

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 26, 2021  
Pages 1308 - 1412  
Volume 9

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VIRTUAL PROCEEDING

MARCH 26, 2021 - 10:05 A.M.

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ADMINISTRATIVE LAW JUDGE HECHT: We'll be on the record. This is Day 9 of the hearings in Investigation 19-06-016 on Aliso Canyon.

Before we went on the record, I gave the statement about preparation and trying to make things go as smoothly as possible from here, and now we are going to pick up with cross-examination of Witness Holzschuh and then redirect, and then a brief break so that we can all switch gears, at which point, I believe, we'll be starting cross-examination of the SoCalGas witnesses.

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

MS. BONE: Yes, your Honor.

ALJ HECHT: Ms. Bone.

MS. BONE: I just wanted to confirm we'll have a brief 10-minute break between cross-examination and redirect so that I can confer with my witness.

ALJ HECHT: I am fine with that. That would be fine.

MS. BONE: Thank you.

ALJ HECHT: With that, is the witness

1 ready?

2 THE WITNESS: Yes.

3 ALJ HECHT: Mr. Lotterman, you may  
4 proceed.

5 MR. LOTTERMAN: Thank your Honor.

6 TYLER HOLZSCHUH,  
7 resumed the stand and testified further as  
8 follows:

9 CROSS-EXAMINATION RESUMED

10 BY MR. LOTTERMAN:

11 Q So yesterday we discussed your  
12 testimony, which is set out in Section 3A of  
13 CalPA Exhibit 400-2, and today I'd like to  
14 focus on the testimony that you set out in  
15 Section 3B. Before I do, though, I would  
16 like to understand a little better the  
17 underlying bases or at least one basis for  
18 your testimony.

19 And here's what I would like to do.  
20 You mentioned yesterday that you had one or  
21 two telephone calls with Blade staff; do you  
22 remember that testimony?

23 A Yes.

24 Q Were you personally involved?

25 A Yes.

26 Q Who set up the calls?

27 A Myself.

28 Q How many were there?

1 A From my memory, there were two.

2 Q How long did each last?

3 A My memory, an hour.

4 Q Hour total or hour each?

5 A My memory, an hour each.

6 Q Who from Cal Advocates

7 participated?

8 A I would say just about everyone on  
9 the Aliso Canyon team, which includes -- do  
10 you want me to list them?

11 Q Please.

12 A I just want to make sure I get  
13 everyone. So there's myself, Tyler  
14 Holzschuh; there's Matthew Taul; there's Alan  
15 Bach; there was Pui-Wa Li, Ms. Li; there was  
16 Godson Ezekwo; there was Ian Fisher; there  
17 was Mina Botros, and there was Elena Gekker,  
18 our attorney at the time.

19 Q Okay. Who from Blade participated?

20 A Subject to check, it was  
21 Dr. Krishnamurthy.

22 Q Only?

23 A I don't think so. I don't know all  
24 their names. It's to my memory, so...

25 Q And, look, you give me your best  
26 recollection and we'll go with that. So if I  
27 understand you correctly, from Blade it was  
28 at least Dr. Krishnamurthy and others, but

1 you don't recall their names; is that  
2 accurate?

3 A To the best of my knowledge, yes.

4 Q Fair enough. Did you take any  
5 notes?

6 A I would assume that I did. I don't  
7 remember.

8 Q Do you know if your colleagues at  
9 Cal Advocates took any notes?

10 A I would assume that they did, but,  
11 again, I don't know.

12 Q Fair enough. Was there any  
13 information transmitted either to or from  
14 Blade before or after the calls?

15 A By "any information," strictly the  
16 definition, it would be yes. If you mean the  
17 definition of "information," but any  
18 information that was related to technical  
19 issues or made its way into our testimony  
20 besides data requests, I think no.

21 Q Okay. Yeah. So let me just unpack  
22 that a little bit. I was not talking about  
23 meaning invites and that type of thing. I  
24 was thinking more technical information, data  
25 reports, something of substance other than  
26 the logistics of the two calls. Was that  
27 transmitted to or from each group?

28 A For the most part, no. To my

1 memory, we fed him questions ahead of time so  
2 they would be prepared for the conversation.

3 Q And were those questions fed  
4 electronically?

5 A Subject to test and to my memory,  
6 yes.

7 Q Who fed them -- who from Cal  
8 Advocates fed those questions to Blade?

9 A I would think it was me, but we had  
10 more than just myself, my input, on these  
11 questions.

12 Q Who ultimately pushed the send  
13 button?

14 A On the questions or the logistics?

15 Q On the questions. You can leave  
16 the logistics out. I could care less about  
17 that. Who ultimately pushed the send button  
18 on the questions you fed to Blade so they  
19 could be prepared for the calls?

20 A Subject to check and my memory --  
21 so, I mean, to my memory, I believe -- I  
22 would have to go through my e-mails, but I  
23 believe that we sent them ahead of time, and  
24 if we did, I assume that would be me.

25 Q Okay. All right. What was the  
26 purpose of the two calls?

27 A The purpose of the calls was to get  
28 back and -- well, I won't say "back and forth

1 information" because they had already  
2 finished their report by then. So their need  
3 for information was pretty limited, but if  
4 they said anything that we wanted to get more  
5 information about, rather than do a formal  
6 data request where we'd have to wait for  
7 clarification possibly a long time, then we  
8 could instantly ask follow-up questions.

9 Q How long ago did the calls occur?  
10 Just roughly.

11 A To the best of my knowledge and, of  
12 course, my memory, around a year and a half  
13 ago.

14 Q Can you tell me generally what  
15 topics were discussed kind of in categories?

16 A I believe I already answered the  
17 question, but for convenience, the topics  
18 that I remember being discussed were cathodic  
19 protection and pressure tests.

20 Q And to the best of your  
21 recollection today, no other topics besides  
22 those two?

23 A I think there were other topics. I  
24 was primarily focused on things that would  
25 end up in my testimony. So I assume that  
26 other people used the opportunity to ask  
27 questions about things that might go into  
28 their testimony. But as I said, those are

1 two topics that I remember being discussed,  
2 but I think there were others.

3 Q Understood. So the information  
4 that you received from Blade on cathodic  
5 protection and pressure tests, did it inform  
6 your testimony that you are presenting in  
7 this proceeding in any way?

8 A Yes.

9 Q Okay. Let's start with cathodic  
10 protection. How did the information you  
11 received from Blade during those one or two  
12 phone calls a year and a half ago inform your  
13 testimony that you're providing today?

14 A It was a long time ago. I mean, I  
15 can just give you my general sense of  
16 cathodic protection and the information I  
17 received from multiple different sources, but  
18 specifically the information that was  
19 provided from Blade, I don't remember.

20 I remember from Blade like in  
21 totality, I generally got a sense that  
22 cathodic protection was sometimes used on gas  
23 wells and sometimes not used on gas wells,  
24 and in general newer wells were more likely  
25 to be cathodic protected but that is not  
26 always the case but I don't remember what was  
27 specifically said about the cathodic  
28 protection at that meeting.

1           Q    Fair enough, sir.  And I'm just  
2 asking for your best recollection, and I  
3 think you're doing a good job at it, so let's  
4 proceed.

5                    Let's turn to the topic of pressure  
6 tests.  Can you tell the Commission what, if  
7 anything, from your telephone calls with  
8 Blade informed your testimony regarding  
9 pressure tests?

10           A    Well, from my perspective as a  
11 previous inspector for transmission and  
12 distribution in natural gas piping, I had  
13 seen quite a few pressure tests on  
14 transmission and distribution piping.

15                    I wasn't clear at the time all the  
16 ins and outs of exactly all of the mechanisms  
17 hooked up in order to make that work, and  
18 Blade filled in some of those areas.

19           Q    And the areas that Blade filled in,  
20 were they regarding transmission and  
21 distribution lines or wells or both?

22           A    As I said, I'm familiar with and I  
23 witnessed and inspected several pressure  
24 tests for transmission in distribution pipes.  
25 The purpose of -- well, some of the questions  
26 at that meeting were about the ins and outs  
27 of pressure tests as they're applied to gas  
28 storage wells.



1 you see that?

2 Are you with me?

3 A Sorry. I was zoomed in on the  
4 Subsection B. But you're going back to page  
5 10. So, yeah, I'm there on page 10.

6 Q Good, good. Do you see your  
7 heading, Roman III?

8 A Yes.

9 Q Okay. And do you see -- by the  
10 way, can I assume you wrote that?

11 A I agree with that statement. I'm  
12 sponsoring this testimony.

13 Q Okay. The statement reads:  
14 SoCalGas failed to act upon  
15 warnings from its storage  
16 engineering manager regarding  
17 risks of major leaks.

18 Is that what you're sponsoring?

19 A Yes.

20 Q What generally is a risk in storage  
21 engineering?

22 A In the most general terms, risk is  
23 probability times consequence. Probability  
24 is fairly straightforward. Consequence is --  
25 you assign, I guess, values to negative  
26 events.

27 Q Okay. And I noticed in that  
28 heading that you used the word "warnings" in

1 the pleural. Do you see that?

2 A Yes.

3 Q So what warning besides  
4 Mr. Mansdorfer's 2009 e-mail are you  
5 referring to?

6 A I would say warnings would imply  
7 there's multiple warnings in this one e-mail.

8 Q All right. But to be clear, I want  
9 to make sure that I understand the situation  
10 here. When you say:

11 SoCalGas failed to act upon  
12 warnings -- pleural -- from its  
13 storage engineering manager.

14 You're referring to multiple  
15 warnings in his 2009 e-mail; correct?

16 A To my knowledge, there were  
17 multiple warnings, but in this section the  
18 only one I referenced is the 2009 e-mail.

19 Q Well, what other warnings did he  
20 give?

21 A I would say that those are outside  
22 the scope of my testimony. But I vaguely  
23 remember his name on memos as far back as  
24 1987 pushing for casing inspection tools.

25 Q Okay. But you don't cite any of  
26 those here, and I take it you're not relying  
27 on any of those here as part of your  
28 testimony. Did I hear that correctly?

1           A    From last I checked the testimony,  
2    yes.

3           Q    Fair enough.  All right.  Let's  
4    turn to section B on page 12.  And I want to  
5    go back to that heading again, but I want to  
6    go back at it from a slightly different angle  
7    just so I understand what you're trying to  
8    say here.

9                        Section B reads:

10                      SoCalGas failed to propose  
11                      preventative measures against  
12                      casing failure until 2014.

13                      Are you sponsoring that language  
14    today?

15           A    Yes.

16           Q    So you sponsor the phrase  
17    "preventative measures."  And I'm wondering  
18    what you mean by the word "preventative"?

19           A    I guess the biggest two things are  
20    case inspection logs and pressure tests.  
21    Because casing inspection logs would allow  
22    them to have the information they needed to  
23    take more direct preventative measures.

24           Q    Yes.  I was actually looking for  
25    some clarity on a higher level, sir.  I was  
26    wondering what you meant by the word  
27    "preventative."

28                      And let me tell you -- let me give

1 you an option. I won't tell you where I got  
2 this from, because I'm not allowed to say  
3 that anymore. But when you use the word  
4 "preventative," did you mean designed to keep  
5 something from happening?

6 MR. GRUEN: Your Honor, if I may object  
7 to that question as prejudicial. If counsel  
8 is going to say -- suggest that he got  
9 something from Google without saying it, we  
10 should be clear about that.

11 MR. LOTTERMAN: I was just trying to  
12 move things along.

13 Your Honor, let me rephrase the  
14 question.

15 ALJ HECHT: Please do.

16 BY MR. LOTTERMAN:

17 Q Mr. Holzschuh, is it fair to say  
18 that the word preventative means designed to  
19 keep something from happening?

20 A Sorry. You have to give me a  
21 minute to think about that. The word  
22 "prevent" I don't even remember where I  
23 learned it must have been such a long time  
24 ago. So searching for other words to define  
25 that word is somewhat difficult.

26 If you don't want something to  
27 happen and you take steps to -- it's hard to  
28 not use the word -- to make that not happen,

1 then that's my definition of prevent, I  
2 guess, subject to check.

3 Q Got it. Got it. So my proposal  
4 was "Designed to keep something from  
5 happening." Are you comfortable with that?

6 MS. BONE: I think the question has  
7 been asked and answered.

8 ALJ HECHT: It's a straightforward  
9 question. Please answer preferably with a  
10 "yes" or a "no" or a "I don't know," and  
11 we'll move on.

12 THE WITNESS: I don't know.

13 BY MR. LOTTERMAN:

14 Q All right. Are you familiar with  
15 the process that SoCalGas employed to convert  
16 the oil production facility at Aliso Canyon  
17 into a gas storage facility?

18 A Very roughly.

19 Q Okay. Good. And did you hear  
20 Dr. Krishnamurthy testify about that on  
21 either Monday or Tuesday?

22 A Yes.

23 Q And is it your view that the  
24 process that SoCalGas went through to convert  
25 its wells from oil production to gas storage  
26 were not preventative measures against casing  
27 failure?

28 A Can you repeat the question?

1           Q    Yeah.  You mentioned that you had  
2    listened to some of Dr. Krishnamurthy's  
3    testimony where he described how SoCalGas  
4    converted the oil production wells in the  
5    whole field for that matter into a gas  
6    storage field.

7                    And my question is:  Those actions  
8    by SoCalGas do you believe that they were not  
9    preventative measures against casing failure?

10           A    Sorry.  One more time?

11           Q    Is it your testimony today or your  
12    opinion today -- your professional judgement  
13    I believe is the term you used yesterday.

14                    Is it your professional judgement  
15    that the actions that SoCalGas did to convert  
16    the Aliso Canyon storage field into a gas  
17    storage field were not preventative measures  
18    against casing failure?

19           A    I would say the pressure test in  
20    1973 was a preventative measure against  
21    casing failure.

22           Q    And that's the only aspect of  
23    conversion that you're willing to say that  
24    for?

25           A    Yes.

26           Q    Okay.  Did you hear  
27    Dr. Krishnamurthy testify on Monday and  
28    Tuesday about DOGGR -- the DOGGR approved

1 monitoring problem of temperature logs?

2 A I would say that is way outside the  
3 scope of my testimony. But, yes.

4 Q If you can't testify about that,  
5 then we'll move on.

6 Are you familiar with how workovers  
7 were conducted at the Aliso Canyon field?

8 A Roughly, yes.

9 Q Okay. And it is your testimony  
10 that when a well was worked over prior to the  
11 leak, it was not done so to provide  
12 preventative measures against casing  
13 failures?

14 A I believe there are multiple  
15 workovers in the 1970's. Can you refer to  
16 which one you're referring to?

17 Q No. I'm just asking you as a  
18 general concept. Working over -- working  
19 over a well at Aliso Canyon from 1970s to  
20 2015, is it your view that those workovers  
21 were not preventative measures against casing  
22 failure?

23 A To my knowledge, most of them were  
24 not preventative measures against casing  
25 failure.

26 Q Okay. Are you familiar with the  
27 2007 Repair and Inspect Program that SoCalGas  
28 implemented? ]

1           A    I read about this in their reply  
2 testimony and issued discovery on this  
3 program.  However, the information SoCalGas  
4 was willing to give up was very limited.

5           Q    So are you not prepared today to  
6 opine on whether that program provided  
7 preventative measures against casing failure?

8           A    I can talk about it based on the  
9 information I have received from SoCalGas,  
10 which is limited.

11          Q    Based on that limited information,  
12 is it your professional judgment that  
13 SoCalGas' 2007 Repair Inspect Program was not  
14 a preventative measure against casing  
15 failure?

16          A    It was not a significant  
17 preventative measure against casing failure.

18          Q    And then going back to my question  
19 about the DOGGR-approved monitoring program,  
20 is it your professional judgment that running  
21 annual temperature logs is not a preventative  
22 measure against casing failure?

23          MS. BONE:  I believe the witness  
24 already said this was outside the scope of  
25 his testimony.

26          MR. LOTTERMAN:  I'm asking him more  
27 generally, your Honor, if that's possible.

28          ALJ HECHT:  Objection overruled.

1           Please answer to the best of your  
2           ability.  It's a general question.

3           THE WITNESS:  I would not consider  
4           temperature surveys to be preventative  
5           measures against casing failure.

6           BY MR. LOTTERMAN:

7           Q     All right.  Let's go to page --  
8           let's go down below that heading, and I'd  
9           like to look at lines 11 to 20 on page 12.

10                  Do you have that in front of you,  
11           Mr. Holzschuh?

12                  A     Yes.

13           Q     All right.  And on line 11, you  
14           write -- or you sponsor the words that:

15                  In his 2009 email, Mr. Mansdorfer  
16                  suggested that SoCalGas proposed  
17                  to mitigate any well integrity  
18                  risks in its test year 2012  
19                  general rate case, GRC,  
20                  application.

21                  Do you see that?

22                  A     Yes.

23           Q     All right.  And then you actually  
24           quote from Mr. Mansdorfer's email, lines 14  
25           to 20, right?

26                  A     Yes.

27           Q     Where he says, you know, "We  
28           would -- and I'm looking at line 15:

1                   We would pull tubing, run a casing  
2                   inspection log, pressure-test the  
3                   casing, and rebuild the wellhead  
4                   seals prior to rerunning tubing  
5                   with the safety valve.

6                   That was in his 2009 email, right?

7                   A    Yes.

8                   Q    And then he makes an offhand guess  
9                   that it would cost about \$300- to \$400,000 a  
10                  well. Do you see that?

11                  A    Yes.

12                  Q    And then he notes down below  
13                  that -- that SoCalGas could probably complete  
14                  20 to 25 wells a year. It would be then a  
15                  five-year program at a cost of \$6 to \$8  
16                  million a year.

17                  Did he write that?

18                  A    Yes.

19                  Q    Okay. And if my math is correct, a  
20                  five-year program at \$6 to \$8 million a year  
21                  is \$30 to \$40 million total. Is that good  
22                  math?

23                  A    I would say it's a lot more  
24                  complicated than that, but that  
25                  multiplication is correct.

26                  Q    Right. That's all I was asking.  
27                  You know, I think we can assume it too was an  
28                  offhand guess. Okay?

1           My question to you is: In your  
2 professional judgment, is a \$30 to \$40  
3 million program a significant effort?

4           A From the limited knowledge of  
5 Sempra's financials, I would say they can  
6 easily do it.

7           Q And do you have any idea what  
8 storage's total budget was during that time  
9 period at SoCalGas?

10          A I don't remember.

11          Q All right. Maybe we'll come to  
12 that. All right. So let's go to the next  
13 page, which I believe is the last page of  
14 your testimony, page 13, and I want to  
15 highlight lines 5 to 11, please.

16                   Do you have that in front of you?

17          A Yes.

18          Q So you note right in the first  
19 sentence, "However, SoCalGas did not propose  
20 this corrosion monitoring program in  
21 A.10-12-006," which I believe is the 2012  
22 GRC. And then in parens you put -- or  
23 someone put, "(where Mr. Mansdorfer was the  
24 witness regarding natural gas storage.)"

25                   Is that what you -- is that what --  
26 is that the testimony you are sponsoring  
27 today?

28          A Yes.

1           Q    And then you end that paragraph by  
2 saying -- because you talk about what  
3 SoCalGas did propose. But you end that  
4 paragraph by saying, "As a result, the  
5 proposal in GRC," basically 2012, "was  
6 inadequate to address existing corrosion or  
7 to prevent future corrosion."

8                    Are you adopting that testimony?

9           A    Yes.

10           Q    And in support of that paragraph,  
11 you cite Mr. Mansdorfer's GRC testimony  
12 twice, footnotes 58 and 59; is that true?

13           A    Yes.

14           Q    Did you read Mr. -- did you read  
15 all of Mr. Mansdorfer's 2012 GRC testimony?

16           A    I would say I skimmed it all.

17           Q    Okay. Let's turn to it. This is  
18 an exhibit to Cal Advocates' testimony. It  
19 is CalPA-401, pincite 495 to 524. And what  
20 I'd like to do is start right on the first  
21 page. Let's go to page 495 just so I can  
22 orient you, Mr. Holzschuh, and everyone as to  
23 what we're talking about here.

24                    Okay. So this, I believe, is a  
25 cover page typed by Cal Advocates.

26                    And, Mr. Kraushaar, would you mind  
27 just scrolling down so we can see that  
28 pincite down at the bottom. There it is.

1 Okay.

2 So clearly this is one of Cal  
3 Advocates' supporting documents filed with  
4 this -- with this panel's testimony. And in  
5 fact, I think we just established it was the  
6 bases for the paragraph you just wrote?

7 Okay?

8 A Yes.

9 Q All right. And if you turn to the  
10 next page of 496.

11 MS. BONE: Objection. I just want to  
12 note for the record that Mr. Holzschuh may or  
13 may not have written this, but he is  
14 sponsoring this testimony.

15 ALJ HECHT: Thank you. Ms. Bone, you  
16 are a little bit indistinct. I heard you,  
17 and I'm hoping that the court reporter did.  
18 But next time try to speak up a little bit.

19 (Interruption by reporter.)

20 MS. BONE: (Speaker on mute.)

21 ALJ HECHT: If you're speaking now,  
22 you're muted. I'm guessing you're --

23 MS. BONE: Sorry. Yes.

24 ALJ HECHT: -- on mute.

25 MS. BONE: Mr. Holzschuh sponsors this  
26 testimony, but he did not necessarily write  
27 all of this testimony.

28 (Interruption by reporter.)

1 ALJ HECHT: Thank you, court reporters.  
2 Thank you, Ms. Bone. Sorry. I should have  
3 probably gotten us off the record during  
4 that, but I didn't. Hopefully we can now  
5 continue.

6 BY MR. LOTTERMAN:

7 Q Mr. Holzschuh, I've asked you to  
8 turn to page 496 of Cal Advocates' supporting  
9 documentation. Does that appear to be the  
10 cover page of Mr. Mansdorfer's, in this case,  
11 revised prepared direct testimony in the 2012  
12 general rate case?

13 A This is Tyler Holzschuh talking.  
14 Yes.

15 Q Okay. And do you see at the bottom  
16 of that page just above the SoCalGas symbol,  
17 it shows a date of July 2011?

18 A Yes.

19 Q And can you and I agree this  
20 morning that this testimony was submitted at  
21 least two years after Mr. Mansdorfer sent his  
22 2009 e-mail?

23 A Unless there's a typo, yes.

24 Q I'm going to -- subject to check,  
25 Mr. Holzschuh, I'm going to tell you it's not  
26 a typo. So let's assume it was -- let's  
27 assume that the email was sent on April 23rd,  
28 2009. And let's assume for this examination

1 that Mr. Mansdorfer submitted this revised  
2 testimony in July of 2011. Okay.

3 So let's turn to page -- and we're  
4 almost done. Let's turn to page 498 if you  
5 would, please. And I want to highlight lines  
6 to 12.

7 Now, this is right up front of the  
8 testimony that you cite twice. Okay? And it  
9 reads, "The purpose of this testimony is to  
10 demonstrate that Southern California Gas  
11 Companies" -- and it gives the various  
12 names -- "storage operations test year -- TY  
13 2012 operation and maintenance (O&M) expense  
14 and capital requirements for the underground  
15 storage system represent the necessary  
16 funding to maintain the integrity of the  
17 storage system to ensure a safe, reliable  
18 supply of natural gas throughout the SoCalGas  
19 service territory."

20 Did I read that correctly?

21 A Yes.

22 Q All right. And then if you drop  
23 down to the table just below that, SoCalGas  
24 sets out the operation and maintenance  
25 expenses and its capital requirements  
26 basically, you know, in -- from 2009 through  
27 the estimated 2012.

28 Do you see that?

1           A    Yes.

2           Q    All right.  And if you look at  
3 2012, which, by the way, was 3 years after  
4 Mr. Mansdorfer wrote his email, the total  
5 operation and maintenance and capital  
6 proposed was roughly \$59 million, right? ]

7           MS. BONE:  Mr. Lotterman, could you  
8 restate that question?

9           BY MR. LOTTERMAN:

10          Q    I was just asking Mr. Holzschuh if  
11 you look at this table, and you look at total  
12 O&M in 2012, and you add total capital --  
13 same category, same column -- that you get  
14 roughly \$58 million?

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

16                   (Off the record.)

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

19          BY MR. LOTTERMAN:

20          Q    Are you ready, Mr. Holzschuh?

21          A    (Indicating.)

22          Q    All right.  Can you confirm for me  
23 that when you add up total O&M under the  
24 column labeled "TY 2012 Estimated" and "Total  
25 Capital" under the same column, it comes out  
26 to roughly \$58 million?

27          A    Based on my limited knowledge of  
28 financials, adding those two numbers is

1 generally not the most useful number.

2 Q Okay. All right. Well, here's  
3 what I wanted to use that number for,  
4 Mr. Holzschuh. Maybe you can help me with  
5 this. When you compare that -- and I'm going  
6 to tell you, if you add it up, it's roughly  
7 \$58 million, and we can make that subject to  
8 check.

9 If you compare that \$58 million  
10 that SoCalGas was estimating to be spent in  
11 2012 with the \$30 to \$40 million that  
12 Mr. Mansdorfer was recommending being spent  
13 in 2009, would you consider Mr. Mansdorfer's  
14 recommendation a significant undertaking by  
15 SoCalGas?

16 MS. BONE: Your Honor, objection;  
17 speculation. It's not even clear to me that  
18 a financial sheet requires that it would be  
19 appropriate to add total O&M plus total  
20 capital. If that were the case, why hasn't  
21 SoCalGas in this chart shown the total  
22 amount? I'm not sure that represents total  
23 spending.

24 ALJ HECHT: Thank you, Ms. Bone.

25 I'm not seeing the relevance of  
26 this. Mr. Lotterman, if you can explain the  
27 relevance, then we may go ahead. If not I  
28 would like to move forward with something

1 else.

2 MR. LOTTERMAN: I'll let the document  
3 speak for itself, your Honor.

4 Q Mr. Holzschuh, let's turn to page  
5 523 of the testimony. Let me know when  
6 you're there.

7 A I'm there.

8 Q Is it safe to assume that this is  
9 the conclusion of Mr. Mansdorfer's July 2011  
10 CPUC testimony?

11 MS. BONE: Objection, your Honor. We  
12 would have to require the witness to review  
13 all of the pages here to determine whether  
14 this is limited to Mr. Mansdorfer or whether  
15 other people have also opined here.

16 MR. LOTTERMAN: Your Honor, I'm showing  
17 as much patience as I can muster this  
18 morning. If we can't agree that Section 5 of  
19 CalPA's Exhibit-401 is not the conclusion of  
20 Mr. Mansdorfer's testimony, I don't know what  
21 to do.

22 ALJ HECHT: I don't really understand  
23 the objection. I think the witness should  
24 answer to the best of his ability, and we  
25 should move on.

26 BY MR. LOTTERMAN:

27 Q Mr. Holzschuh, let me come at it a  
28 little different way. This was part of the

1 testimony that you cited twice in support of  
2 the paragraph that we're looking at in the  
3 testimony you're sponsoring; correct?

4 A Yes.

5 Q Let's assume for the purpose of my  
6 next five or six questions that what we have  
7 up on the screen, which is pulled off of Cal  
8 Advocates pincite 523, is, in fact,  
9 Mr. Mansdorfer's conclusion to his 2011  
10 testimony that he filed in the 2012 GRC;  
11 okay?

12 A I would agree that Mr. Mansdorfer  
13 is sponsoring this conclusion.

14 Q Okay. Excellent. So does he say  
15 in the very first sentence:

16 The forecasts of the O&M expenses  
17 and planned capital expenditures  
18 represented in this testimony are  
19 appropriate and prudently derived  
20 and should be adopted by the  
21 Commission.

22 A Yes.

23 Q And is it your understanding when  
24 he says "Commission," he's talking about the  
25 CPUC?

26 A Yes.

27 Q And does he go on then to say:

28 In this testimony, the

1 requirements were presented to  
2 meet SoCalGas's goals to  
3 maintaining safety and reliability  
4 of the gas storage infrastructure  
5 for both O&M expenses and capital  
6 expenditures.

7 A Is your question that did you read  
8 that correctly?

9 Q Sure.

10 A Yes. You read that correctly.

11 Q Did I read the next sentence in his  
12 conclusion correctly:

13 The O&M and capital expenditures  
14 discussed in this testimony are  
15 required to ensure public safety  
16 to cost-effectively meet customer  
17 needs and meet mandated regulatory  
18 requirements?

19 A Yes.

20 Q And does he conclude this  
21 conclusion by saying:

22 These forecasts reflect sound  
23 judgment and represent the  
24 significant impact that federal,  
25 state, and local legislation, and  
26 regulations will have on  
27 SoCalGas's storage fields?

28 A You read all those sentences

1 correctly.

2 Q Yeah. Right. Right.

3 And if I understand what you're  
4 trying to say in the section of the testimony  
5 that we're just about done with, you're  
6 saying that this testimony he sponsored here  
7 did not include his recommendations out of  
8 his 2009 e-mail; correct?

9 A Yes.

10 Q And yet he is saying in sworn  
11 testimony for this very Commission two years  
12 after he wrote that e-mail that the funds  
13 requested in this filing would ensure public  
14 safety across all of SoCalGas's storage  
15 fields including Aliso Canyon; correct?

16 A That is not correct.

17 Q Okay. Have you read his EUO  
18 testimony?

19 A You asked me this exact same  
20 question yesterday, and for convenience I'll  
21 respond, yes.

22 Q Mr. Holzschuh, you are one of, I  
23 think, three or four witnesses from  
24 Cal Advocates, and my apologies if I forget  
25 who responded to which question. So I'll be  
26 patient with you and you be patient with me;  
27 okay.

28 A Sounds good.

1           Q    All right.  And so I'm curious  
2    about your answer because I just read almost  
3    verbatim what he put in that conclusion, and  
4    yet in that testimony, in his testimony, he  
5    does not have the proposal that you hang your  
6    hat on in your testimony.

7                    And I'm wondering what's the basis  
8    for your saying that notwithstanding his  
9    sworn testimony before CPUC, you believe that  
10   those expenditures did not ensure public  
11   safety?

12           A    Can you repeat the question?

13           Q    No.  I think I'm going to move on.

14           MR. GRUEN:  Your Honor, I'd like to  
15   note an objection for the record.  I would  
16   object that Mr. Lotterman is misstating  
17   Mr. Holzschuh's testimony.  He's expanding it  
18   to suggest that Mr. Holzschuh believes that  
19   Mr. Mansdorfer's testimony -- that he  
20   believes it does not cover public safety.

21                    That is not what Mr. Holzschuh has  
22   testified to here; so I'd object to  
23   misstating testimony.

24           ALJ HECHT:  Mr. Holzschuh's testimony  
25   speaks for itself.  The attorneys are not  
26   testifying, and to the extent possible should  
27   avoid characterizing the testimony, and with  
28   that, we should move on.

1 BY MR. LOTTERMAN:

2 Q Mr. Holzschuh, is it your testimony  
3 that Mr. Mansdorfer believed that the  
4 expenditures and the safety improvements at  
5 SoCalGas's Aliso Canyon facility did not  
6 provide the required safety necessary?

7 A Yes.

8 Q Okay. Let's turn to page 91 of  
9 Mr. Mansdorfer's examination under oath.

10 Before we do, did you factor in  
11 this conclusion to Mr. Mansdorfer's 2012  
12 testimony into the testimony you're  
13 sponsoring today?

14 A I had read this, yes.

15 Q That wasn't my question, sir. My  
16 question was a little more precise. I was  
17 asking whether you factored in this sworn  
18 testimony into your testimony that you're  
19 sponsoring today?

20 MS. BONE: Objection. Could you  
21 specify which sworn testimony you're  
22 referring to in that question. Specifically,  
23 are you asking about the EUO or his 2012  
24 testimony?

25 MR. LOTTERMAN: No. My question  
26 circled back to Mr. Mansdorfer's 2012 sworn  
27 testimony that we just walked through, and my  
28 question to be precise is as follows.

1           Q    Mr. Holzschuh, did you factor in  
2   Mr. Mansdorfer's sworn testimony provided in  
3   his conclusion to the CPUC when you sponsored  
4   your testimony on pages 10, 11, 12, and 13 of  
5   the CalPA Exhibit 400-2.

6           A    I believe I already answered this  
7   question. I don't see the difference between  
8   the fact that I've read it, and it didn't  
9   change my testimony, but for convenience, I  
10  did factor it in.

11          Q    If I understand your answer, what  
12  you're saying is, you read it, but it did not  
13  change the conclusion that you're sponsoring  
14  today; is that right?

15          A    Yes.

16          Q    All right. So let's turn to  
17  Mr. Mansdorfer's sworn testimony in his  
18  examination under oath, and that is SED  
19  Exhibit-201, and I want to turn to page 91.

20                And before we do so, Mr. Holzschuh,  
21  did you read, scan, or otherwise review  
22  Mr. Mansdorfer's EUO that was taken in this  
23  proceeding on September 13, 2018?

24          A    I read it, yeah.

25                MS. BONE:  Objection --

26                BY MR. LOTTERMAN:

27                Q    Okay. Good. All right.

28                    Did you happen to read the portion

1 that Mr. Kraushaar is putting up on the  
2 screen there starting at line -- let's start  
3 at line 21 since, I guess, that's technically  
4 where the question begins, starts at line 21  
5 and goes to the next page, line 1.

6 Do you recall reviewing this  
7 portion of Mr. Mansdorfer's examination in  
8 preparing and sponsoring your testimony?

9 A I would say, yes. I would say I  
10 reviewed probably thousands of pages of  
11 documents in preparation for my short  
12 testimony. Most of it was not relevant to my  
13 testimony. So I don't remember all of it.

14 Q Understood. I'm asking you if this  
15 portion was relevant.

16 A I don't remember it being relevant  
17 at the time that I wrote the testimony, but  
18 reading it now, it is relevant.

19 Q Okay. So let's just read it into  
20 the record for sake of the proceeding and  
21 then we'll move on.

22 "QUESTION BY MR. GRUEN: Was it  
23 your understanding -- thank you. Was it your  
24 understanding that safety improvements were  
25 part of your role as storage field manager?

26 "ANSWER: Improvements is implying  
27 that things weren't safe, and I think we  
28 thought that our programs were, if we

1 implemented properly, provided the required  
2 safety."

3 Did I read that correctly?

4 A Yes.

5 MR. LOTTERMAN: I have no further  
6 questions, your Honor.

7 THE WITNESS: I have a question. Can I  
8 ask a question?

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

10 (Recess taken.)

11 ALJ POIRIER: When we left off, I think  
12 we were going to proceed to redirect by  
13 Ms. Bone with Witness Holzschuh.

14 Ms. Bone, please go ahead.

15 MS. BONE: Okay. Thank you, Judge  
16 Poirier.

17 REDIRECT EXAMINATION

18 BY MS. BONE:

19 Q Mr. Holzschuh, do you recall that  
20 at the end of your cross-examination,  
21 Mr. Lotterman read an excerpt from  
22 Mr. Mansdorfer's 2018 Examination Under Oath  
23 into the record?

24 A Yes.

25 Q Did he ask you a question about  
26 that testimony after he read it into the  
27 record?

28 A No.

1 Q Do you want to comment on that  
2 testimony that Mr. Lotterman quoted?

3 A Yes.

4 Q Could you, please, do so.

5 A So in the context, first of all, in  
6 the context of everything that Mr. Mansdorfer  
7 has said, this does not refer to the facts  
8 that he thinks that SoCalGas's Aliso Canyon  
9 site operated with a reasonable level of  
10 safety. He says, "I think we thought that  
11 our programs were, if we implemented them  
12 properly, provided the required safety."

13 The "we" here in the context of his  
14 EUO refers to SoCalGas. So he thinks -- he's  
15 not sure that SoCalGas thought -- but  
16 SoCalGas isn't sure either -- that they  
17 provided the required safety.

18 Not a reasonable level of safety,  
19 the required level of safety. So he's not  
20 sure if SoCalGas thinks that they provided  
21 the required level of safety.

22 Q Do you think that the excerpts that  
23 Mr. Lotterman read into the record reflect  
24 Mr. Mansdorfer's full range of concerns  
25 regarding the safety of the Aliso Canyon gas  
26 field?

27 A No.

28 Q Did you observe in your testimony

1 that the SS-25 well did not have cathodic  
2 protection?

3 A Yes.

4 Q Was this the same observation made  
5 in the 1988 Mansdorfer memo?

6 A Are you referring to the 2009  
7 e-mail?

8 Q It's a 1988 e-mail. I thought  
9 that -- I believe we relied on -- oh, sorry.  
10 You're right. It is the 2009 e-mail.  
11 Forgive me. It's Cal Advocates 006, the  
12 pincite, Exhibit Cal Advocates-401.

13 MR. LOTTERMAN: Ms. Bone, would you  
14 mind restating the question?

15 MS. BONE: Yes.

16 Q Was the same observation made in  
17 the 2009 e-mail from Mr. Mansdorfer?

18 A Mr. Mansdorfer made the observation  
19 that many wells in Aliso Canyon were not  
20 cathodically protected and SS-25 was one of  
21 those wells we now know.

22 Q Did you testify under  
23 cross-examination by Mr. Lotterman that you  
24 recall general information about cathodic  
25 protection that you may have learned from  
26 Blade on one of the two calls you had with  
27 them?

28 A Yes.

1           Q    Did you perform your own research  
2 into cathodic protection?

3           A    Yes.

4           Q    Can you, please, describe that.

5           A    So cathodic protection, there was a  
6 lot of research on it, I think, about 80  
7 years ago, and it provides a large factor of  
8 safety as in -- well, a long time ago,  
9 especially (inaudible), they put steel  
10 samples in the ground, and they measured the  
11 wall loss, but really it was loss of mass.  
12 That's how they determined how effective the  
13 cathodic protection was.

14                   And for cathodic protection, you  
15 need a current path from cathode to the  
16 anode, and they found that for normal steel  
17 in normal soil, the most effective voltage  
18 was 850 millivolts when you use a copper,  
19 copper sulfate half cell to measure it.

20                   However, the 850 millivolts  
21 provides a large factor of safety, and  
22 there's also a factor of safety if that 850  
23 millivolts was not met.

24           Q    Is that all, Mr. Holzschuh?

25           A    I also was appraised (sic) of the  
26 research that my coworkers did on the survey  
27 of cathodic protection in California for gas  
28 storage wells and -- from Blade. And I know

1 that some gas storage wells are cathodically  
2 protected, but some are not.

3 Q Forgive me because I'm not an  
4 engineer, Mr. Holzschuh, but I recall that  
5 you have some expertise or training in metal  
6 engineering?

7 A Correct. My area of competency in  
8 mechanical engineering is machine design,  
9 which is primarily the strength and failure  
10 of metals.

11 Q And my last question: Did you  
12 factor in Mr. Mansdorfer's sworn testimony  
13 provided in the 2012 GRC when you sponsored  
14 your testimony?

15 A Yes.

16 Q As I understand, you read it, but  
17 it did not change your conclusions; is that  
18 correct?

19 A Yes.

20 MS. BONE: Thank you, Mr. Holzschuh.

21 The witness is now available for  
22 recross if necessary.

23 ALJ POIRIER: Mr. Lotterman, do you  
24 have any recross questions?

25 MR. LOTTERMAN: I have just one or two  
26 questions in light of the testimony that  
27 Ms. Bone was able to develop.

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RECROSS EXAMINATION

BY MR. LOTTERMAN:

Q Mr. Holzschuh, did you say that the research you looked at was 80 years old, eight-zero?

A I would have to stay with my memory banks, but to my knowledge, cathodic protection of steel in normal soil is -- I would say is not a hot research topic today.

Q Right. That does not surprise me, sir. I was just wondering, so if the research you're referring was 80 years old, would this be research circa 1930s, 1940s?

A To my knowledge, yes, but I could easily be off by 30 years.

MR. LOTTERMAN: No further questions, your Honor.

ALJ POIRIER: Ms. Bone, do you have further redirect?

MS. BONE: I do not.

ALJ POIRIER: Thank you, Mr. Holzschuh. That concludes your cross-examination. Let's go off the record.

(Off the record.)

ALJ POIRIER: Let's go back on the record. While we were off the record, we were discussing logistics for moving exhibits and how that may raise an issue regarding

1 potential discovery, and how we will -- they  
2 may raise how we may have to handle that in  
3 the future and that will happen when  
4 appropriate. For now I want to go Ms. Bone  
5 and let's start with the exhibits.

6 MS. BONE: Yes, your Honor. One thing  
7 I wanted to point out to you is that we  
8 deviated slightly from the proposed numbering  
9 convention in one of the last guidance orders  
10 that you issued, in that you wanted to see  
11 which version, I think, ultimately, the  
12 exhibit was, and you had that number coming  
13 before the exhibit number.

14 So it might have been, like, Cal  
15 Advocates 2-400, and when you follow that  
16 convention, then they don't lineup in  
17 numerical order in an appropriate manner, and  
18 so what I've done is 400-2 instead of 2-400,  
19 if that's okay with you.

20 ALJ POIRIER: That's fine with me. ]

21 MS. BONE: Thank you. For convenience.

22 And so we have four exhibits: CalPA  
23 Exhibit 400-2, which is opening testimony;  
24 CalPA-401, 4-0-1, which is Supporting  
25 Authorities to Opening Testimony; CalPA-402,  
26 Sur-Reply Testimony; and CalPA-403,  
27 Supporting Authority to Serve Reply  
28 Testimony.

1 ALJ POIRIER: And do you move those  
2 exhibits into the record?

3 MS. BONE: I would like to.

4 ALJ POIRIER: Thank you.

5 Do we have any objections?

6 MS. MORTAZAVI: No objections.

7 ALJ POIRIER: Thank you.

8 CalPA's request to move Exhibits  
9 400-2, CalPA-401, CalPA-402 and CalPA 403 are  
10 granted.

11 (Exhibit No. CalPA-400-2 was  
12 received into evidence.)

13 (Exhibit Nos. CalPA-401 to CalPA-403  
14 were received into evidence.)

15 ALJ POIRIER: Ms. Mortazavi?

16 MS. MORTAZAVI: Thank you, your Honor.

17 Setareh Mortazavi for SoCalGas. SoCalGas  
18 would like to admit the following exhibits:  
19 SoCalGas-148, Interoffice Correspondence  
20 between R.W. Weibel, R.M. Hijazi, D.R.  
21 Horstman, and M.E. Melton September 28, 1988,  
22 re Workover Recommendation for Standard  
23 Sesnon 9 Aliso Canyon.

24 SoCalGas-149, Interoffice  
25 Correspondence Between R.W. Weibel, R.M.  
26 Hijazi, D.R. Horstman, and M.E. Melton  
27 September 28, 1988, Re Workover  
28 Recommendation For Standard Sesnon 8 Aliso  
Canyon.

1                   SoCalGas-150, Interoffice  
2                   correspondence between R.W. Weibel, R.M.  
3                   Hijazi, D.R. Horstman, and M.E. Melton  
4                   September 22nd, 1988, re Workover  
5                   Recommendation for Porter 37 Aliso Canyon.

6                   SoCalGas-151, Interoffice  
7                   correspondence between R.W. Weibel, R.M.  
8                   Hijazi, D.R. Horstman, and M.E. Melton  
9                   September 22nd through 23rd, 1988, re  
10                  Workover Recommendation for Porter 46 Aliso  
11                  Canyon.

12                  And SoCalGas-153 Interoffice  
13                  Correspondence from D.G. Neville to R.A.  
14                  Skultety. November 15, 1991, re Review of  
15                  Corrosion Evaluation Logs from Montebello MGS  
16                  20-13.

17                  ALJ POIRIER: And does SoCalGas want to  
18                  move these exhibits into the record?

19                  MS. MORTAZAVI: Yes, your Honor.

20                  ALJ POIRIER: Do we have any objections  
21                  to moving these exhibits into the record?

22                  MS. BONE: If your Honor could just  
23                  read back the numbers one time quickly?

24                  ALJ POIRIER: SoCalGas-148,  
25                  SoCalGas-149, SoCalGas-150, SoCalGas-151, and  
26                  SoCalGas-153.

27                  MS. BONE: We have no objections to  
28                  those. We do have one more question.

1 ALJ POIRIER: Let's -- I want to hear  
2 from Mr. Gruen if he has any objections.

3 MR. GRUEN: No objections from SED,  
4 your Honor.

5 ALJ POIRIER: Okay.

6 Ms. Bone, is the question on these  
7 exhibits, or is it on a different matter?

8 MS. BONE: On an exhibit that hasn't  
9 been discussed yet.

10 ALJ POIRIER: Okay. First, let me get  
11 to this.

12 SoCalGas's motion to move Exhibits  
13 SoCalGas-148, 149, 150, 151, and 153 are  
14 granted.

15 (Exhibit Nos. SoCalGas 148 through  
16 SoCalGas-151 were received into  
evidence.)

17 (Exhibit No. SoCalGas 153 was  
18 received into evidence.)

19 ALJ POIRIER: Ms. Bone, do you have  
20 another question?

21 MS. BONE: Yes, your Honor. One of our  
22 witnesses, Matthew Taul, referred to an  
23 exhibit that we have marked as Exhibit  
24 CalPA-405, and it's Cal Advocates'  
25 supplemental response to the first data  
26 request from SoCalGas.

27 And I was wondering if in the  
28 interest of efficiency instead of having to

1 cross-examine a SoCalGas on -- a SoCalGas  
2 witness on this exhibit, that SoCalGas would  
3 be willing to allow this one into the record.

4 It is one of the six or seven that  
5 we forwarded to SoCalGas previously asking if  
6 they would waive opposition to entry of the  
7 exhibits in exchange for our waiver of  
8 cross-examining witnesses.

9 But we haven't been able to get to  
10 the others, but I was hoping for this one it  
11 would be appropriate.

12 ALJ POIRIER: Ms. Mortazavi?

13 MS. MORTAZAVI: Thank you, your Honor.  
14 I was also going to raise Exhibit-405. We  
15 also noted that during the redirect of  
16 Mr. Taul yesterday, Ms. Bone referred on the  
17 record to include that that has not been  
18 served, Exhibit-405. We have not seen it.  
19 We don't know what needs to be done with it.  
20 That's my understanding from my co-counsel.

21 Further it's our understanding that  
22 new documents may not be introduced on  
23 redirect. So we would also like some  
24 clarification on that point.

25 MS. BONE: So just to be clear, I think  
26 it's perfectly reasonable for Mr. Taul to  
27 refer to the fact that he answered a question  
28 and then sent a data request. And if he

1 wants to respond by referring to a document,  
2 that should be perfectly fine.

3 But secondly Ms. Patel has received  
4 all of the documents that we intend to --

5 Well, let me just say that she's  
6 received six or seven documents from us, and  
7 that this is one of them. And that they  
8 should be familiar with them because we've  
9 gone back and forth regarding these  
10 documents.

11 So, no. They have not been  
12 officially served pursuant to your Honors'  
13 orders or marked. But they absolutely  
14 received this document in the last few weeks.

15 MS. PATEL: Your Honor, if I may add to  
16 the record on that. This is Avisha Patel  
17 with SoCalGas. We did receive a number of  
18 exhibits from Ms. Bone. But I don't know  
19 specifically which one she's referring to  
20 when she says "Exhibit-405."

21 We would need to know which exhibit  
22 that is so we can evaluate it before we agree  
23 that we don't object to its admission into  
24 the record.

25 ALJ POIRIER: Let's do this. Over the  
26 lunch break, let's see if we can look at this  
27 document, and we can address this when we  
28 come back.

1 I do want to -- it's appropriate for  
2 Mr. Taul to refer to it. It's appropriate in  
3 his answer. There's no issue there.

4 But it looks like there just needs  
5 to be a little more communication on this  
6 issue, and I'm happy to entertain it if the  
7 parties want to after the lunch break.

8 Are there any other questions,  
9 Ms. Bone?

10 MS. BONE: You know, I was just hoping  
11 to do it in the interest of efficiency. And  
12 I've identified it twice as Cal Advocates'  
13 supplemental response to SoCalGas's first  
14 data request to us.

15 So it's pretty easy. It's been  
16 addressed twice. If this was going to take a  
17 lot more effort, we'll just cross one of  
18 their witnesses on it and do it that way.

19 ALJ POIRIER: Okay. Well, let's -- it  
20 sounds like SoCalGas isn't prepared to  
21 provide an answer on this. So let's give it  
22 over the lunch break and see if we can. If  
23 not we'll proceed like you indicated.

24 Are there any other issues? We've  
25 moved all of the exhibits. Is there any  
26 other housekeeping issues?

27 (No response.)

28 ALJ POIRIER: I'm not seeing anything.

1                   Given that we need time for the  
2 witnesses to be set up in that room, I'm  
3 inclined to break a little early for lunch.  
4 I do want to let parties know we pretty much  
5 have a hard stop at 3:30 today. We want to  
6 reserve some time at the end and see if  
7 there's any housekeeping matters. We'll try  
8 to get as much done as we can.

9                   So we'll be breaking until 1:00 p.m.  
10 And we'll be off the record.

11                   (Off the record.)

12                   (Whereupon, at the hour of 11:49  
13 a.m., a recess was taken until 1:00  
p.m.)

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AFTERNOON SESSION - 1:17 P.M.

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ALJ POIRIER: Back on the record.

Good afternoon. This is ALJ Marcello Poirier. This is the afternoon of hearings in Investigation 19-06-016.

We just returned from a lunch break. I think I want to recall some of the things we had to talk about -- some of the matters we want to talk about during the break.

I think one thing was that SED raised a request for a moratorium on written motions until April 1st. SoCalGas and Cal Advocates indicated they would support such a motion. So I am going to go ahead make a ruling granting that motion that there will be a moratorium on written motions until April 1st.

I also noted -- or -- to parties that March 31st is a state holiday. So some Commission offices -- the offices will be unavailable such as Docket Office.

I also asked parties to work together to stipulate on some exhibits. The entrance of some exhibits if possible. Specifically SoCalGas is going to look at Cal Advocates-405 this afternoon and see if that can be admitted or others in the future.

1           We also had some discussions on the  
2 identification of exhibits. It was noted  
3 that some of SoCalGas's exhibits do not have  
4 a cover page and do not have specific  
5 identification on the documents. And  
6 SoCalGas is going to re-serve those documents  
7 and those exhibits to make sure they're  
8 consistent with requirements in the rules.

9           With that I want to turn to  
10 Ms. Mortazavi.

11           MS. MORTAZAVI: Thank you, your Honor.  
12 I believe our witness, Ms. Kitson is on.  
13 Would you like to begin with swearing in the  
14 witness?

15           ALJ POIRIER: I would.

16           Good afternoon, Ms. Kitson.

17           THE WITNESS: Good afternoon.

18           ALJ POIRIER: First thing we're going  
19 to do is there is an attestation that I'm  
20 going to read through. What I'd like to do  
21 is I'm going to read through the entire  
22 thing. There's multiple parts of it. At the  
23 end, I'm going to ask you if you agree to  
24 that attestation, and I'd like to have a  
25 verbal answer on that. Okay?

26           THE WITNESS: Okay.

27           ALJ POIRIER: I do solemnly state under  
28 penalty of perjury that the testimony I give

1 in the case now pending before this  
2 Commission shall be the truth, the whole  
3 truth, and nothing but the truth. I attest I  
4 will testify based on my own knowledge and  
5 memory free from external influences and  
6 pressures.

7 I attest I will adhere to all of the  
8 formal requirements of testifying under oath  
9 including the prohibition against being  
10 coached.

11 I attest I will only refer to the  
12 materials provided by the parties, exhibits  
13 premarked and identified by the parties and  
14 previously shared with the opposing party.

15 I attest I will not make any  
16 recording of the proceeding.

17 I attest I understand that any  
18 recording of the proceeding held by Webex  
19 including screen shots or other visual  
20 copying of a hearing is absolutely  
21 prohibited.

22 I attest that I understand that the  
23 violation of these prohibitions may result in  
24 sanctions including removal from the  
25 evidentiary hearings, restricted entry to  
26 future hearings, denial of entry to future  
27 hearings, or any other sanctions deemed  
28 necessary by the Commission.

1 I attest I will not engage in any  
2 private communications by phone, text, or  
3 e-mail, or any other mode of communication  
4 while under oath and being examined.

5 If I experience any attempt to  
6 tamper with my witness testimony, I will  
7 report the occurrence to the presiding  
8 officer immediately.

9 Ms. Kitson, do you attest to these  
10 things?

11 THE WITNESS: Yes.

12 ALJ POIRIER: Thank you.

13 Amy Kitson, called as a witness by  
14 Southern California Gas Company, having  
15 been sworn and attested, testified as  
16 follows:

17 MS. MORTAZAVI: Thank you, your Honor.  
18 I'd first like to mark some exhibits.

19 The exhibit marked SoCalGas-03 is  
20 the Prepared Opening Testimony of Amy Kitson.  
21 Dated November 22, 2019.

22 The exhibit marked SoCalGas-14 is  
23 The Prepared Reply Testimony of Amy Kitson.  
24 Dated March 20th, 2020.

25 The exhibit marked SoCalGas-25 is  
26 the prepared Sur-Reply Testimony of Amy  
27 Kitson. Dated June 30th, 2020.

28 And the exhibit marked SoCalGas-26,  
The Exhibits to the Prepared Sur-Reply

1 Testimony of Amy Kitson. Dated June 30th,  
2 2020.

3 DIRECT EXAMINATION

4 BY MS. MORTAZAVI:

5 Q Ms. Kitson, can you please state  
6 your full name for the record?

7 A Yes, Amy Kitson.

8 Q Can you please state your current  
9 position with SoCalGas?

10 A The director of integrity  
11 management and strategic planning.

12 ALJ POIRIER: Ms. Kitson, can you spell  
13 your name for the record, please?

14 THE WITNESS: Sure. Amy, A-m-y.  
15 Kitson, K-i-t-s-o-n.

16 ALJ POIRIER: Thank you.

17 BY MS. MORTAZAVI:

18 Q Ms. Kitson, have you held any  
19 positions at SoCalGas relating to storage?

20 A Yes. I started in storage as the  
21 technical services manager, which primarily  
22 focused on the above ground storage  
23 facilities. I then moved to a temporary  
24 assignment as the storage engineering  
25 manager. And then from there I moved to the  
26 director -- or the manager of storage risk  
27 management. And from there the director of  
28 storage risk management and then my current

1 position today.

2 Q Do you have the exhibits that we  
3 just marked as SoCalGas-03, SoCalGas-14,  
4 SoCalGas-25, and SoCalGas-26, which are your  
5 opening, reply, sur-reply testimonies, and  
6 respective attachments?

7 A Yes.

8 Q Were these documents prepared by  
9 you or at your direction?

10 A Yes.

11 Q Do you adopt them as your testimony  
12 in this proceeding?

13 A Yes.

14 Q The parties to this proceeding have  
15 attested they will not record these  
16 proceedings but that does not apply to third  
17 parties. So just in case there are any third  
18 parties out there who may seek to record  
19 these proceedings, I'm stating on the record  
20 that I do not consent to such a recording.

21 Do you consent to being recorded by  
22 any third party?

23 A No.

24 MS. MORTAZAVI: Your Honor, the witness  
25 is available for cross-examination.

26 ALJ POIRIER: Thank you.

27 Mr. Gruen, please go ahead.

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CROSS-EXAMINATION

BY MR. GRUEN: Thank you, your Honor.

Q Ms. Kitson, my name is Darryl Gruen, and I am one of the attorneys on behalf of the Safety and Enforcement Division in this proceeding, and I will be doing cross-examination of you today.

And I believe I -- we've met before. I've examined you under oath prior to the commencement of this proceeding. Do you recall that?

A Yes.

Q Thank you. And if -- just if I can follow up on the attestations and Ms. Mortazavi's discussion with regards to them. Are you alone at the moment?

A Yes, I am.

Q Okay. Are you able to communicate with anyone privately or separately while you testify before the Commission and the administrative law judges today?

A No.

Q And do you -- I'll ask it a little bit more broadly than Ms. Mortazavi did. Do you consent to being recorded by anyone or transcribed by anyone except for the court stenographer approved by the California Public Utilities Commission today?

1 A No.

2 Q Thank you. And, Ms. Mortazavi,  
3 (sic) I just -- following the vain of  
4 Mr. Lotterman for certain witnesses, if I  
5 press your memory, please feel free -- today  
6 during cross, if I press your memory, please  
7 feel free to say you don't recall. If you  
8 don't know, please let me know. I will take  
9 that and go on with it. Do you understand?

10 A Yes.

11 Q Okay. Thank you. And just maybe  
12 to establish a common understanding of  
13 certain terms. If I use the term "Blade"  
14 today, or if you use the term "Blade" today,  
15 can we agree that we're talking about Blade  
16 Energy Partners?

17 A Yes.

18 Q And if we use the term "Aliso  
19 Canyon Facility" or "Aliso," can we agree  
20 we're talking about Southern California Gas  
21 Company's Aliso Canyon Natural Gas Storage  
22 Facility?

23 A Yes.

24 Q And with regards to the terms "root  
25 cause analysis" or "RCA," will you understand  
26 if I mean that to refer to Blade's Root Cause  
27 Analysis and supplemental reports issued in  
28 May of 2019?

1 A Yes.

2 Q And with regards to the term  
3 "SS-25," will you understand that to refer to  
4 the Standard Session 25 well at Aliso?

5 A Yes.

6 Q And the term "incident," will you  
7 understand if I use that term that that  
8 refers to the release of gas from the SS-25  
9 facility that was discovered beginning  
10 October 23rd, 2015?

11 A Yes.

12 Q Thank you. Okay. So turning to  
13 your testimony if you could specifically  
14 page 3. And Ms. Mortazavi had identified  
15 that and reminded us that that was Exhibit  
16 SoCalGas-03. Do you recognize this as your  
17 opening testimony in this proceeding?

18 A Yes.

19 Q Okay. And if we -- further effort.  
20 Just noting Chapter 3 Prepared Opening  
21 Testimony of Amy Kitson on Behalf of Southern  
22 California Gas Company is the title in bold  
23 on the cover page.

24 Ms. Kitson, would you agree with  
25 that?

26 A Yep.

27 Q Okay. And if we turn to page 4 of  
28 Exhibit SoCalGas-03 -- I am sorry. If we

1 turn -- pardon me. Page 5 of Exhibit  
2 SoCalGas-03. And you had discussed your  
3 witness qualifications a bit at a high level  
4 on direct with Ms. Mortazavi, and I'd just  
5 like to delve down into that a bit more if we  
6 could.

7 So if you see on lines -- on page  
8 5, lines 9 through 13, that discusses  
9 generally your experience in the Gas  
10 Integrity Management Program as well as the  
11 technical services manager, the storage  
12 engineering manager for risk assessment, and  
13 controls manager, and director of storage  
14 risk management with storage operations.

15 Did I did read that correctly?

16 A Yes. That's pretty much what it  
17 says, yeah.

18 Q Okay. And so given those  
19 qualifications and your background, your  
20 educational background, can you tell us if  
21 that background and experience would enable  
22 you to exam wellbore schematics?

23 A That background -- I'm not a  
24 technical expert in wellbore schematics. My  
25 primary focus is on the integrity management  
26 programs overall. The technical portions of  
27 that is not my area of expertise.

28 Q Understood. But would it enable

1 you -- does your background at a basic level  
2 would you be able to understand and read  
3 wellbore schematics and understand what they  
4 mean?

5 A I'd say at a very basic level. I  
6 couldn't dive very deep into them.

7 Q Okay. And what about other well  
8 drawings? Does your experience enable you to  
9 understand and read other well-related  
10 drawings?

11 A Can you explain what you mean by  
12 "other well drawings"?

13 Q Images of wells and drawings of  
14 wells at Aliso?

15 A Like a picture of a well?

16 Q Picture of a well, the drawing of a  
17 well, as-builts for examples, proposed  
18 drawings, any of those things?

19 A Again, depending on the picture, it  
20 would be probably at a high level depending  
21 on the picture that I'm looking at.

22 Q Okay. Has your background and  
23 experience given what you've discussed both  
24 in writing and orally today, did you share  
25 drawings and images, schematics with others  
26 at SoCalGas as part of your work?

27 A Me personally? I know I've been  
28 copied on e-mails and things with well

1 schematics on them, but I never personally  
2 updated a well schematic.

3 Q Okay. And I'm not asking about  
4 updating. It's not my intent to go there.  
5 But just you have been looped in regarding  
6 communications, even looped with others at  
7 SoCalGas with regards to schematics; is that  
8 right?

9 A From time to time, I'm sure I've  
10 been copied on e-mails where a well schematic  
11 was attached, yes.

12 Q And other drawings as well with  
13 regard to wells at Aliso?

14 A I can't remember a certain example  
15 but perhaps.

16 Q Okay.  
17 If we could go to page 3 of the  
18 exhibit that we have here, SoCalGas-03. And  
19 I'm wondering if the exhibit could be  
20 enlarged slightly. Hopefully everyone can  
21 read that.

22 But with regards to -- this is  
23 page 3 of your opening testimony. And if we  
24 could scroll down to the bottom of the page  
25 just so I can read the Bates Number on it.  
26 For the record, I see there Exhibit  
27 SoCalGas-3.0004. And if we scroll back up to  
28 get to lines 8 through 11, please. And if we

1 could begin at the end of line 8 and I'll  
2 read. It says:

3 While Blade was able to cut,  
4 extract, and thoroughly examine  
5 the casing at well SS-25 because  
6 there were plans to abandon the  
7 well, it is not feasible for  
8 SoCalGas to perform the same level  
9 of failure analysis on active gas  
10 storage wells.

11 Is that correct?

12 A Yes.

13 Q Okay. I want to ask you some  
14 clarification questions to better understand  
15 what SoCalGas did know about the casing of  
16 well SS-25 during the incident to the best of  
17 your knowledge of course. Are you ready --

18 A I'm ready.

19 Q -- to discuss that?

20 Okay. So if we could pull up  
21 Exhibit SED-220, please. Okay. And this is  
22 the cover page for SED-220.

23 And for the record just noting it  
24 says, "E-mail from Avideh," A-v-i-d-e-h,  
25 "Razavi," R-a-z-a-v-i, "to Todd Van De  
26 Putte." And the last name is spelled V-a-n  
27 space D-e space P-u-t-t."

28 I believe that there may be an "e"

1 after that as well.

2 "Steve Cardiff re SS-25 Data in  
3 Wellview. I. 19-06-016 ALJs Hecht and  
4 Poirier. Date served March 24th, 2021."

5 Do you see that?

6 A Yes.

7 Q And pardon me. Did I spell Mr. Van  
8 De Putte's name correctly? Perhaps you know  
9 better than I do.

10 A There is an "e" at the end.

11 Q There is an "e" at the end. Thank  
12 you. Okay.

13 If we could scroll down to the  
14 bottom of this page. Just the bottom of the  
15 cover. Okay. And continuing to the next  
16 page. So this is Bates No.  
17 AC\_CPUC\_SED\_DR\_17\_0001820. And if you'd  
18 scroll back up, we can ask some questions  
19 about this. And could we go back to the  
20 hundred percent. Thank you. Just so we're  
21 seeing a little bit bigger example.

22 Ms. Kitson, is this big enough for  
23 you to see on your screen?

24 A Yes, thank you.

25 Q Okay. And do you recognize -- why  
26 don't I go through it in a little bit of  
27 detail. So this is indeed an e-mail from  
28 Avidah Razavi to Todd Van De Putte and Steve

1 Cardiff and cc'ing you; is that correct?

2 A Yes. Appears to be that e-mail,  
3 yes.

4 Q And it's dated November 2nd, 2015;  
5 is that correct?

6 A Yes.

7 Q Thank you. And the subject line  
8 reads "SS-25 data in Wellview." Is that also  
9 correct?

10 A Yes, that's the subject.

11 Q Okay. And the attachment field  
12 indicates an attachment which appears to be  
13 entitled SS-25\_Schematic.PDF; is that right?

14 A Yes.

15 Q Okay. And, Ms. Kitson, do you  
16 recognize this e-mail?

17 A Yes, I saw it from yesterday when  
18 you submitted it. I didn't recognize it. I  
19 didn't recall it before that.

20 Q Did seeing it from yesterday  
21 refresh your recollection?

22 A Not really.

23 Q Okay.

24 (Crosstalk)

25 A -- anything during that time.  
26 Sorry.

27 Q Not at all. No need to apologize.  
28 Would you agree that you were in

1 fact included on this e-mail? That is an  
2 accurate e-mail looping you in?

3 A Yes.

4 Q Okay. And if we go to --

5 ALJ POIRIER: Mr. Gruen, I am sorry to  
6 interrupt.

7 MR. GRUEN: Not at all.

8 ALJ POIRIER: If folks can make sure  
9 that they've muted their lines. We're  
10 picking up a lot of background. So please  
11 make sure of that.

12 Again, I am sorry to interrupt,  
13 Mr. Gruen. Please continue.

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

15 Q We'll be turning to the body of the  
16 e-mail that I'm reading:

17 Hi Todd and Steve. Attached  
18 please see the updated schematic  
19 with all the available information  
20 noted. Joel found and input this  
21 information into Wellview today.

22 (This is per all available  
23 documents in the well file.)

24 Do you see that portion of the  
25 e-mail?

26 A Yes. I see that portion.

27 Q Okay. And toward the bottom of  
28 this particular page if you scroll down a

1 little bit more, do you see the forth bullet  
2 from the bottom where it says:

3 Possible slight shoe leak,  
4 migrating higher than 8,440 feet  
5 (Temp break around 6800 feet.)

6 Do you see that? ]

7 A Yes.

8 Q And above it says, "April 4th,  
9 1984," the bullet right above; is that  
10 correct?

11 A Yes, that's what it says.

12 Q Okay. So does this then indicate a  
13 possible slight shoe leak higher than 8,440  
14 feet via the temp break around 6,800 feet as  
15 of April 11th, 1984?

16 A Well, I didn't write the email, but  
17 that's -- appears to be what it says there.

18 Q Okay. Thank you. Let's go to  
19 Exhibit SED-221. And just to get the title  
20 of it into the record, this is -- the title  
21 page shows, "SED" -- excuse me -- "221,  
22 Standard Sesnon 25 gas company wireline  
23 schematic by 19-06-016 ALJs Hecht and  
24 Poirier, date served March 24th, 2021."

25 Do you see that?

26 A Yes.

27 Q And if we scroll to the next page  
28 and at the bottom, Bates

1 No. A\_CPUC\_SED\_Dr\_17\_0001823.

2 So I'll just ask you, do you  
3 recognize this as the attachment to the  
4 November 2nd, 2015 email we just showed you?

5 A Based on what you provided  
6 yesterday, that was the attachment that was  
7 provided.

8 Q Thank you. And it shows, if we can  
9 maybe enlarge it a little bit more for  
10 purposes of this piece -- if we can enlarge  
11 and scroll down to the bottom corner. Thank  
12 you.

13 Can you see there it shows at the  
14 bottom right corner in the blue frame there  
15 report printed on November 2nd, 2015,  
16 correct?

17 A Yes. That's what it says.

18 Q Okay. So this -- would you agree  
19 then that this schematic was in existence as  
20 of November 2nd, 2015?

21 A Yeah. That report date is the date  
22 that it was printed out of the database  
23 system. So that means that on that date that  
24 was when that schematic was printed, I  
25 believe.

26 Q So it -- while it was printed on  
27 November 2nd, 2015, the information on this  
28 schematic may have been in existence prior to

1 that; is that right?

2 A That's correct.

3 Q Okay. And do you -- if we scroll  
4 back up slightly -- I think we've got the  
5 right resolution for this, but if we need to  
6 scroll out for you, Ms. Kitson -- if we need  
7 to zoom out, we can do that.

8 Do you see the red triangles  
9 pointing outwards towards the middle of the  
10 page?

11 A Yes, I see a red triangle.

12 Q Okay. And do you see also just  
13 below the red triangles towards the upper  
14 middle of the page that there is a rectangle  
15 that is surrounded by two lines, if you will?

16 Maybe we could just show -- point  
17 the arrow in the direction that we're  
18 referencing to. Can you see that, where the  
19 cursor is? Do you see the rectangle there?

20 A Sorry. Yes, I can see the cursor.  
21 Thank you.

22 Q Okay. So I'm going to ask you  
23 about what those -- what those pieces of the  
24 image mean. So --

25 MS. BONE: Your Honor, I'm going to  
26 object here as outside the scope of Ms.  
27 Kitson's testimony. She's also testified  
28 that she does not have detailed knowledge of

1 wellbore schematics.

2 MR. GRUEN: Your Honor, this is going  
3 to Ms. Witson's -- excuse me -- Ms. Kitson's  
4 knowledge as a witness. She's -- she was  
5 looped in and has -- has knowledge of this,  
6 and it goes to probe the understanding of  
7 what exactly, if she knows, was shared with  
8 Boots & Coots, frankly.

9 ALJ POIRIER: Objection overruled. The  
10 witness can answer to the best of her  
11 ability.

12 THE WITNESS: Sorry. Can you restate  
13 the question?

14 BY MR. GRUEN:

15 Q Sure. Just going back to the  
16 objects on the image. So the triangles  
17 pointing outwards towards the middle of the  
18 page, what -- do you have a general  
19 understanding of what those triangles  
20 indicate?

21 A Not really. This isn't my area of  
22 expertise to do a detailed analysis of the  
23 wellbore schematics. I'm sorry.

24 Q Okay. So you don't -- you don't  
25 have an understanding that those triangles  
26 are indications of perforations at the bottom  
27 of the well?

28 A You know, I can only go by what's

1 written on the schematic. It's not my area  
2 of expertise to analyze that.

3 Q Okay. And so let's go to the --  
4 what is written on the schematic. If you  
5 could scroll -- zoom in slightly.

6 Do you see on the left triangles  
7 there, just to the left, yes, where the  
8 cursor is where it says, "perf, 8,485.0  
9 through 8,466.0"? Do you see that?

10 A I see that, yes.

11 Q And next to it "May 24th, 1973."  
12 Do you see that as well?

13 A Yes, I see that.

14 Q And so does "perf" -- in your  
15 understanding, does that represent the word  
16 "perforation"?

17 A Like I said, I believe so, but it's  
18 not my area of expertise to review these well  
19 schematics.

20 Q Understood. Does it also, to the  
21 best of your understanding and belief then,  
22 represent that there were perforations at the  
23 bottom of the well at approximately 8,485  
24 feet to 8,466 feet?

25 A Again, I don't know. I wouldn't  
26 claim to be an expert in this area at all.  
27 So I don't know.

28 Q Okay. Okay. So you know -- you

1 believe that this -- the wording represents  
2 "perforation," but you don't know if this --  
3 where the arrow is pointing to represents  
4 perforations in this case as -- even though  
5 it's pointing to the red triangles? Am I  
6 understanding your testimony correctly?

7 A Again, because I'm -- I'm assuming  
8 that it's perforations to start with, so I  
9 don't want to -- I would never be the one to  
10 provide this information to, no. It would go  
11 to someone else on the team that had this  
12 knowledge.

13 Q Right. And Ms. Kitson, why were  
14 you looped in on this schematic?

15 A My best guess is because Avi Razavi  
16 reported to me at the time. So she copied me  
17 on the communication.

18 Q I see. So as your -- manager, you  
19 would have a basic working knowledge of the  
20 kinds of things that Ms. Razavi is working  
21 on; isn't that right?

22 A Yes. But if you recall from my  
23 EUO, I was only in that job for a week and a  
24 half prior to the incident. And it was a  
25 temporary assignment. So I was still very  
26 new in the position when this occurred.

27 Q Okay. Well, let's go back to just  
28 the best of your understanding what this does

1 represent. So we've got the -- your belief  
2 that this -- the information here "perf" does  
3 show -- does indicate a perforation. What  
4 about the date there? Does that, to the best  
5 of your knowledge and belief, represent that  
6 there were perforations on Well SS-25 as of  
7 May 24th, 1983 toward the bottom of the well?

8 A Again, not my area, but I would  
9 assume that that's what that date represents,  
10 but it's not my area of expertise.

11 Q Okay. And -- understood. Let's go  
12 back to -- we didn't unpack this, but I'd  
13 like to. The rectangle that we had discussed  
14 just under the red triangles, do you recall  
15 discussing that?

16 A Yeah, I recall you pointing it out,  
17 yes. Thank you.

18 Q Just pointing it out. Yeah, we  
19 hadn't gone further. I agree. So with  
20 regards to that rectangle, to the best of  
21 your understanding, does that represent the  
22 packer of the well?

23 A Based on the notation on here,  
24 that's what I would guess. But again, I'm  
25 not familiar -- super familiar with the  
26 symbols on this schematic.

27 Q Understand. But with relationship  
28 to the -- just so we're clear, with

1 relationship to the packer -- excuse me --  
2 the red triangles right above it would  
3 suggest, to the best of your belief, that  
4 there are perforations shown here above the  
5 packer, as of May 24th, 1973; is that  
6 correct?

7 A Yeah. Again, that's what I would  
8 assume that date means, but it's not my area.

9 Q Understood. Thank you. And just  
10 to continue then, given your belief that the  
11 red triangles above the packer would suggest  
12 perforations, if we look further down that  
13 schematic at the red triangles below the  
14 packer, do you see those as well?

15 A Yes.

16 Q And do you see the words  
17 "perforated" next to some of them, to the  
18 left of them?

19 A Yes.

20 Q So just as above, would -- to the  
21 best of your knowledge and belief, do those  
22 red triangles below the packer represent  
23 perforations below the packer of the Well  
24 SS-25?

25 A Again, seems to be so based on how  
26 they are labeled here, yes.

27 Q And starting with the top one, the  
28 first perforation -- I'm -- not the top

1 triangle, but rather the top wording to the  
2 left of the triangles below the packer where  
3 it says, "perforated 8,510 to 8,538 feet."

4 Do you see that?

5 A I see those numbers, yes.

6 Q And if I can see right -- my vision  
7 isn't what it once was, but it looks like it  
8 says underneath that "June 4, 1973."

9 Do you see that?

10 A Yes, I see that.

11 Q Suggesting that the -- that  
12 particular perforation below the packer was  
13 created in June 4th, 1973. Would you agree?

14 A I would agree that that's what that  
15 date says, yes.

16 Q Do you have any reason to doubt its  
17 accuracy?

18 A No. But again, this isn't my area  
19 of accuracy. So --

20 Q Understood.

21 MS. BONE: Your Honor, the witness has  
22 testified that she does not have any  
23 knowledge regarding this schematic. At this  
24 point, she just seems to be reading the  
25 document, which doesn't seem to be the best  
26 use of time.

27 ALJ POIRIER: Mr. Gruen?

28 MR. GRUEN: Your Honor, it's not just

1 reading the document. It's going to facts  
2 that the words in the document represent.  
3 And she seems to have some knowledge of what  
4 it represents as -- based on her basic  
5 understanding. I'd ask -- I don't think this  
6 is going to go too much longer with regards  
7 to the actual words. So I'd ask for a bit of  
8 indulgence to get through this.

9 ALJ POIRIER: Okay.

10 MS. BONE: Ms. Kitson says that she --  
11 sorry, your Honor -- that she's guessing  
12 based on the documents.

13 ALJ POIRIER: I'm going to allow a  
14 little bit of latitude, Mr. Gruen, but I  
15 think the witness has stated on several  
16 occasions that this isn't her area of  
17 expertise. And I want to move this along  
18 since I think -- okay?

19 MR. GRUEN: Okay.

20 ALJ POIRIER: So please -- you're  
21 building towards something. Let's do that.  
22 And let's move forward on that, but let's do  
23 so expeditiously.

24 MR. GRUEN: Understood. Okay. Maybe  
25 if I could -- without going through the  
26 triangles, if we could scroll up, maybe I'll  
27 do -- no. Stay where we are. I'm sorry.  
28 Stay where we are.

1 Q Do you know what the term -- do you  
2 see the term "WSO"?

3 A Yes. I see "WSO" there.

4 Q What does that term mean? Do you  
5 understand -- do you know what that term  
6 means?

7 A I don't know.

8 Q Okay. Are you familiar with the  
9 term "water shutoff"?

10 A Not really, no.

11 Q Okay. Ms. Kitson, are perforations  
12 holes in the casing, to your knowledge?

13 A I believe they are, yes.

14 Q Okay. So if there are holes in the  
15 casing, that means that, in fact, gas could,  
16 in fact, be escaping out of the casing; is  
17 that right?

18 A I don't know the answer to that,  
19 because I think it depends on where they are  
20 located also. If they are in the storage  
21 zone, then that's the purpose of them. But  
22 you know, again, I'm not the expert on where  
23 they are located and what they are for.

24 Q But just -- the question that I had  
25 is -- I understand you're not an expert, but  
26 just at a level -- a basic engineering level,  
27 with holes in the casing, gas could be  
28 escaping from it through those holes; is that

1 not correct?

2 A I mean, hypothetically, but it also  
3 depends on the configuration of the well and  
4 where the perforations are located.

5 Q Understood.

6 A As far as I know.

7 Q Appreciate that. Yes, understood.  
8 Thank you. So, Ms. Kitson, since you were  
9 looped in on this, with the -- on the date of  
10 November 2nd, 2015 -- I just want to focus on  
11 the date for a moment. Do you recall us  
12 talking about the November 2nd, 2015 date  
13 that's both represented here and in the email  
14 we reviewed?

15 A Yes.

16 Q And that's -- of course, that's  
17 after the incident began -- I trust you would  
18 agree to that?

19 A Yes.

20 Q Ms. Kitson, was this schematic, to  
21 your knowledge, shared with SoCalGas'  
22 well-kill contractor Boots & Coots?

23 A This very schematic? I don't know.

24 Q Okay. And when I -- just for the  
25 record, when I say "Boots & Coots," would you  
26 agree that refers to SoCalGas' well-kill  
27 contractor that was hired for certain of the  
28 well-kill attempts at SS-25?

1           A    Yes, that's the well-kill  
2 contractor, yes.

3           Q    Okay.  So do you know whether  
4 information about the casing perforations on  
5 Well SS-25 that are -- is shown here was  
6 shared with Boots & Coots in another way?

7           MS. BONE:  Your Honor, I'm going to  
8 object again as outside the scope of Ms.  
9 Kitson's testimony, which explains the status  
10 of the implementation of Blade Solutions.

11          ALJ POIRIER:  Mr. Gruen.

12          MR. GRUEN:  Your Honor, it goes to her  
13 knowledge as to whether this information was  
14 shared with Boots & Coots.  And your Honor, I  
15 might note too, Ms. Kitson's knowledge of  
16 storage integrity management, which SoCalGas  
17 claims was, in fact, begun at this state, if,  
18 in fact, it's true -- she's true to her word  
19 on that, then she should have some knowledge  
20 about the status of Well SS-25 at the time of  
21 the state.  I think it's well within her  
22 scope of knowledge, your Honor.

23          MS. BONE:  Mr. Gruen's question is  
24 about Boots & Coots and the well kill of  
25 SS-25.  That is outside of Ms. Kitson's  
26 knowledge.

27          MR. GRUEN:  Well, if we could -- if I  
28 could have a chance to probe it, we can find

1 that out.

2 ALJ POIRIER: Okay. Folks, I don't  
3 want to go back and forth on this. I'm going  
4 to allow us to move forward with this  
5 question. Ms. Kitson can answer to the best  
6 of her knowledge if she has any on this.

7 Please go ahead.

8 THE WITNESS: Could you please repeat  
9 the question? Thank you.

10 BY MR. GRUEN:

11 Q Sure. Of course. Do you know --  
12 let me see if I can state the question  
13 approximately the way that I did. Do you  
14 know if SoCalGas shared information about  
15 casing perforations on Well SS-25 with Boots  
16 & Coots like what is shown on this schematic?

17 A I don't know, because I wasn't the  
18 person that was dealing directly with Boots &  
19 Coots. I do know that they had full access  
20 to the SS-25 well file, so -- and all the  
21 information that was within in it, as far as  
22 I know.

23 Q Okay. Do you know if information  
24 was -- regarding perforations at the bottom  
25 of Well SS-25 was shared with Boots & Coots,  
26 do you know who within SoCalGas shared that  
27 information?

28 A Again, I don't know. I wasn't the

1 one dealing directly with Boots & Coots. So  
2 the most of my knowledge is that they had  
3 full access to the well file and information  
4 for SS-25.

5 Q Okay. Ms. Kitson, what was your  
6 role in communications regarding the  
7 well-kill operations with Boots & Coots?  
8 What role did you serve there?

9 A I wasn't part of the well-kill  
10 operations.

11 Q Okay. So even though you weren't  
12 part of the well-kill operation, it's not the  
13 exact question I asked. With regards to  
14 communications with Boots & Coots, did you --  
15 were you looped in?

16 Were you included on any of the  
17 communications that SoCalGas had with Boots &  
18 Coots?

19 A Not that I can recall.

20 Q Okay. So when you say that the  
21 well file -- you know that the well file was  
22 shared with Boots & Coots, you're not saying  
23 that based on your personal knowledge; is  
24 that right?

25 A Only because my team was, you know,  
26 the storage field engineer team. So I know  
27 that they -- Bret asked for the file, and  
28 that was given. That's the extent of my

1 knowledge.

2 Q But you weren't looped in on that  
3 communication --

4 A I may have been --

5 Q -- the communication that shows  
6 that the file was given to Boots & Coots; is  
7 that right?

8 A I may have been looped in to ask  
9 for the files, but I don't recall anything  
10 beyond that.

11 Q Okay. And just to clarify, when  
12 you say "asked for the file," you mean the  
13 request that SoCalGas have the file  
14 available, not the request that it be shared  
15 with Boots & Coots?

16 A I don't remember how it was asked.  
17 I'm sorry.

18 Q Okay. Understood. Let's turn to a  
19 different line, if I may.

20 ALJ POIRIER: Sorry to interrupt. I  
21 just want to check on timing because we might  
22 have a break coming up.

23 How much longer do you think you  
24 have with Ms. Kitson?

25 MR. GRUEN: Yeah. Your Honor, this is  
26 a short line. I don't anticipate it taking  
27 too much longer. If -- your Honor, we could  
28 do a break now, or it's possible we could get

1 done with this fairly quickly and have a  
2 break afterwards and let Ms. Kitson go.

3 ALJ POIRIER: Let's go ahead and move  
4 ahead. Probably take a break around 2:15.  
5 It looks like the light is back on where  
6 Ms. Kitson is. That's helpful.

7 THE WITNESS: I don't think I'm moving  
8 enough.

9 ALJ POIRIER: Let's continue. I  
10 realized I don't think we went off the  
11 record.

12 So let's just go ahead.

13 MR. GRUEN: Okay. Yes, your Honor.

14 Q Ms. Kitson, if we could turn back  
15 to your opening testimony, Exhibit  
16 SoCalGas-30. And if we could pull that up on  
17 the screen. And going to page 2, lines 10  
18 through 12. And Ms. Purchia's correct. Just  
19 for the record, if I could read the Bates  
20 number at the bottom of page 2. So this is  
21 Bates No. SoCalGas 3.0003. And if we turn to  
22 lines 10 through 12, there you discuss,  
23 "SoCalGas began a SIMP pilot program for well  
24 integrity and management work in 2014. Its  
25 request for SIMP was approved by the CPUC in  
26 2016, and SoCalGas has implemented SIMP  
27 today."

28 Do you see that?

1 A Yes.

2 Q Just for the record, to clarify,  
3 SIMP stands for "Storage Integrity Management  
4 Program." Is that correct?

5 A Yes.

6 Q Okay. And so with regards to that  
7 statement, the pilot program specifically  
8 that you discuss from 2014 now -- you have  
9 that in mind, right?

10 A Yes.

11 Q Okay. Did SoCalGas do the 2014  
12 SIMP pilot program for well integrity and  
13 management work on Well SS-25?

14 A No.

15 MR. GRUEN: Okay. Your Honor, that was  
16 quicker than I thought it might be. Those --  
17 with that, those are all the questions that  
18 we have for Ms. Kitson at this point.

19 ALJ POIRIER: Okay. Let's go off the  
20 record.

21 (Off the record.)

22 ALJ POIRIER: Back on the record.

23 We're going to take a 10-minute  
24 break until 2:15. And at that point, Cal  
25 Advocates may have some cross for Ms. Kitson.  
26 Okay.

27 Off the record.

28 (Off the record.)

1 ALJ POIRIER: Let's go back on the  
2 record.

3 We just returned from a brief break.

4 And, Ms. Bone, are you going to have  
5 cross for this witness?

6 MS. BONE: Yes, your Honor. Cal  
7 Advocates will have cross for this witness.  
8 I estimate roughly 20 minutes.

9 ALJ POIRIER: Okay. Please go ahead.

10 CROSS-EXAMINATION

11 BY MS. BONE:

12 Q Good afternoon, Ms. Kitson. How  
13 are you doing?

14 A Good. How are you?

15 Q I'm good. I'm Traci Bone from Cal  
16 Advocates. We've never met before. So  
17 hello.

18 A Yes.

19 Q Do you recall -- you mentioned many  
20 times during Mr. Gruen's cross-exam of you  
21 that you did not have the expertise to answer  
22 his questions?

23 A Yes.

24 Q What is your area of expertise?

25 A Primarily the integrity management  
26 programs at our company is where I spent most  
27 of my career.

28 Q So who at SoCalGas would have the

1 expertise to answer his questions?

2 A Oh. Certainly Mr. Dan Neville.

3 Q And is it correct that you oversee  
4 the integrity management practices and  
5 related functions for SoCalGas' gas storage  
6 facility?

7 A Yes. That's -- my team under me  
8 has the storage integrity management program.  
9 Yes.

10 Q And what does that job currently  
11 entail?

12 A My current job?

13 Q Yes.

14 A My current job actually -- in  
15 addition to storage, that's one piece of what  
16 I cover. I actually have the regulatory  
17 policy for all the integrity management  
18 programs, the -- we are actually starting up  
19 a new integrity management program that we'll  
20 be asking for in the GRC, our facilities'  
21 integrity management program, which is new.

22 And we have -- and then I have the  
23 storage integrity management program team and  
24 the risk assessment and threat identification  
25 team.

26 Q Could you give some specific  
27 examples of what you might do in a day  
28 related to managing the integrity management

1 program specifically for the gas storage  
2 facility?

3 A So specific to the gas storage  
4 facility, I support all of my teammates that  
5 do, you know, the various -- you know, like I  
6 said, the risk assessment, threat  
7 identification. We have, you know, the  
8 audits, the integrity management plan  
9 implementation.

10 So I just either support them in  
11 any way that I can, work with the other  
12 departments that we -- like the Storage  
13 Operations Department where we work really  
14 closely with and support the integrity  
15 assessments that are going on in the fields  
16 right now. We help with the analysis that  
17 goes -- that's part of that work.

18 Q Ms. Kitson, are you a petroleum  
19 engineer?

20 A No. I'm a mechanical engineer.

21 Q And do you believe that a petroleum  
22 engineer should be the person overseeing the  
23 integrity management practices of the  
24 SoCalGas storage facility?

25 A No. I don't think it's necessary.  
26 Like we have Dan Neville on our team. He is  
27 the subject matter expert. And we have other  
28 petroleum engineers who have expertise. I

1 think it's actually a really good  
2 collaboration to have those experts with  
3 integrity management experts. It works out  
4 really well.

5 Q And you mentioned, in response to  
6 Mr. Gruen, that you have limited ability to  
7 interpret well drawings; is that correct?

8 A Yes.

9 Q Do you believe that it would be  
10 useful to be able to interpret well drawings  
11 as the person overseeing integrity management  
12 practices of a gas storage facility?

13 A Not necessarily. Again, we have  
14 very strong technical experts on our team  
15 with years of experience both in the field  
16 and on my team that they are able to handle  
17 that work. And I support them from how that  
18 would integrate into an integrity management  
19 program. Again, I think it's a very good  
20 system that we have.

21 Q But you are ultimately responsible  
22 for ensuring that the integrity management  
23 program is performed in a safe and effective  
24 manner, are you not?

25 A Yes. I'm -- I'm responsible to  
26 make sure we stay in compliance with all the  
27 regulations and our standards, yes. ]

28 Q Are the integrity management

1 practices between natural gas transmission  
2 and distribution pipelines significantly  
3 different than those that apply to well  
4 storage facilities?

5 A Oh, yes. There is -- I think the  
6 high-level concepts are very similar. And  
7 what we've stated, even in Phil Baker's  
8 testimony, data gathering, threat  
9 identification, the integrity inspections,  
10 the concepts are there, but once you start  
11 diving into the technical application, it's  
12 pretty different. That's why there's  
13 specific regulations and best practices  
14 API-1171 specific for storage.

15 Q You stated that you oversaw Avidah  
16 Razavi. Have I pronounced her name properly?

17 A Avi. She goes by Avi.

18 Q Okay. And you oversee her. Is she  
19 on your team?

20 A She actually is currently on my  
21 team, but we're in a different role. I'm  
22 starting up our Facilities Integrity  
23 Management Program right now.

24 Q So what is her job title?

25 A Today or the date of the incident?

26 Q How about today.

27 A So she's the Facilities Integrity  
28 Management Program manager. Yes, I believe

1 that's what --

2 Q For what type of facilities; for  
3 gas storage facilities or transmission or  
4 distribution facilities?

5 A So when we talk space facilities,  
6 it's kind of our compressor stations, like  
7 our aboveground processing facilities, which  
8 are both in storage and transmission and some  
9 distribution.

10 Q And what was her title at the time  
11 of the incident?

12 A I believe it was storage field  
13 engineer.

14 Q So what is Ms. Razavi's area of  
15 expertise?

16 A As far as her degree or work  
17 history?

18 Q I think what you would consider her  
19 area of expertise in terms of her position at  
20 SoCalGas.

21 A Well, she's been in many different  
22 roles over time. So she's really good with  
23 data and data management and records, and  
24 she's also very strong in her role as -- in  
25 facilities now, she's very strong in that as  
26 well.

27 Q Would Ms. Razavi have knowledge to  
28 read a well schematic?

1           A    Well, I think, you know, better  
2    than myself, but certainly not to the level  
3    of like Dan Neville.

4           Q    Does Ms. Razavi have knowledge  
5    about petroleum engineering?

6           A    I believe so.  She started --  
7    before she came to the company, I think she  
8    worked for Schlumberger.  I think her degree  
9    is in chemical engineering, but she has  
10   worked in and around that work as well.

11          Q    And remind me Schlumberger is the  
12   company that does some of the testing similar  
13   to Vertilog testing; is that correct?

14          A    Yeah.  They do some logging also,  
15   is one of the things they do, yes.

16          Q    And does Ms. Razavi have knowledge  
17   about Storage Integrity Management Programs?

18          MS. MORTAZAVI:  I'm going to object as  
19   outside the scope of testimony.

20          MS. BONE:  Your Honor, this goes to why  
21   this witness is testifying rather than  
22   somebody who is more qualified.

23          MS. MORTAZAVI:  Qualified?  Your Honor,  
24   I'm sorry.  I'm not sure what Ms. Bone means  
25   by "qualified."  Ms. Kitson is sponsoring her  
26   testimony.

27          ALJ HECHT:  Overruled.  Let's continue.

28   BY MS. BONE:

1           Q    I'll restate the question.  Does  
2 Ms. Razavi have knowledge about the Storage  
3 Integrity Management Program for --

4           A    Now or at the time of the incident  
5 or in general?

6           Q    At the time of the incident.

7           A    She was pretty new to it then.  She  
8 was one of the people -- one of the engineers  
9 working on some of the projects that we were  
10 starting to implement for our Storage  
11 Integrity Management Programs; for example,  
12 she was working on and project managing  
13 putting in the realtime pressure monitors at  
14 Goleta.  She was project managing the data  
15 (inaudible) effort into WellView, so -- and  
16 starting to write the written plan.

17                   I met with her quite often when she  
18 was starting to write the written plan.  As  
19 an example, she would run things by me  
20 because she was pretty -- pretty new to the  
21 integrity management space at that time.

22           Q    Do you recall that Mr. Gruen  
23 examined both you and Ms. Razavi together in  
24 relation to the Storage Integrity Management  
25 Program?

26           A    I recall when he interviewed us  
27 both together.  It was primarily for her to  
28 answer questions around the data and record

1 keeping.

2 Q We're curious why SoCalGas hasn't  
3 offered Ms. Razavi to at least join with you  
4 to testify regarding the Storage Integrity  
5 Management Program?

6 MS. MORTAZAVI: Object; calls for  
7 speculation.

8 MS. BONE: Well, she might actually  
9 know the answer to the question.

10 ALJ POIRIER: I'll overrule the  
11 objection. The witness can answer to the  
12 extent of her knowledge.

13 THE WITNESS: First of all, I am not  
14 quite sure. I have a lot more extensive  
15 knowledge in the integrity management space  
16 than she does, especially at the time because  
17 I worked both in transmission integrity and  
18 distribution integrity prior to coming to  
19 storage. And the primary focus of my  
20 testimony, which we haven't touched on most  
21 of it, is around that space, not wellbore  
22 schematics.

23 Q But she did work for Schlumberger?

24 A I believe for a brief time before  
25 she came with the company, about a year or  
26 two.

27 Q And she has the capacity to  
28 understand well schematics, which are often

1 the product of logs; correct?

2 A No. Wellbore schematics are not  
3 the product of logs, no.

4 Q How are they related to logging?

5 A It would be one of the things you  
6 would look at prior to logging, and that's  
7 what our field inspection team, storage field  
8 engineers in the field do. Not my team, not  
9 specifically.

10 Q Okay. So the team that looks at  
11 integrity management doesn't necessarily  
12 participate in the logging activities; is  
13 that correct?

14 A No. Let me explain a little bit.  
15 So the integrity management program  
16 is made up of many things. So we have data  
17 gathering, the risk assessment, that's  
18 primarily in my area.

19 And when you get to the one  
20 inspection piece of the program, that work is  
21 performed by a group in the field. The data  
22 is then sent back to my team to do the  
23 analysis and integrate that data.

24 So, again, it's in close -- and  
25 this is very similar to how our Transmission  
26 Integrity Management Program is as well.  
27 Right. There's a team in the field that runs  
28 the pigs, and there's the team in the office

1 that, you know, documents and runs the  
2 program.

3 MS. BONE: Thank you very much  
4 Ms. Kitson. That concludes my  
5 cross-examination.

6 ALJ POIRIER: Ms. Mortazavi, do you  
7 have any redirect?

8 MS. MORTAZAVI: Would it be possible to  
9 have a brief break so I can confer with the  
10 witness, your Honor?

11 ALJ POIRIER: Sure. We'll be off the  
12 record.

13 (Recess taken.)

14 ALJ POIRIER: We are be back on the  
15 record. We took a short break to allow  
16 SoCalGas to confer with the witness.

17 Ms. Mortazavi, do you have any  
18 redirect?

19 MS. MORTAZAVI: Yes. A couple of  
20 questions, your Honor.

21 ALJ POIRIER: Please, go ahead.

22 REDIRECT EXAMINATION

23 BY MS. MORTAZAVI:

24 Q Ms. Kitson, do you recall Ms. Bone  
25 asking you questions about your expertise?

26 A Yes.

27 Q Is there anything you'd like to add  
28 with regard to your expertise in integrity

1 management?

2           A    Yes, sure. Briefly. I just wanted  
3 to give a little more color and background to  
4 the experience I have at the company in  
5 integrity management. So I started off in  
6 the transmission -- when I came to the  
7 company after a few years' experience at a  
8 different, utility, I came into the  
9 Transmission Integrity Management Program,  
10 and actually, you know, helped with the  
11 development, continued development of that  
12 program.

13                   And then after a few years, I moved  
14 on to when we were early in the stages of  
15 developing our Distribution Integrity  
16 Management Program, even ahead of the  
17 regulations. From there, I helped develop  
18 our Distribution Integrity Management --  
19 well, plans, and some of our programs that we  
20 were -- or programs and projects that we were  
21 putting in place to address risk and  
22 distribution.

23                   And then from there, I actually  
24 lead several of those projects. The -- we  
25 called it the Sewer Lateral Inspection  
26 Project where we were looking for potential  
27 cross-bores of gas lines and then riser, the  
28 anodeless riser project or program where were

1 looking for corrosion on, and wrapping risers  
2 to prevent corrosion.

3 And then from there, I moved into  
4 the storage -- my storage job, where I was  
5 assisting, helping develop our SIMP program.  
6 Again, ahead of any regulations.

7 And then I will add -- I mentioned  
8 it a little bit with our Facilities Integrity  
9 Management Program that we are putting  
10 together, which we are kind of leading the  
11 industry on. There's not many utilities that  
12 even have -- are starting to address this,  
13 and we're putting a formalized project  
14 together that we put in our Gas Safety Plan  
15 as well as putting in our next GRC.

16 Q Thank you, Ms. Kitson.

17 Do you recall Ms. Bone asking you  
18 whether you need to be a petroleum engineer  
19 for your role, and you responded that you  
20 collaborate with people on your team that  
21 have specific expertise?

22 A Yes.

23 Q Would you like to elaborate more on  
24 that point?

25 A Yes. I wanted to really touch on  
26 the senior and SME expertise that we have on  
27 our team to help support -- to help support  
28 me and all the other directors that we have

1 at the company. So I like I mentioned, Dan  
2 Neville, but we also have several other  
3 members that either have extensive 10,  
4 15-years-plus experience in risk analysis and  
5 assessment, and we have other petroleum  
6 engineers with extensive both field and  
7 practical experience as well as integrity  
8 management experience. So it's kind of the  
9 collective that's super important to support  
10 these efforts.

11 MS. MORTAZAVI: Thank you. No more  
12 questions, your Honor.

13 ALJ POIRIER: Thank you.

14 Mr. Gruen, do have any recross based  
15 on what was just discussed?

16 MR. GRUEN: Sorry. I was on mute. I  
17 was putting myself on mute out of an  
18 abundance of caution. Can you hear me?

19 ALJ POIRIER: Yes, I can.

20 MR. GRUEN: Your Honor, if you'll bear  
21 with me just a moment.

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

23 (Off the record.)

24 ALJ POIRIER: Back on the record.

25 Mr. Gruen, do you have any recross?

26 MR. GRUEN: No further questions, your  
27 Honor.

28 ALJ POIRIER: Thank you.

1 Ms. Bone, do you have any recross.

2 MS. BONE: No further questions, your  
3 Honor.

4 ALJ POIRIER: Thank you.

5 Ms. Kitson, I think we're done.  
6 Thank you.

7 Off the record.

8 (Off the record.)

9 ALJ POIRIER: Let's be back on the  
10 record.

11 While we were off the record, we  
12 discussed kind of the rest of the day and  
13 concluded that it would be wise to adjourn  
14 after we handle some housekeeping matters.

15 It looks like Mr. Sera will not be  
16 available next week, so he will come up later  
17 I think. If next week we can get an updated  
18 potential hearing witness order, that would  
19 be appreciated.

20 I think let's first turn to the  
21 exhibits for Ms. Kitson. We'll start with  
22 Ms. Mortazavi.

23 MS. MORTAZAVI: Thank you, you Honor.

24 SoCalGas moves to admit the  
25 following exhibits into the record:  
26 SoCalGas-03, Prepared Opening Testimony of  
27 Amy Kitson, dated November 22nd, 2019;  
28 SoCalGas-14, Prepared Reply Testimony of Amy

1 Kitson, dated March 20, 2020; SoCalGas-25,  
2 Prepared Sur-Reply Testimony of Amy Kitson,  
3 dated June 30, 2020; and SoCalGas-26, the  
4 Exhibits to the Prepared Sur-Reply Testimony  
5 of Amy Kitson, dated June 30, 2020.

6 ALJ POIRIER: Do you have any  
7 objections to moving these exhibits into the  
8 record?

9 MR. GRUEN: None from SED, your Honor.

10 MS. BONE: None from Cal Advocates.

11 ALJ POIRIER: So Exhibits SoCalGas-03,  
12 SoCalGas-14, SoCalGas-25, and SoCalGas-26 are  
13 entered into the record. Thank you.

14 (Exhibit No. SoCalGas-03 was  
15 received into evidence.)

16 (Exhibit No. SoCalGas-14 was  
17 received into evidence.)

18 (Exhibit No. SoCalGas-25 was  
19 received into evidence.)

20 (Exhibit No. SoCalGas-26 was  
21 received into evidence.)

22 ALJ POIRIER: Ms. Purchia.

23 MS. PURCHIA: Thank you.

24 SED requests to move the following  
25 cross exhibits into the record: SED-220,  
26 e-mail from Avidah Razavi to Todd Van de  
27 Putte, Steve Cardiff, re SS-25 data in  
28 WellView, dated November 22, 2015; and  
SED-221, Standard Sesnon 25 Gas Company  
Wireline Schematic.

1 ALJ POIRIER: I think we lost --  
2 Ms. Purchia is frozen on screen.

3 (Off the record.)

4 ALJ POIRIER: Please continue,  
5 Ms. Purchia.

6 MS. PURCHIA: Thank you. The second  
7 exhibit SED requests to move into the record  
8 is SED-221, Standard Sesnon Gas Company  
9 Wireline Schematic.

10 ALJ POIRIER: Do we have any objections  
11 to moving these exhibits onto the record?

12 MS. MORTAZAVI: No objections.

13 ALJ POIRIER: Hearing none, we shall  
14 move exhibits SED-220 and SED-221 into the  
15 record. Thank you.

16 (Exhibit No. SED-220 was received  
17 into evidence.)

18 (Exhibit No. SED-221 was received  
19 into evidence.)

20 ALJ POIRIER: Now, turning to  
21 Ms. Patel.

22 MS. PATEL: They're Ms. Bone's  
23 exhibits. I'll let her take the lead.

24 MS. BONE: Thank you, Ms. Patel.

25 Cal Advocates would like to move  
26 Exhibits CalPA-404, Public Advocates Response  
27 to Southern California Gas Company's First  
28 Set of Data Requests, January 24, 2020.

ALJ POIRIER: Please.

1 MS. BONE: And one more: Cal Advocates  
2 would like to enter into the record  
3 CalPA-405, Cal Advocates Supplemental  
4 Responses to Southern California Gas  
5 Company's First Set of Data Requests,  
6 February 11, 2020.

7 ALJ POIRIER: Thank you.

8 Do we have any objections to moving  
9 those exhibits onto the record?

10 MS. PATEL: No objections from  
11 SoCalGas.

12 ALJ POIRIER: Thank you.

13 So Exhibits Cal Advocates-404 and  
14 405 are moved into the record.

15 (Exhibit No. CalPA-404 was received  
16 into evidence.)

17 (Exhibit No. CalPA-405 was received  
18 into evidence.)

19 Anything else that we have to handle  
20 on the record?

21 (No response.)

22 ALJ POIRIER: Hearing none, we will go  
23 off the record.

24 (Off the record.) ]

25 (Whereupon, at the hour of 3:00  
26 p.m., this matter having been continued  
27 to Thursday, April 1, 2021, at 10:00  
28 a.m., via virtual proceeding, the  
Commission then adjourned.)

\* \* \* \* \*

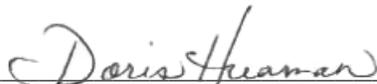
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BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE  
STATE OF CALIFORNIA

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EXECUTED THIS APRIL 01, 2021.

  
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CSR NO. 10538

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SHANNON ROSS  
CSR NO. 8916

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