it wasn't simply just asking her
27 questions about the document. We asked her
28 questions about the issue addressed in the

1 document and the document helped explain the
2 context for those questions. So we think
3 it's appropriate, as your Honor indicated
4 earlier, the use of cross exhibits can be
5 very broad and this would fit in that
6 category.

7 ALJ HECHT: Mr. Gruen.

8 MR. GRUEN: Thank you, your Honor. My
9 recollection of the record, without the
10 transcripts available, is that Mr. Stoddard
11 had represented that he would only ask about
12 one more sentence and proceeded, when there
13 was the objection for lack of foundation, and
14 he proceeded to go well beyond one sentence,
15 and he used these for multiple questions.

16 I think had SED known at the time
17 that Mr. Stoddard was going beyond the one
18 sentence that he represented he was going to
19 use, SED would have vehemently objected to
20 proceeding down that robust line of cross. I
21 would still urge your Honors to find that
22 there has been no foundation laid. The
23 record, I think, will show just that.

24 ALJ HECHT: Mr. Stoddard.

25 MR. STODDARD: At the time, as I
26 recall, ALJ Poirier indicated that he found
27 the documents relevant for the purpose of the
28 line of questioning. If anything, the extent

1 of questioning over those documents supports
2 admission rather than briefly touching upon
3 them and moving on from it.

4 ALJ HECHT: Mr. Gruen, go ahead.

5 MR. GRUEN: Thank you for your
6 indulgence, your Honor. I'm sorry, I have to
7 respond to that, with your Honor's
8 permission, of course. But you can't just
9 lay foundation by asking a bunch of questions
10 for a document. That's not the basis of
11 getting foundation. It's getting the witness
12 to recognize it. If that was the simple
13 basis, SoCalGas could go on for weeks and get
14 a bunch of documents in. That's not the way
15 that foundation is laid and they haven't done
16 it here.

17 ALJ HECHT: My colleague found the
18 document to be relevant yesterday. There was
19 significant questioning on it. I am
20 overruling the objection. I am denying the
21 motion to -- no, I'm overruling the objection
22 to the motion to enter this into the record,
23 so that's SoCalGas-61 and 143. So we have
24 addressed SoCalGas-31 and 34 and SoCalGas-61
25 and 143 so far.

26 MR. GRUEN: Your Honor, those are all
27 the objections we have. Thank you.

28 ALJ HECHT: Thank you. All right. So

1 we are identifying and marking those
2 exhibits, as I probably said before, but just
3 to be sure, we have heard objections to
4 entering those exhibits into the record.
5 Some of those objections were overruled, so
6 we are going to enter into the record the
7 list that was read earlier minus SoCalGas-31
8 and 34 which are SoCalGas' direct testimony,
9 and there will be further cross-examination
10 on them later and an opportunity to offer
11 them again for the record.

12 Are there any questions?

13 (No response.)

14 ALJ HECHT: All right. If need be, I
15 can restate that long list of numbers, but I
16 think that I will not do that today and kind
17 of wrap up. I think we have wrapped up the
18 cross-examination and redirect for Ms. Felts.
19 We have dealt with most of the exhibits, but
20 we do need to revisit SED-204 and 216 and
21 SoCalGas-31 and 34, which we will do later.

22

23 (Exhibit Nos. SoCalGas-35 through
24 SoCalGas-37 were received into
evidence.)

25 (Exhibit No. SoCalGas-40 was
26 received into evidence.)

27 (Exhibit Nos. SoCalGas-43 and
28 SoCalGas-44 were received into
evidence.)

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(Exhibit Nos. SoCalGas-46 and

1 SoCalGas-47 were received into
evidence.)

2 (Exhibit No. SoCalGas-49 was
3 received into evidence.)

4 (Exhibit Nos. SoCalGas-51 and
5 SoCalGas-52 were received into
evidence.)

6 (Exhibit Nos. SoCalGas-54 and
7 SoCalGas-55 were received into
evidence.)

8 (Exhibit Nos. SoCalGas-58 through
9 SoCalGas-60 were received into
evidence.)

10 (Exhibit Nos. SoCalGas-69 and
11 SoCalGas-70 were received into
evidence.)

12 (Exhibit No. SoCalGas-70 was
13 received into evidence.)

14 (Exhibit No. SoCalGas-73 was
15 received into evidence.)

16 (Exhibit No. SoCalGas-75 was
17 received into evidence.)

18 (Exhibit No. SoCalGas-82 was
19 received into evidence.)

20 (Exhibit Nos. SoCalGas-126 and
21 SoCalGas-27 were received into
evidence.)

22 (Exhibit Nos. SoCalGas-135 and
23 SoCalGas-136 were received into
evidence.)

24 (Exhibit No. Cal PA-61 was received
25 into evidence.)

26 (Exhibit Nos. Cal PA-124 and Cal
27 PA-125 were received into evidence.)

28 (Exhibit No. Cal PA-128 was received
into evidence.)

(Exhibit Nos. Cal PA-143 through Cal
PA-147 were received into evidence.)

(Exhibit No. Cal PA-401 was received

1 into evidence.)

2

3 ALJ HECHT: On Monday we plan to start
4 at 10:00 a.m., and I believe we will start
5 with the Blade witness.

6 Mr. Gruen.

7 MR. GRUEN: Thank you, your Honor.
8 That gets to the nature of my question. I
9 suppose this is a housekeeping question, but
10 given your Honor's instruction that Blade
11 will be available for cross-examination and
12 will be cross-examined Monday, I know Public
13 Advocates Office had been scheduled for
14 today. How would your Honor like to arrange
15 the ordering of witnesses in light of this?

16 ALJ HECHT: We will take Blade on
17 Monday in the morning. We will defer the
18 Public Advocates witnesses until we complete
19 Blade.

20 Are there any comments or questions
21 or objections to dealing with it that way?

22 MR. STODDARD: None here, your Honor.

23 MR. GRUEN: Your Honor, the only
24 concern that we have is running out of time,
25 just with the current schedule. I note that
26 there could be certain additional dates
27 added, but it seems that we're slightly
28 behind schedule compared to what we had set

1 for the dates. So the concern is that SED
2 runs out of time to cross-examine SoCalGas'
3 witnesses under the current scheduling.

4 ALJ HECHT: Yes, we are slightly behind
5 schedule on the schedule that did not really
6 come close to getting us done in these three
7 weeks to begin with. We will deal with that
8 next week. It is important that we get the
9 Blade witness when the Blade witness is
10 available.

11 MR. GRUEN: Sure.

12 ALJ HECHT: And it is our intention to
13 take the Blade witness Monday morning.

14 MR. GRUEN: Understood.

15 ALJ HECHT: Are there other
16 housekeeping issues?

17 ALJ POIRIER: I think Ms. Bone has a
18 comment.

19 ALJ HECHT: All right. I do not see
20 Ms. Bone, but, Ms. Bone, I will refresh my
21 screen. Please go ahead.

22 MS. BONE: Yes, thank you, your Honor.
23 I just wanted you to know that Cal Advocates
24 will be trying to work with SoCalGas over the
25 next few days to see what we can do about
26 streamlining the schedule from our side so
27 that we can get to the SoCalGas witnesses.

28 ALJ HECHT: Thank you very much. I

1 appreciate that. This means that your
2 witnesses probably have some time before they
3 can expect to be on the stand, so they had a
4 reprieve today, if they look at it that way,
5 and will not be called again until sometime
6 after Monday morning certainly. Having been
7 a witness in front of the CPUC myself, I know
8 that feeling so I appreciate that.

9 Does anybody else have any other
10 housekeeping issues or anything that should
11 be dealt with before we adjourn for the day,
12 knowing that we're coming back Monday at
13 10:00?

14 (No response.)

15 ALJ HECHT: I'm not seeing anything, so
16 I am going to say that we're going to adjourn
17 now for the day. We'll be off the record.

18 (Off the record.)

19 (Whereupon, at the hour of 3:41
20 p.m., this matter having been continued
21 to Monday, March 22, 2021, at 10:00
a.m., via virtual proceeding, the
Commission then adjourned.)

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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

CERTIFICATION OF TRANSCRIPT OF PROCEEDING
I, ANDREA L. ROSS, CERTIFIED SHORTHAND REPORTER
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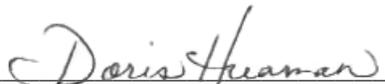
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CSR NO. 7896

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CSR NO. 10538

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BEFORE THE PUBLIC UTILITIES COMMISSION
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CERTIFICATION OF TRANSCRIPT OF PROCEEDING
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TRANSCRIPT OF THE TESTIMONY AND PROCEEDINGS HELD IN
THIS MATTER ON MARCH 19, 2021.

I FURTHER CERTIFY THAT I HAVE NO INTEREST IN THE
EVENTS OF THE MATTER OR THE OUTCOME OF THE PROCEEDING.

EXECUTED THIS MARCH 25, 2021.



JASON A. STACEY
CSR NO. 14092

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