

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 25, 2021
Pages 1151 - 1307
Volume 8

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VIRTUAL PROCEEDING

MARCH 25, 2021 - 10:04 A.M.

* * * * *

ADMINISTRATIVE LAW JUDGE POIRIER: On the record. Good morning. This is ALJ Marcelo Poirier. This is, I believe, Day 8 of the Evidentiary Hearings and Investigation 19-06-016, the Aliso Canyon Adjudicatory OII, and co-presiding with ALJ Jessica Hecht.

Prior to going on the record, we had a brief discussion on how we're going to proceed today. Initially, we're going to briefly touch on the schedule that was provided via e-mail for the remaining proceeding, and after that, we're going to proceed with discussing the issue of the court reporter, that was the non-CPUC court reporter that was involved in the past few days.

SED and Cal Advocates provided questions. I'm going to ask SoCalGas to address these questions. There may be follow-up questions from SED and/or Cal Advocates on those matters. I'm going to emphasize this matter is not going to be resolved today. We're going to be getting some of these questions -- there may be more questions.

1 And ALJ Hecht and I are going to
2 have to consider this one so we have more
3 information. I think the process is to get
4 some of these questions in, maybe have some
5 brief comments from the parties.

6 ALJ Hecht and I will have some
7 comments after that, and we'd like to move on
8 to cross-examination.

9 So let's first lead with the
10 schedule. Ms. Patel, do you want to --

11 MS. PATEL: Sure, your Honor.

12 ALJ POIRIER: One second --

13 MS. PATEL: -- schedule this morning,
14 pursuant to your Honor's instruction
15 yesterday, we've made some progress. I think
16 whereas we had additionally contemplated ten
17 additional full days; we are now down to nine
18 additional full days and half an hour on the
19 tenth day.

20 Did your Honor receive the schedule?

21 ALJ POIRIER: I did. I'm looking at it
22 right now. Okay. So I think this looks
23 like, hopefully, we'll finish with Cal
24 Advocates's cross today, then begin with
25 Witness Kitson.

26 Just as ALJ Hecht had touched upon
27 the fact that we are reserving some
28 additional days, we are in the process of

1 doing that. That is likely going to be in
2 May, the beginning of May. We will try to
3 get some firm dates to everybody as soon as
4 we can, but in the meantime, let's just try
5 to be efficient, but at the same time, we are
6 going to be booking those days. We want
7 everybody to have a reasonable opportunity to
8 do their cross.

9 MS. PATEL: Your Honor, I wonder if it
10 might be helpful for us to do what we did
11 yesterday and have a brief discussion as to
12 which witnesses are expected to be called the
13 following day. You know, I ask that because
14 yesterday we discussed Mr. Kitson and
15 Mr. Sera should be prepared to testify, and
16 then last night, SED officially asked that we
17 have Mr. LaFevers prepared to testify today,
18 but they also at the same time indicated that
19 they weren't prepared to revise down their
20 cross estimates, so that would mean that SED
21 has a notion that we're going to be getting
22 through six witnesses today to get to
23 Mr. LaFevers, but they haven't revised down
24 their cross estimate.

25 MR. GRUEN: Your Honor, may I respond
26 to that?

27 ALJ POIRIER: Please go ahead,
28 Mr. Gruen.

1 MR. GRUEN: I'm sorry, your Honor. I
2 have to call that out, the
3 mischaracterization. This is not a
4 misunderstanding of SED's cross estimates.
5 SED knows exactly what its cross estimates
6 are. And we have not changed them. We
7 haven't even heard SoCalGas's witnesses go
8 on.

9 What we were doing in asking
10 Mr. LaFevers to be available today, is in
11 case we go short, having not heard any
12 answers, but he's available, so every minute
13 of cross time can be used. We are not -- to
14 be clear, we are not downwardly adjusting our
15 cross estimate. We were clear with SoCalGas
16 that we were providing our best estimates
17 last night. I'm surprised to hear Ms. Patel
18 claim that we're having a discrepancy with
19 the cross estimates that we provided.

20 ALJ POIRIER: Ms. Patel.

21 MS. PATEL: I don't think I said there
22 was a discrepancy. I stated exactly what
23 Mr. Gruen stated, which is they haven't
24 revised down their cross estimate, but they
25 also want who would be -- the person who
26 would be the seventh witness to go on today
27 to be available today.

28 I just think it would be helpful.

1 If your Honors think this would not be
2 helpful, that's fine.

3 ALJ POIRIER: Okay. It looks like
4 today we have Cal Advocates, Kitson and Sera
5 are available; is that correct?

6 MS. PATEL: That is correct.

7 ALJ POIRIER: Okay. I think that looks
8 like -- Mr. Gruen, let me work through this.
9 I think given the estimates that we have, I
10 think those witnesses being available for
11 today makes sense.

12 Since Mr. LaFevers is the next one
13 up, I think he should probably be prepared to
14 go tomorrow if we go short today, and that's
15 something we can revisit as the day goes
16 along, but I think just given, you know, what
17 we have in store, and that we're going to
18 have to spend some time, you know, discussing
19 these questions, I think we have a reasonable
20 approximation, and that's something we can
21 revisit at the end of the day. Okay.

22 MS. PATEL: Thank you, your Honor.

23 ALJ POIRIER: Mr. Gruen, anything
24 further?

25 MR. GRUEN: No, your Honor.
26 Understood. Thank you.

27 ALJ POIRIER: Let's move on to the
28 questions. I assume it's going to be

1 Mr. Stoddard. I'd like you to address each
2 of these questions, and just go down the
3 line.

4 MR. STODDARD: Yes, your Honor. If I
5 may make a brief statement on the issue, very
6 brief, and then I will -- very brief and then
7 I'm going to turn to each of the questions
8 and answer them in turn.

9 ALJ POIRIER: Go ahead.

10 MR. STODDARD: Your Honor, we'll be
11 responding to specific questions from Cal
12 Advocates in a moment, but before I do, I
13 would like to make a brief statement
14 regarding the realtime transcription issue
15 that we discussed yesterday.

16 The statement's based on additional
17 information that I learned after speaking
18 with Ms. Biehl last night. First, to the
19 degree that SoCalGas misunderstood the scope
20 of the attestations at the beginning of this
21 proceeding, we apologize. We ceased using
22 the court reporting service yesterday when
23 directed by ALJ Hecht and will terminate any
24 further use of the service.

25 SoCalGas did not believe that the
26 use of a court reporter to provide a realtime
27 reporting feed violated either the spirit or
28 the letter of the parties' attestation, which

1 we understood to focus on visual and audio
2 recording, as I believe is evident from some
3 of the questions that I asked on the first
4 day of hearing.

5 This is the first time most of us
6 have conducted virtual hearings and we were
7 trying to make these efficient and effective
8 as an in-person hearing.

9 We did not believe that the use of a
10 court reporter would be an issue because this
11 proceeding is open to the public online and
12 is being transcribed anyway.

13 We aren't intruding on anyone's
14 privacy with screenshots of their home,
15 ImageCastor, or audio recordings, and
16 Ms. Biehl was calling in with her name and
17 appeared on Webex on the speakers' panel and
18 was not attempting to be surreptitious.

19 It may be helpful to briefly explain
20 that the initial purpose for having the court
21 reporter, which we arranged for in advance of
22 hearing, was so that we could have realtime
23 reporting and daily transcripts.

24 However, once we reviewed the
25 attestations, we determined that we should
26 not obtain transcripts from the court
27 reporter, and we told her we didn't want or
28 need any on the first day.

1 Clearly, there was some confusion on
2 our end about the scope and purpose of the
3 attestation. We did not think the realtime
4 reporting functionality, however, was
5 inconsistent with the attestations.

6 Realtime reporting is a tool
7 routinely used by attorneys for purposes of
8 questioning witnesses in hearings and
9 depositions. It allows the attorney to
10 follow along in realtime in order to track
11 questions and answers, and promotes
12 efficiency when questions are asked to be
13 repeated.

14 In addition, it's relied on by some
15 attorneys, including Mr. Lotterman, to assist
16 with hearing deficiency. In initially making
17 our arrangements for realtime reporting in
18 preparation for hearing, we thought it might
19 also be of use, especially for the examining
20 attorney, if there was connection or sound
21 issues on our end related to the remote
22 hearing.

23 As I mentioned yesterday, the
24 realtime reporting stream or feed appears on
25 a web page and runs throughout the course of
26 the day. It's for temporary use during
27 hearings and it's not for retention. It's
28 not final, includes errors, shorthand, and

1 phonetic spelling.

2 However, to clarify, Ms. Biehl did
3 prepare rough transcripts based on her
4 realtime feed. We received a rough
5 transcript at the end of Day 1, which we told
6 her we didn't want and did not review, but
7 after checking with Ms. Biehl last night, it
8 is now my understanding that she has
9 transcripts for additional days.

10 To be clear, and as I said
11 yesterday, I did not utilize the realtime
12 feed or any transcript during the examination
13 of Ms. Felts.

14 Mr. Lotterman set up the realtime
15 feed, but was unable to use it effectively,
16 and Mr. Lotterman, likewise, did not review
17 or access any of the rough transcripts
18 prepared by Ms. Biehl of which we learned of
19 last night.

20 Turning to the questions asked by
21 SED and Cal Advocates, and, again, I think in
22 combination with that statement above, this,
23 hopefully, should address many of the
24 questions that would be focused on this
25 matter, but we'll see.

26 First off, the form of the questions
27 that are asked relate to a recording program.
28 We're not sure what this means exactly by

1 "recording program," but for the sake of
2 efficiency, we're not going to quibble with
3 semantics here. To be clear, this was a
4 court reporter, Ms. Biehl, using a
5 stenography machine in connection with a
6 program called iCVNet.

7 The first question we were asked
8 was, "What is the name of the recording
9 program you were using?"

10 Again, putting aside the definition
11 of reporting program or the understanding of
12 that, I spoke with Ms. Biehl last night for
13 the purpose of answering these questions.

14 She told me that the realtime
15 transcription was created by herself using
16 her stenography machine in connection with a
17 program called iCVNet.

18 The next question was --

19 MR. GRUEN: Your Honor, I'm sorry to
20 interrupt. If I may, just for purposes of
21 efficiency and so that we have a complete
22 record on the point of each questions, may I
23 interpose follow-ups in response to each
24 answer?

25 MR. STODDARD: Your Honor, if I can get
26 through my statement, it may be -- because a
27 lot of these questions relate to each other,
28 I think it might be more efficient if I can

1 get through the questions because some of
2 them may answer the follow-up questions.

3 ALJ POIRIER: Mr. Gruen, let's go ahead
4 and move through the questions and you can do
5 follow-up. One note, Mr. Stoddard, please
6 try to not speak too quickly for the sake of
7 our court reporters.

8 MR. STODDARD: Yes, your Honor.
9 Apologies. I believe I was on Question
10 No. 2: "Does this recording program have the
11 capability to save, export, or otherwise have
12 the information made available for any
13 duration after the initial recording is
14 transcribed?"

15 According to Ms. Biehl, the realtime
16 feed does not enable to save or export the
17 information. The feed is available until
18 Ms. Biehl terminates the service at the end
19 of each day; however, as I noted previously,
20 Ms. Biehl did create rough transcripts based
21 on the realtime feed.

22 Question 3: "When starting this
23 reporting program, are there any automatic
24 alerts, warnings, or similar indications
25 about compliance with California or any other
26 law regarding recording information without
27 consent?"

28 Not to my knowledge.

1 Question 4: "How quickly does the
2 recording program bring up what is being said
3 during hearing?"

4 Immediately.

5 Question 5: "How long does it
6 remain on the screen?"

7 Again, the feed is available until
8 Ms. Biehl terminates the service at the end
9 of each day, but as I noted before, Ms. Biehl
10 did create transcripts for additional days.

11 Question 6: "Is this recording
12 program used for machine learning or other
13 artificial purposes?"

14 The answer to that -- and I'm not
15 sure we fully understand the questions, but I
16 discussed this with Ms. Biehl as well, and my
17 understanding the answer to that question is
18 no.

19 Question 7: "Has SoCalGas,
20 including Morgan Lewis, used the information
21 from this recording program in your
22 cross-examination for redirect of witnesses
23 during this hearing?"

24 I can say I did not use either the
25 realtime transcription service or any of the
26 rough transcripts that were prepared by
27 Ms. Biehl in connection with my examination
28 of Ms. Felts. Mr. Lotterman tried to use the

1 realtime reporting service, but was not able
2 to do effectively.

3 Question 8: "Is this recording
4 program used with eData?"

5 Our answer on that is, I don't know
6 what eData is, and I asked Ms. Biehl and she
7 didn't know either.

8 Question 9: "Is this recording
9 program used with LiveNote databases?"

10 I also checked on this with
11 Ms. Biehl. And the answer is, no, LiveNote
12 database is utilized with a different
13 transcription program.

14 Question 10: "How is this data
15 stored?"

16 Again, realtime data is not stored
17 after termination each day. However, again,
18 I understand that Ms. Biehl generated and
19 retained rough transcripts, which are stored
20 in PDF and TXT format. She sent us one on
21 the first day, which we told her we didn't
22 want or need, and we didn't access or utilize
23 the transcript either.

24 Question 11: "Where is the data
25 stored?"

26 This data is stored, my
27 understanding, is on Ms. Biehl's computer in
28 the recycle bin. Again, I understand we

1 received a transcript for the first day; so
2 we would need to confirm whether that's in
3 anyone's possession on our end.]

4 Question 12: "How long has Morgan
5 Lewis been using this recording program
6 during the hearings?"

7 The answer to that is since the
8 first day, although again, I was not actually
9 using it, and Mr. Lotterman tried to, but
10 wasn't able to make it work very well.

11 Question 13: "Was SoCalGas aware
12 that their outside counsel was using this
13 recording program?"

14 Yes.

15 Question 14: "Did SoCalGas let
16 parties know that they were using this
17 recording program at any point prior to the
18 identification by ALJ Hecht that there was an
19 unexpected entity as a panelist?"

20 No.

21 Question 15: "Does this recording
22 program have the capability of storing the
23 information said during hearings?"

24 I think this has been answered
25 above, but again, realtime data is not stored
26 after termination each day; however, again,
27 Ms. Biehl did generate and retain rough
28 transcripts.

1 16 -- Question 16: "Describe each
2 and every purpose with how SoCalGas and/or
3 Morgan Lewis or any other entity contracted
4 with SoCalGas are utilizing this recording
5 program."

6 We're not. We've terminated any use
7 of it. We've also -- we've terminated the
8 service. And again, I wasn't using it, and
9 Mr. Lotterman tried to use solely the
10 realtime transcription, but it did not work
11 well for him.

12 Question 17: "Has SoCalGas and/or
13 Morgan Lewis and/or any other entity
14 contracted with SoCalGas utilized this
15 record -- recording program at any other
16 point during this proceeding or any other
17 proceeding before the Commission?"

18 For purposes of this proceeding,
19 aside from depositions where we have used
20 realtime transcription services, no; as to
21 other proceedings before the Commission, not
22 to my knowledge, although again, it would be
23 commonly used in the context of depositions,
24 but not to my knowledge.

25 18: "Is SoCalGas and/or Morgan
26 Lewis using any other technologies that
27 enable SoCalGas to track the words that had
28 been mentioned at hearings?"

1 No.

2 Question 19: "If so, what are
3 they?"

4 Again, since the answer to Question
5 18 was "No," that's not applicable.

6 Your Honor, we're -- we -- and
7 we're -- again, to the degree there are
8 further questions, I'm happy to answer them.
9 I believe this is a pretty complete account
10 of what I know, however, so I may -- you
11 know, it may require some follow-up.

12 ALJ POIRIER: We're going to allow some
13 follow-up now. We may probably allow for
14 follow-up (inaudible) later, just because,
15 you know, questions might come up when --
16 when parties look at the transcript. And --
17 and again, I -- I want to proceed today.
18 But, we'll allow some questions now.

19 I -- will it be Ms. Bone or
20 Mr. Gruen that will be asking the questions?
21 Mr. Gruen, please go ahead.

22 MR. GRUEN: Thank you, your Honor;
23 several -- several questions.

24 One thing -- one theme that we note
25 throughout the answers that we were
26 observing, many of the answers just were
27 speaking from Mr. Stoddard's and
28 Mr. Lotterman's experience. The questions,

1 we would note, are broader than that.
2 They're asking about SoCalGas, including
3 Morgan Lewis, many of them. So we'd note
4 that the answers are deficient in that
5 fashion.

6 We also would say that there's some
7 lack of clarity regarding whether -- on this
8 point regarding whether SoCalGas -- other
9 SoCalGas people had access to this --
10 what's -- what Mr. Stoddard has called the
11 realtime recording.

12 I have some -- frankly, just some
13 limitations in my understanding of the
14 technology, so just for clarity, with regards
15 to specifics, I think there was reference to
16 the ML use -- I'm sorry, the iCVNet, excuse
17 me, and so I'm not clear how it is that
18 Morgan Stanley (sic) uses iCVNet.

19 The other thing I'd note is I think
20 there were -- pardon me. For -- for lack of
21 a better term, there were some wiggle words
22 in some of those answers, and I think the
23 transcript will reflect it.

24 So when we see, for example,
25 Question 8, I think it was -- it might have
26 been Question 9. I was taking notes
27 quickly -- is this recording prep -- program
28 used with eData, I think the answer was

1 effectively they don't use recording. Maybe
2 it was with LiveNote, one or the other. But,
3 we're looking to understand what that means;
4 not effectively. We're asking whether or not
5 it was used with these types of programs,
6 whether the recording was used with these
7 types of things. So we'd like it -- a
8 definitive statement. So --

9 ALJ POIRIER: Mr. Gruen --

10 MR. GRUEN: -- we expect that -- I'm
11 sorry.

12 (Crosstalk.)

13 MR. GRUEN: I'm sorry, your Honor.

14 ALJ POIRIER: I -- I want to make --
15 see if Mr. Stoddard can address that
16 question.

17 MR. GRUEN: Yes, your Honor.

18 ALJ POIRIER: So Mr. Stoddard, can you
19 address that, please?

20 MR. STODDARD: I can address both
21 questions I've made notes of. I would say
22 that I'm not -- I don't -- I can't -- I'm
23 doing my best to keep notes of what
24 Mr. Gruen is asking, but it may be helpful,
25 if he wants to ask it, I can answer it one at
26 a time.

27 So on the first issue, there was no
28 intent to be overly narrow here. To answer

1 his question, yes, others had access to the
2 realtime feed on our team. Again, I was
3 answering, you know, as to Mr. Lotterman and
4 myself. I don't -- given the time allowed, I
5 don't currently have the specifics, but I can
6 absolutely say others on our team had access
7 to the realtime feed during the proceeding.

8 On the second issue, which is I
9 think he asked whether the program was used
10 with eData or LiveNote and was concerned we
11 included wiggle words, my answer on eData was
12 I don't know what that is, and Ms. Biehl
13 didn't either. And so the answer to that is
14 I don't -- I don't think so, but I don't know
15 what eData is. On LiveNote, no, it utilizes
16 a different transcription program. These
17 aren't -- this is software that -- at least
18 my understanding is these are things that
19 would be used by the court reporter. So I'm
20 not sure, but we haven't -- you know, again,
21 what we -- the -- the -- the use here was a
22 realtime transcript to follow along with
23 during hearings, and I -- I'm not aware of
24 anything like a LiveNote database or similar
25 software that was utilized in this context,
26 but it may be based on the limitation of my
27 knowledge. And again, I did check with
28 Ms. Biehl and others, and no one else was

1 aware of that use, either.

2 Hopefully, that clarifies it, but --

3 ALJ POIRIER: Okay. Mr. Gruen, we'll
4 return to you. I think some guidance before
5 we start.

6 MR. GRUEN: Yes, your Honor.

7 ALJ POIRIER: I think it's clear that
8 probably, you know, there's going to need to
9 be follow-up questions later, once you look
10 at the transcript. So I think keep that in
11 mind that this is all coming together pretty
12 quickly. So I think I want to provide the
13 opportunity for you to ask some questions
14 today when they are fresh in your mind, but
15 realize that we will be providing an
16 opportunity for SED, Cal Advocates to do
17 follow-ups at a later point. So with that
18 guidance --

19 MR. GRUEN: Understood.

20 ALJ POIRIER: -- please go ahead.

21 MR. GRUEN: Understood.

22 ALJ POIRIER: And if you can ask
23 question by question, and then we'll have
24 Mr. Stoddard answer to the best of his
25 ability, I think that would be most
26 efficient.

27 MR. GRUEN: Understood, your Honor.
28 Thank you for the guidance. We appreciate

1 that, and we'll work with that.

2 Okay. First question in follow-up
3 we have is: How does Morgan Lewis or
4 SoCalGas access iCVNet or software -- the
5 "I" -- "I" -- excuse me.

6 How does it access the iCVNet
7 software?

8 MR. STODDARD: Yeah, Darryl, you did
9 ask that question, and I -- I -- I missed it.

10 So again -- and I may need a
11 follow-up to just confirm, so this is subject
12 to check, but my understanding is we don't
13 access the software. That's something that's
14 utilized by the court reporter. And
15 hopefully, the court reporters here will
16 forgive me if I'm botching this, but my
17 understanding is that's something that's used
18 by the court reporter in connection with
19 generating the realtime feed. That said, it
20 may be that where we are viewing a realtime
21 feed is somehow on an iCVNet platform. So I
22 would need to confirm that detail. But,
23 we're not, to my knowledge, utilizing the
24 software in any active way aside from
25 following a realtime feed, if that makes
26 sense. But, I can confirm whether that
27 realtime feed appears on something called
28 iCVNet or something else.

1 MR. GRUEN: Thank you.

2 Your Honor, I'm happy to wait for
3 instructions from you, but if -- if I may
4 follow up directly to Mr. Stoddard, would
5 that be acceptable?

6 ALJ POIRIER: Yes. Please go ahead.

7 MR. GRUEN: Okay.

8 With regards to your mentioning the
9 realtime feed, how is the realtime feed
10 accessed?

11 MR. STODDARD: On a website.

12 MR. GRUEN: Okay. And did SoCalGas
13 witnesses and other staff have access to the
14 realtime transcripts?

15 MR. STODDARD: I don't know the answer
16 to that. I would have to confirm. I believe
17 it was kept internal to the legal team, but I
18 would need to confirm.

19 MR. GRUEN: Okay. And with regards to
20 the -- the access to the realtime transcripts
21 through the website, which website?

22 MR. STODDARD: Again, I would need to
23 confirm it. It might be that that website
24 is -- it might be that that website is
25 associated with iCVNet, but I am not -- I'm
26 not sure if that's the name of the website.
27 It's -- it's not -- again, it's not
28 dissimilar to the realtime transcription

1 that -- that -- that we use, Darryl, in
2 connection with -- with depositions. So I
3 can get the name of the website so that we
4 can confirm it.

5 MR. GRUEN: Okay. And with regards to
6 the effective use of these resources, we had
7 understood Mr. Lotterman tried to use them,
8 but didn't have much success. Can you
9 contextualize Mr. Lotterman's use of the --
10 the various resources and what he did?

11 MR. STODDARD: Yes, I can do that based
12 on my understanding, and if there's
13 additional detail required, it might -- I
14 don't know. We might need to get it from
15 Mr. Lotterman.

16 But, my understanding is that he
17 tried to use it in connection with
18 questioning on two occasion -- two days, but
19 was continuing -- continued to get bounced
20 out of it, and therefore, wasn't able to
21 effectively utilize it, and then just moved
22 on. I -- that's my understanding.

23 MR. GRUEN: But, he was trying to use
24 it for his cross?

25 MR. STODDARD: Yes.

26 MR. LOTTERMAN: Mr. Gruen -- Mr. Gruen,
27 let me -- let me answer that directly, just
28 to save a little time, please. Is --

1 MR. GRUEN: Mr. Lotterman, I wasn't
2 aware you were on the call. Pardon me. I
3 would have directed this question --

4 (Crosstalk.)

5 MR. LOTTERMAN: No problem. It makes
6 sense probably for me to answer this myself.

7 So it's been my practice -- and I
8 think I've taken about 75 depositions
9 remotely since the COVID-19 crisis
10 occurred -- to use iCVNet. And by the way,
11 you've got two options. You can either click
12 right onto a link that the court reporter
13 sends you, or iCVNet has -- has an app, which
14 I have on my iPad, which you can then click
15 on and then enter the data, and it'll feed
16 you in. But, that's been my experience with
17 it, but Mr. -- Mr. Stoddard can confirm that.

18 For purposes of the
19 cross-examination of Dr. Krishnamurthy, I had
20 my iPad on the right-hand side here. You may
21 have actually seen me try to look at it. And
22 what you do is you -- you enter the system on
23 a separate platform, and then so you're --
24 you're -- you're conversing remotely like
25 this, and you have sort of a running
26 transcript that kind of flows up the page as
27 you talk or as Dr. Krishnamurthy talks or,
28 Mr. Gruen, as you talk, and it just kind of

1 rolls. You can scroll down from time to time
2 and all that type of thing, but you have to
3 keep pushing something like "resumed" or
4 "realtime" to get it back to current. The
5 problem I had, for some reason, with what we
6 set up here is every time I would touch it,
7 it would -- I couldn't get real -- I couldn't
8 get real realtime. It just sat there frozen.
9 And so I was constantly trying to find it. I
10 was pushing, you know, "resume realtime." It
11 wouldn't work, and I got bounced out a couple
12 times; and so I tried to get back on, and
13 then I lost the site. So, you know, I
14 certainly tried to use it. I think it's a
15 very effective tool, especially for me
16 when -- when I may not understand quite what
17 the witness said, and I can at least read
18 what the court reporter thinks that witness
19 said. I also find it very effective when,
20 for example, there is a question, some
21 objections, some colloquy, and then one of
22 the judges says, "Could you please restate
23 the question." You literally can turn and
24 reread your question, and -- and it's very
25 effective in deposition. So I did try. I
26 don't recall actually relying on it at all.
27 But, I signed on and signed in both days for
28 Dr. Krishnamurthy, and it was not worth

1 doing.

2 MR. GRUEN: Thank you. If I may,
3 Mr. Lotterman, thank you for that. I
4 appreciate that.

5 I think there was reference to you
6 using it for -- for two days of hearings, if
7 I had understood correctly, you using the
8 device you just described. Did I understand
9 that correctly?

10 MR. LOTTERMAN: You know what, I think
11 so. When did the issue arise?

12 MR. GRUEN: Which two days were you
13 using it?

14 MR. LOTTERMAN: Well --

15 MR. GRUEN: Were you using it for your
16 cross of Mr. Krishnamurthy or Cal Advocates,
17 or both?

18 MR. LOTTERMAN: Well, that's why I'm
19 asking, is, to be precise, I used it until it
20 was raised before whatever cross I did, and
21 then I did not. So if that was day three, I
22 used it for two days. If it was day four, I
23 used it for three. I don't -- I really --
24 I'd have to look at my calendar. I don't
25 remember. But -- but, I used it at the
26 beginning of Dr. Krishnamurthy's cross until
27 the -- the morning when Judge Hecht raised
28 the issue.]

1 MR. GRUEN: If I may, just for clarity
2 of the record, my understanding was that the
3 issue was first raised yesterday during the
4 cross-examination of Mr. Taul and Mr. Bach.

5 Does that match your recollection
6 and understanding as well?

7 MR. LOTTERMAN: Yes. And if that's the
8 case, then I used it for day 1 and day -- so
9 that would be Monday and Tuesday of
10 Dr. Krishnamurthy. And then yesterday, when
11 the issue was raised, I did not. I mean I
12 think I may have -- I believe I logged on,
13 but I took it down once Judge Hecht expressed
14 concern.

15 MR. GRUEN: Okay. Just with regards to
16 the effectiveness, I think since other
17 parties weren't using this tool, as best as I
18 can understand, I can certainly say SED
19 hasn't. I'm just trying to understand the
20 advantage that SoCalGas, yourself,
21 Mr. Stoddard, this tool affords you to better
22 understand that nature.

23 Now, you've talked about scrolling
24 back to see what was said on the record. Can
25 you elaborate on the kind of things that you
26 were using this tool for.

27 MR. LOTTERMAN: I can elaborate on what
28 the tool can be used for and I'll try to

1 identify what I did in this case. The tool
2 can be used to give you literally an
3 instantaneous reading of what is being said
4 during the proceeding, which in my mind is
5 valuable because, like I said, oftentimes I
6 don't quite pick up what a witness is saying.
7 I find that problem even worse with remote
8 type proceedings, and so that is one benefit
9 of it.

10 The second benefit of it is is if he
11 says something -- if he says A then and you
12 thought he said B two minutes ago, you can
13 literally take your finger and scroll back up
14 and look at the transcript to see if, in
15 fact, A and B are inconsistent. So there is
16 a certain value.

17 That in my view -- I think those are
18 the only two values that I can think of.
19 I've never used -- I don't even know if it
20 has a search function. I don't believe it
21 does, but I've never used anything like that.
22 As far as Dr. Krishnamurthy's examination
23 goes, I truly -- I certainly never have
24 scrolled up and tried to find an earlier
25 answer because for some reason it just did
26 not work on my iPad on those two days.

27 I did look at it once in a while to
28 see if I could figure out what he was saying

1 once in a while when I couldn't quite
2 understand what he'd said, but I can tell you
3 I was so busy in the cross-examination and
4 that tool was so unreliable for those two
5 days that I gave up. I signed on every day
6 hoping it would get better. It never did.

7 MR. GRUEN: Okay.

8 MR. STODDARD: Darryl also directed
9 that question to me so if I can briefly --

10 MR. GRUEN: Of course, please do.

11 MR. STODDARD: Again, I didn't utilize
12 it, which is one of the reasons, when I was
13 on the record questioning Ms. Felts, I would
14 occasionally ask for court reporters to read
15 back questions or I would, you know, try to
16 remember what I'd asked. I wasn't using
17 realtime transcription during the questioning
18 of Ms. Felts.

19 MR. GRUEN: Okay. And, your Honor, I
20 think we have just a couple of more
21 questions. To both Mr. Lotterman and
22 Mr. Stoddard, have you ever used this device
23 in another proceeding, another hearing,
24 another trial, in your experience while we've
25 been doing remote or otherwise?

26 MR. LOTTERMAN: Let me take a shot at
27 that first. As I mentioned before, I have
28 used it in, I would say, 50 to 70 depositions

1 in the last year. I definitely used it even
2 before the COVID-19 pandemic hit. I'm trying
3 to think. My last trial was in New Orleans
4 back in 2012 and I truly don't remember.

5 MR. STODDARD: And I can answer for
6 myself that in terms of proceedings, used it
7 in the context of the depositions.

8 MR. GRUEN: So that's helpful.

9 Your Honor, I think at this point we
10 would take your Honor up on the --
11 thankfully, graciously -- on the opportunity
12 to issue further questions, but at this time
13 those are the questions that we have orally
14 on the record. What I might respectfully
15 request is if we could go off the record
16 briefly and if SED might take your Honor up
17 on the opportunity to make comments regarding
18 this matter.

19 ALJ POIRIER: Before we do that, I
20 think Ms. Bone might have questions.

21 MR. GRUEN: Pardon me.

22 ALJ POIRIER: So what we'll do is
23 Ms. Bone will ask some questions. I would
24 like to try to move through this. And then I
25 think I will make some comments and then ALJ
26 Hecht and then we'll open it up to parties,
27 and then we'll try to move from there.

28 MR. GRUEN: Understood, your Honor.

1 MS. BONE: Quickly, your Honor. I have
2 a lot of questions, but I'm not going to
3 raise them all here. We will put them in
4 writing with SED, coordinate on that. But I
5 just was very curious whether other people,
6 whether for SoCalGas or Morgan Lewis, were
7 watching the feed and sending you questions
8 to ask during cross-exam.

9 MR. STODDARD: Is that directed to me?
10 Not to my knowledge. I can say other people
11 were watching the feed and we were
12 coordinating with others during
13 cross-examination, but I can't say whether,
14 you know, that people were giving us
15 questions based on the realtime.

16 MR. LOTTERMAN: Same answer for me.

17 MS. BONE: Okay. So this goes to my
18 other -- my next question, or maybe it's just
19 an observation for the Court, and that is
20 that "not to my knowledge" is not an
21 acceptable answer to these questions. We
22 need to understand fully whether -- how
23 SoCalGas issues this program and how Morgan
24 Lewis have used this program and,
25 specifically with regard to SoCalGas, asking
26 whether they're using this in other
27 proceedings at the Commission. "Not to my
28 knowledge" is not an adequate answer. We

1 need an answer from SoCalGas on this. So
2 these are issues that we're going to pursue
3 in further questioning.

4 ALJ POIRIER: Go ahead, Mr. Stoddard.

5 MR. STODDARD: Thank you, your Honor.
6 "Not to my knowledge" is not intended to
7 evade anything. "Not to my knowledge" here
8 is based on the time we've had in order to
9 provide these answers, but I understand if
10 further information is required.

11 ALJ POIRIER: Okay. I want to make
12 some brief comments. You know, I think we've
13 issued rulings that have set out the rules
14 for these video hearings. We had a status
15 conference one week prior to beginning
16 hearings. My initial feeling in reaction to
17 this is this is something that should have
18 been raised at that time.

19 If there was any question whether
20 this was proper to use consistent with the
21 attestations, this is something that the
22 questions should have been asked at that
23 point, and then we could have provided
24 guidance and we could have gotten input from
25 parties.

26 I want to emphasize to the parties
27 that to the extent there is a question on
28 whether something is appropriate and

1 consistent with the rules that we've
2 established, they need to raise that and
3 we'll provide guidance. We understand that
4 there's going to be questions, but I'd rather
5 us raise those so we can address that.

6 I think this -- obviously there's
7 more information that we need to gather on
8 this and there's going to be more questions
9 and we're going to provide an opportunity for
10 the parties to do that. But I think at a
11 minimum this is a situation where this should
12 have been raised in a prior circumstance and
13 we could have dealt with it.

14 It's not, you know, for us to notice
15 that someone is on the speaker panel that we
16 don't know who they are and is not -- you
17 know, we had specific instructions who had
18 access to that. So there's certainly concern
19 on my behalf. We're going to have more
20 process on this. I think obviously what I'd
21 like to allow is that the transcripts for
22 this hearing from our court reporters will be
23 out probably next week and that will allow an
24 opportunity for parties to review that and
25 will provide an opportunity for follow-up.
26 Certainly ALJ Hecht and I need to confer on
27 this more.

28 With that, I want to provide ALJ

1 Hecht an opportunity to make some comments.

2 ALJ HECHT: Thank you very much.

3 I think that ALJ Poirier covered it
4 extremely well and I don't really have
5 anything to add. I also don't have further
6 questions at this time. I share his concern
7 that this is something that we found out
8 because I noticed a name and did a Google
9 search, so that's kind of where I am. Thank
10 you.

11 ALJ POIRIER: Okay. I'm going to allow
12 parties some brief comments with the
13 realization that, you know, this is not going
14 to be resolved today and I really would like
15 to proceed with the cross, but I want to
16 provide that. I'm going to start with SED,
17 and then I'll move to Cal Advocates, and then
18 SoCalGas can have a word at that point, and
19 then we'll go off the record at that point
20 and figure out the plan for the remaining
21 day.

22 So, Mr. Gruen, do you have any
23 comments?

24 MR. GRUEN: Yes, your Honor. Thank
25 you. Your Honor, SED shares your Honors'
26 concerns about having -- there was the
27 opportunity to raise this at the status
28 conference, there was another opportunity to

1 raise this matter when attestations were
2 being given and it wasn't raised. We could
3 have been having this conversation in a
4 proactive way.

5 SED is still concerned after hearing
6 this discussion. And while we appreciate
7 SoCalGas and counsel's answering the
8 questions here, it's because your Honors
9 required them to do so, we will note, and
10 this is -- with regards to the lack of
11 providing this up front, we'd like to note a
12 couple of points of authority that perhaps
13 are helpful for your Honors to consider.

14 The California Rules of Court,
15 Rule 1.150(d), provides that: "The judge may
16 permit inconspicuous personal recording
17 devises to be used by persons in a courtroom
18 to make sound recordings as personal notes of
19 the proceedings."

20 However, it continues, quote, "A
21 person proposing to use a recording device
22 must obtain advance permission from the
23 judge. The recordings must not be used for
24 any purpose other than personal notes," end
25 quote.

26 Sub-part f provides -- of Rule
27 1.150, California Rules of Court -- also
28 provides in part that a violation of this

1 rule is an unlawful interference with
2 proceedings of the court and may be the basis
3 for a citation for contempt of court or an
4 order.

5 Our rules, the Commission's rules
6 that is, contemplate that every individual
7 who comes before the Commission, including
8 the attorneys who appeared for Morgan Lewis,
9 represent Southern California Gas Company.
10 What we would note as well -- and that's,
11 excuse me, that's Public Utilities Code
12 Section 2109 -- we would note that there are
13 several remedies at the Commission's
14 disposal.

15 One is to fine SoCalGas -- find,
16 excuse me, that SoCalGas' lack of cooperation
17 during hearings explicitly to be a reason to
18 increase penalties related to the violation
19 at issue in this proceeding, within the
20 ranges, of course, allotted under Public
21 Utilities Code Section 2107.

22 Another option is to issue separate
23 sanctions related to SoCalGas' behavior
24 pursuant to Public Utilities Code Section
25 2113, which I believe is the contempt
26 provision that was -- so there is a method of
27 finding SoCalGas in contempt here just like
28 the California Rules of Court do in

1 Rule 1.150. So there could be separate
2 sanctions issued under Public Utilities Code
3 Section 2113 and 2107.

4 Your Honor, I'd note that there's
5 a -- we have a concern, one that I've always
6 had with handling hearings remotely, but more
7 so in light of what's happened. SoCalGas'
8 credibility is at issue here. To do what it
9 did yesterday -- and I understand
10 Mr. Stoddard's statement that it
11 misunderstood its own attorneys' attestations
12 to not record during this proceeding.

13 In light of this, and given that it
14 could have raised issues beforehand, how can
15 we now know that SoCalGas will not somehow
16 also misunderstand other parts of its
17 attorneys' attestations on the record such as
18 the one that says it will not coach its
19 witnesses while they are testifying?

20 We have grave concerns about this
21 behavior. This is a serious -- this -- we
22 have concerns about the credibility of
23 SoCalGas in undermining the regulatory
24 process, given what it has done. Your Honor,
25 we'd also suggest that your Honors consider
26 there's an expectation that SoCalGas should
27 not have done what it did because they were
28 explicitly asked in advance and they agreed

1 to not do recording.

2 Now, I understand that SoCalGas may
3 claim that, in fact, they were not recording,
4 but this certainly seems to -- what's the
5 term -- walk and quack like a recording, if
6 you will. This is participating in a public
7 forum online, but it's similar, since they
8 agreed, this is like setting your privacy
9 settings how you would want. In that
10 situation you would have -- once you set
11 those settings, you would have a certain
12 expectation of privacy or a certain
13 expectation to not have the proceedings
14 recorded.

15 Your Honor, the other thing that I'd
16 note, if I may, is just with regards to
17 schedule. To the extent that schedule is, in
18 fact, delayed, SED has not done one line of
19 cross on SoCalGas' witnesses. This is
20 entirely the schedule and where we are today
21 and where we end up after Public Advocates
22 Office finishes is the result of SoCalGas'
23 doing, if you will, including the distraction
24 that we've had to take the time we've had to
25 take today to deal with SoCalGas' behavior
26 that was first discovered by your Honor's
27 careful observations. And we appreciate that
28 yesterday. Thank you for noticing that,

1 ALJ Hecht. That's most helpful. That's the
2 end of our comments for SED. Thank you.]

3 ALJ POIRIER: Thank you, Mr. Gruen.
4 Ms. Bone.

5 MS. BONE: I'll keep it quick, your
6 Honor. I want to, first, thank you for
7 noticing this issue and elevating it and
8 taking it seriously. It is a very serious
9 issue. I think that there's no question at
10 this point that this equipment was not only
11 capable of recording, but did record, and we
12 really don't know at this point, you know,
13 how it was used, how many people it was
14 shared with, and kind of the limits of what
15 this recording can do.

16 And I just wanted to flag the point
17 that not only SoCalGas, but its attorneys
18 should be potentially held liable for
19 sanctions. But we will pursue this in the
20 future. At this point, I'll just say that I
21 share concerns raised by Mr. Gruen, and we
22 will follow up with additional questions.
23 Thank you.

24 ALJ POIRIER: Mr. Stoddard, response.
25 Go ahead.

26 MR. STODDARD: Thank you, your Honor.
27 Briefly, a few items that I just
28 want to address in Mr. Gruen's statement.

1 First and foremost, our statement today was
2 as candid and forthcoming as possible based
3 on the information I had today. Second,
4 Mr. Gruen referenced a sound recording rule,
5 and I want to be absolutely clear for
6 purposes of the record, that there was no
7 sound recording or visual recording here.

8 And, finally, Mr. Gruen seemed to
9 suggest that in light of this, he seemed to
10 think that we would be coaching witnesses,
11 and I want to be absolutely clear here, this
12 has nothing to do with that, and there's no
13 reason to believe that SoCalGas would be
14 coaching witnesses in this proceeding, and
15 that concern is entirely baseless and it's
16 simply taking this issue and turning it into
17 another one.

18 With that, we will address
19 additional questions as they come. I'd also
20 like to note that to the degree there are
21 technical questions, it may be cleared up if
22 we are allowed to share this tool with other
23 parties, including, you know, your Honors, so
24 that you're able to see what it involved to
25 the degree you don't know or to the degree I
26 haven't been clear in my explanations.

27 So that is also an option, but other
28 than that, we'll address additional questions

1 as they come, and we will respond, you know,
2 appropriately based on next steps, and we'll
3 follow any direction from your Honors. Thank
4 you.

5 ALJ POIRIER: Okay. Just to close this
6 up for today, again, the matter is not going
7 to be closed today. Obviously, there's a lot
8 more information that needs to be gathered,
9 and I think given the discussion today, it's
10 going to take some time to digest it.

11 I think I want SoCalGas to
12 communicate with Cal Advocates and SED as
13 transparently as possible to provide them the
14 information they need. I think later we'll
15 discuss kind of the timing of those
16 questions. I do want to provide, like I
17 said, an opportunity for that transcript.

18 Moving forward, I want folks to go
19 back and familiarize themselves with these
20 rules and the attestations and make sure if
21 you have any questions, if there's anything
22 that is not clear, raise that with us, and we
23 can address that here.

24 With that, I want to provide ALJ
25 Hecht, do you have any further comments?

26 ALJ HECHT: Just a couple. First, I
27 want to emphasize that these are public
28 hearings, and I don't have any expectation

1 that they are private. My expectation is
2 that people who are involved in them follow
3 the rules, and that's really what I'm looking
4 for here. That's the bottom line.

5 I'll also say I think there was a
6 level of distrust among the parties to begin
7 with in this case, and that may be where some
8 suspicion on this is coming from, whether it
9 is related or not; so I just want to make
10 that observation that that level of distrust
11 does not make our jobs easier and not sure it
12 makes any of your jobs easier either.

13 That's really all I had. I think
14 Judge Poirier covered it quite well.

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

17 (Off the record.)

18 ALJ POIRIER: We will be back on the
19 record. We will be taking a break until
20 11:10.

21 (Recess taken.)

22 ALJ POIRIER: Back on the record.

23 We are just returning from a short
24 break. We'll be recommencing hearings with
25 redirect by Cal Advocates of its panel of
26 witnesses, Mr. Bach and Mr. Taul.

27 Ms. Bone, please proceed.

28 MS. BONE: Thank you, your Honor.

1 MATTHEW TAUL and ALAN BACH,
2 resumed the stand and testified further as
3 follows:

4 REDIRECT EXAMINATION

5 BY MS. BONE:

6 Q Traci Bone for Cal Advocates, and
7 good morning. Mr. Bach, how are you doing?

8 WITNESS BACH: I'm doing fine. Thanks.

9 Q Great. So we're going to talk
10 about Mr. Lotterman's cross-examination of
11 you yesterday. He asked you about the list
12 of 20 candidate wells that were identified
13 Vertilog; do you recall that?

14 A Yes. I believe in Cal Advocates'
15 Exhibit 401.

16 (Reporter clarification.)

17 BY MS. BONE:

18 Q Yes. Specifically it's at pages
19 267 and 268.

20 And do you recall Mr. Lotterman
21 asking you about the comments column for
22 these pages of cross-examination exhibits?

23 WITNESS BACH: Yes, I do.

24 Q And was it your understanding that
25 this listing, particularly in the comments'
26 section, identified all the mechanical
27 integrity issues with the wells that were
28 being identified for Vertilog inspections?

1 A No, not in terms of the entire
2 history of that well.

3 Q So, for example, is it possible
4 that there could have been other leaks in
5 those wells that the listing did not
6 identify?

7 A Yes. For example, I know SS-17 had
8 a leak that was repaired about the time that
9 it was drilled.

10 Q But that leak is not reflected on
11 the comment log?

12 A No. It does not appear to be.

13 Q Okay. Mr. Lotterman asked you a
14 number of questions about a 1991 memo
15 regarding the Vertilog results for a
16 Montebello well -- field well. The document
17 is marked as Exhibit SoCalGas 153. I will
18 also note that I understand it's also marked
19 as Exhibit SED No. 66.

20 Do you recall reviewing that memo
21 with Mr. Lotterman?

22 A Yes, I do.

23 Q And if we could look at it for a
24 minute, Mr. Neville, the author of the memo,
25 explained at the bottom of the first page
26 that there were several possible explanations
27 for the log inaccuracy; didn't he?

28 A Yes. I updated yesterday, for

1 example, calibration issues with a specific
2 tool for the casing eccentricity - sorry - at
3 the particular well.

4 Q So, similar, to what you just said,
5 he specifically stated that the Western Atlas
6 tools may not be functioning as specified in
7 the Atlas literature; didn't he?

8 A Yes, I believe so.

9 Q And he explained, as we roll on to
10 page 2 of this memo, that to address this
11 possible Western Atlas was going to have
12 their Houston office review the job, and he
13 would attach their report to this memo when
14 the work was completed; didn't he?

15 A That appears to be what he said,
16 yes.

17 Q And have you seen a copy of the
18 Western Atlas report?

19 A I have not.

20 Q So to be clear, that Western Atlas
21 report was not attached to the copy of the
22 1991 memo that you have seen; correct?

23 A Yes, to the best of my knowledge.

24 Q And do you know if SED asked
25 SoCalGas to provide the Western Atlas report
26 to them?

27 A I believe they did.

28 Q And to your knowledge, did SoCalGas

1 provide that report to SED?

2 A I believe they did not.

3 Q And do you know if Cal Advocates
4 has asked SoCalGas to provide that Western
5 Atlas report to us?

6 A Yes. We did as of yesterday.

7 (Reporter clarification.)

8 BY MS. BONE:

9 Q Thank you, Mr. Bach. If you could
10 just raise your voice level a little bit, it
11 helps a lot. So let's talk about Vertilog
12 results in the Montebello situation found.

13 Did the Vertilog results in that
14 study identify corrosion in that well?

15 WITNESS BACH: Yes, it did.

16 Q Does this memo dispute that
17 significant corrosion was found?

18 A It disputes the level of corrosion.
19 It doesn't dispute that there was corrosion.
20 It was less significant than what the logs
21 said. I'd have to take a minute to read it
22 to determine whether it's significant or not.

23 MS. BONE: Can we take a few minutes,
24 your Honors, to allow Mr. Bach to look at
25 that?

26 ALJ POIRIER: Go off the record.

27 (Off the record.)

28 ALJ POIRIER: Back on the record.

1 Ms. Bone, maybe you could restate.

2 BY MS. BONE:

3 Q Yes. Does the 1991 memo dispute
4 that significant corrosion was found?

5 WITNESS BACH: It states there was
6 corrosion in the range of 12 to 18 percent.

7 Q Mr. Bach, do you have an opinion on
8 whether that was significant corrosion or
9 not?

10 A I don't have an opinion at this
11 time. It would depend on the vintage of the
12 pipe and how that affected the maximum
13 allowable operating pressure compared to the
14 pressure what the pipe -- the pressure the
15 pipe normally operated at.

16 Q Mr. Bach, would you agree that it
17 only takes one area of corrosion in a casing
18 wall to cause a rupture?

19 A Yes. I agree, but there only --
20 but it would -- but it only requires one area
21 of corrosion to possibly cause a catastrophic
22 rupture, as was the case in SS-25.

23 Q At page 3 of the 1991 memo,
24 Mr. Neville made recommendations; is that
25 correct?

26 A Yes. That's correct.

27 Q Under Recommendation No. 2, did
28 Mr. Neville recommend stopping the use of

1 Vertilog?

2 A No, not necessarily. It appears
3 that he still not -- thought it would be
4 useful on qualitative basis.

5 Q In fact, didn't he say in the last
6 sentence of his recommendation on page 2 that
7 the severity of the corrosion problem and the
8 fact that we are all still in the process of
9 evaluating the corrosion mechanism warrants
10 being overly cautious at Montebello?

11 A Yes, he does state that.

12 Q And, if, in fact, Mr. Neville
13 identified the possibility of errors in
14 running the Vertilog, including calibration
15 errors; correct?

16 MR. LOTTERMAN: I understand we're
17 trying to get through this quickly, but I
18 believe Ms. Bone is leading the witness, and
19 I believe it's her witness, and she should
20 not be doing so.

21 ALJ POIRIER: Ms. Bone, can you
22 restate?

23 MS. BONE: Sure.

24 Q Did Mr. Neville apply the
25 possibility of errors in running the
26 Vertilog, including capped calibration
27 errors?

28 WITNESS BACH: Yes. As I previously

1 stated, calibrations errors are eccentric in
2 the casing.

3 Q So is that another type of --
4 strike that.

5 Did Mr. Neville identify other
6 types of casing inspection logs that could be
7 run to measure the wall thickness?

8 A Yes, he did. He mentioned a
9 company Schlumberger and Halliburton under
10 Recommendation No. 1.

11 Q Do you recall what he said about
12 Schlumberger?

13 A He mentioned that it should be
14 considered.

15 Q Why should it be considered?

16 A Possibly that if --

17 MR. LOTTERMAN: Your Honor, I'm going
18 to object. Excuse me. I'm going to object
19 on speculation grounds here.

20 MS. BONE: Your Honor, how is it
21 speculation when it's exactly what
22 Mr. Neville recommended?

23 MR. LOTTERMAN: No, I'm not disputing
24 the recommendation. I'm disputing Mr. Bach's
25 ability to interrupt that sentence "should be
26 considered." I don't see anywhere in this
27 memo where Mr. Neville lays out what should
28 be considered or why.

1 ALJ POIRIER: Ms. Bone, why don't you
2 restate with the idea that this is in the
3 exhibit, and I want the language of the
4 document to speak for itself.

5 MS. BONE: I think I'll move on.

6 Q Mr. Bach, has Southern California
7 Gas provided any evidence that it was
8 concerned with the quality of the Vertilog
9 inspections that were performed at the Aliso
10 Canyon facility?

11 WITNESS BACH: Can you repeat the
12 question?

13 Q Sure. Has SoCalGas provided any
14 evidence that it was concerned with the
15 quality of the Vertilog inspections that were
16 performed at the Aliso Canyon facility?

17 A They provided this exhibit and
18 their surreply testimony of, I believe,
19 Witness Carnahan, of his concerns.

20 Q So did they rely on this memo, this
21 1991 memo, as justification for why they
22 canceled the Vertilog inspections at Aliso
23 Canyon; is that your understanding --

24 A (Indecipherable.)

25 (Crosstalk.)

26 MR. LOTTERMAN: I think I need to
27 object on speculation grounds here, your
28 Honor, unless Mr. Bach can give a foundation

1 as to why he would know that.

2 ALJ POIRIER: Ms. Bone, can you
3 restate?

4 MS. BONE: I believe -- your Honor, I
5 believe Mr. Bach can provide a foundation.
6 Perhaps, he should just be allowed to answer
7 the question.

8 ALJ POIRIER: Go ahead, Mr. Bach.

9 WITNESS BACH: Based on, I was crossed
10 on this by SoCalGas yesterday, and the line
11 of cross appeared to be -- to try to
12 discredit the accuracy of Vertilog. It
13 appears that, yes, that this 1991 memo,
14 SoCalGas was using to base the accuracy of
15 Vertilog.

16 BY MS. BONE:

17 Q Mr. Lotterman asked you the high,
18 medium, and low priorities given to the 2020
19 candidate wells that were included in the
20 1988 memo. When you talk about priorities
21 for the inspections, are you suggesting that
22 all of the 20 candidate wells should have
23 been inspected because they were all priority
24 wells relative to the over 100 wells in the
25 Aliso Canyon facility?

26 WITNESS BACH: Likely, yes.
27 Considering that they were identified as
28 candidate wells by SoCalGas's employees.

1 Q Mr. Lotterman asked you about
2 DOGGR's regulations and its findings that
3 SoCalGas complied with its mechanical
4 integrity requirements. Do you recall that
5 discussion?

6 A Yes.

7 Q Did you believe or do you believe
8 that DOGGR's integrity task requirements --

9 (Unmuted phone-line noise.)

10 ALJ POIRIER: Off the record.

11 (Off the record.)

12 ALJ POIRIER: Back on the record.

13 Ms. Bone, continue.

14 MS. BONE: Yes. And I'm almost done
15 with Mr. Bach.

16 Q Do you believe that DOGGR's
17 integrity test requirements were sufficient
18 to identify the mechanical integrity of the
19 storage wells?

20 WITNESS BACH: No, I don't believe so.
21 The allowance to use only temperature surveys
22 and noise logs were -- appeared to allow for
23 the -- allowed for casing to leak and that do
24 an after-the-fact repair, not necessarily
25 determine repairs as the integrity was
26 failing.

27 Q And do you believe that SoCalGas
28 proactively looked into the mechanical

1 integrity of the 20 candidate wells?

2 A I do not.

3 Q And this is based on your
4 engineering judgment; correct?

5 A Yes, that's correct.

6 Q Is it also based on your experience
7 regarding integrity management programs for
8 natural gas transmission and distribution
9 systems?

10 A Yes. Both contributing to it,
11 yeah.

12 Q And do you believe --

13 MR. LOTTERMAN: I didn't catch that
14 last answer.

15 ALJ POIRIER: Sorry. Mr. Bach, please
16 repeat your answer.

17 THE WITNESS: I said, yes, contributing
18 to it.

19 MR. LOTTERMAN: Oh, okay.

20 BY MS. BONE:

21 Q And do you believe -- also believe
22 this is common sense; is that correct?

23 WITNESS BACH: Yes.

24 MS. BONE: Thank you, Mr. Bach. That
25 is all I have for you.

26 ALJ POIRIER: Mr. Lotterman, do you
27 have any recross?

28 MR. LOTTERMAN: I didn't know if

1 Mr. Gruen gets an opportunity as well.

2 ALJ POIRIER: No.

3 MR. LOTTERMAN: Got it. Thank you.

4 RECROSS EXAMINATION

5 BY MR. LOTTERMAN:

6 Q Two quick questions, Mr. Bach, and
7 then I'll let you go. Are you aware that
8 this Western Atlas report even exists?

9 WITNESS BACH: I do not.

10 Q Secondly, is there any doubt in
11 your mind that the tool that Mr. Neville used
12 at SoCalGas's Montebello storage facility was
13 the same tool that SoCalGas was using at its
14 Aliso Canyon facility during that time
15 period?]

16 A I don't recall if it was the same
17 or different tool, and I'm not sure it was
18 the only tool that SoCalGas had available.

19 Q Okay. Thank you, Mr. Bach.

20 I have no further questions, your
21 Honor.

22 ALJ POIRIER: Thank you. Ms. Bone, do
23 you have -- do you have any further re- --
24 redirect?

25 MS. BONE: No, I do not.

26 ALJ POIRIER: Okay. Thank you.

27 Let's go off the record.

28 (Off the record.)

1 ALJ POIRIER: We'll go back on the
2 record.

3 Now we will have redirect for
4 Mr. Taul, and please proceed, Ms. Bone.

5 MS. BONE: Thank you.

6 FURTHER REDIRECT EXAMINATION
7 BY MS. BONE:

8 Q Mr. Taul -- oh, great. I can see
9 you. Good morning.

10 WITNESS TAUL: Good morning.

11 Q Mr. Lotterman spent some time
12 asking you about your corrosion rate
13 calculation. Do you recall that?

14 A Yes.

15 Q And do you recall Mr. Lotterman
16 asking you a series of questions calculating
17 how long it would take a pipe to corrode at
18 an existing rate?

19 A Yes.

20 Q And do you have a view on whether
21 it is accurate to assume that corrosion
22 always occurs at the same rate?

23 A Yeah. It is my understanding that
24 corrosion will not occur at the -- a constant
25 rate, for several reasons.

26 Q Would -- would you like to
27 elaborate on those reasons?

28 A Yeah. Obviously, it -- it -- if

1 the start of -- of a pipe being spudded,
2 there's high-gauge fluid that is there to
3 prevent the growth -- outgrowth of some
4 microbial, you know, methanogens or bacteria
5 or any of those corrosion sources. But,
6 Blade even gets into the fact that, as
7 corrosion happens, there are two competing
8 directions, both the surface area of the
9 piping grows locally, so potentially, there's
10 more surface area that could be in contact
11 with the aqueous environment, allowing more
12 corrosion to occur, but at the same time, the
13 corrosion they found to be most likely
14 involved created a scale build-up, which
15 would hinder the rate. So it's not clear to
16 which -- to which rate would win out in the
17 long-term, if that makes sense.

18 Q It does; some simpler questions for
19 those of us who aren't engineers.

20 Can variations in the rainy season
21 be a factor that makes corrosion occur in an
22 irregular rate?

23 A Yes. And I believe
24 Mr. Krishnamurthy spoke to this a little bit.

25 Q Yes, he did.

26 Were you clear in your -- in Cal
27 Advocates' supplemental response to SoCalGas'
28 first data request on Cal Advocates that your

1 corrosion rate calculation was an
2 illustration of the fact that the wells
3 examined by Vertilog in 1988 existed in a
4 corrosive environment?

5 A That's right, in that because of
6 that corrosive environment that they found
7 in -- in the wells they did test led me to
8 believe that you could perform some analysis
9 to determine, you know, what is the
10 likelihood of failure with these estimates of
11 the 1988 Vertilog.

12 Q Okay. And just to make clear, that
13 response is -- our supplemental data response
14 was in Question 7, and we have marked that as
15 Cal Advocates Exhibit Number 405. Correct?

16 A Yes, I believe so.

17 MS. BONE: Okay. And I know that this
18 has been provided to SoCalGas in other
19 context, but they do have -- they do have the
20 exhibit. It hasn't been marked for them yet,
21 and we'll be sure to send it along to them,
22 just as an aside.

23 Q Was it clear that the Vertilog
24 results at Aliso Canyon showed extensive
25 corrosion in the candidate wells that were
26 inspected?

27 A Yes, though the Blade report has
28 five of the seven wells tested. I believe

1 two of them had upwards of a Class 3
2 corrosion issue, over 60 percent outer
3 diameter wall thickness loss. I would agree
4 with that statement.

5 Q And so is it true that you
6 testified that as a result of this corrosion
7 you believe that SoCalGas should have
8 performed corrosion analysis on the various
9 wells to determine if the corrosive
10 environment was an isolated or systemic
11 problem?

12 A I believe I did, yes.

13 Q By that, did you mean that SoCalGas
14 should have considered all of the 20 -- 20
15 candidate wells identified for Vertilog?

16 A Yes.

17 Q But, is it your understanding that
18 SoCalGas terminated the Vertilog program?

19 A That's right, yes. Their reasons,
20 I believe, were given yesterday.

21 Q And you understand those reasons to
22 be the ones articulated in the 1991 memo?

23 A For the most part, yes. I believe
24 that's the only document I've seen provided
25 on that topic.

26 Q Okay. Thank you very much,
27 Mr. Taul.

28 The witness is available for

1 recross.

2 ALJ POIRIER: Mr. Lotterman, do you
3 have any recross for Mr. Taul?

4 MR. LOTTERMAN: Just a -- a brief one
5 or two questions, your Honor, hopefully.

6 FURTHER RECROSS EXAMINATION
7 BY MR. LOTTERMAN:

8 Q Mr. Taul, you have my apologies,
9 because when your counsel yesterday said that
10 the table that we were discussing was
11 exemplary, I thought she meant the best of
12 its kind. And I won't tell you where I got
13 that definition from, because apparently I'm
14 not allowed to use Google in this proceeding.

15 I now understand that when you said
16 the table was exemplary, you meant serving
17 only as an example or illustrative. Is that
18 correct?

19 WITNESS TAUL: Yes, I would agree with
20 that statement.

21 Q All right. All right. And, in
22 fact -- and -- and I, in fact, read -- or
23 reread Cal Advocates' discovery responses
24 last night, and, in fact, you did explain
25 that in that response, didn't you?

26 A Yes, that is correct.

27 Q All right. And so to be clear,
28 and -- and to -- and to shut this door, and

1 hopefully never open it again, your Table 1
2 in your testimony that you're presenting
3 today in this proceeding is not an effort to
4 determine, opine or otherwise calculate the
5 actual corrosion rates experienced at those
6 five wells. Correct?

7 A Correct.

8 MR. LOTTERMAN: No further questions,
9 your Honor.

10 ALJ POIRIER: Ms. Bone, do you have
11 anything further?

12 MS. BONE: Yes, just one question for
13 the witness.

14 FURTHER REDIRECT EXAMINATION

15 BY MS. BONE:

16 Q What was your purpose in providing
17 this illustrative example?

18 WITNESS TAUL: I believe, as
19 Mr. Lotterman and you both said, I -- the
20 reason was there was results coming out of
21 the Vertilog tests in the 1998 (sic) to 1990
22 program, and through data requests to
23 SoCalGas, through writing our testimony,
24 reading the sur-reply, it did not appear
25 that -- well, sorry, reading the opening
26 testimony, rather. There -- there's a
27 timeline there. Reading the opening
28 testimony, it did not appear that SoCalGas

1 had documents at that time that showed or
2 inner correspondence that described why, in
3 particular, they believed that the Vertilog
4 was -- the data was so bad as to -- to quit
5 the program. And so I wanted to do some
6 calculations, look at -- I believe I said at
7 the end of yesterday, Mr. Krishnamurthy and
8 Blade quoted somewhere between five to 10 MPY
9 was -- was a fair estimate of corrosion, and
10 just looking at those figures and trying to
11 see where they came to those figures, as
12 well.

13 Q Did you have any evidence of
14 SoCalGas doing any type of corrosion
15 estimates?

16 A I do not. And I believe the -- in
17 my opening testimony, I speak to that, that I
18 did not come across any such analysis by
19 SoCalGas.

20 Q And so did you want to show that
21 analysis could be done?

22 A That's right, yes, analysis could
23 be done. It could be done better, had there
24 been more data available, again, that data
25 being actual measurements with a casing
26 inspection and -- and the like.

27 MS. BONE: Okay. No further questions,
28 your Honor.

1 ALJ POIRIER: Mr. Lotterman, do you
2 have any?

3 MR. LOTTERMAN: No, thank you, your
4 Honor.

5 ALJ POIRIER: Okay. Thank you.

6 Let's go off the record.

7 (Off the record.)

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

10 While off the record, we were
11 discussing the future order of witnesses, and
12 we've decided that -- that Mr. Taul will now
13 go.

14 And I just want to remind the -- the
15 witnesses they made attestations while they
16 were brought up as witnesses for the panel,
17 and they still apply.

18 Please -- please go ahead,
19 Mr. Lotterman.

20 MR. LOTTERMAN: Thank you, your Honor.

21 FURTHER RECROSS EXAMINATION

22 BY MR. LOTTERMAN:

23 Q Mr. Taul, we are now switching to
24 another area that I believe you sponsored as
25 part of your testimony, and to make the
26 record clear, I believe you sponsored a
27 portion of Cal Advocates' opening testimony,
28 Exhibit 400-2, pages 15 through 23. Is that

1 correct?

2 A That is my -- yes, I agree.

3 Q All right. And then I believe you
4 also provided a portion of Cal Advocates'
5 sur-reply testimony, and that is encompassed
6 in pages 4 through 9?

7 A Four through -- yes, I'd agree.

8 Q All right. All right. Good. All
9 right. And -- and just to kind of move
10 through this quickly, in those two reports,
11 you identify a number of -- I'm sorry.

12 In those two sets of testimony,
13 excuse me, Exhibits 400-2 and Cal -- Cal
14 "P" -- Cal PA 402, you identify a number of
15 reports you believe are missing. Correct?

16 A Yes, I -- yes.

17 Q Okay. All right. And I have a --
18 just a handful of questions for you.

19 One is: Did you check to see if
20 any of those missing records or reports were
21 in SoCalGas' databases, such as WellView or
22 Maximo?

23 A Yes, I did.

24 Q Second question: Do missing
25 records nec- -- necessarily mean that the
26 activities were not performed?

27 A In my experience with traveling to
28 18 PG&E gas and transmission locations and

1 trying to find records to prove or -- or
2 disprove that maintenance or inspections
3 occur, the rule on the ground was if the
4 software was incomplete, perhaps a date was
5 incorrect, you would go and try to find the
6 paper copy that proved the work actually
7 occurred. It was called the document of
8 record. Paper was the -- the ground proof
9 that informed the database.

10 To answer your question, if the
11 software shows something inaccurately, I
12 would presume that there would be a paper
13 copy that could correct that in the record,
14 and my analysis following several DRs after
15 my trip down to SoCalGas, there were no paper
16 copies that could disprove the Maximo record.

17 Q So -- so let me ask my question
18 again, and -- and given that explanation,
19 maybe you can answer it "Yes" or "No."

20 Do missing records necessarily mean
21 the activities were not performed?

22 A No.

23 Q All right.

24 I have no further questions, your
25 Honor.

26 ALJ POIRIER: Ms. Bone, do you have any
27 redirect?

28 MS. BONE: Yes, I do.

1 ALJ POIRIER: Please go ahead.

2 MS. BONE: Thank you.

3 FURTHER REDIRECT EXAMINATION

4 BY MS. BONE:

5 Q Mr. Taul, just to be clear, you
6 went in person to perform this records
7 inspection at SoCalGas's facilities.

8 Correct?

9 A That is correct.

10 Q Okay. And do -- was this something
11 that you would consider a small sampling? As
12 I understand it, you were just there for two
13 days?

14 A That's right; well, for the record,
15 two and a half days. I believe the last day
16 was just a partial day on-site. It was me
17 and one other regulatory analyst reviewing
18 partial well files for five separate wells.
19 So this was a very quick project, not a lot
20 of manpower on it, and still, hence, my
21 testimony and reply testimony show we found
22 14 instances of casing leaks not being
23 inspected weekly, as is required by
24 SoCalGas's own internal standard and by
25 DOGGR's requirement four, as well as several
26 instances of monthly inspections appearing to
27 not have been performed, as well, due to
28 inconsistencies in the Maximo software.

1 Q Based on your experience both at
2 SoCalGas and in your review of PG&E's records
3 in the past, do you believe you would have
4 found more instances of missing records at
5 SoCalGas had you stayed longer and done a
6 more extensive investigation?

7 MR. LOTTERMAN: Your Honor, I need to
8 object on speculation grounds there.

9 MS. BONE: The speculation is based on
10 his experience of what he found at SoCalGas
11 plus his experience at PG&E.

12 ALJ POIRIER: I'm going to overrule --
13 (Crosstalk.)

14 ALJ POIRIER: -- and allow Mr. Taul to
15 answer to the best of his ability.

16 THE WITNESS: Can you repeat the
17 question, Ms. Bone?

18 BY MS. BONE:

19 Q Yes. Based on your experience at
20 SoCalGas for those few days and in your
21 experience in investigating PG&E's records,
22 do you believe you would have found
23 additional missing records if you had stayed
24 longer at SoCalGas's facility?

25 A I -- I would believe, yes. We did
26 not get through all of the binders presented
27 to us in those two and a half days. There
28 were several binders of -- of Maximo

1 printouts, readouts that me and my colleague
2 were not able to get through. We tackled as
3 much as we could in the time permitted. Then
4 again, those were only a small portion of the
5 well file, and again, small portion of the
6 number of wells that SoCalGas operates at the
7 Aliso Canyon facility. So I believe that is
8 a valid point, yes.

9 Q Thank you very much, Mr. Taul.

10 ALJ POIRIER: Mr. Lotterman, do you
11 have any recross questions?

12 MR. LOTTERMAN: Just I -- I'd like to
13 give Mr. Taul an opportunity to correct what
14 he just said.

15 FURTHER RECROSS EXAMINATION

16 BY MR. LOTTERMAN:

17 Q Mr. Taul, when Ms. Bone was asking
18 you about the 14 weekly casing pressure
19 readings, you said that those casing leaks
20 were not reported weekly. Did you misspeak?

21 A No. Oh, if I said the word,
22 "leaks," that is a misspeak. The weekly
23 casing pressure reading, as I understand it,
24 involved a tech reading the gauges at the
25 site, at the location, and taking down the
26 pressures; no leaks. I do apologize if I
27 misspoke there.

28 Q Well, we're -- we're even. Thank

1 you, Mr. -- Mr. Taul.

2 A Thank you very much.

3 ALJ POIRIER: Ms. Bone, do you have
4 anything further on that last question?

5 MS. BONE: Nothing further, your Honor.

6 ALJ POIRIER: Okay. Let's go off the
7 record.

8 (Off the record.)

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

11 We're going to take a lunch break
12 until one o'clock, and then we'll commence
13 with cross-examination of Mr. Bach. Thank
14 you, everybody.

15 Off the record.

16 (Whereupon, at the hour of 11:52
17 a.m., a recess was taken until 1:00
p.m.)]

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AFTERNOON SESSION - 1:00 P.M.

* * * * *

ALAN BACH,

resumed the stand and testified further as follows:

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

We are just back from our lunch break, and it is the afternoon of March, I think, 25th, and I think it's the eighth day of our hearing. We are going to pick up where we left off. This will be with cross-examine -- cross-examination of Mr. Bach from the Public Advocates Office.

I will remind the witness that he took an oath and attestations yesterday, and that those still apply. You understand that. Yes?

THE WITNESS: Yes, I do.

ALJ HECHT: All right. And I do not believe the Public Advocates Office needs to do much direct, but if somebody can identify his sole testimony, that would be great, and then we'll go to cross-examination.

DIRECT EXAMINATION

BY MS. BONE:

Q Mr. Bach, could you please identify

1 the testimony that you are sponsoring that
2 you're being crossed on this afternoon?

3 A Yes. This is Section 4 of Cal
4 Advocates' opening testimony and Sections 3
5 and 4 of Cal Advocates' sur-reply testimony.

6 MS. BONE: I present the witness for
7 cross-examination.

8 MR. LOTTERMAN: Thank you, Ms. Bone.

9 Your Honor, may I proceed?

10 ALJ HECHT: Yes, please proceed,
11 Mr. Lotterman.

12 MR. LOTTERMAN: All right.

13 CROSS-EXAMINATION

14 BY MR. LOTTERMAN:

15 Q Mr. Bach, good afternoon. You
16 don't have to say it's good to see me again,
17 but hopefully, we'll get done with you today.
18 Okay?

19 A Okay.

20 Q All right. Because you're under
21 oath.

22 Okay. So let's -- let's turn to
23 your sponsored testimony for this afternoon,
24 and I want to focus on the testimony in --
25 which is set forth in Cal PA Exhibit 400-2,
26 and that is the opening testimony. I
27 understand you did some sur-reply testimony,
28 but I want to focus, at least initially,

1 on -- on the opening testimony. So do you
2 have that available, sir?

3 A Yes, I do.

4 Q Good. And the good news is you're
5 the sole sponsor on this one, so you're the
6 sole spokesperson. Is that fair to assume?

7 A Yes, that's true.

8 Q Okay. And can we proceed using the
9 same terms about Blade and SS-25 and the like
10 that we used earlier today and some of
11 yesterday?

12 A Yes.

13 Q Good. Okay. Quick question for
14 you, I -- I'm hoping: Did you do any
15 different preparation in preparing this
16 testimony than what you did in preparing the
17 joint testimony with Mr. Taul which is set
18 forth in Section 2?

19 A I don't believe so. I might have
20 did some -- some somewhat surface well site
21 report --

22 Q Okay.

23 A -- looked at different DR requests.
24 But, no, the -- the -- generally, it -- it
25 was all the same.

26 Q Fair enough. I just wanted to make
27 sure there was no big effort undertaken here
28 that -- that we did not address earlier

1 today. So with that understanding, and I
2 understand -- and -- and I -- and I agree
3 that if there's something that comes to mind,
4 please let me know. I'm going to assume that
5 generally the preparation was the same.

6 And looking at your qualifications,
7 can I assume you have not received any
8 additional degrees and education since this
9 morning's session?

10 A I have not received --

11 Q Okay.

12 A -- any additional degrees.

13 Q Okay. And then to recap your
14 qualifications very briefly, you've been a
15 practicing engineer since 2016?

16 A That was when I received my
17 master's, yes.

18 Q Right. I guess -- so that's what I
19 was wondering.

20 Did you work as an engineer while
21 you were getting your master's?

22 A I did not.

23 Q Okay. So when did you actually
24 sort of leave academia and begin working as a
25 practicing engineer?

26 A I suppose the -- the research work
27 that I did right after I graduated wouldn't
28 count, so like in 2017.

1 Q Okay. All right. So you've been a
2 practicing engineer for about three and a
3 half -- three years and change. Right?

4 A I think it was closer to four
5 years.

6 Q Four year -- four years, you're
7 right. You're right. Thank you.

8 And you've been licensed as a
9 mechanical engineer since 2019. Is that
10 right?

11 A Yes.

12 Q And I believe you told us earlier
13 that you have done inspections on gas
14 infrastructure as part of your career. And
15 my notes are unclear about this, but did you
16 say never at a storage facility?

17 A No. I said the extent of
18 inspections at storage facilities were
19 limited to control rooms.

20 Q Okay. All right. That's right.
21 Okay. And then I -- I remember I asked you
22 and not wells, and you said, "No." Right?

23 A Yes, that's correct.

24 Q Okay. And then I believe you also
25 testified earlier that you've actually never
26 run a casing inspection tool. Right?

27 A Yes, that's correct.

28 Q Okay. Now, you also mentioned, I

1 believe, in your qualifications that you are
2 familiar with -- I think I asked you this
3 question. You are familiar with PG&E's
4 storage program, generally, and its RAMP
5 program, but I neglected to ask you when you
6 became fill your -- familiar with both.

7 Could you give me the dates when
8 you -- when you sort of started working with
9 or on PG&E's storage program, and same
10 question for its RAMP?

11 A For its -- the storage program,
12 first worked on PG&E's gas transmission and
13 storage general rate case. I think that was
14 in 2018, and also in -- so from a
15 program-wise perspective, that was my first
16 encounter with that. Then I visited Los
17 Medanos when I was -- Los Medanos gas storage
18 facility, sorry, when I was part of SED. I
19 had some just general knowledge of their gas
20 storage facilities, but nothing in depth of
21 the entire program.

22 And then for RAMP, or Risk
23 Assessment Mitigation Phase, I worked on
24 PG&E's -- I think that was also in 2018, and
25 then I subsequently worked on "S" -- SCE's,
26 and I did some probe work for -- I forget
27 who. I believe -- I believe it was Sempra's,
28 but I -- I wasn't -- I then -- I wasn't

1 assigned to that proceeding.

2 Q Okay. All right. I think I
3 understand that.

4 And so -- so -- so just to sort
5 of -- I can tailor my -- my later questions
6 to that answer, is it fair to say that you
7 had no knowledge of PG&E's storage system
8 before 2018, and likewise, its RAMP program?

9 A To clarify, I -- I did not have a
10 under -- understanding of it as -- on a
11 program-wide level, yeah.

12 Q Okay.

13 A Sorry. Sorry. I'm assuming you're
14 asking me if I had that knowledge, not if I
15 know of any information about those
16 facilities pre-2018.

17 Q I was focusing on the former
18 question first. I was focusing on your own
19 personal knowledge and experience, and then
20 we'll get to the second one next.

21 A Okay. Yes. Yeah. Yes. I -- I
22 was not aware of PG&E's programs on like a --
23 on a pro- -- PG&E's gas storage on a
24 program-wide level prior to me learning about
25 it in 2018.

26 Q And I think you just answered my
27 second question, but as part of your work,
28 did you learn about PG&E's past storage

1 practices?

2 A Yes, a -- a little bit, especially
3 for the RAMP proceeding.

4 Q Okay. What about its operations
5 and maintenance?

6 A For -- again, specific to storage
7 wells?

8 Q Yes, sir.

9 A Yes. Again, prior to 2018, any
10 knowledge I have of operations and the
11 maintenance would be cursory in terms of
12 how it relates to transmission distribution
13 pipe.]

14 Q Okay. All right. Well, I may have
15 to ask you some questions you don't know the
16 answer to, but that certainly helps. And I
17 believe we established either yesterday or
18 this morning that you have no training or
19 experience in petroleum engineering; right?

20 A Yes, that's correct.

21 Q And just to be clear, the
22 engineers that -- well, let me ask it this
23 way: The engineers at PG&E who were working
24 on the downhole pipes, were they typically
25 petroleum engineers, if you know?

26 A I don't know.

27 Q Okay. Is a petroleum engineer
28 typically someone who works on downhole

1 infrastructure?

2 A I don't know.

3 Q Okay. And then I believe we talked
4 yesterday or today that you've actually never
5 worked in the oil and gas business; is that
6 right?

7 A No, not in the private sector, no.

8 Q Now, your qualifications mention
9 that you took courses for a PHMSA Certified
10 Pipeline Inspe -- to be a certified -- PHMSA
11 Certified Pipeline Inspector; is that right?

12 A Yes, that's correct.

13 Q And was that for transmission
14 infrastructure?

15 A For regulation of transmission and
16 distribution infrastructure and (inaudible)
17 of storage field.

18 Q Got it. And to be clear, just so I
19 understand, you received no training or
20 courses in storage kind of below-ground
21 inspection; is that right?

22 A No specific information. Obviously
23 there's some information that's applicable to
24 both.

25 Q Or perhaps analogous; right?

26 A Yes.

27 Q Okay. But, again, to be clear,
28 transmission lines in this country, or

1 certainly in California, are regulated by one
2 set of regulations; correct?

3 A Well, not exactly. PHMSA has
4 regulations on a (inaudible) level --

5 Q Right.

6 A -- California regulations. But,
7 yes, the -- if what you're getting at is the
8 regulatory body for transmission pipe is
9 different than for underground wells, then
10 yes.

11 Q That's where I was going. Thank
12 you very much for taking me there. In light
13 of that, are you familiar with, for example,
14 API 1171, which applies to storage?

15 A As I mentioned yesterday, I only
16 have a general knowledge.

17 Q Okay. Do you feel qualified to
18 opine on its applicability and its -- the
19 breadth and scope of its mandates in this
20 proceeding?

21 A I'm not clear on what extent you
22 want me to opine on it, but I could give it a
23 shot.

24 Q Sorry, I didn't hear your answer,
25 sir.

26 A Sorry. I'm not sure to what extent
27 you want me to opine on it, but I can give it
28 a shot.

1 Q Okay. All right.

2 MS. BONE: Objection, your Honor. Is
3 this API 1171 even cited in Mr. Bach's
4 testimony?

5 ALJ HECHT: Mr. Lotterman, is it --

6 MR. LOTTERMAN: Not that I'm aware of,
7 Your Honor.

8 ALJ HECHT: Okay.

9 MS. BONE: So isn't this outside of the
10 scope of his testimony? Why would he be
11 opining on it?

12 MR. LOTTERMAN: Well, I don't expect
13 him to. And I think the point I was trying
14 to make is he probably shouldn't be since his
15 expertise does not pertain to storage at all.

16 ALJ HECHT: Okay. And having
17 established that, I think that question is
18 not directly relevant, and we will continue
19 with the cross-examination. Thank you.

20 MR. LOTTERMAN: Thank you. All right.

21 Q Mr. Bach, you mentioned some calls
22 with Blade that occurred in preparation for
23 your testimony. Would you elaborate on
24 exactly how many calls there were and
25 generally what topics were discussed.

26 A To the best of my knowledge, as I
27 said yesterday, I recall two calls. But what
28 was discussed -- it's been a while.

1 MS. BONE: Objection, your Honor. This
2 question was asked and answered yesterday as
3 were many of the questions that have been
4 posed so far.

5 MR. LOTTERMAN: I'm trying to get a
6 little more detail, your Honor.

7 ALJ HECHT: You can ask for more
8 detail. I do not want us to be spending a
9 lot of time rereading the same ground, so --

10 MR. LOTTERMAN: Understood.

11 ALJ HECHT: -- please be mindful.

12 BY MR. LOTTERMAN:

13 Q Let me ask it this way, Mr. Bach,
14 maybe this will short-circuit the inquiry:
15 Was there anything in those two calls with
16 Blade's engineers that you relied on in
17 preparing your testimony today?

18 A Not -- not obviously not directly,
19 but it might have given me a -- led me down
20 the path of what I wanted to write.

21 Q Okay. And how did it do that?

22 A It might have helped me get a
23 better understanding of -- of gas storage
24 wells and what is possible in terms of
25 inspecting the wells. But, yeah, I don't
26 remember the exact content of those calls.

27 Q Okay. Fair enough. I thought I
28 also heard you say yesterday that you had

1 some calls with some either casing or casing
2 inspection companies? Did I get that right?

3 MS. BONE: Objection, we're retreading
4 old ground again.

5 ALJ HECHT: Let's have Mr. Bach answer
6 this question, but then I would like to move
7 on to things that have not been addressed
8 before, please.

9 THE WITNESS: Yeah, so Mr. Holzschuh
10 contacted some companies and -- I'm trying to
11 recall to what extent I was present on those
12 calls.

13 BY MR. LOTTERMAN:

14 Q Mr. Bach, let me ask you a more
15 focused question and we'll move on. Was
16 there anything on those calls with those
17 casing companies -- and I could ask
18 Mr. Holzschuh about this -- that at all
19 informed or supported the testimony that you
20 are sponsoring this afternoon?

21 A Mostly just general knowledge of
22 what casing inspection technologies were
23 available.

24 Q Okay. And is it fair to say in
25 your report you don't cite any information in
26 footnotes or whatever from either the calls
27 with Blade or the calls with the casing
28 companies; is that right?

1 A Yes, I don't cite them.

2 Q Let's turn to your testimony, sir,
3 page 13.

4 A I'm there.

5 Q All right. And I'd like to
6 highlight, Mr. Moshfegh, if you're there, the
7 first sentence.

8 MR. MOSHFEGH: Mr. Lotterman, if I may
9 interrupt. This is Pejman Moshfegh on behalf
10 of Morgan Lewis. If I can kindly ask the
11 ALJs to maybe direct IT to enable the share
12 feature on the Webex.

13 ALJ HECHT: Oh, dear, you're correct.
14 It looks like somebody else has the share
15 feature.

16 Can our IT please activate that for
17 Mr. Moshfegh.

18 UNIDENTIFIED SPEAKER: Yeah, we'll get
19 to that right now.

20 ALJ HECHT: I'll be off the record.

21 (Off the record.)

22 ALJ HECHT: We'll be back on the
23 record. While we were off the record, we
24 just made sure that the correct person could
25 share documents and got the subject documents
26 on the screen.

27 Please continue.

28 MR. LOTTERMAN: Thank you.

1 Q Mr. Bach, I have pulled up page 13
2 of CalPA Exhibit 400-2 and I believe that is
3 the beginning of this portion of the
4 testimony that you sponsored; right?

5 A Yes, that's correct.

6 Q And, Mr. Moshfegh, if you wouldn't
7 mind highlighting that very first sentence
8 for me, as well as the Footnote 60 that is at
9 the end of that sentence.

10 All right. So, Mr. Bach, you start
11 your testimony in this section by saying,
12 "SoCalGas management did not systematically
13 perform casing failure analysis on its failed
14 wells; i.e., identifying the cause of the
15 well failures."

16 Do you see that?

17 A Yes, I do.

18 Q And then if you go down to Footnote
19 60, which seems to be in support of that
20 sentence, you cite the Blade report at
21 page 232.

22 Do you see that?

23 A Yes, I do.

24 Q And if I recall with my time with
25 Dr. Krishnamurthy, I believe that is the
26 section of the Blade report where it lays out
27 its mitigations, its sort of proposed or
28 potential mitigation solutions; true?

1 A Yes.

2 Q Okay. And then if I understand the
3 import of your testimony -- and correct me if
4 I'm wrong -- you say that it's important to
5 run this kind of systematically-performed
6 casing failure analyses because if SoCalGas
7 had done so, it could have identified
8 systematic risks and then allowed or launched
9 efforts to mitigate those risks.

10 Is that roughly what you say here?

11 A Yes. But to clarify, I'm not
12 necessarily saying that SoCalGas had to do a
13 full-blown root cause analysis. I'm just
14 saying that SoCalGas should have identified
15 any failures, for example, categories, and
16 then try to determine if there was any trends
17 to determine if there's some general
18 mitigation measures that needed to be in
19 place.

20 Q Okay. Right. And that was my next
21 question. You're not insisting that every
22 time there's a leak at a well in California
23 that the operator launch a full root cause
24 analysis; right?

25 A Yes, that's correct.

26 Q But if I look at your statement
27 carefully, you say "did not systematically
28 perform casing failure analysis on failed

1 wells identifying the cause of the well
2 failure."

3 Do you see that?

4 A Yes.

5 Q You just said that the failure
6 should identify categories of failures. Is
7 it categories or is it causes or is it both?

8 MS. BONE: Objection, I'm not sure what
9 the difference is.

10 MR. LOTTERMAN: I'm hoping Mr. Bach
11 tells me.

12 ALJ HECHT: I will allow the question.

13 Just answer to the best of your
14 ability for the witness.

15 THE WITNESS: So what I'm saying here
16 is, for example, I think somewhat later I
17 cite SoCalGas' response to --

18 THE REPORTER: Excuse me, Mr. Bach.
19 Could you restart that, please. When you
20 turned your head, it cut out.

21 THE WITNESS: Sorry about that.

22 So in this section, I cite SoCalGas'
23 Response to Cal Advocates' DR 014 Q2, which
24 is Cal Advocates' Exhibit 401, page
25 approximately 4 -- 540 -- let me find the
26 exact page -- 538, 539 and so forth. And so
27 in these sections, and as I expound
28 later in -- I'm sorry -- on these pages as I

1 expound later on these sections, Cal --
2 SoCalGas did diagnostics of how to repair
3 issues on these wells.

4 And so what I'm saying here in terms
5 of categorization and identifying the cause
6 is you did these diagnostics of how to repair
7 the leaks, why not categorize them because
8 you might not know the exact cause, but you
9 might have some inferences of if it's
10 corrosion, if it's something with an issue
11 with the manufacturing of pipe. And then
12 based on that, you might have some ideas of
13 how to mitigate against future failures.

14 BY MR. LOTTERMAN:

15 Q All right. Let me see if I can
16 unpack that a little bit. Again, I want to
17 focus on the phrase "identifying the cause of
18 the well failure," so let me ask a couple
19 questions in that context.

20 Are you suggesting that SoCalGas
21 historically did not identify all types of
22 leaks that occurred at its facilities?

23 A No. I'm -- I -- this is kind of, I
24 guess, how to center(sic) this phrase.
25 It's -- what -- what I was recommending here
26 is that SoCalGas systematically identify the
27 causes.

28 Q No, I understand. I'm just trying

1 to probe what you mean by "cause." Do you
2 mean -- well, let me go at it this way: In
3 your review of SoCalGas' files, did you see
4 where they routinely identified things such
5 as leak in casing, leak in tubing, leak in
6 wellhead, leak in shoe, like we saw in the
7 1988 memo? Did you not see those
8 identifications in SoCalGas' files?

9 A Yes, I did. But the point is it
10 seemed very piecemeal and that's why I was
11 saying to do it systematically in trying
12 to -- instead of just, okay, we have this
13 leak and this is how we're going to repair it
14 to be proactive about it and say they have
15 these types of leaks at, for example, this
16 depth all the time. Maybe there's something
17 wrong. Maybe we should look into why all
18 these leaks are happening at this depth or
19 what have you. And to be clear, these are
20 just illustrative examples.

21 Q Okay. Exemplary; right?

22 A Sure, exemplary.

23 Q All right. All right. Okay.
24 Well, let me explore that a little bit then
25 because I'm not sure I still understand.
26 Let's assume you've got four storage wells at
27 Aliso Canyon and like the SS-25, they're
28 8,000 feet deep. And let's say that for

1 whatev -- and this is maybe over the course
2 of two, three, four years. I don't really
3 care. And let's say that SoCalGas' temp logs
4 show an anomaly or even casing inspection log
5 shows wall thinness a mile deep, 2 --
6 5,280 feet deep.

7 What are you recommending SoCalGas
8 do?

9 A So there's only one failure?

10 Q No. You've got four wells, same
11 depth across the field, but the issue, the
12 question, the integrity issue, is a mile deep
13 on all four of them. So tell me what you
14 propose storage operators like SoCalGas do to
15 identify the cause of the well failures.

16 MS. BONE: Well, objection, you haven't
17 identified what kind of well failures are
18 occurring in these wells that you're asking
19 us to speculate about.

20 MR. LOTTERMAN: That's my point, and I
21 appreciate that speaking objection.

22 Q Mr. Bach, I want you to assume that
23 all those failures are casing leaks; okay?
24 So you got four wells scattered across the
25 facility five square miles with almost
26 identical casing leaks a mile deep. So what
27 in your engineering judgment should SoCalGas
28 do to, quote, "identify the cause of those

1 well failures"? That's my question.

2 A For this specific example, I don't
3 know. But, for example, if it was at a -- if
4 it was a sur -- sorry, not sur -- if it was
5 at a shallower depth than -- and all the
6 wells were in an area where there is poss --
7 possibility for excess water, then, for
8 example, SoCalGas could look into that.

9 If there was a lot of wells that
10 were -- if there was a lot of wells are
11 leaking at 5,280 feet, then that could inform
12 SoCalGas to do more casing inspection logs.
13 Yeah, for the specific example, as I already
14 said, I'm not a petroleum engineer. I don't
15 know exactly what they would do for that
16 specific example, but there are general
17 things that SoCalGas could have done.

18 Q And did you listen to
19 Dr. Krishnamurthy testify Monday and Tuesday?

20 A As I previously said, I listened to
21 the bulk of it but, forgive me, but I don't
22 remember every word that he says.

23 Q And forgive me if I forget your
24 earlier answer, sir, because this has been a
25 long week. Do you recall Dr. Krishnamurthy
26 saying that they found no correlation or
27 trends with the location of the wells at
28 Aliso Canyon?

1 A Yes, and I do not -- what's the
2 word? Not oppose, but --

3 Q Do not disagree?

4 A I don't disagree with it.

5 Q All right. Do you recall
6 Dr. Krishnamurthy saying that there was no
7 correlation between corrosion and depth of
8 wells at the Aliso Canyon field?

9 A I'll take your word for it. That
10 seems about right.

11 Q Okay. What about age?

12 A Yes.

13 Q In fact, do you recall
14 Dr. Krishnamurthy saying Blade found no
15 pattern of corrosion at the Aliso Canyon
16 facility?

17 A Yes, I remember that.

18 Q All right.

19 A And to be clear, I'm not saying
20 that -- I'm not saying that those failure
21 analysis necessarily would have found the
22 issue of SS-25, but that SoCalGas should have
23 done so anyways because it would have been
24 good practice to have knowledge of the wells
25 they were operating.

26 Q Okay. But aren't you saying in
27 this portion of the testimony that had
28 SoCalGas done an investigation, they would

1 have identified the problem at SS-25 and the
2 leak would have been averted?

3 A So this --

4 MS. BONE: Objection,
5 mischaracterization of testimony. I believe
6 that that's in the testimony on page 4.

7 ALJ HECHT: Let's avoid characterizing
8 the testimony one way or another and ask
9 factual questions of the witness, please.

10 MR. LOTTERMAN: Sounds good, your
11 Honor. I just get a little confused as to
12 who's sponsoring what but I will try to sort
13 that out if I can.

14 Q So just to be clear, Mr. Bach, and
15 then we'll move on, you're not insisting that
16 underground storage field operators like
17 SoCalGas identify the specific mechanism of
18 corrosion for each casing leak that occurs on
19 their facilities, are you?

20 A I recommended that they do it to
21 the extent practical, but I'm not necessarily
22 recommending that they have to pull the
23 casing for each leak, no.

24 Q Right. And if I heard your earlier
25 answer, because you're not a petroleum
26 engineer, you can't tell this Commission what
27 is practical with an underground storage
28 well; correct?

1 A No. That's not what I said. I
2 said I don't -- I can't drill deep into the
3 specifics, but there's general risk -- risk
4 management tools that I believe are
5 applicable both from my experience from gas
6 transmission and distribution and for storage
7 wells and that it -- at minimum the gas
8 storage facility operator should have -- I
9 forget exact terminology I used in this
10 part -- but has maintained an understanding
11 of its own system.

12 Q Okay. Did you just say you had
13 experience with storage wells?

14 A I said I have experience with gas
15 transmission and distribution and that I
16 believe for the purposes of risk management
17 there are skills that are applicable both to
18 gas transmission and distribution and for gas
19 storage wells.

20 Q I see. Okay. I thought I heard
21 you say in light of your experience with gas
22 storage wells and I believe the answer to
23 that is I misheard you; right?

24 A It appears so.

25 Q All right. Thank you. So let me
26 just ask one more question and then we will
27 move on and I can tell you I'm almost done.
28 As far as what is technically possible and

1 whether its technically feasible and whether,
2 frankly, its benefits may be outweighed by
3 its risks, you, as Cal Advocates' sponsor of
4 this testimony, have no opinion on that;
5 correct?

6 (Crosstalk.)

7 THE WITNESS: I'm sorry, can you repeat
8 the question.

9 MR. LOTTERMAN: I'm sorry?

10 ALJ HECHT: I'm sure there's a way that
11 you can repeat that question and restate it
12 so that it's more clear, please.

13 MR. LOTTERMAN: Thank you. Understood.

14 Q Let me ask it in the affirmative,
15 Mr. Bach. Are you qualified to opine in this
16 proceeding what sort of failure analysis is
17 technically feasible on downhole wells?

18 A As I said in terms of specifics, I
19 don't think so. But from my data request, it
20 didn't seem like that SoCalGas was doing any
21 systematic analysis of failures -- or,
22 sorry -- if -- sorry -- they -- no systematic
23 analysis of failures besides the groupings
24 that they get for the 1988 Vertilog.

25 Q Okay. And are you able to identify
26 any gas storage operator who does
27 systematically perform casing failure
28 analyses on its failed wells?

1 A No.

2 Q Okay. And can you identify any
3 federal or California requirement that as of
4 2015 required any gas storage operator to
5 systematically perform casing failure
6 analyses?

7 A No. And as I said, it's -- that's
8 not necessarily because of regulations that
9 are making these recommendations, just making
10 them because an operator should have an
11 understanding of their own system.

12 Q Okay. So let's probe that a
13 minute. Tell me what your bases, what your
14 authorities are for making that statement.

15 A So an operator should be able to
16 ensure that -- the safe operation of their
17 system. And so to the extent that any --
18 that there's the possibility for failures
19 that could have result in an unsafe
20 operation, the operator should have some way
21 to determine and mitigate that.]

22 Q Right. So what I'm getting at now,
23 sir, and maybe I'll ask you a little more
24 focused question. I'm asking you to list for
25 us, the bases, the authorities you have for
26 making that statement. I understand you
27 believe it. I understand Cal Advocates
28 believes it.

1 I want you to list for me what
2 either industry standards or authorities or
3 literatures or treatises you have looked at
4 and relied on to form that opinion.

5 MS. BONE: Objection. Could you at
6 least restate the opinion that you're asking
7 him to provide the analysis on.

8 BY MR. LOTTERMAN:

9 Q Let's start with a very focused
10 opinion. Please tell me what authorities you
11 are relying on for the opinion that SoCalGas
12 or that underground storage management -- and
13 I'm going right to the first sentence of your
14 testimony on page 13 if you want to look at
15 it.

16 I want to know what authorities you
17 can cite for the proposition that a company
18 like SoCalGas should systematically perform
19 casing failure analyses on its failed wells.
20 Any authority.

21 A Well, that's basically what
22 integrity management programs are designed to
23 do, and that was only required for the
24 transmission and distribution of pipe at the
25 time prior to the leak; that there's
26 requirements surrounding that after the leak,
27 suggest that that was a good idea.

28 And, yeah, and just because it

1 wasn't required or there wasn't that industry
2 standard around it prior to the leak, doesn't
3 mean that wasn't a good idea, considering
4 that it's required to some extent afterwards.

5 Q Right. And I'm asking you, would
6 you please identify who besides you believes
7 it was a good idea?

8 MS. BONE: Objection, your Honor. I
9 believe we already have established that
10 Blade also found that it was a good idea.

11 MR. LOTTERMAN: That is a speaking
12 objection, your Honor.

13 ALJ HECHT: That is a speaking
14 objection. Please refrain from that. I
15 don't think we're getting anything out of
16 this line of cross right now, and I think
17 it's time to move on.

18 MR. LOTTERMAN: If I may have just a
19 minute, your Honor. Actually, you know, let
20 me do this because this might inform if I
21 have any more questions.

22 Mr. Moshfegh, would you pull up
23 CalPA Exhibit 401 and start at -- I think you
24 call them pincites -- 083, and then if you
25 wouldn't mind scrolling down, just so
26 Mr. Bach can see what this document consists
27 off. No. I'm looking for -- I believe it's
28 page 80. There you go. That's what I want.

1 Q Mr. Bach, I guess my threshold
2 questions --

3 MS. BONE: Excuse me. Which page are
4 you on here?

5 MR. LOTTERMAN: I believe it's 083.
6 Let me pull it up. Yes. Yes. Your exhibit,
7 Ms. Bone, starts at 082, but this page starts
8 at 083 of CalPA Exhibit 401.

9 Q So my question, Mr. Bach, did you
10 review this testimony of Mr. Baker in
11 November of 2014 in preparation of the
12 testimony you're sponsoring this afternoon?

13 A I might have, but I don't think --
14 I don't recall adding this to the list of
15 exhibits or -- sorry -- as adding this as
16 part of our exhibits.

17 Q Right. No, I understand. I did
18 not see it cited as an exhibit in this
19 portion of your testimony. I'm asking you if
20 you considered and reviewed this testimony in
21 preparation of that effort?

22 A I want to say, no. I might have.
23 There's quite a few documents I reviewed,
24 but --

25 ALJ HECHT: This is Judge Hecht.
26 Please try to state your answers simply and
27 clearly, and it's fine to say you don't know
28 or don't remember if that is the truth.

1 That's what we're looking for, is the truth
2 right now. Thank you. That's all.

3 MR. LOTTERMAN: Mr. Bach, let me ask
4 you a little more refined question because I
5 understand you have looked at a lot of
6 documents, and I understand you may not
7 recall sitting here today which one you
8 specifically looked at.

9 Mr. Moshfegh, would you mind turning
10 to page 109, and there's a Table 8 there, and
11 that's what I was going to ask you about,
12 Mr. Bach.

13 Q And my question, I guess my
14 foundational question is, do you recall
15 seeing Table PEB in CalPA Exhibit 401 before
16 and did you at least consider this
17 information in preparing your testimony
18 today?

19 A If I've seen it in the past, I
20 don't think I considered it.

21 Q Okay. Well, then, let me ask you a
22 couple of wrap-up questions, and then I will
23 pass the witness.

24 Are you familiar with the SIMP
25 program that SoCalGas launched in 2014
26 vis-à-vis this CPUC testimony?

27 A In passing, but I don't know all
28 the details of what SoCalGas proposed.

1 MR. LOTTERMAN: Okay. Your Honor, I
2 think with this witness, there's little value
3 of pursuing this exhibit; so I am prepared to
4 pass the witness.

5 ALJ HECHT: I am assuming that CalPA
6 would like redirect with that witness; is
7 that correct?

8 MS. BONE: Yes, your Honor, and if it's
9 possible to take a five or 10-minute break in
10 order to prepare.

11 ALJ HECHT: That was my next question
12 is whether you wanted that short break. We
13 will take a 10-minute break. We will return
14 at 2:00, and with that, we'll be off the
15 record.

16 (Recess taken.)

17 ALJ HECHT: We'll be back on the
18 record. I am going to turn to the attorney
19 for the Public Advocates Office who was on my
20 screen a moment ago -- there she is -- and
21 say, do you have some redirect for this
22 witness?

23 MS. BONE: Yes, your Honor. I do.

24 ALJ HECHT: All right. Please, go
25 ahead.

26 REDIRECT EXAMINATION

27 BY MS. BONE:

28 Q Mr. Bach, is it true that in

1 response to questions from Mr. Lotterman you
2 were not recommending that SoCalGas should do
3 a root cause analysis for every well failure?

4 A (Muted.)

5 Q Mr. Bach, you're on mute.

6 ALJ HECHT: Off the record.

7 (Off the record.)

8 ALJ HECHT: We'll be back on the
9 record. While we were off the record, we got
10 reconnected by telephone with our witness,
11 Mr. Bach. It also sounds that there has been
12 a change in personnel on the Morgan Lewis
13 side for running the screen share, but
14 somebody else will be doing that rather than
15 Mr. Moshfegh. With that, I think we would
16 like to pick up with redirect.

17 Ms. Bone.

18 MS. BONE: Thank you, your Honor.

19 Q Mr. Bach, in response to questions
20 Mr. Lotterman, do you recall that you
21 explained you were not proposing SoCalGas
22 should do a root cause analysis for every
23 well failure?

24 A Yes, I do.

25 Q Do you recommend in your testimony
26 that SoCalGas should perform casing failure
27 analysis on its failed wells?

28 A Yes, I did.

1 Q Was your recommendation informed by
2 the recommendations in the Blade report on
3 page 232?

4 A Yes, they were.

5 Q Can you please turn to the Blade
6 report on page 232 and read the first few
7 lines of what Solution No. 6 recommends.

8 A Yes. So the Blade report states:
9 Despite numerous casing failures,
10 no data were provided to indicate
11 that failure causes were
12 investigated. Casing failures
13 need to be formally investigated
14 so that their causes are
15 identified and their implications
16 are understood. Understanding and
17 interpreting failures are critical
18 to finding the propensity or risk
19 of such failures field
20 (inaudible). Such analysis is an
21 important part of any risk
22 assessment.

23 Q Did you submit data requests on
24 whether SoCalGas did any failure analysis?

25 A Yes, I did.

26 Q And did SoCalGas provide any
27 evidence that it was performing failure
28 analysis on its failed wells at Aliso Canyon?

1 A The data request responses they
2 provided me back only indicated failure
3 analysis to the extent of repairing
4 individual failures and not anything
5 systemic.

6 Q So they didn't identify the causes
7 of the failures or suspected causes of the
8 failures?

9 A They might have identified causes
10 to the extent of repairing the leak, but
11 they -- there wasn't any indication that they
12 used that data to identify potential or
13 expected failures in the future. No.

14 Q Mr. Bach, do you have public sector
15 experience in the oil and gas industry?

16 A I do.

17 Q Could you please explain.

18 A So I worked in the Commission's
19 Safety and Enforcement Division, specifically
20 the Gas Safety and Reliability for a year,
21 and I've worked on some death-related
22 proceedings in my little over three years now
23 with the Public Advocates Office.

24 Q Mr. Bach, do you believe it is
25 necessary to be a petroleum engineer to
26 identify good integrity management practices
27 for a gas storage facility?

28 A Well, a petroleum engineer might be

1 able to identify things in more detail. I
2 think any engineer could identify some good
3 risk management practices.

4 Q Did you apply your best engineering
5 judgment in determining that SoCalGas should
6 perform casing failure analysis of its failed
7 wells?

8 A Yes.

9 Q Did you also rely on the Blade
10 report?

11 A Yes, I did.

12 Q Did you also rely on common sense?

13 A Yes, I did.

14 MS. BONE: Thank you, Mr. Bach. That's
15 all I have.

16 ALJ HECHT: Do we have any recross for
17 this witness from Mr. Lotterman?

18 MR. LOTTERMAN: Briefly, your Honor.

19 RECCROSS EXAMINATION

20 BY MR. LOTTERMAN:

21 Q Is it your testimony -- let me back
22 up. I understand you're relying on the Blade
23 report as support for your testimony
24 submitted this afternoon; is that accurate?

25 A Yes. That's correct.

26 Q And I wasn't quite sure what part
27 of Blade's recommended mitigation solutions
28 you were reading there. By the time I got to

1 it, you had finished reading.

2 Would you mind just identifying for
3 the record what page you were reading from
4 and what solution.

5 A Yes. This was Blade report, page
6 232, and that was Solution 6.

7 Q All right. That's what I thought.

8 And is it your testimony that
9 Dr. Krishnamurthy and Blade undertook an
10 analysis to determine what SoCalGas should
11 have done historically for SS-25 in the Aliso
12 Canyon facility generally?

13 A I do not think so. I think
14 there -- the extent of their study, as I
15 believe Dr. Krishnamurthy said, was to
16 (inaudible) actions, they are possible
17 solutions that could have prevented the leak.

18 Q That's my recollection, too, sir,
19 because do you remember when I asked him
20 about the scope of his technical root cause
21 analysis?

22 A I don't remember all the details,
23 but I'll take your word for it.

24 Q Okay. And do you remember him
25 explaining that he explained the process, but
26 he said the scope of his analysis was not to
27 determine what SoCal's management should have
28 done?

1 A Yes.

2 Q So let's agree that Blade has set
3 forth mitigation solutions in its root cause
4 analysis report that could have prevented the
5 SS-25 leak, including conducting casing
6 failure analysis.

7 I want to know what authority you
8 have for the proposition that SoCalGas should
9 have done that.

10 MS. BONE: Objection; asked and
11 answered.

12 ALJ HECHT: The question was asked. I
13 don't believe the answer was very clear. The
14 witness should try to answer briefly and
15 clearly.

16 THE WITNESS: Okay.

17 BY MR. LOTTERMAN:

18 Q Do you understand my question?

19 A Yes. I believe I understand the
20 question.

21 Q Okay.

22 A So concerning that Blade mentioned
23 that it possibly could have prevented SS-25
24 or other failures, then that seems like it
25 would have been a good idea to do so, and I'm
26 just relying on my authority of -- that
27 similar regulations were later required by
28 gas regulations and also just engineering --

1 my engineering background and common sense.

2 Q Okay. Thank you. And then when
3 you say similar -- I can't even read my own
4 handwriting. And when you gave me that
5 second bucket, were you referring to
6 API-1171?

7 A Sorry. Second bucket in terms of?

8 Q Engineering requirements later
9 required.

10 A So correct me if I'm wrong, but I
11 believe API-1171 is an industry standard and
12 then a regulating body needs to actually
13 (inaudible) regulations.

14 MR. LOTTERMAN: Right. And, your
15 Honor, I apologize. I want to make sure this
16 is crystal clear.

17 Q Let me just walk-through the four
18 items you just gave me. I got common sense.
19 I got your engineering background. I got
20 your view that it was a good idea to do so.

21 That second one I didn't quite get.
22 My notes say: Similar regulations later
23 required, and I guess I was trying to flesh
24 out what exactly you meant by that, Mr. Bach.

25 A After the Aliso Canyon leak, that
26 there were regulations on the federal end,
27 scale, level, that increased the requirements
28 for integrity management of storage wells.

1 Q Got it. Right. And that was my
2 question. The federal regulations that were
3 promulgated and adopted after the leak for
4 integrity management of storage, that's
5 API-1171 -- right -- or portions of it shall
6 we say?

7 A Yes. To my understanding it
8 adopted API-1171.

9 Q Right. And then the state
10 regulations that were adopted post-incident,
11 what were those?

12 A I don't know.

13 MR. LOTTERMAN: Okay. All right.

14 I have no further questions, your
15 Honor. Thank you.

16 Mr. Bach, thank you very much.

17 ALJ HECHT: Thank you.

18 Ms. Bone, do you have any follow-up
19 questions?

20 MS. BONE: I do not.

21 ALJ HECHT: Does anybody have any
22 objection to excusing this witness then?

23 (No response.)

24 ALJ HECHT: Seeing no objection, the
25 witness is excused, and we will pick up now
26 with the change of witness. I believe
27 Mr. Holzschuh is next -- is that correct --
28 Ms. Bone?

1 MS. BONE: That is correct.

2 ALJ HECHT: All right. Is he on screen
3 yet?

4 MR. LOTTERMAN: Your Honor, may I have
5 two minutes to switch piles?

6 ALJ HECHT: Yes. That was exactly my
7 next question. Does anyone want two minutes
8 to get settled with the new witness?

9 MR. LOTTERMAN: (Indicating).

10 ALJ HECHT: Yes. Two minutes. We'll
11 off the record.

12 (Recess taken.)

13 ALJ HECHT: We'll be back on the
14 record. We took a short break to accomplish
15 the change in witnesses, and I think we are
16 now all settled. I can see the witness and
17 the relevant attorneys on my screen so that's
18 a good sign.

19 We're going to start by swearing in
20 the witness and doing attestations, and I
21 will read out a long series of things, and at
22 the end, I would like the witness to express
23 his agreement, assuming he agrees.

24 So, first, do you solemnly affirm
25 that the testimony you are about to give will
26 be the truth, the whole truth, and nothing
27 but the truth; does the witness attest to
28 tell the truth based on his personal

1 knowledge;

2 Will the witness testify based on
3 his own knowledge and memory, free from
4 external influence and pressure;

5 Does the witness attest that he will
6 adhere to all formal requirements of
7 testifying under oath, including the
8 prohibition against being coached;

9 Does the witness attest to only
10 refer to materials previously shared with all
11 parties, including exhibits premarked and
12 identified by the parties;

13 Does the witness attest that he will
14 not make any recording of the proceeding, and
15 attest that he understands that any recording
16 of the proceeding by Webex or teleconference
17 including, screenshots or other visual
18 copying of the hearing is completely
19 prohibited;

20 And does the witness attest that he
21 knows a violation of these prohibitions may
22 result in sanctions, including removal from
23 the evidentiary hearing, restricted entry to
24 future hearings, denial of entry to future
25 hearings, or any other sanctions deemed
26 necessary by the Commission;

27 Do you agree --

28 THE WITNESS: Yes. Yes.

1 ALJ HECHT: Thank you very much.

2 Ms. Bone, please proceed.

3 TYLER HOLZSCHUH, called as a witness
4 by California Public Advocates Office,
5 having been sworn, testified as
6 follows:

6 DIRECT EXAMINATION

7 BY MS. BONE:

8 Q Good afternoon, Mr. Holzschuh.

9 A Good afternoon.

10 Q Can you please identify which
11 testimony and exhibits you are sponsoring
12 today.

13 A That would be the Public Advocates
14 Office Opening Testimony, Section 3, pages 10
15 to 13, and the Public Advocates Office
16 Surreply Testimony, Section 5, from pages 13
17 to 15.

18 Q Thank you. And in addition to
19 those, are you sporting the supplemental
20 attachments in Exhibit 401 and 403 that refer
21 to your testimony --

22 A Yes.

23 Q -- or that informed your testimony?

24 A Yes.

25 Q Thank you.

26 And do these documents represent
27 your testimony in this case?

28 A Yes.

1 Q And is your testimony true and
2 correct to the best of your knowledge?

3 A Yes.

4 Q You are an engineer; correct?

5 A Yes.

6 Q Can you please share with the Court
7 here your educational, professional
8 engineering background.

9 A So I got a Master's Degree from
10 Wesleyan University in Connecticut with
11 honors in math, and then I have an Electrical
12 Engineering Degree from UCLA, and then I
13 joined the Commission in 2018 in the Gas
14 Safety and Reliability Branch and got my
15 Professional Engineering license in 2019 in
16 mechanical engineering.

17 ALJ HECHT: I apologize for
18 interrupting, but the witness is a little bit
19 indistinct, and I suspect if I hadn't stopped
20 him, the court reporter might have.

21 Can he please enunciate as clearly
22 as possible, and I'm sorry for interrupting.

23 THE WITNESS: I'm sorry about not
24 speaking clearly enough. I'll just start
25 from the beginning.

26 I have a math and physics degree
27 from Wesleyan University in Connecticut, with
28 honors in math. I have an electrical

1 engineering degree, a Master's Degree from
2 University of California Los Angeles. I
3 started at the Commission in 2018 in the
4 Safety and Enforcement Division in the Gas
5 Safety and Reliability Branch.

6 And I have a Professional
7 Engineering license in Mechanical
8 Engineering, which I received in 2019, and my
9 area of competency is in machine design,
10 which is, basically -- well, most of that
11 would be the strength and failure modes of
12 metals. Yeah, that's about it.

13 BY MS. BONE:

14 Q Thank you, Mr. Holzschuh.

15 To the extent that your testimony
16 requires your engineering judgment, does your
17 testimony represent your best engineering
18 judgment?

19 A Yes.

20 MS. BONE: Your Honor, Mr. Holzschuh is
21 now available for examination.

22 ALJ HECHT: Thank you very much, and
23 thank you to our witness.

24 Is Mr. Lotterman ready for the
25 cross-examination?

26 MR. LOTTERMAN: I am, your Honor. May
27 I proceed?

28 ALJ HECHT: Yes. Please, proceed.

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CROSS-EXAMINATION

BY MR. LOTTERMAN:

Q Mr. Holzschuh, good afternoon. My name is Tom Lotterman, and I'm an attorney at Morgan Lewis and Bockius, and I'm representing the gas company this afternoon.

I guess my first question out of the box is have you ever testified before the CPUC before?

A No.

Q All right. And earlier Judge Hecht read you some attestations, and I was wondering in addition to those, do you consent to be recorded by third parties today?]

A Well, basically, I don't consent to be recorded by anyone except for the court report -- court stenographer approved by CPUC.

Q Great. Thank you, sir.

And I understand your -- what you're sponsoring. I guess I wanted to make sure what -- just what exactly you are sponsoring, because it's my impression that your testimony was going to be co-sponsored by yourself, and then Mr. either Li or Li. Is that right?

A Miss Li.

1 Q Miss Li. Okay.

2 And are you prepared to adopt and
3 sponsor all of the testimony set forth in
4 Section 3 of Cal PA 400-2?

5 A Wait. 400-2. What are you
6 referring to there?

7 Q I'm referring to Cal PA's opening
8 testimony. That's the exhibit number that
9 the Commission has given it for these
10 proceedings. So let me ask the question
11 again, and -- and -- and ignore the exhibit
12 number.

13 Is it -- are you sponsoring all of
14 the testimony provided in Section 3 of the
15 opening testimony of the Public Advocates
16 Office in this proceeding?

17 A Yes.

18 Q Okay. And a couple questions for
19 you with your qualifications.

20 When did you receive your
21 bachelor's in math and physics from Wesleyan?

22 A 2014.

23 Q Okay. And when did you receive
24 your master's from UCLA?

25 A 2016.

26 Q Okay. So is it fair to say that
27 you began working as a -- you began
28 practicing as an engineer in 2016?

1 A I worked on some engineering
2 projects, I guess, during college, so I did
3 have some engineering experience before 2016.

4 Q Okay. But, as far as full-time
5 employment, did that begin after you received
6 your master's from UCLA?

7 A If you're referring to full-time as
8 40 hours a week, I did have some 40 hours a
9 week (inaudible) during college.

10 Q Okay. All right. That's fine.

11 And I guess the -- and do you have
12 any education or training in petroleum
13 engineering?

14 A As far as petroleum engineering
15 relates to the production of petroleum, no.

16 Q What about wellbores which bring
17 the petroleum or the natural gas or the oil
18 from the reservoir to the surface?

19 A Only analogous concepts in
20 pipelines.

21 Q Okay. And I think I know the
22 answer to these questions, but let me just
23 make sure it's clear.

24 Have you ever worked in the oil and
25 gas business before?

26 A Yes, in the public sector at the
27 CPUC.

28 Q Got it. Any other experiences

1 there?

2 A No.

3 Q Okay. Have you ever visited a
4 underground storage facility?

5 A Yes.

6 Q How many times?

7 A Either once or twice.

8 Q Okay. Can you just briefly tell me
9 what the circumstances were?

10 A The first time was inspecting Gill
11 Ranch Storage as part of the Gas Safety and
12 Reliability Branch. And besides that, I
13 would assume that I have been to another
14 storage site, but I can't remember.

15 Q All right. And that's fine. I --
16 it -- it -- by the way, if today I press your
17 memory, and you don't remember, you should
18 feel free to say, "I don't recall," and
19 likewise, if I press you on something which
20 had nothing to do with what you're doing here
21 or whatever, you should feel free to say, "I
22 don't know." I will take that and -- and
23 move on. Okay? All right.

24 Have you ever sort of worked in
25 underground storage at all as far as drill --
26 drilling wells, operating wells, monitoring
27 wells, inspecting wells, that type of thing?

28 A No.

1 Q All right. Do you belong to any
2 professional organizations that -- you know,
3 either vis-à-vis your specialty or just
4 generally in the engineering world?

5 A None that are related to this
6 proceeding.

7 Q Okay. All right. And let me just
8 briefly walk through the terms that your --
9 your colleagues signed off on them, and I
10 think it made the process go a little faster,
11 and I want to do so with you, as well.

12 If we talk about Blade today, can
13 we agree that we're all referring to Blade
14 eng- -- Energy Partners?

15 A Yes.

16 Q All right. And if we talk about
17 the Aliso Canyon facility, can we agree that
18 we're talking about SoCalGas's Aliso Canyon
19 gas storage facility?

20 A Yes.

21 Q And if we talk about the root cause
22 analysis, or the RCA, that's the analysis
23 and -- and conclusions as outlined in Blade's
24 main report and supplemental reports that
25 were issued in and around May and June of
26 2019?

27 A Yes.

28 Q And if I talk about Standard Sesnon

1 25, or SS-25, can we agree that, in fact,
2 that's the -- that's the Standard Sesnon 25
3 well at the Aliso Canyon facility?

4 A Yes.

5 Q Okay. And finally, if we talk
6 about the leak or the incident, can we agree
7 that that was the leak that was -- that was
8 first detected at SS-25 on October 23rd,
9 2015?

10 A Yes.

11 Q Finally, I want to ask you, sir,
12 what you did to prepare this testimony that
13 you're sponsoring today, and let me walk
14 through a couple categories briefly.

15 Did you review any well files of
16 the Aliso Canyon facility and its wells,
17 whether at Aliso Canyon or at the gas tower
18 or anywhere else?

19 A I reviewed secondary sources of
20 summaries of what happened at SS-25 and other
21 wells at Aliso Canyon.

22 Q I'm not -- I'm not sure what that
23 means.

24 Could you give us a sense what --
25 what those secondary sources are?

26 A So basically, I looked at the Blade
27 report and data requests from SoCalGas, but,
28 to my knowledge, actual documents produced by

1 well engineers, I didn't look at very many of
2 those.

3 Q Okay. And -- and the ones you did
4 look at, are there -- are there categories?
5 In other words, did you look at well file
6 memos or did you look at, you know, CPUC
7 testimony, that type of thing? Can you give
8 us a sense as to what kind of non-well file
9 documents, primary sources, that you looked
10 at in preparing your sponsored testimony?

11 A Are you referring to my opening
12 testimony or my sur-reply testimony?

13 Q Good question. Let's -- let's
14 stick with your opening right now.

15 A Can you repeat the question?

16 Q Yeah. I guess I'll -- what I'm
17 wondering is what primary sources or
18 categories of primary sources did you review
19 in support or in preparation of this
20 sponsored testimony?

21 A The main two documents that the
22 opening testimony relies on is a letter from
23 James Mansdorfer to his management and the
24 next GRC testimony on underground gas
25 storage.

26 Q Got it. Okay. All right.
27 We'll -- we'll walk through both of those in
28 the next 20, 30 minutes. All right. Did you

1 confer with any other expert -- and -- well,
2 let me back up.

3 So leaving aside any of your
4 colleagues at the Cal Advocates Office, did
5 you refer -- or confer with any other experts
6 to prepare your submitted testimony?

7 A For very minor sections of it, yes.

8 Q Could you tell me which experts you
9 conferred with?

10 A Other members of Cal Advocates --
11 I'm -- I'm -- I talked with them, but other
12 members of Cal Advocates surveyed other gas
13 storage operators as far as cathodic
14 protection, and I also spoke with Blade about
15 pressure tests.

16 Q And did you rely on either
17 information in sponsoring your testimony
18 today?

19 A I would say not really. Basically,
20 that information shapes the testimony, but if
21 I didn't have it, the testimony would likely
22 be the same.

23 Q Okay. Did it shape the direction
24 in which your testimony went?

25 A In a very minor way, as I said.

26 Q All right. All right. Because --
27 well, it must have been quite minor, because
28 it's not cited in your testimony. Correct?

1 A Correct.

2 Q All right. So for purposes of --
3 of my examination on your opening testimony
4 today, then, I'm going to assume that you did
5 not rely on any outside expertise or experts
6 in preparing that. Okay?

7 A I would not make that assumption.
8 Basically, Mr. Mansdorfer, I believe, was an
9 expert, as was Blade. I did not reference
10 direct conversations with them, but their
11 statements do influence my testimony.

12 Q All right. All right. But,
13 subject to -- to that qualification, and I
14 understand what you're saying, can I assume
15 that there is no other expertise -- outside
16 expertise that you relied on in preparing
17 this testimony?

18 A I don't understand the question,
19 because if you take away the biggest experts
20 I relied on my testimony, and then say
21 besides them, then we're going to more minor
22 parts of the testimony. So --

23 Q Okay.

24 A -- could you clarify the question?

25 Q You know what, I got a better idea.
26 Let me move on.

27 Let's turn to your testimony, and
28 I -- I'd like to start on page 10. And let

1 me know when you're there.

2 A I'm there.

3 Q Okay. And I want to focus on the
4 first sentence, which begins at line 20 and
5 goes to line 23. Do you see that? And you
6 say:

7 "On -- on April 23, 2009, James
8 Mansdorfer, the storage engineering manager
9 at SoCalGas, cautioned Rudy Weibel,
10 SoCalGas's director of natural gas storage,
11 that," quote, "casing corrosion, landslide
12 movement or fault movement are all potential
13 causes of a major subsurface casing leak."

14 Do you see that?

15 A Yes.

16 Q And then at the end of that
17 sentence you cite in Footnote 43 the 2009 --
18 and I believe you meant to say, "e-mail"
19 earlier, but that's the -- is that the 2009
20 Jim Mansdorfer e-mail that you talked about
21 moments ago?

22 A Yes.

23 Q Okay. And -- and then, if you keep
24 going down that paragraph, down paragraph --
25 down -- on page 10, excuse me, you say or you
26 note that Mr. Mansdorfer indicated that the
27 majority of over 100 storage wells at Aliso
28 Canyon, I assume that's your addition, are

1 from 35 to 70 years old, with no cathodic
2 protection, and I assume you -- you put in
3 the words "against corrosion." Is that
4 right?

5 A Yes.

6 Q Okay. So are you aware of the
7 average age of a storage well in the
8 united -- of a underground gas storage well
9 in the United States?

10 A No.

11 Q Did you attempt to correct -- to
12 conduct any research on that factor?

13 A I have knowledge that
14 Mr. Mansdorfer was concerned, due to the age
15 of these wells.

16 Q Well, I was asking you a slightly
17 different question, Mr. Holzschuh. Let me --
18 let me restate it.

19 You mentioned that you were not
20 aware of the average age of a gas storage
21 well in the United States, and I was asking
22 you if you can -- if you attempted to conduct
23 any research on that point.

24 A Minor research.

25 Q What does that mean?

26 A I read some books on wells and, I
27 guess, the history of wells.

28 Q And what did that tell you about

1 the average age of a storage well in the
2 United States?

3 A Well, I don't remember exactly, but
4 store -- well, storage wells are not -- how
5 do I put it? They haven't been around for a
6 hundred years, so if you have a
7 70-year-old -- a 70-year-old well, that is
8 quite old.

9 Q Okay. And what's your basis for
10 saying that?

11 MS. BONE: Asked and answered. The
12 answer is he learned from what he read.

13 ALJ HECHT: Yes. Let's continue,
14 Mr. Lotterman.

15 MR. LOTTERMAN: All right. All right.

16 Q Mr. Holzschuh, are you aware that
17 an expert in this proceeding, MHA, will
18 testify that the average age of a storage
19 well in the United States is 74 years?

20 A No.

21 Q All right. Are you aware -- by the
22 way, did you listen to any of the earlier
23 proceedings, for example, Ms. Felts or
24 Dr. Krishnamurthy?

25 A Yes.

26 Q Did you hear Dr. Krishnamurthy say
27 that Blade found no correlation between the
28 age of the wells and corrosion at the Aliso

1 Canyon facility?

2 A I don't remember that,
3 specifically.

4 Q All right. Do you remember
5 Dr. Krishnamurthy saying it was not unusual
6 in this country to take an old oil production
7 field, and convert it into natural gas
8 storage?

9 A Yes.

10 Q Okay. You then go on to say -- let
11 me see if I can find -- there it is.
12 Let's -- let's skip to page 11, line --
13 please highlight, Mr. Kraushaar, page 11,
14 line 9 through line 11, please. There you
15 go. That's close enough.

16 Mr. Holzschuh, you also write,
17 then, on page 11 the fact that SS-25 was not
18 cathodically protected, replaced, or taken
19 out of service prior to the leak, meant that
20 the corrosion was unmitigated. Do you see
21 that?

22 A Yes.

23 Q All right. And -- and are you,
24 then, referring back to Mr. Mansdorfer's
25 listing or -- or discussion in his e-mail
26 about cathodic protection?

27 A Yes, but I'm not only referring to
28 that.

1 Q Understood. Understood. We'll get
2 to that in a minute, as well.

3 So are you familiar with how
4 cathodic protection works?

5 A Yes, as part of working in the
6 Safety and Enforcement Division in the Gas
7 Safety and Reliability Branch, we were
8 required to take accredited courses in
9 several subjects. One of those subjects was
10 cathodic protection.

11 Q And are you familiar, either
12 through that -- those courses or elsewhere,
13 how cathodic protec- -- protection, excuse
14 me, is applied to underground storage wells?

15 A I would say otherwise, not through
16 those courses.

17 Q All right. So let me ask the
18 question slightly differently, just to make
19 sure I understand.

20 Are you familiar in -- from
21 whatever source, how cathodic protection is
22 applied to underground storage wells?

23 A Yes.

24 Q Okay. And where did that knowledge
25 come from?

26 A A few places. It comes from the
27 indirect research that other Public Advocates
28 Office (inaudible) years (inaudible) when

1 they did surveys of cathodic protection and
2 practices in California. It also comes from
3 the analogy between cathodic protection in
4 other places and storage wells. It comes
5 from the research I did while preparing this
6 testimony. And it also comes from exhibits
7 in SoCalGas's testimony.

8 Q All right. So what's your
9 professional view as to how deep cathodic
10 protection can be implied (sic) to an
11 underground storage well?

12 MS. BONE: Objection, your Honor. He
13 didn't testify on -- on this specific -- this
14 specific issue.

15 MR. LOTTERMAN: Your Honor, may I
16 respond?

17 ALJ HECHT: Yes, you may respond.

18 MR. LOTTERMAN: Mr. Holzschuh is -- is
19 testifying here about SoCalGas's lack of
20 cathodic protection at its facility, and I
21 was trying to probe the depth of his
22 knowledge on the topic briefly.

23 ALJ HECHT: I think that that is
24 relevant to do briefly. Please continue.

25 The witness should answer to the
26 best of his knowledge.

27 BY MR. LOTTERMAN:

28 Q Would you like me to repeat the

1 question, Mr. Holzschuh?

2 A Yes.

3 Q In your professional judgment, how
4 deep can cathodic protection be applied to an
5 underground storage well?

6 A Well, first of all, I'd like to say
7 that this is not relevant to my testimony,
8 because if you read carefully, never do I say
9 that SS-25 -- the SS-25 leak was in any way
10 caused (inaudible) -- or I shouldn't say
11 that. I didn't say that SoCalGas should have
12 applied cathodic protection, and that lack of
13 cathodic protection caused the SS-25 leak.
14 So I would consider this to be irrelevant to
15 my testimony. However --

16 Q Go ahead.

17 A -- I would say that this depends on
18 multiple factors, specifically the --

19 (Reporter clarification.)

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

22 (Off the record.)

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

25 While we were off the record, the
26 witness started using a headset and holding
27 the microphone closer, because there were
28 some problems with audio. I'm hoping that

1 that dealt with it, and we should continue
2 with the cross-examination, Mr. Lotterman.

3 BY MR. LOTTERMAN:

4 Q Mr. Holzschuh, let me back up a
5 little bit, just to kind of get you back into
6 the -- into the line of questions that I want
7 to pursue.

8 Do you not say on page 11 of your
9 testimony the fact that SS-25 was not
10 cathodically protected, dot, dot, dot, dot,
11 dot, meant that the corrosion was
12 unmitigated?

13 A Yes.

14 Q All right. So your view is that --
15 so is it your view that the SS-25 should have
16 been cathodically protected?

17 A In my professional judgment, I
18 would do a cost benefit analysis in this
19 situation. I don't see many downsides
20 besides the cost of using cathodic
21 protection.

22 Q All right. Is there a downside
23 that in some circumstances nearby wells can
24 actually in -- incur more corrosion?

25 A I would say that if a study is
26 done, the probability of that is extremely
27 low.

28 Q That's your professional judgment?

1 good idea.

2 Q One final question because I'm not
3 sure you answered my question. I'm asking
4 you is it possible generally to put cathodic
5 protection on a production casing that is
6 surrounded by a surface casing?

7 A I would say would you say possible
8 or whether it's a good idea or not are two
9 different -- there's different; right?
10 Because --

11 Q Right. I'm asking the first
12 question.

13 A I mean --

14 ALJ HECHT: This is Judge Hecht. I
15 think the question was clear "is it
16 possible," and I think an answer would be
17 good. "I don't know" and "yes" and "no" are
18 all acceptable answers depending on what you
19 believe.

20 THE WITNESS: Well, I don't want my
21 answer to be taken out of context. If you
22 want me to give a 10- or 15-minute
23 explanation of it, then I'd be happy to do
24 so, but I don't want my answer to be taken
25 out of context.

26 BY MR. LOTTERMAN:

27 Q Fair enough. Let me give you three
28 options, "yes, no," or "it depends."

1 A I repeat my answer.

2 If your Honor, the ALJs, want me to
3 discuss all the options and why they are
4 probably not a good idea, then I'd be happy
5 to do so, but --

6 (Crosstalk.)

7 MR. LOTTERMAN: There's no need, your
8 Honor. I will move on.

9 ALJ HECHT: I went off the record.

10 (Off the record.)

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

13 BY MR. LOTTERMAN:

14 Q Let me try a different approach,
15 Mr. Holzschuh. Did you hear
16 Dr. Krishnamurthy testify in this proceeding
17 on either Monday or Tuesday that it is not
18 possible to place cathodic protection on a
19 production casing that is surrounded by a
20 surface casing? That, I think, is a
21 yes-or-no answer.

22 A I don't remember that.

23 Q Okay. And do you know whether
24 cathodic protection was required on
25 underground storage wells before the incident
26 in 2015?

27 A To my knowledge, there was no
28 explicit requirement to cathodically protect

1 gas storage wells in California; however,
2 there is PU Code 451 which is a catchall.

3 Q Do you know whether it is or was a
4 prevailing industry practice to apply
5 cathodic protection to underground storage
6 wells?

7 A I do not know.

8 Q Okay. In preparing your testimony
9 in this proceeding, did you research the
10 circumstances surrounding Mr. Mansdorfer's
11 2009 e-mail?

12 A Yes.

13 Q Okay. What did you look at?

14 A I looked at three General Rate Case
15 testimonies from SoCalGas. I reviewed
16 secondary sources to estimate the amount of
17 casing inspection tools ran at Aliso Canyon.
18 I performed data requests to SoCalGas to
19 inform me of what they did in this time as
20 far as running casing inspection logs and
21 other mitigation programs.

22 Q Did you read the examination under
23 oath of Mr. Mansdorfer?

24 A If you're referring to the one that
25 was performed by Mr. Gruen, yes.

26 Q Okay. Well, let's turn to that, if
27 we could, just briefly. That is SED
28 Exhibit 201.

1 I'd like to jump to page 130,
2 beginning on line 18, Mr. Kraushaar, if
3 you're there.

4 ALJ HECHT: We'll be off the record
5 while we find that.

6 (Off the record.)

7 ALJ HECHT: We'll be back on the
8 record. We have found the document.

9 Please continue, Mr. Lotterman.

10 BY MR. LOTTERMAN:

11 Q For the record, I have asked
12 Mr. Holzschuh to refer to the Examination
13 Under Oath of James Mansdorfer dated
14 September 13, 2018. It's been marked as
15 SED-201 and I've asked Mr. Kraushaar to go to
16 page 130. I don't even think we need to
17 highlight this, but beginning at line 18,
18 Mr. Holzschuh, will you just sort of scan
19 that -- the bottom of that one and the top of
20 the next one -- and tell us if you reviewed
21 this testimony in preparation of your
22 sponsored testimony today?

23 MS. BONE: Your Honor, I just want to
24 renew my objection. Our witness did not
25 testify that there needed to be cathodic
26 protection or that it was a bad thing that
27 cathodic protection was not on these wells.
28 He only repeated what Mr. Mansdorfer has said

1 in his 1988 memo. That's all this is about.
2 So now he's being subject to massive
3 cross-examination on cathodic protection and
4 it just doesn't make any sense to me. There
5 doesn't seem to be any foundation or any
6 relevance to it.

7 MR. LOTTERMAN: Your Honor, with all
8 due respect, the sentence that I've now
9 referred to two or three times was not a
10 quote from Mr. Mansdorfer's e-mail. It is a
11 direct quote from Mr. Holzschuh's testimony.

12 MS. BONE: Mr. Mansdorfer's e-mail
13 specifically says in the second paragraph on
14 page 2, "There is no cathodic protection on
15 these wells." He was just observing what
16 Mr. Mansdorfer had observed and repeating
17 that in his testimony.

18 ALJ HECHT: Thank you, all, I have
19 heard enough. Based on that sentence in the
20 testimony, I do believe knowledge of cathodic
21 protection is relevant. I would like to move
22 through this line of cross as quickly as
23 possible. It may not be the most important
24 thing, it may turn out to be tangential, but
25 it could be relevant.

26 So, with that, I think we're still
27 on the record and I will ask Mr. Lotterman to
28 proceed.

1 MR. LOTTERMAN: Thank you, your Honor.

2 Q Mr. Holzschuh, without belaboring
3 this point, I guess my threshold question is
4 did you review pages 130 and 131 of
5 Mr. Mansdorfer's EUO in preparation of your
6 testimony today?

7 A I had read those pages before I had
8 drafted the opening testimony; however, I
9 don't think it's shaped in my testimony.

10 Q I'm sorry, sir. I don't understand
11 that answer. Could you rephrase it for me.

12 A I'll just repeat it. I don't
13 understand what was confusing about it. I've
14 read those pages. I don't think it affected
15 my testimony in any way.

16 Q I got it. Thank you. I didn't
17 understand the shaping part. Now I getcha.
18 Okay. So just to be clear, what you're
19 saying is -- and I'm not going to read it
20 into the record because this is already an
21 exhibit -- but what you're saying here is
22 that Mr. Mansdorfer's sworn testimony on
23 pages 130 and 131 of this examination did not
24 affect or otherwise shape your testimony
25 today.

26 Is that what you're saying?

27 A Yes.

28 Q All right. Let's move on. Let's

1 focus on the other parts of that sentence on
2 page 11.

3 Mr. Kraushaar, would you put that
4 back up a minute.

5 Let's sort of skip passed,
6 Mr. Holzschuh, now the "cathodically
7 protected" phrase and let's focus on the rest
8 of it. So if you sort of modify it, what you
9 say -- and these are your own words, by the
10 way -- "The fact that SS-25 was not replaced
11 or taken out of service prior to the leak
12 meant that the corrosion was unmitigated."

13 Did you write that in your
14 testimony, sir?

15 A I agree with that sentence and I am
16 sponsoring it.

17 Q Okay. And did you hear
18 Dr. Krishnamurthy's testimony that there was
19 nothing in SS-25's operating history that
20 showed warning signs of a leak?

21 A I would say that sentiment is taken
22 out of context.

23 Q Your sentiment or
24 Dr. Krishnamurthy's?

25 A Dr. Krishnamurthy's.

26 Q Okay. Did you not hear him testify
27 in front of this Commission that he reviewed
28 38 years of temp logs, noise logs, and

1 pressure surveys and no anomalies were ever
2 recorded at SS-25?

3 A Again, I would say that that is
4 taken out of context.

5 Q Okay. Did you hear him testify
6 that in addition to that, there were also no
7 warning leaks from the two nearby wells in
8 the same pad?

9 A Do you want me to explain why I
10 think it's taken out of context?

11 Q No. That's just kind of a
12 yes-or-no answer. I think I'll let your
13 counsel do that on redirect. My question is
14 actually quite simple. Do you recall
15 Dr. Krishnamurthy testifying that when they
16 reviewed the two wells on the very same pad
17 as SS-25, they saw no warning signs from
18 those wells either?

19 A I do not remember that, but it
20 seems like that is taken out of context.

21 Q Okay. Well, let me come at it this
22 way, then we'll move on: Tell me what
23 engineering data supports your view -- and
24 I'm going to quote you here -- "The SS-25
25 should have been replaced or taken out of
26 service" at the time Mr. Mansdorfer's wrote
27 his e-mail?

28 MS. BONE: Objection,

1 mischaracterization of testimony. He's not
2 saying that that should have happened.

3 ALJ HECHT: This is not the first time
4 that we've heard the mischaracterization of
5 testimony objection. I will say what I said
6 last time, which is please refrain from
7 characterizing the testimony --

8 MR. LOTTERMAN: Okay.

9 ALJ HECHT: -- if you can, and ask
10 factual questions.

11 MR. LOTTERMAN: Okay. Fair enough,
12 your Honor.

13 Q Mr. Holzschuh, here is my question:
14 What engineering data can you point to to
15 support your view that the SS-25 should have
16 been replaced or taken out of service prior
17 to the leak?

18 MS. BONE: Objection, lack of
19 foundation. That is not the view -- that is
20 not the view that he's expressed.

21 ALJ HECHT: There is a subtle
22 difference here. What the testimony says is
23 because it was not cathodically protected,
24 replaced, or taken out of service prior to
25 the leak meant that the corrosion was
26 unmitigated. That is the sentence we're
27 discussing. I don't know see the word
28 "should." I don't see other

1 characterizations, and I would prefer not to
2 hear them and to have factual questions.

3 MR. LOTTERMAN: Okay. That's fine,
4 your Honor. Now I understand what's being
5 said and I will move on.

6 Q Mr. Holzschuh, when you reviewed
7 Mr. Gruen's examination of Mr. Mansdorfer, do
8 you recall discussion about the shearing of
9 wells, the potential shearing of wells at the
10 Aliso Canyon facility?

11 A No.

12 Q All right. Let's move on to --
13 give me a second here, your Honor. I'm going
14 to try to move this -- I'm going to pass on
15 that.

16 ALJ HECHT: We'll be off the record for
17 a moment.

18 (Off the record.)

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

20 BY MR. LOTTERMAN:

21 Q All right. Let's finish up here,
22 Mr. Holzschuh. I'd like to turn to Section B
23 of your testimony. I'd like to look at
24 page 12, lines 11 to 20; okay?

25 Before we go there, Mr. Holzschuh,
26 you referred to earlier that Section 451 was
27 a catchall. What did you mean by that?

28 A Well, I have some experience in a

1 few different engineering fields and I would
2 say that basically every regulation that
3 applies to every engineering field does not
4 specify every consequential decision an
5 engineer or technician would make. However,
6 if they do something that is considered
7 unreasonable, I would consider that still to
8 be a violation of the regulation or the law.

9 Q Are you relying on that
10 interpretation in your testimony here?

11 (Interruption in proceedings.)

12 ALJ POIRIER: Excuse me, this is ALJ
13 Poirier. We have someone who is not muted.
14 Can they mute their phone. We have
15 background noise.

16 MR. AVILA: This is Brandon from IT.
17 I'd like to remind people to keep their lines
18 muted when they're not speaking. Thank you.

19 ALJ POIRIER: Apologies for the
20 interruption, Mr. Lotterman.

21 MR. LOTTERMAN: It's okay. It's late
22 and I'm getting tired.

23 Q Mr. Holzschuh, have you
24 understandably forgotten what I asked?

25 A I don't remember which section of
26 the testimony you're referring to when you
27 talk about me referencing 451 as a catchall.

28 Q No. That was not what I meant to

1 suggest. You said that in one of your
2 answers a couple minutes ago, which is why I
3 was following up on that. I was asking for
4 an explanation as to why you testified about
5 451 as being a catchall. You were in the
6 process of explaining that, I think, when we
7 got cut off. Have you finished your answer
8 or would you like to add more?

9 A Can I ask the court reporter to
10 read back what she recorded because it can
11 catch everything.

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

13 (Off the record.)

14 ALJ HECHT: We'll be back on the
15 record. We can continue, having clarified
16 some questions while we were off.

17 Go ahead.

18 BY MR. LOTTERMAN:

19 Q I guess my follow-up question to
20 that, Mr. Holzschuh, is did you rely on that
21 interpretation of Section 451 in crafting
22 your testimony that you're sponsoring today?

23 A I'm not a lawyer so my
24 interpretation of 451 -- I don't know if that
25 is given the highest weight, but that is my
26 understanding as I write about it on page 11.

27 Q Okay. And are you likewise or
28 similarly rendering opinions on the

1 reasonableness or unreasonableness of
2 SoCalGas' actions before the leak?

3 Did we lose him?

4 A Oh, I'm here.

5 Q Okay.

6 A If you're asking me do I think that
7 SoCalGas' actions were unreasonable before
8 the leak, I would say yes.

9 Q Yeah, no, I was asking you a more
10 structural or more general question then I'll
11 move on. What I was asking you is are you
12 rendering opinions as to the reasonableness
13 or unreasonableness of SoCalGas' actions in
14 this proceeding?

15 A Well, I'm being cross-examined and
16 I just said I believe SoCalGas' actions were
17 unreasonable and I'm giving evidence of it in
18 my section of testimony.

19 Q All right. Let's move on.
20 Mr. Holzschuh, let's us finish this
21 enterprise by turning to page 12 of your
22 testimony, Subsection B. Do you see where
23 you say, "SoCalGas failed to propose
24 preventative measures against casing failure
25 until 2014"?

26 Do you see that?

27 A What page is this on?

28 Q Page 12, Section B. I'm reading

1 the heading at line 5.

2 A I'm there.

3 Q All right. And is this heading,
4 summarized there where you say, "SoCalGas
5 failed to propose preventative measures
6 against casing failure until 2014"?

7 (Crosstalk.)

8 THE WITNESS: Yes, you read the heading
9 of that section.

10 BY MS. LOTTERMAN:

11 Q I read it correctly; right?

12 ALJ HECHT: We'll be off the record.]

13 (Off the record.)

14 ALJ HECHT: We'll be back on the
15 record. While we were off the record, we
16 discussed the hope that we will finish with
17 the CalPA witnesses today, and we have the
18 rest of cross and potentially redirect with
19 this witness, so we will try to get through
20 this expeditiously.

21 Mr. Lotterman, you may continue.

22 BY MR. LOTTERMAN:

23 Q Okay. Yes. Let's do this,
24 Mr. Holzschuh. Let's get through this as
25 well. I want to get done today as well.

26 So let's focus on Section B of your
27 testimony, which starts on page 12; are you
28 with me?

1 A Yes.

2 Q Do you see the highlighted portion
3 that we put up on the screen?

4 A Yes.

5 Q Okay. And is the purpose of
6 this -- let me ask very focused questions.

7 Do you note here that in his 2009
8 e-mail, Mr. Mansdorfer suggested that
9 SoCalGas proposed to mitigate well risks
10 through a program, which you lay out in that
11 indented quote; true?

12 A Yes.

13 Q Okay. And that's the 2012 General
14 Rate Case that I believe was one of the GRC
15 documents that you looked at in preparing
16 this testimony that we're talking about right
17 here; right?

18 A Can you repeat the question?

19 Q The 2012 rate case that you pulled
20 a quote from on the middle of page 12, is
21 that the 2012 General Rate Case that you told
22 us earlier you had reviewed as one of the
23 documents in preparation for this testimony?

24 A No. That quote is not from the
25 testimony in the general rate case.

26 Q No. That was not my question. Let
27 me try it again. Do you see where -- well,
28 let me come at it this way: Do you see where

1 you write, "In his 2009 e-mail,
2 Mr. Mansdorfer suggested that SoCalGas
3 propose to mitigate any well integrity risks
4 in its Test Year 2012 General Rate Case GRC
5 Application," et cetera; do you see that?

6 A Yes.

7 Q And did you not tell me earlier
8 this afternoon that one of the documents you
9 looked at in preparing this testimony was, in
10 fact, Mr. Mansdorfer's testimony in the
11 general rate case?

12 A Yes.

13 Q Okay. Let's go to that testimony.
14 Okay. This is CalPA Exhibit 401 and the jump
15 site or the pincite is 496, and the document
16 goes to 524, and I just want you to look at
17 two pages and we're done. I want you to look
18 at the first page. Let me know when you're
19 there, Mr. Holzschuh.

20 A So sorry. Which "524" were you
21 referring to? Were you referring to the page
22 number, the PDF number, or some other number?

23 Q I am referring to the supporting
24 exhibits to your testimony. It's been marked
25 CalPA-401. It's the supporting exhibit to
26 the original testimony, and if you could
27 scroll through that and go down to page 496,
28 then we're on the same page.

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

2 (Recess taken.)

3 ALJ HECHT: We are back on the record
4 we took a break for me to get a little air,
5 among other things. I think the
6 cross-examination can continue.

7 Mr. Lotterman.

8 MR. LOTTERMAN: Thank you, your Honor,
9 and thank you for the break actually.

10 Q Mr. Holzschuh, I want to go back to
11 page 12 of your testimony, please.

12 Mr. Kraushaar, would you put that
13 back up. Okay. I want to go back to the
14 heading, and I want to go through the
15 highlighted part, and, hopefully, we'll get
16 done. You state in the heading, "SoCalGas
17 failed to propose preventive measures against
18 casing failure until 2014." And my question
19 is, what happened in 2014?

20 A SoCalGas started a small pilot of
21 its SIMP program.

22 Q Have you investigated just what
23 that small pilot entailed?

24 A The main SIMP program was designed
25 to test about 40 wells across SoCalGas's
26 storage facilities per year. They proposed
27 this program in 2014; however, according to
28 James Mansdorfer, they did not -- they did

1 not test 40 wells starting in 2014.

2 Q What's your support for that fact?

3 You said, "James Mansdorfer"; is
4 this like his examination under oath or some
5 other primary document?

6 Could you let us know what the
7 basis for that statement is?

8 A His examination under oath is one
9 source. I don't know if there's any other
10 source. There might be.

11 Q All right. So, again, and I don't
12 want to belabor this point, but I just need
13 to understand what you're saying. Are you
14 saying that SoCalGas started to perform
15 preventative measures against casing failures
16 in 2014?

17 A The situation is more complicated
18 than that.

19 Q You'll have to explain that answer,
20 please.

21 A Well, as you know SoCalGas did log
22 some wells in 1988, and we also know -- I
23 mean, I can't fill in every single detail
24 that I know and even every single detail I
25 know is not the full picture, but in
26 (indecipherable) 1988, they logged a few
27 wells, a very small number of wells, that
28 didn't mitigate much risk, and then in 2009

1 Mansdorfer is very worried about the
2 integrity of his wells.

3 So saying, oh, they started in 2014
4 would not be an accurate statement, but 2014
5 is significant because that's when they
6 proposed an integrity management program that
7 was at a significantly higher rate than
8 before.

9 Q Okay. Now, I understand.

10 And I didn't focus -- so the focus
11 of that heading was the word "propose." What
12 you're saying is in your view, before 2014
13 SoCalGas had failed to proposed any
14 preventative measures against casing failure.
15 In 2014, in your view, there was a small
16 pilot program of SIMP that began. Am I
17 understanding that correctly?

18 A Yes.

19 MR. LOTTERMAN: All right. All right.
20 That's progress. Well, look, I want to ask
21 you -- your Honor, I'm not going to finish in
22 seven minutes. I can tell you I have 20
23 minutes, but I also do not want to be rushed
24 unfortunately.

25 So, if I may, Mr. Holzschuh, I would
26 like to ask you to clarify something you said
27 earlier, and then I will defer to your Honors
28 what we do next, if that's okay.

1 ALJ HECHT: I do not want to keep the
2 court reporters past 4:00.

3 MR. LOTTERMAN: Okay.

4 ALJ HECHT: So we will not finish
5 today. You can ask for the clarification if
6 that clarification is going to be less than
7 five minutes to the best of your knowledge,
8 and then we will continue.

9 MR. LOTTERMAN: Your Honor, I would
10 rather not go there because it's not only to
11 the best of my knowledge, but it's to the
12 best of my ability and I'm not sure I have
13 control of that today. So with all due
14 respect, I would suggest that we stop for the
15 day. I will go through my notes, and I will
16 make an educated and very strong commitment
17 that I will be done in less than 30 minutes
18 tomorrow morning.

19 ALJ HECHT: All right. Thank you very
20 much. That means that we will not stay here.

21 Are we off the record. No, we are
22 on the record. That's good. We'll be off
23 the record.

24 (Off the record.)

25 ALJ HECHT: All right. We'll be back
26 on the record. We went off the record to
27 establish that we will be picking this up
28 tomorrow morning with more cross-examination

1 starting tomorrow at 10:00 a.m. This has
2 been a long week; so I expect that tomorrow
3 may not be quite a full day. So just for
4 your information, you can keep that in mind.

5 I do expect that we will start with
6 the end of the cross-examination of Witness
7 Holzschuh, and then whatever redirect has to
8 come from there, after that, we will put
9 CalPA exhibits into the record to the extent
10 that they are not there, and then we will
11 continue with SoCalGas witnesses.

12 There was a question this morning
13 about discussing ahead what witnesses should
14 be ready. I think tomorrow definitely Kitson
15 and Sera should be ready, and I think the
16 next witness, LaFevers, and I think that he
17 should be ready as well.

18 Does anybody have any reason to
19 believe that that list is not sufficient for
20 tomorrow?

21 MR. GRUEN: Your Honor, Darryl Gruen
22 for SED. I don't see SoCalGas's Ms. Patel,
23 and I know she's been handling the schedule,
24 but given your guidance to have a shortened
25 day, it seems to me that those three
26 witnesses would likely be more than
27 sufficient for the purposes of preparation.

28 ALJ HECHT: Thank you. And now I see

1 Ms. Patel. Do you have any concerns about
2 that plan?

3 MS. PATEL: I don't. Our three
4 witnesses will be prepared for tomorrow.

5 ALJ HECHT: Thank you very much.

6 With that, I'll see if my
7 co-assigned ALJ, Judge Poirier has any words
8 at the end of the day.

9 ALJ POIRIER: Nothing further from me.
10 Thank you.

11 ALJ HECHT: All right. Then I think we
12 have finished Day 8. We are adjourned.
13 We'll be off the record.]

14

15 (Whereupon, at the hour of 4:00
16 p.m., this matter having been continued
17 to Friday, March 26, 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
NO. 7896, IN AND FOR THE STATE OF CALIFORNIA, DO
HEREBY CERTIFY THAT THE PAGES OF THIS TRANSCRIPT
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TRANSCRIPT OF THE TESTIMONY AND PROCEEDINGS HELD IN
THIS MATTER ON MARCH 25, 2021.

I FURTHER CERTIFY THAT I HAVE NO INTEREST IN THE
EVENTS OF THE MATTER OR THE OUTCOME OF THE PROCEEDING.

EXECUTED THIS MARCH 30, 2021.



ANDREA L. ROSS
CSR NO. 7896

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BEFORE THE PUBLIC UTILITIES COMMISSION
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CERTIFICATION OF TRANSCRIPT OF PROCEEDING
I, REBEKAH L. DE ROSA, CERTIFIED SHORTHAND
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REBEKAH L. DE ROSA
CSR NO. 8708

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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

CERTIFICATION OF TRANSCRIPT OF PROCEEDING
I, SHANNON ROSS, CERTIFIED SHORTHAND REPORTER
NO. 8916, IN AND FOR THE STATE OF CALIFORNIA, DO
HEREBY CERTIFY THAT THE PAGES OF THIS TRANSCRIPT
PREPARED BY ME COMPRISE A FULL, TRUE, AND CORRECT
TRANSCRIPT OF THE TESTIMONY AND PROCEEDINGS HELD IN
THIS MATTER ON MARCH 25, 2021.

I FURTHER CERTIFY THAT I HAVE NO INTEREST IN THE
EVENTS OF THE MATTER OR THE OUTCOME OF THE PROCEEDING.

EXECUTED THIS MARCH 30, 2021.


SHANNON ROSS
CSR NO. 8916

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