

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA



FILED
04/09/21
04:59 PM

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
April 6, 2021
Pages 1497 - 1624
Volume 11

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VIRTUAL PROCEEDING

APRIL 6, 2021 - 10:02 A.M.

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ADMINISTRATIVE LAW JUDGE HECHT: We'll be on the record. The Commission will please come to order. This is day 11 of our hearings in Investigation 19-06-016 into Aliso Canyon and related matters.

We ended last week swearing in and getting attestations from Witness Healy. Today we are going to start the cross-examination with that witness. I did not hear of any housekeeping issues before we went on the record so I'll give you all one last quick chance. Any issues before we get going? All right. I see shaking of heads so I'm not going to belabor the point.

With that, I understand that Ms. Purchia will be doing the cross-examination today and you may begin when you're ready.

MS. PURCHIA: Thank you, your Honor. I'm sorry I'm experiencing a bit of technical problems here at the Commission today.

Mr. Healy, are you ready?

THE WITNESS: I am ready. I am not seeing you on my video, Ms. Purchia, but I am ready.

1 ALJ HECHT: Let's give it a moment. If
2 you change your view from the grid view to
3 the stage view and then back, that might help
4 because I can see Ms. Purchia so she is
5 connected, but I'd like you to be able to see
6 counsel.

7 THE WITNESS: Yes, your Honor. If I
8 change the layout I at least can now see
9 Ms. Purchia, so thank you.

10 ALJ HECHT: Okay. With that then, I
11 think we can begin. Thank you.

12 Ms. Purchia.

13 MS. PURCHIA: Okay. Thank you, your
14 Honor, and thank you, Mr. Healy.

15 GREGORY HEALY,
16 resumed the stand and testified further as
17 follows:

18 CROSS-EXAMINATION

19 BY MS. PURCHIA:

20 Q My name is Robyn Purchia, and I'm
21 an attorney with the Safety and Enforcement
22 Division in this proceeding. I'd like to
23 start by asking you a few initial questions
24 to build on the attestations you gave last
25 week.

26 Do you recall those attestations?

27 A I do, yes.

28 Q Are you alone?

1 A I am, yes.

2 Q Are you able to communicate
3 separately or privately with anyone outside
4 of the hearing while you testify today?

5 A I am not.

6 Q Do you consent to allow anyone to
7 record or in any way transcribe your
8 testimony in this proceeding?

9 A I do not, other than the court
10 reporter for the CPUC, who I understand would
11 be doing that.

12 Q Thank you. If any of the questions
13 I ask you this morning press your memory,
14 please feel free to say that you don't recall
15 or you don't remember; is that okay?

16 A Yes.

17 Q Okay. Now I want to ask you some
18 questions to develop a common understanding
19 of terms. When we talk about SED, can we
20 agree that we are referring to the Safety and
21 Enforce Division at the California Public
22 Utilities Commission?

23 A Yes.

24 Q When we talk about SoCalGas, can we
25 agree that we're referring to Southern
26 California Gas Company?

27 A Yes.

28 Q When we talk about the Aliso Canyon

1 facility, or Aliso, can we agree we're
2 talking about SoCalGas' Aliso Canyon Natural
3 Gas Storage Facility?

4 A Yes.

5 Q When we talk about SS-25, can we
6 agree we're talking about the Standard
7 Sesnon 25 well at the Aliso Canyon facility?

8 A Yes.

9 Q When we talk about the incident,
10 can we agree we are talking about the release
11 of gas from the SS-25 well that was
12 discovered beginning October 23, 2015?

13 A Yes.

14 Q And finally, when we talk about
15 DOGGR, or D-O-G-G-R, can we agree we are
16 talking about the Division of Oil, Gas, and
17 Geothermal Resources at the California
18 Department of Conservation?

19 A Yes.

20 Q Let's go to your reply testimony,
21 which is Exhibit SoCalGas-19.

22 And Mr. Zarchy is helping me today,
23 so if you could pull that out, I would
24 appreciate that. Great.

25 So this is Exhibit SoCalGas-19, the
26 Prepared Reply Testimony of Gregory Healy.
27 Let's go to the page with your witness
28 qualifications, which is on the last page

1 Bates Stamped Number SoCalGas-19.0013.

2 And, Mr. Zarchy, if we can scroll
3 up. Okay. Great. So at line 3 you say you
4 are employed by SoCalGas as a regulatory
5 business manager. Can you please describe
6 some of your responsibilities in that
7 position.

8 A Well, in that position today I
9 assist with case management of regulatory
10 proceedings primarily related to Aliso
11 Canyon, so this proceeding, I.19-06-016, as
12 well as a separate investigation, 17-02-002,
13 which is related to -- well, we refer to it
14 as SB 380 OII.

15 Q Okay. And with case management,
16 does that involve providing SoCalGas'
17 responses to SED's data requests?

18 A As a case manager, you would assist
19 in the coordination of those data responses
20 typically, so we would, you know, coordinate
21 with the relevant subject matter experts on
22 behalf of the company to address, you know,
23 whatever question may be directed to us in
24 those proceedings.

25 Q Okay. And then you provide
26 SoCalGas' data responses to SED; is that
27 correct?

28 A I would -- yeah, typically as -- in

1 the case management role, I would handle the
2 submittal of data responses to -- you know,
3 in the case of SED, I would handle that
4 submittal to them, yes.

5 Q And at lines 5 through 7, you say
6 that you received a Bachelor of Arts in
7 Political Science and a Master of Arts in
8 Public Administration; is that correct?

9 A That is correct.

10 Q Do you hold any other degrees?

11 A I do not.

12 Q Okay. Let's go to page 6 of your
13 reply testimony. It's Bates Stamp Number
14 SoCalGas-19.0008. Starting at line 14, okay,
15 you say, "The electronic production of the
16 hard copy well files was conducted by an
17 experienced third-party vendor who scanned
18 the individual well files as they are
19 maintained in the ordinary course of
20 business."

21 Do you see that?

22 A I do, yes.

23 Q When you say "hard copy well
24 files," do you mean the three well files for
25 SS-25, SS-25A, and SS-25 B?

26 A I think this specifically is
27 addressing the well file for well SS-25, so I
28 was speaking directly to the production of

1 that well file.

2 Q Okay. All right. Maybe we can
3 return to that, then. So you referenced a
4 third-party vendor in the singular. Is it
5 fair to say that there's only one-third party
6 vendor who scanned the hard copy SS-25 well
7 file?

8 A My understanding is that was
9 conducted by one vendor, yes. There may have
10 been different individuals on behalf of that
11 vendor but one vendor who performed that
12 function.

13 Q Okay. Thank you. And I guess we
14 can return to that question now. So you said
15 this is just the hard copy SS-25 well files,
16 but this is well files in the plural. Can
17 you explain that.

18 A Well, I think we're referring to --
19 I mean when you talk about a well file is --
20 is one thing. You know, each well at the
21 storage field has a well file, but obviously
22 there are many files within that well file.
23 I think it's just a reference to those well
24 files.

25 Q Okay. So you're saying that the
26 SS-25 well file had multiple files; is that
27 correct?

28 A There are multiple documents that

1 make up that well file, yes.

2 Q I'm just confused because you just
3 used well file in the singular again. I'm
4 trying to understand. When you say the
5 electronic production of the hard copy well
6 files, so are you saying that another
7 third-party vendor or -- you're not referring
8 at all to SS-25A or SS-25B in the sentence?

9 A No. I believe my testimony is just
10 addressing SS-25, the specific well file for
11 that well.

12 Q And were there records for SS-25A
13 and SS-25B in the hard copy SS-25's well
14 file?

15 MS. PATEL: Objection, your Honor.
16 This goes outside the scope of the witness'
17 testimony.

18 MS. PURCHIA: Well, I'm asking about
19 the well files that's in the sentence. I'm
20 just trying to understand his use of the
21 term, especially because he's using it in the
22 singular and the plural.

23 MS. PATEL: Well, I think you're
24 talking about the content of the well files
25 at this point and we have another witness,
26 Mr. Neville, who is addressing the content of
27 the well files.

28 ALJ HECHT: I'm going to overrule the

1 objection and say that the witness can answer
2 to the best of his ability. I will say that
3 I think we've had plenty of questions about
4 file and files and we should be moving on
5 shortly.

6 Please go ahead.

7 THE WITNESS: Sorry, Ms. Purchia.
8 Could I ask you to repeat the question then.
9 I think I might have lost track of the
10 question.

11 BY MS. PURCHIA:

12 Q Sure, Mr. Healy. I'll repeat it to
13 the best of my ability. I'm asking are there
14 records for the SS-25A and SS-25B wells in
15 the hard copy SS-25 well files?

16 A I don't know.

17 Q Okay. Do you know the name of the
18 third-party vendor who scanned the SS-25 well
19 files?

20 A I believe it's a company called
21 iDiscover.

22 Q Okay. Were you involved in the
23 contracting of the third-party vendor?

24 A I was not.

25 Q Were you personally -- have you
26 personally worked with a third-party vendor
27 before?

28 A Can you be more specific perhaps

1 with that question?

2 Q Sure. Have you worked with
3 iDiscover, or the third-party vendor who
4 scanned the SS-25 well files before they
5 started scanning the SS-25 well files?

6 A Not to my recollection, no.]

7 Q Okay. Did you check the resumes of
8 the individuals who scanned the SS-25 well
9 files?

10 A I did not.

11 Q Do you know any of the background
12 of the individuals who scanned the SS-25 well
13 files?

14 A I do not.

15 Q What is your basis for testifying
16 that the third-party vendor is experienced?

17 A I had conversations with -- our
18 outside counsel retained that vendor. My
19 understanding is that they were qualified to
20 perform that function.

21 Q Okay. So -- okay. Can you please
22 explain what you mean by, "In the ordinary
23 course of business," in the sentence of your
24 testimony?

25 A I am sorry. Which sentence are you
26 referring to?

27 Q Yes. So lines 15 and 16 when you
28 say that:

1 The well files as they are
2 maintained in the ordinary course
3 of business.

4 What do you mean by, "The ordinary
5 course of business"?

6 A I'm just referring to how that well
7 file exists in a physical fashion. So that
8 it was copied consistent with that format.
9 So the well file itself is actually, sort of,
10 this multidimensional file with, sort of, a
11 number of different subsections.

12 But, again, I was just referring to
13 the fact that that's how it's maintained and
14 it was copied consistent within that.

15 Q Okay. So your testimony uses the
16 present tense in the sentence, "Scanned the
17 well files as they are maintained in the
18 ordinary course of business."

19 Were the hardcopy SS-25 well files
20 scanned as they were maintained at the time
21 of the incident?

22 A I think this sentence is referring
23 to at the time that those were scanned,
24 which, again, was in if I recall correctly
25 somewhere around, you know, January or
26 February of 2016. So I think it's referring
27 to that. As they existed in that timeframe.

28 Q Okay. Okay. So if we could go up

1 to line 9 on that same page. Okay. You
2 state that:

3 SoCalGas carried out a deliberate
4 process to produce accurate and
5 complete electronic versions of
6 the hardcopy well files to SED and
7 produce them in an organized
8 manner.

9 Do you see that sentence?

10 A I do, yes.

11 Q So does this deliberate process
12 include scanning SS-25 hardcopy well files?

13 A I mean, the scanning would be part
14 of that effort in terms of providing an
15 electronic version to SED, which was what was
16 requested in the data request that we were
17 responding to, yes.

18 Q Who developed this process for
19 scanning the hardcopy well files?

20 A I don't know.

21 Q What did the process for scanning
22 the hardcopy SS-25 well files entail?

23 A I don't know.

24 Q How did the third-party vendor
25 obtain the hard copy SS-25 well files?

26 A I don't specifically know. But
27 they were -- you know, those vendors were on
28 site and I assume were provided access to

1 those files to make copies of it.

2 Q But you don't remember who provided
3 them access to those files?

4 A I do not, no.

5 Q Okay. Did the third-party vendor
6 have instructions on how to scan the hardcopy
7 SS-25 well files?

8 A I don't know.

9 Q Okay. Who gave -- okay. All
10 right. I'm just trying to understand your
11 use of the word "deliberate" there. Can you
12 explain why you use that word "deliberate"?

13 A I don't specifically recall why I
14 chose to use that word. But I think I'm just
15 reflecting the fact that, you know, again, my
16 understanding is they were given direction on
17 how to, you know, copy the documents that
18 they were asked to copy. And it was just
19 speaking to that direction and process.

20 One which I assume they're very
21 familiar with. This is a company, again, to
22 my knowledge who this is what they do. So I
23 assume understanding how to copy documents is
24 something they would be aware of and
25 understand how to do.

26 Q Okay. Was it your understanding at
27 the time that the SS-25 well file was a
28 sensitive well file?

1 MS. PATEL: Objection, your Honor. I'm
2 not sure what the characterization of
3 "sensitive" is intended to mean. But I think
4 the witness already testified the basis for
5 his knowledge, and he was not the one who
6 directly coordinated the scanning of the
7 files.

8 ALJ HECHT: Thank you.

9 I also found the question somewhat
10 unclear. If you can rephrase the question
11 with more clarity, that would be great.
12 Otherwise moving on.

13 MS. PURCHIA: I would be happy to, your
14 Honor.

15 Q Were you aware at the time that
16 there could be evidence in the SS-25 well
17 file related to an investigation?

18 A I don't recall thinking about that
19 at that time necessarily. I don't know. I
20 don't recall.

21 Q Okay. So you mentioned that the
22 third-party vendor scanned the hardcopy SS-25
23 well file on site; is that correct?

24 A That's my understanding, yes.

25 Q And by that, you mean SoCalGas's
26 property?

27 A I am sorry. I'm not sure I
28 understand. When you say "property," what

1 are you referring to there?

2 Q Was on site, do you mean on site at
3 SoCalGas?

4 A Sorry. Thank you. "On site," I
5 was referring to at the Aliso Canyon storage
6 field where those well files are maintained.

7 Q Okay. At any point, were you in
8 the room during the scanning of the hardcopy
9 SS-25 well file?

10 A Not that I recall, no.

11 Q So you were not able to observe the
12 scanning of the hardcopy SS-25 well files; is
13 that correct?

14 A Not that I recall, no.

15 Q Did other SoCalGas personnel
16 observe the scanning of the hard copy SS-25
17 well file?

18 A I don't know.

19 Q Did any SoCalGas counsel and that
20 includes SoCalGas personnel as well as those
21 serving under contract observe the scanning
22 of that hard copy SS-25 well file?

23 A I am sorry. I'm not sure I
24 understood the part of the question. I think
25 you were asking about counsel, but then you
26 were referring to personnel and contractors.
27 I'm not sure I understood what you're asking
28 about there.

1 Q Of course. I'm happy to clarify.
2 So I'm asking if any SoCalGas counsel -- that
3 would be in-house counsel or counsel from
4 another firm outside SoCalGas -- observe the
5 scanning of the hard copy SS-25 well file?

6 A I don't know whether they observed
7 it or not.

8 Q I'd like to introduce Exhibit
9 SED-246. And this is the response of
10 Southern California Gas Company to the Safety
11 and Enforcement Division's motion to compel
12 appearance and request for subpoena.

13 Do you see that?

14 A I do, yes.

15 Q And if we could go to the first
16 page. I just want to give it a little bit
17 more context. So if we could scroll down a
18 bit more. Okay. So this is filed
19 February 25th, 2021. I just want you to have
20 that timeframe.

21 So if we could go to the Bate Stamp
22 No. 24 -- well, I'll let you scroll down so
23 you know where you're going. So this is this
24 page with the Bate Stamp No. SED-246.008.

25 And in the first full paragraph
26 about mid-way, there's a sentence. Okay:

27 As per SED's request that SoCalGas
28 also produce SoCalGas personnel to

1 observe the scanning, based on
2 diligence conducted in the time
3 available prior to submitting its
4 response on shortened time.
5 SoCalGas does not believe any
6 SoCalGas personnel observed the
7 scanning of the SS-25 well file.

8 Do you see that?

9 A I do, yes.

10 Q So I'm taking your previous answers
11 to confirm that no SoCalGas personnel,
12 contractors, or representatives, observed the
13 scanning of the hardcopy SS-25 well file; is
14 that correct?

15 MS. PATEL: Objection, your Honor.
16 This misstates the witness's testimony. I
17 believe he answered all of those questions
18 with, "I don't know." Not that no one did.

19 ALJ HECHT: That is correct. Objection
20 sustained.

21 Please continue.

22 BY MS. PURCHIA:

23 Q Okay. So if you don't recall
24 whether any SoCalGas personnel, contractors,
25 or representatives, observed the scanning who
26 provided oversight of the scanning process?

27 MS. PATEL: Your Honor, I am going to
28 object again. The witness did not state that

1 he does not recall. He said he did not know.

2 ALJ HECHT: Yes. I do not really
3 understand the purpose of these questions.

4 Can we please get to that purpose or
5 move on?

6 BY MS. PURCHIA:

7 Q Sure. I'm trying to understand the
8 use of the words "deliberate process," the
9 phrase "deliberate process," in your
10 testimony, Mr. Healy.

11 And I'm just trying to understand
12 did anyone from SoCalGas provide oversight of
13 the scanning process?

14 A I don't know specifically. But,
15 again, they were retained. That company was
16 retained by our outside counsel to perform
17 those copy -- or documentation functions.

18 Q Okay. And did anyone from SoCalGas
19 observe the scanning?

20 MS. PATEL: Objection, your Honor.
21 Asked and answered.

22 ALJ HECHT: Objection sustained. That
23 has been asked and answered.

24 BY MS. PURCHIA:

25 Q Okay. Let's go back to your
26 testimony, SoCalGas-19. So this is page 6 at
27 line 9. Okay. I just wanted to see your
28 place -- the same place in your testimony

1 where you reference the deliberate process.

2 Did SoCalGas take any measures to
3 keep the site secure during the scanning of
4 the hardcopy SS-25 well file?

5 A And just to clarify by "site,"
6 you're referring to the Aliso Canyon storage
7 field I think that we discussed previously?

8 Q Well, was the -- did the scanning
9 just occur openly in the field? Or was it in
10 a specific location?

11 A Well, I mean to my -- I mean, there
12 are facilities at the storage field or there
13 were facilities at the time that I believe --
14 or at least to my recollection were used to
15 perform that copying function if you will.

16 Q Okay. Can we refer to it as a room
17 just so that we are on the same page; is that
18 fair?

19 A That would be fine, yes.

20 Q Okay. Did SoCalGas take any
21 measures to keep the room secure during the
22 scanning of the hardcopy SS-25 well file?

23 A I don't recall.

24 Q Okay. Did representatives from the
25 third-party vendor have to pass SoCalGas
26 security to access the rooms?

27 A I don't recall. I mean, there was
28 certainly security that would have provided

1 them access to the storage field in general.

2 But I don't know about beyond that.]

3 Q So at any point, did these
4 third-party vendor representatives have to
5 sign in, in order to access the room?

6 A I don't know.

7 Q Okay. How did the third-party
8 vendor produce this scanned hard copy SS-25
9 well files to SoCalGas?

10 A I don't know exactly how that
11 transmittal would have occurred.

12 Q So did you receive the scanned
13 copies?

14 A I don't recall receiving anything
15 directly from the vendor, no.

16 Q Did you receive anything from
17 anyone else at SoCalGas?

18 A To make sure I understand your
19 question, did I receive anything else from
20 anybody at SoCalGas?

21 Q I am trying to understand how the
22 scanned copies were produced to SED.

23 So, the scanners scanned the
24 copies. Did they -- did they transmit those
25 to you?

26 A I don't recall them transmitting
27 them to me directly, no.

28 Q Do you know who they transmitted

1 those copies to?

2 A I do not. No.

3 Q Who provided the copies to you?

4 A I actually don't believe that I
5 handled the submittal of this data response
6 to SED. So -- and I'm not sure at the time
7 that I received them, but I believe those
8 again were made by or, you know, the
9 documents were received by our outside
10 counsel who maintained them and, you know,
11 they were then produced from there.

12 Q If we could scroll down a little
13 bit, Mr. Zarchy, to the next page.

14 So at line three, you say, "Based
15 on my review of the well files in the format
16 in which they were produced by SoCalGas to
17 SED," when did you conduct this review?

18 A Well, I think I've had a number of
19 opportunities over the past, I guess five
20 years, to review those well file productions
21 to SED.

22 Q Okay. I just want to make sure I'm
23 understanding. So did you conduct your
24 review before they were produced to SED --
25 before the well files were produced to SED?

26 A No. It would have occurred after
27 that initial production to SED.

28 Q Okay. Do you know who inserted the

1 Bates numbers onto the scanned copies of the
2 SS-25 well fills that SoCalGas produced to
3 SED?

4 A I don't know specifically who would
5 have done that, but it would have been
6 coordinated through our outside counsel.

7 Q Okay. If we could scroll down,
8 Mr. Zarchy, to Footnote 18. It states:

9 The well files for SS-25 was
10 originally produced to SED in
11 response to a January 26, 2016
12 data request of SED and the
13 Division of Oil, Gas and
14 Geothermal Resources.

15 Do you see that?

16 A I do, yes.

17 Q And I would like to introduce
18 Exhibit SED-247.

19 So this is SED-247. It's SED and
20 DOGGR January 26th, 2016 Data Request. If we
21 could go to the first page; this has a Bates
22 stamp number of SED-247.001. Do you see
23 that?

24 A I do, yes.

25 Q Do you recognize this document as
26 SED and DOGGR's January 26, 2016 Data
27 Request?

28 A Yes. I mean without seeing the

1 rest of the pages, but, yes, I would agree
2 that that is consistent with that data
3 request.

4 Q Okay. And this is the data request
5 that you reference on page 7, Footnote 18, of
6 your reply testimony, correct?

7 A That's correct.

8 Q The due date for the response is
9 February 1st, 2016, correct?

10 A That's what's stated on this page.
11 It's requesting the response by February 1st,
12 2016, yes.

13 Q Okay. If we could go to the third
14 page of the document, please.

15 So this has a Bates stamp number of
16 SED-247.003. And Question A1 asks for all
17 well records for SS-25, right?

18 A That's correct, yes.

19 Q And if we could please go to the
20 5th page of the document. And so this is a
21 Bates stamp number of SED-247.005.

22 And, Mr. Healey, is this large
23 enough for you to see? Can you read the
24 questions I am referencing?

25 A Yes. That's a little better, but I
26 think I am hanging in there with the eyes.

27 Q Okay. Great. So Question 1 asks:

28 For well sites SS-25, S-25A, SS-25

1 provide any and all design and
2 construction records for since
3 well inception.

4 Do you see that?

5 A I do, yes.

6 Q So the question says, "well sites
7 SS-25, S-25A and SS-25," but I believe this
8 was intended to encompass SS-25, SS-25A and
9 SS-25B. Is that your understanding, too?

10 MS. PATEL: Objection, your Honor,
11 calls for speculation. The witness didn't
12 draft the document.

13 ALJ HECHT: The witness can answer to
14 the best of her ability.

15 THE WITNESS: I can't speak to what the
16 intent of this question was. I mean my
17 recollection was that the data request, yeah,
18 in general dealt with questions regarding
19 wells SS-25, SS-25A and SS-25B, you know. So
20 I think those were the three wells that were
21 largely addressed by the data request.

22 BY MS. PURCHIA:

23 Q Thank you, Mr. Healy. I think
24 perhaps SoCalGas' understanding is better
25 conveyed through our next exhibit.

26 I would like to introduce SED-248,
27 please. Okay. So this is SED-248, SoCalGas'
28 Response to SED and DOGGR, January 26, 2016

1 Data Request.

2 And if we could scroll down a bit
3 so you can see the first page. This has a
4 Bates stamp number. Let me just read that
5 into the record. SED-248.001.

6 And do you recognize this document
7 as SoCalGas' response to SED's January 26,
8 2016 data request that you mention in
9 Footnote 18 of your reply testimony?

10 A Yes. I believe this was SoCalGas'
11 first response to that data request. I
12 believe this one was dated February 5th,
13 2016. Yes.

14 Q Okay. Thank you. Okay. So
15 Question A1 on the bottom of this page
16 requests all well records for SS-25, correct?

17 A That's correct.

18 Q And the response says:

19 See enclosed electronic document
20 production set for copies of all
21 documents comprising the active
22 SS-25 well file documents Bates
23 range AC_CPUC_0000023 to AC_CPUC
24 0000795.

25 Is that right?

26 A Yeah. That is what Response 1
27 says, yes.

28 Q Would you please remember these

1 pages 23 to 759 for me? Is that okay?

2 A Are you asking me to remember --

3 MS. PATEL: Objection, your Honor.

4 (Crosstalk.)

5 MS. PURCHIA: I am just asking the
6 witness to make a note of these pages 23 to
7 75 -- 759, so he can then recall them later
8 in the cross-examination.

9 MS. PATEL: And that is not a question.

10 ALJ HECHT: I am confused. Please
11 continue and be clear with the questions.

12 MS. PURCHIA: We can move on.

13 Q Questions C1, if we could scroll to
14 that page, Mr. Zarchy, so this has a Bates
15 stamp number SED-248.005. If we can scroll
16 up to the C1. So this one it says:

17 For well sites SS-25, S-25A,
18 SS-25B provide any and all design
19 and construction records for since
20 well inception.

21 Do you see that?

22 MS. PATEL: Your Honor, I'm going to
23 object again here. And this is an objection
24 that we had noted last night to SED. A lot
25 of these documents are talking broadly about
26 well records. And the witness' testimony is
27 specifically about the hard copy well file
28 for SS-25. So this goes far outside the

1 scope of his testimony.

2 ALJ HECHT: Objection sustained. We're
3 going to stay within the scope of this
4 testimony.

5 MS. PURCHIA: Okay. Your Honor, if I
6 could just raise a point with that. When
7 your Honors denied SED's motion to compel
8 appearances, you stated that if SoCalGas'
9 witnesses are unable to address questions on
10 the scanning of SS-25 well files, that
11 inability would go to weight of SoCalGas'
12 testimony.

13 Your Honors also denied SED's motion
14 to strike Mr. Healy's testimony on the basis
15 that SED can cross-examine him as to the
16 veracity and credibility of his assertion.

17 This is an opportunity for Mr. Healy
18 to provide those answers. And his testimony
19 was not specific as to SS-25. It said, "well
20 records."

21 MS. PATEL: I'd like to respond to
22 that, if that's okay, your Honor.

23 ALJ HECHT: Yes, please.

24 MS. PATEL: The reply testimony that
25 Mr. Healy had provided in this proceeding
26 goes to the violations that are alleged. I
27 believe he quotes it, if they could go back
28 to Exhibit SoCalGas-19. He quotes the

1 violation that is identified in SED's opening
2 testimony and the violation is specifically
3 about the SS-25 hard copy file -- hard copy
4 well file.

5 MS. PURCHIA: And just to respond to
6 that, your Honor, there are violations
7 regarding SS-25A well file and SS-25B well
8 file.

9 ALJ HECHT: Yes. 25A and 25B are
10 within the scope. Please continue.

11 MS. PURCHIA: So, your Honor, just for
12 clarification, I'm sorry. Should I be asking
13 -- can I ask a question about Question C1
14 here to Mr. Healy?

15 ALJ HECHT: I'm sorry. We'll be off
16 the record.

17 (Off the record.)]

18 ALJ HECHT: We'll be back on the
19 record. The last question that we had
20 related to the data response that we are
21 looking at, Question C1, this addresses well
22 sites SS-25, 25A, and 25B. The witness can
23 answer that question to the best of his
24 ability within the context of his testimony.

25 MS. PURCHIA: Thank you, your Honor.

26 Q Mr. Healy, would you like me to
27 repeat the question?

28 A Yes, please.

1 Q Okay. Question C1 asks, "For well
2 sites SS-25, SS-25A, SS-25B, provide any and
3 all design and construction records for since
4 well inception."

5 Do you see that?

6 A I do, yes.

7 Q And then the response refers to A1;
8 correct?

9 A Well, it begins with a reference to
10 A1 and then continues but, yes.

11 Q Thank you for that clarification.
12 Yes, it begins with a reference to A1 and
13 then to continue, it says, "As to well
14 SS-25A, please see enclosed electronic
15 document production set for the active well
16 file associated with well SS-25A, Bates range
17 AC_CPUC_0000001 to AC_CPUC_00000011 --"

18 And to make this move a little bit
19 faster, I'll make my reading of the Bates
20 numbers a little bit faster. After that it
21 says, and pages 760 to 1198.

22 Do you see that?

23 A I see that portion of the response,
24 yes.

25 Q And the next portion, it says, "As
26 to well SS-25B, please see enclosed
27 electronic document production set for the
28 active well file associated with well

1 SS-25B," and again I'll provide the shortened
2 response, pages 12 to 22 and pages 1199 to
3 1587.

4 Do you see that?

5 A I do, yes.

6 Q The rest of SoCalGas responses to
7 SED's questions in this data request are
8 either blank or refer back to SoCalGas'
9 Response to Questions A1 and C1.

10 Would you agree subject to check?

11 A No, I don't think I'm comfortable
12 agreeing to that without a review of that
13 document with the entire response.

14 Q Okay. If we could return to the
15 first page with the Bates Stamp Number --
16 I'll just wait until you get there --
17 SED-248.001, does it indicate on this page
18 when SoCalGas provided this response?

19 And, Mr. Zarchy, if you could
20 scroll up a little bit, sometimes the
21 response date is at the top.

22 Do you see your response date here,
23 Mr. Healy?

24 A I do not, no.

25 Q Do you happen to recall when
26 SoCalGas provided this response?

27 A Yes, I believe it was February 5,
28 2016.

1 Q Do you agree that the February 5th
2 response date is after the February 1st due
3 date that SED and DOGGR provided in their
4 January 26th request?

5 MS. PATEL: Objection, your Honor. I
6 don't see the relevance of this question to
7 the witness' testimony.

8 ALJ HECHT: I don't see the relevance
9 of it either. Can you please move on.

10 MS. PURCHIA: Sure.

11 Q I'm trying to ascertain why was
12 SoCalGas unable to scan one well file by
13 February 1, 2016?

14 ALJ HECHT: Okay. If that is your
15 question, then the witness can address that
16 question.

17 THE WITNESS: I'm sorry, Ms. Purchia,
18 just to make sure I understand it, could you
19 repeat that question again.

20 BY MS. PURCHIA:

21 Q Of course, Mr. Healy. Why was
22 SoCalGas unable to scan one well file by
23 February 1, 2016?

24 A I don't know what well file you're
25 referring to and I don't know the answer to
26 that question.

27 Q I'm referring to the SS-25 well
28 file. Does that help you answer the

1 question?

2 A No, I don't recall.

3 Q Okay. Did SoCalGas provide a
4 response to SED and DOGGR's January 26, 2016,
5 data request before it provided this
6 response?

7 A My recollection, this was the first
8 I guess what I would call substantive
9 response, but I believe there was some
10 communications with SED, and I assume with
11 DOGGR as well, as this was a joint data
12 request, regarding the ability to meet that
13 February 1st timeline.

14 Q Okay. Did you provide the response
15 you're looking at here in Exhibit SED-248 to
16 SED?

17 A I don't believe that I submitted
18 the original response. No, I don't.

19 Q Okay. Did SoCalGas supplement its
20 response to SED and DOGGR's January 26, 2016,
21 data request?

22 A Yes, we did.

23 Q Do you happen to recall how many
24 times SoCalGas supplemented its response to
25 SED and DOGGR's January 26, 2016, data
26 request?

27 A I don't recall in its entirety.
28 It's a fairly lengthy data request. I'm not

1 sure how many specific questions are in here,
2 but there's quite a few. I know that we had
3 an initial response on February 5th; I
4 believe a second one on February 18, 2016, if
5 I recall; and then one on March 18, 2016,
6 that I think sort of represented our complete
7 initial response to this data request.

8 And then I do recall I think there
9 was some other supplemental responses to
10 various parts of this data request, you know,
11 after those dates.

12 Q Thank you, Mr. Healy. So maybe
13 this would just help a little bit if we could
14 introduce Exhibit SED-249. This is an e-mail
15 from you, Gregory Healy, to Kenneth Bruno.
16 It's regarding the Aliso Canyon Data Request
17 Master Document Index, the date is 6-3-19.
18 Could you go to the first page. This has
19 Bates Stamp Number SED-249.001. And again,
20 it's an e-mail from you, Gregory Healy, to
21 Kenneth Bruno, Randy Holter, Nicholas Sher,
22 Darryl Gruen, Maria Solis.

23 Do you see that?

24 A I do, yes.

25 Q And Mr. Bruno, Mr. Holter,
26 Mr. Sher, Mr. Gruen, and Ms. Solis are
27 representatives of SED; is that correct?

28 A Yes, and they were all involved

1 with, you know, with the Aliso-Canyon-related
2 matter at that point in time, yes.

3 Q Okay. And do you see the
4 attachment? It says, "SED Aliso Canyon Data
5 Request Master Document Index 060319.xlsx"?

6 A I do see that, yes.

7 Q The ".xlsx" indicates that it is a
8 Microsoft Excel document; correct?

9 A My understanding is that reflects
10 it's an Excel document, yeah. I don't know
11 if Microsoft owns or operates Excel or not.

12 Q Thank you. So as the regulatory
13 business manager, you produce SoCalGas' data
14 responses to SED typically; is that correct?

15 A I submit data responses associated
16 with the matters I'm working on, yes.

17 Q Okay. So you would have
18 information that may help SoCalGas create an
19 index of SED's data request and the dates on
20 which SoCalGas responded for the Aliso Canyon
21 proceeding; is that correct?

22 A Yeah, I think that's fair to say in
23 my role that I would have information that
24 would be relative to that, yes.

25 Q Did you help create the master
26 document index that was attached to this
27 e-mail?

28 A I believe that is provided in that

1 other exhibit. Can I see that document,
2 again?

3 Q Of course, yes. Let's go to the
4 Master Document Index. It's exhibit -- I'd
5 like to introduce Exhibit SED-250. So this
6 is SED-250, Master Document Index, 16.3.19.
7 This is the entry for 2016.0126.DR 01. If we
8 could go to the first page, please. This is
9 Bates Number SED-250.001.

10 So besides it being a PDF version,
11 do you recognize this document as part of the
12 Master Document Index that was attached to
13 your June 3, 2019, e-mail to SED?

14 A I mean it would appear to be
15 consistent with those Master Document
16 Indexes. We provided those on a weekly basis
17 to my recollection for I think a couple
18 years, and then it may have eventually
19 shifted into something that was provided
20 monthly, but -- so there were a lot of them
21 provided, but this appears to be consistent
22 with that index, although, again, we did
23 provide the index in an Excel format, which I
24 believe is how SED requested it. And this
25 appears to be a PDF version of that, which I
26 don't believe I created the PDF version but
27 somebody did.

28 Q Thank you for that. So going to

1 the far left column, it says, "SED DR Date,"
2 and then the entries under that are
3 "1-26-2016."

4 Do you see that?

5 A Yeah, I mean I see that through
6 Question A-4 on this page, yes.

7 Q Okay. Do you also see the heading
8 "Question No." and "Question" to the right of
9 that?

10 A Yes.

11 Q And the second entry beneath
12 "Question No." on the first page says "A1";
13 right?

14 A That's correct.

15 Q And the description to the right
16 reads "All well records"; correct?

17 A Yes.

18 Q Okay. So based on this information
19 you reviewed, would you agree that this is a
20 spread sheet with an index to the questions
21 in SED and DOGGR's January 26, 2016, data
22 request and SoCalGas' responses?

23 A Again, subject to review of the
24 other I guess nine pages in this document,
25 but, yes, that appears to be representative
26 of the index of that data request -- data
27 request and responses.

28 Q Okay. And do you see the column on

1 the far right entitled "Response Date"?

2 A Yes.

3 Q And, I'm sorry, Mr. Zarchy, could
4 you zoom in a little bit. It's a little hard
5 to see. Okay. Just scrolling to the right.
6 Little bit more. Okay.

7 So it indicates the first response
8 date of February 5th, 2016.

9 Do you see that?

10 A I do, yes.

11 Q If we scroll a little bit to the
12 left, you can see the Bates numbers 23 to
13 759; correct?

14 A That's correct.

15 Q So do you agree that the SoCalGas
16 response we looked at in Exhibit SED-248 was
17 provided to SED on February 5, 2016?

18 MS. PATEL: Your Honor, I'm going to
19 object here again. I think there seems to be
20 a fundamental confusion between hard copy
21 well file, which is what the witness'
22 testimony is about, and this data request
23 which asks for well records.

24 ALJ HECHT: I think that that is a
25 reasonable concern, and I'd really like to
26 know the relevance of these questions to the
27 testimony of Mr. Healy.

28 MS. PURCHIA: Sure. I'm happy to

1 provide the relevance. So we have -- SED has
2 alleged violations against SoCalGas for
3 improper record keeping for wells SS-25 well
4 files, SS-25A, and SS-25B. These form the
5 basis for four violations, Violations 327 to
6 330.

7 Mr. Healy's testimony disputes this
8 conclusion. He says that there was a
9 deliberate process, but SoCalGas has provided
10 multiple responses. I'm trying to figure out
11 if their deliberate process that SoCalGas
12 undertook to scan or provide its well records
13 was for each of these supplemental responses.

14 MS. PATEL: Yeah, and as I noted
15 before, your Honor, we actually have had
16 three different witnesses provide testimony
17 on the record keeping violations, of which
18 there are four. Mr. Healy's testimony
19 specifically goes to the violation that
20 states that the SS-25 hard copy well file was
21 disorganized and he is rebutting that. His
22 testimony does not go to SS-25A or B --

23 MS. PURCHIA: He uses --

24 (Crosstalk.)

25 ALJ HECHT: Stop. Too much crosstalk.
26 We'll be off the record.

27 (Off the record.)

28 ALJ HECHT: We'll be back on the

1 record. I am trying to figure out what the
2 underlying issue is here and I think that
3 there is some confusion about whether the
4 phrase "well file" refers to a particular
5 well file or a well file having to do with a
6 particular well or to all records having to
7 do with that. So I am asking the witness
8 what he intended by the use of the phrase.

9 THE WITNESS: Yes, your Honor. I
10 think, you know, my testimony is speaking to,
11 you know -- is responding to SED's testimony
12 but specific to the well file for SS-25.
13 But, again, that well, you know -- what we
14 refer to as a well file is -- so essentially
15 there's one well file for each well, but
16 obviously those well files consist of
17 documents that may be part of that well file.
18 Anyway, that's how I'm referring to well file
19 and well files in the context of my testimony
20 based on my understanding.

21 ALJ HECHT: Thank you. I note that
22 this is a little bit unorthodox, the way that
23 I'm approaching it. I will point out that
24 SED had originally reserved 15 minutes for
25 this witness and we've been going for about
26 an hour. These questions seem to be somewhat
27 repetitive. I would like to hear what the
28 witness has to say and take that answer and

1 then move on. So the witness has explained
2 what he means. You can continue with your
3 further questions. We'll go another 10 or
4 15 minutes and then we will take a break.

5 MS. PURCHIA: Thank you, your Honor.

6 ALJ HECHT: Thank you.

7 Ms. Purchia.

8 BY MS. PURCHIA:

9 Q So, Mr. Healy, just to return to
10 this page, if we could zoom out a little bit
11 so I can get my bearings again. So if we
12 look at the question for A1, it says,
13 "Detailed Well Data - 'Standard Sesnon,' all
14 well records."

15 Do you see that?

16 A Well, yes, but I think those are
17 sort of two different -- I mean the A -- the
18 first line, "A. Detailed Well Data," was a
19 sort of heading of that section and then the
20 question is A1 referring to "All well
21 records."

22 Q Okay. So with the heading,
23 "Detailed Well Data - 'Standard Sesnon' 25,"
24 could the question "All well records" be
25 referring to that well?

26 A Yeah, I mean my understanding is
27 that Question A1 is referring to well SS-25,
28 yes.

1 Q Thank you. So scrolling to the
2 right, there's four different response dates
3 for this question; correct?

4 A That's correct.

5 Q You see February 5, 2016, at the
6 top; and then June 3rd, 2016; then
7 November 18, 2016; and March 11, 2019; is
8 that correct?

9 A Those are the four dates listed,
10 yes.

11 Q Did SoCalGas locate additional hard
12 copy records from the SS-25 well file after
13 it provided its initial response on
14 February 5, 2016?

15 MS. PATEL: Objection, your Honor. The
16 question assumes that this question is asking
17 solely for hard copy records.

18 MS. PURCHIA: That's what it's asking
19 under A1.

20 MS. PATEL: The question asks for well
21 records. It doesn't say anything about a
22 hard copy well file or hard copy records.

23 ALJ HECHT: All right. We are back to
24 the confusion between well file and well
25 records. What I am understanding is that
26 there is a well file, that well file contains
27 well records. It seems like there may be
28 some confusion about whether well records are

1 contained only in that well file, at least
2 that's where I have gotten to based on this
3 questioning.

4 I don't think that this has to be
5 such a long, drawn-out process. I'm going to
6 overrule the objection, but I am not really
7 seeing the relevance of this and I would like
8 people to at least try to speak the same
9 language.

10 MS. PATEL: Your Honor, we do have
11 another witness who has provided testimony on
12 well records.

13 ALJ HECHT: And which witness is that?

14 MS. PATEL: That's Mr. Neville.

15 ALJ HECHT: Okay. And we have a lot of
16 time with Mr. Neville reserved for future
17 days probably in our next set of hearings in
18 May.

19 MS. PURCHIA: Your Honor, if I could
20 speak to that. Mr. Healy did -- his
21 testimony is on the scanning of these well
22 files and I'm -- or the well file, and I'm
23 trying to understand why SoCalGas provided
24 supplemental responses with additional pages.

25 ALJ HECHT: Okay. And we can get an
26 answer to that question to the extent that
27 the witness knows the answer, and then we
28 will move on. Again, I feel like these

1 questions have been asked and talked around
2 for quite a while. I think the problem is
3 one of underlying language.

4 Yes, Ms. Patel.

5 Did we have a statement from
6 Ms. Patel or shall we move on? Or did you
7 lose my audio? You may have lost my audio.

8 ALJ POIRIER: No, it sounds like
9 Ms. Patel's audio. She's not able to
10 communicate.

11 ALJ HECHT: Okay. Thank you. Then we
12 will take our break now rather than in 10
13 minutes. We will take a break until 11:30.
14 We will be off the record.

15 (Off the record.)]

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

18 We took a 15-minute break to deal
19 with some technical problems, which several
20 of us have had unfortunately. I am going to
21 ask a couple of questions about schedule and
22 timing before we continue with
23 cross-examination.

24 So my understanding was that
25 initially the cross for Mr. Healy was
26 supposed to be short. And the most recent
27 schedule that I saw, Mr. Healy is finishing
28 at lunch. Is that still what you intend?

1 MS. PURCHIA: That is my goal, your
2 Honor, yes. We just have a few more lines of
3 questioning left.

4 ALJ HECHT: Okay. Then we will start
5 with Mr. Sera after lunch. And it is my hope
6 that we do get that far.

7 I am going to ask that people be
8 more efficient in the questioning and in the
9 responses. If you have questions you want to
10 get to, please get to them. We could be here
11 for a very, very long time. And we will
12 actually be here for a very long time, and
13 that's fine. But I don't think it needs to
14 be longer than it takes to actually get the
15 answers to the questions that are important.

16 So, yes, Ms. Patel?

17 MS. PATEL: Thank you. Your Honor,
18 does Cal Advocates still have questioning
19 with Mr. Healy?

20 ALJ HECHT: Good question.

21 Ms. Bone, do you still have
22 questions for Mr. Healy?

23 MS. BONE: At this point, I don't
24 anticipate questions. It will depend on how
25 the rest of the cross-examination goes.

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

28 Yes, Ms. Patel?

1 MS. PATEL: I assume that, you know,
2 when we do Mr. Healy's redirect whether it's
3 before lunch or after lunch depends how long
4 this goes.

5 ALJ HECHT: Okay. Thank you. I don't
6 want to go past 12:30 before we take a lunch.
7 Hopefully we will finish by then. It's
8 unlikely that we would finish redirect before
9 then it looks like. But we'll do it whenever
10 we get there.

11 All right. any other questions?

12 (No response.)

13 ALJ HECHT: No. I don't see any.

14 Ms. Purchia, please continue with
15 cross-examination.

16 BY MS. PURCHIA:

17 Q Thank you, your Honor --

18 MR. ZARCHY: this is Daniel Zarchy from
19 SED. Can IT give me back the presenter
20 control?

21 ALJ HECHT: Yes. That is a good idea
22 speaking of --

23 MR. ZARCHY: All right. I have it.
24 Thank you.

25 ALJ HECHT: Okay.

26 BY MS. PURCHIA:

27 Q Mr. Healy, are you ready?

28 A I am, yes.

1 Q I'd like to go -- sorry. I'd like
2 to introduce Exhibit SED-257. And going to
3 the first pages please, Mr. Zarchy. Do you
4 recognize this -- sorry. Sorry, yes. The
5 Bates Stamp No. Is SED-257.001. And if you
6 could scroll up, please.

7 Do you recognize this document as
8 SoCalGas's response to SED's data
9 request-129?

10 A Yes. It appears to be that, yes.

11 Q Okay. If we could jump to question
12 9 please, Mr. Zarchy. Okay. And the Bate
13 Stamp No. on this page is SED-257.006. And
14 the question asks:

15 Did SoCalGas personnel or
16 contractors scan documents in each
17 well file in the exact order as
18 the documents were kept in
19 hardcopy well file.

20 Do you see that?

21 A I do see that question, yes.

22 Q And if we could go to the answer on
23 the next page.

24 Mr. Zarchy, do you want to scroll
25 down so I can read the Bates Stamp No. Into
26 the record. So it's SED-257.007.

27 So here SoCalGas refers to
28 Section 5 of your reply testimony; is that

1 correct?

2 A Response 9 does refer to that
3 section, yes.

4 Q Okay. Can you answer whether the
5 January 2016 -- sorry. The January 26, 2016
6 hardcopy well file were scanned in the same
7 order as they were in October 23rd, 2015?

8 MS. PATEL: Your Honor, I'm going to
9 object here. This question is internally
10 inconsistent because we just discussed how
11 the well file was scanned in early 2016. And
12 Ms. Purchia is asking whether it was scanned
13 as maintained on October 23rd, 2015.

14 ALJ HECHT: Please restate your
15 question more clearly, Ms. Purchia.

16 BY MS. PURCHIA:

17 Q Sure. I'd like to understand,
18 Mr. Healy, whether the file that was scanned
19 in response to SED and DOGGR's data request
20 on January 26, 2016, reflected the SS-25
21 hardcopy well file as it existed
22 October 23rd, 2015?

23 A My understanding is that -- that --
24 I don't recall exactly when the well file was
25 scanned. Obviously at some point prior to
26 February 5th when it was provided -- February
27 15th, 2016 when it was provided to SED. But
28 I think that it represents the well file that

1 was scanned, you know, that existed at that
2 time that it was scanned.

3 Q Okay. So can you answer whether
4 the file that existed as it -- when it was
5 scanned was the same as it existed on
6 October 23rd, 2015?

7 A I don't think I can say
8 specifically that it was exactly consistent
9 with how it existed on October 23rd, 2015.
10 But I believe it was -- would have been
11 consistent with what existed on that date,
12 yes.

13 Q Okay. And was the hard copy SS-25
14 well file scanned in the same order as it was
15 on February -- you know, between January 26th
16 and February 5th, 2016?

17 MS. PATEL: Objection. This assumes
18 facts not in evidence. I don't think that
19 Mr. Healy indicated that he's aware that the
20 file was scanned during that time period. He
21 said sometime before.

22 ALJ HECHT: Could you please restate
23 your question more clearly?

24 And I'm going to reiterate. If
25 there is a place where you're going, please
26 get there quickly rather than slowly. The
27 foundational questions are only helpful up to
28 a point. And at a certain point, they are

1 stalling us and making it difficult for us to
2 make progress on --

3 (Crosstalk.)

4 ALJ HECHT: Ms. Purchia.

5 MS. PURCHIA: Thank you, your Honor. I
6 am sorry.

7 Q So the question in -- Question 9
8 asks -- if we could scroll up, Mr. Zarchy.

9 Did SoCalGas personnel or
10 contractors scan documents in each well file
11 in the exact order as the documents were kept
12 in the hardcopy well file? Can you answer
13 that question, Mr. Healy?

14 A Yes. I believe that they were.
15 Again, I think I previously mentioned that
16 the hardcopy well file is, sort of, a
17 multidimensional file. It's got a number of
18 different, sort of, folder and tabs in it.

19 So, you know, the order of it, you
20 know, I guess, could be interpreted. But I
21 believe that what we provided as an
22 electronic well file, which were essentially
23 individual PDFs of those documents is
24 representative of the hardcopy well file that
25 existed at that time and that the documents
26 were provided in an order consistent with
27 that hardcopy well file.

28 Q Thank you, Mr. Healy. I'll move on

1 to my last line of questioning. So let's go
2 to Exhibit SED-258, please. And if we could
3 scroll down, please Mr. Zarchy.

4 Just -- okay. So the Bates Stamp
5 No. Is SED-258.001. And go to the top.

6 Do you recognize this document as
7 SoCalGas's response to SED Data Request-143?

8 A It appears to be that. At least
9 the first page of that response, yes.

10 Q Okay. And if we could go to
11 Question 1 on the bottom of the first page.
12 It references a letter from SoCalGas's
13 outside counsel, Latham & Watkins to Boots &
14 Coots. And if we could scroll down to the
15 next page, Mr. Zarchy. Okay.

16 The letter -- the question quotes a
17 portion of the letter that states:

18 That we request that Boots -- that
19 B&C take steps to preserve all
20 documents and other evidence that
21 relates to well SS-25 and to
22 SoCalGas and its consultants'
23 response to the leak.

24 Do you see that?

25 MS. PATEL: Your Honor, I'm going to
26 object to this. This has absolutely nothing
27 to do with the hardcopy well file for SS-25.

28 MS. PURCHIA: Your Honor, I can shorten

1 this.

2 ALJ HECHT: All right. Seeing it might
3 have possible relevance, please keep it
4 short.

5 BY MS. PURCHIA:

6 Q Okay. Mr. Healy, were you told to
7 preserve the hardcopy SS-25 well file as it
8 existed on October 23rd, 2015?

9 MS. PATEL: Your Honor, I am going to
10 object to that request. This assumes that
11 Mr. Healy is the custodian of the well file.

12 As I mentioned before, we've had
13 another witness provide testimony on the well
14 file and that witness is the one who is
15 appropriate to address this question.

16 ALJ HECHT: If he is not the custodian
17 of the well file, he can answer. I think it
18 was a factual question that he can answer.
19 Its relevance may be questionable.

20 BY MS. PURCHIA:

21 Q Would you like me to repeat the
22 question, Mr. Healy?

23 A Yes. If you could, please.

24 Q Were you told to preserve the
25 hardcopy SS-25 well file as it existed on
26 October 23rd, 2015?

27 A I was the recipient of legal hold
28 orders, you know, from our company that dealt

1 with the retention of you know, various forms
2 of, I guess, data related to Aliso Canyon. I
3 don't recall if SS-25 -- the SS-25 well file
4 was specifically referenced in those legal
5 hold orders although I assume it would have
6 been in some way either specifically or by
7 the documents that are maintained in it.

8 But, again, I'm not the company's
9 custodian or owner of the SS-25 well file.
10 But, again, I certainly did receive legal
11 hold orders subject to the Aliso Canyon
12 incident.

13 Q Just one more question then,
14 Mr. Healy. Did you preserve the SS-25 well
15 file as it existed on October 23rd, 2015?

16 MS. PATEL: Same objection, your Honor.

17 MS. PURCHIA: I'm just trying to
18 understand if he made any changes to it.
19 That's it. During the course of scanning.

20 ALJ HECHT: Then please ask the
21 question.

22 BY MS. PURCHIA:

23 Q Did you modify the hardcopy SS-25
24 well file, Mr. Healy?

25 MS. PATEL: Objections again.
26 Mr. Healy stated he was not personally
27 involved in the scanning of the well file nor
28 is he the custody of the well file.

1 ALJ HECHT: He did state that. What is
2 the relevance of this question?

3 MS. PURCHIA: His testimony speaks to
4 the scanning of the SS-25 well file. I'm
5 just trying to understand if it was modified
6 in any way between October 23rd, 2015, and
7 the time when it was scanned.

8 ALJ HECHT: Thank you. The witness can
9 answer the question to the best of his
10 ability for what that is worth.

11 I still believe that we are walking
12 around some questions that should be asked
13 directly so that we can move on.

14 Ms. Purchia.

15 BY MS. PURCHIA:

16 Q Mr. Healy, did you modify the hard
17 copy SS-25 well file between October 23rd,
18 2015, and the time when it was scanned?

19 A I did not.

20 Q Thank you.

21 MS. PURCHIA: Thank you, your Honor.
22 That concludes my cross-examination.

23 ALJ HECHT: Thank you very much.

24 And I will ask whether the Public
25 Advocate's Office has any cross or if the
26 Public Advocate's Office wants to take a
27 minute or two off the record to find that
28 out.

1 MS. BONE: Your Honor, Cal Advocates
2 has no cross for this witness.

3 ALJ HECHT: All right. Then I'm
4 inclined to give Ms. Patel 10 minutes to get
5 her redirect ready and then we will come
6 back.

7 Ms. Patel, how much redirect do you
8 think that you have? I'm trying to figure
9 out if we can finish it before lunch.

10 MS. PATEL: I think we can finish it
11 before lunch assuming that you would like to
12 finish by 12:30 or so.

13 ALJ HECHT: Yeah. If it was going to
14 go much past that, I would take the break on
15 the earlier side.

16 With that we will take a 10-minute
17 break until 11:55.

18 We'll be off the record.

19 (Off the record.)

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

22 We took a 10-or-so minute break.
23 And we are picking up now with the redirect
24 of Witness Healy.

25 So, Ms. Patel, please proceed.

26 MS. PATEL: Thank you, your Honor.

27 Q Mr. Healy, Ms. Purchia asked you
28 about a data request from SED dated

1 January 26, 2016. Do you have an
2 understanding for what was happening at Aliso
3 Canyon during that time?

4 A Well, yeah, during that time, I
5 mean, the SS-25 incident -- so the release at
6 well SS-25 was still ongoing. And there was
7 obviously a lot of combined efforts ongoing
8 at the field to control that release at that
9 well at that time.

10 Q And Ms. Purchia also referred to a
11 March 2019 document production made in
12 response to the January 26, 2016, data
13 request. What did that production entail?

14 A I think the March 2019 production
15 that was responsive to Question A 1 consisted
16 of some well-related records in well SS-25
17 that had also been provided to Blade Energy
18 at that -- around that same time associated
19 with their root cause analysis work and data
20 request that we received from them as well.

21 So in order to be consistent I
22 think with the information that was being
23 provided to both Blade, the CPUC, and Safety
24 and Enforcement Division, and DOGGR that that
25 response was supplemented at that time as
26 well to SED and DOGGR.

27 Q And the hardcopy well file that
28 your testimony refers to for SS-25, was that

1 hardcopy well file available for SED to
2 review?

3 A Yes. My recollection is it was
4 made available to SED to review. You know, I
5 think we had some communications.
6 Ms. Purchia spoke earlier by the response due
7 date of February 1st, 2016, for that
8 January 26, 2016, data request. We had some
9 communications with their -- SED's counsel at
10 that time about the time that would be
11 necessary to begin to provide responses to
12 that data request and that we would do so on
13 a rolling basis as we were able to make that
14 information available. But that part of that
15 would also obviously to the extent that SED
16 wanted they could have access to review the
17 hardcopy well files as well.

18 And then I believe there was a
19 request -- I want to say November of 2019, I
20 believe, when Margaret Felts became the
21 witness in this matter -- in this regulatory
22 proceeding, I. 19-06-016 to review -- if my
23 recollection is correct, initially she was
24 intending to review the hardcopy well files
25 and then decided not to. Instead reviewed
26 some of our electronic databases with
27 well-related records in them, and we did
28 provide that for her at that time.

1 ALJ HECHT: It looks like we may have
2 lost --

3 MS. PATEL: Can you hear me now?

4 ALJ HECHT: Yes.

5 MS. PATEL: I think that was a
6 user-error issue. I apologize.

7 ALJ HECHT: No problem.

8 BY MS. PATEL:

9 Q Mr. Healy, referring specifically
10 to the electronic hardcopy well file
11 documents of SS-25, do you know the format in
12 which these documents were provided to
13 Ms. Felts?

14 A I do not.

15 MS. PATEL: Your Honor, that's all I
16 have.

17 ALJ HECHT: All right. Thank you.

18 Do we have any followup questions
19 from Ms. Purchia?

20 MS. PURCHIA: Your Honor, could I have
21 a moment to just discuss with our client?

22 ALJ HECHT: Yes. Let's take about five
23 minutes and we'll be off the record.

24 (Off the record.)

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

27 Ms. Purchia, do you have any
28 additional questions for Witness Healy?

1 MS. PURCHIA: We do not, your Honor.

2 ALJ HECHT: All right. Then I think
3 that that wraps up Mr. Healy. The witness
4 may be excused.

5 We will come back after lunch, and
6 we will deal with entry of the exhibits for
7 this witness. Ideally we would do it now,
8 but I think I could use a lunch break.

9 So any questions or housekeeping
10 before we go?

11 MS. PATEL: No, your Honor.

12 MR. GRUEN: Your Honor, just what time
13 do you want us back?

14 ALJ HECHT: Let's come back at 1:10,
15 please.

16 And thank you all very much. And
17 thank you, Witness Healy.

18 We'll be off the record.

19 (Off the record.)]

20 (Whereupon, at the hour of 12:07
21 p.m. a recess was taken until 1:10
22 p.m.)

23 * * * * *

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1 AFTERNOON SESSION - 1:12 P.M.

2 * * * * *

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

5 All right. We took our lunch break
6 today. And we are now going to deal with the
7 exhibits for our last witness, Witness
8 Healey. I would like to start with
9 Ms. Patel. And if you can identify those
10 exhibits, and then we can go to the
11 cross-exhibits.

12 MS. PATEL: Thank you, your Honor.
13 SoCalGas moves to admit into the record
14 exhibits that that have been marked as
15 SoCalGas-19, The Prepared Reply Testimony of
16 Gregory Healy dated March 20th, 2021; and
17 SoCalGas-20, The Exhibits to the Prepared
18 Reply Testimony of Gregory Healy also dated
19 March 20th, 2020.

20 ALJ HECHT: Great. Thank you.

21 Are there any questions or
22 objections to identifying those and admitting
23 them into the record?

24 (No response.)

25 ALJ HECHT: Seeing none, then
26 Exhibits-19 and 20, SoCalGas, are being
27 admitted into the record.

28 (Exhibit Nos. SoCalGas-19 through
 SoCalGas-20 were marked for

1 identification.)

2 (Exhibit Nos. SoCalGas-19 through
3 SoCalGas-20 were received into
evidence.)

4 ALJ HECHT: So that's two.

5 And we will turn to -- is it going
6 to be Ms. Purchia or Mr. Gruen for the
7 cross-exhibits?

8 MS. PURCHIA: It will be me,
9 Ms. Purchia. Thank you so much.

10 ALJ HECHT: Thank you.

11 MS. PURCHIA: So SED moves to admit the
12 exhibits that have been marked as SED-247
13 that's SED and DOGGR January 26, 2016, Data
14 Request; SED-248, SoCalGas Response to SED
15 and DOGGR January 26th, 2016, Data Request;
16 and SED-249, E-Mail From Gregory Healy to
17 Kenneth Bruno Et Al Re Aliso Canyon Data
18 Request Master Document Index 060319; and
19 SED-250, Master Document Index 060319 Entry
20 For 2016.0126.CR01.

21 And two more. SED-257, SoCalGas
22 Response to SED Data Request-129; and
23 SED-258, SoCalGas Response to SED Data
24 Request-143.

25 SED moves to -- moves these exhibits
26 -- requests to move these exhibits into the
27 record.

28 ALJ HECHT: Thank you very much,

1 Ms. Purchia.

2 Are there any objections or comments
3 to moving SED Exhibits-247, 248, 249 and 250,
4 into the record?

5 MS. PATEL: Yes, your Honor. As to
6 Exhibit-248, which is SoCalGas's Response to
7 SED and DOGGR Data Request issued
8 January 26th, 2016. You know, this is it
9 seems the initial response to that data
10 request. But there were subsequent data
11 request responses. And I think it would make
12 sense if either the final one or all of them
13 together were admitted into the record.

14 ALJ HECHT: Are there any comments or
15 objections to the idea of either admitting
16 the final one or the full set?

17 My inclination would be that we
18 would use the one that was used for
19 cross-examination. But I would not have a
20 problem with moving the full set.

21 MS. PURCHIA: Your Honor, we would
22 support moving the one, SED-248, that we used
23 for cross-examination.

24 By "full sets," is Ms. Patel asking
25 to admit the other exhibits that have not
26 been marked? That would be SED-252, SED-253,
27 SED-254, SED-255, and SED-256, because I
28 think that those exhibits contain

1 supplemental responses.

2 MS. PATEL: Sitting here today, I don't
3 know if that's the complete set of the
4 response. So I'm afraid I can't answer that
5 right now.

6 ALJ HECHT: All right. With that I
7 would be inclined to move this one into the
8 record. But also ask that the others -- a
9 complete set be identified, and we have all
10 of the supplemental responses moved in later.

11 Is there any objections to doing it
12 that way so we move this one now?

13 We could alternatively wait and do
14 them all at once tomorrow or whenever they
15 are being presented.

16 MS. PATEL: That's fine with SoCalGas.
17 Although I do have objections to additional
18 exhibits.

19 ALJ HECHT: Right. Okay. So that
20 addresses 248.

21 What other concerns do you have
22 about the other exhibits?

23 MS. PATEL: Exhibit-257 and 258, I do
24 not believe a foundation was laid for -- to
25 admit those into the record. I believe these
26 items were pulled up and the witness was
27 asked for full questions that don't relate to
28 the scope of his testimony. At the most, I

1 believe he merely read or agreed with what
2 the documents said.

3 ALJ HECHT: All right. And that was
4 Exhibits SED-257 and 258?

5 MS. PATEL: That's correct.

6 ALJ HECHT: Thank you.

7 Ms. Purchia, what are your comments?

8 MS. PURCHIA: Thank you, your Honor.
9 So SED-257, the question that Mr. Healy read
10 and the response referred directly to his
11 testimony. So I would say it's within the
12 scope of his testimony.

13 And SED-258 talks about the legal
14 hold that, as the regulatory business
15 manager, we expected Mr. Healy to be
16 complying with as he oversaw the scanning of
17 the SS-25 well file.

18 ALJ HECHT: I'm inclined to let those
19 in if there isn't, sort of, a clearer
20 statement of a reason that they should not be
21 in the record.

22 Ms. Patel, do you have other
23 information or concern?

24 MS. PATEL: Well, I think the legal
25 holds that Ms. Purchia is referring to is a
26 letter from an outside law firm to a third
27 party. It's not just SoCalGas.

28 And also I believe Ms. Purchia just

1 stated that Mr. Healy oversaw the scanning.
2 He's already testified that he did not
3 personally oversee the scanning. I think the
4 attempt behind both these exhibits frankly
5 are just he was not the right witness for
6 them.

7 ALJ HECHT: Okay. Thank you.

8 Ms. Purchia, are those exhibits
9 going to be used in cross-examination of a
10 different witness?

11 MS. PURCHIA: Yes. We could use theme
12 for the cross-examination of Mr. Neville.

13 ALJ HECHT: Then I would be inclined --
14 since that was the witness that Ms. Patel
15 pointed to earlier, I would be inclined to
16 wait for that and revisit those at that time.

17 Any concerns about handling it that
18 way?]

19 Okay. Are there any other
20 objections?

21 MS. PURCHIA: No, your Honor.

22 ALJ HECHT: Okay. So let me say that I
23 think that we have identified and are moving
24 into the record SED Exhibits-247, 248, 249
25 and 250. Let me know if that's correct.

26 MS. PURCHIA: That's what I have, your
27 Honor.

28 ALJ HECHT: Great. Then we will move

1 those into the record. We are holding off on
2 certain other exhibits, including 257 and 258
3 which can be used in cross-examination of a
4 different and possibly more-appropriate
5 witness.

6 And there are another set that I
7 would like someone to check on related to
8 supplemental responses to the one we
9 identified as 248, and one of you should
10 bring those back in the next series of
11 hearings.

12 (Exhibit No. SED-247 was marked for
13 identification.)

14 (Exhibit No. SED-248 was marked for
15 identification.)

16 (Exhibit No. SED-249 was marked for
17 identification.)

18 (Exhibit No. SED-250 was marked for
19 identification.)

20 (Exhibit No. SED-247 was received
21 into evidence.)

22 (Exhibit No. SED-248 was received
23 into evidence.)

24 (Exhibit No. SED-249 was received
25 into evidence.)

26 (Exhibit No. SED-250 was received
27 into evidence.)

28 MS. PURCHIA: Your Honor, if I may
propose that SoCalGas bring those exhibits
back, since it was Ms. Patel's proposal to
admit all of the responses.

ALJ HECHT: Do you have any objection

1 to that, Ms. Patel?

2 MS. PATEL: No. We can do that.

3 ALJ HECHT: Great. That seems like a
4 good way of making sure that all of the
5 responses are found. So I think that's a
6 good idea. All right.

7 I think then we're going to move on
8 to witness Sera. I am going ask a couple of
9 questions and then turn it over to Judge
10 Poirier.

11 First, it looks like Witness Sera is
12 scheduled for all of this afternoon and
13 possibly some of tomorrow morning. Is that
14 still accurate?

15 MR. GRUEN: Your Honor, Darryl Gruen
16 for SED.

17 To the best our knowledge, it is,
18 assuming that the cross goes reasonably as we
19 anticipated. Of course, if there are changes
20 to that, it is subject to change, but it's
21 our best guess, at this point. Yes, your
22 Honor. It's possible we may move a little
23 bit faster, depending.

24 ALJ HECHT: Okay. Great. And which
25 attorney will be doing the cross-examination
26 for Mr. Sera?

27 MS. PATEL: I will, your Honor. I will
28 do the direct.

1 ALJ HECHT: Okay. Then I am going to
2 turn it over to Judge Poirier and he can move
3 on.

4 ALJ POIRIER: Good afternoon,
5 everybody. Let's go off the record real
6 quick.

7 (Off the record.)

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

10 We took a short break just to
11 ascertain some of the timing for Witness Abel
12 coming up.

13 Now we will proceed with Witness
14 Sera.

15 Mr. Sera, are you ready?

16 THE WITNESS: Yes, sir.

17 ALJ POIRIER: Are court reporters
18 ready?

19 COURT REPORTER: Yes, Judge.

20 ALJ POIRIER: Mr. Sera, what we're
21 going to do is we're going to start out with
22 the attestation. I am going to read it to
23 you. There's several parts of it. At the
24 end, I will ask you to respond. Okay?

25 THE WITNESS: Okay.

26 ALJ POIRIER: I do solemnly state,
27 under penalty of perjury, that the testimony
28 I give in the case now pending before this

1 Commission, shall be the truth, the whole
2 truth and nothing but the truth.

3 I attest I will testify based on my
4 own knowledge and memory, free from external
5 influences or pressures.

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

9 I attest I will only refer to
10 materials being provided by the parties,
11 exhibits pre-marked and identified by the
12 parties and previously shared with the
13 opposing party.

14 I attest I will not make any
15 recordings of the proceeding and I attest I
16 understand that any recordings of a
17 proceeding held by Webex, including screen
18 shots or other visual copying of a hearing is
19 absolutely prohibited.

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

27 I attest I will not engage in
28 private communications by phone, text or

1 e-mail or any other mode of communication
2 while under oath and being examined. If I
3 experience any attempts to tamper with my
4 witness testimony, I will report the
5 occurrence to the presiding officer
6 immediately.

7 Mr. Sera, do you agree with these
8 attestations?

9 THE WITNESS: I do.

10 TRAVIS SERA, called as a witness by
11 Southern California Gas Company, having
12 duly attested and having been duly
13 sworn, testified as follows:

14 ALJ POIRIER: Thank you.

15 Ms. Patel, why don't you start with
16 direct.

17 MS. PATEL: Thank you, your Honor.

18 DIRECT EXAMINATION

19 BY MS. PATEL:

20 Q Mr. Sera, can you please state and
21 spell your name for the record?

22 A My name is Travis Sera.

23 T-r-a-v-i-s. The last name is S-e-r-a.

24 Q Can you please state your current
25 position with SoCalGas?

26 A I'm the Director of Integrity
27 Management.

28 Q Do you have the exhibits with you
that have been pre-marked as SoCalGas-12, the

1 Prepared Reply Testimony of Travis Sera,
2 dated March 20, 2020, and SoCalGas-13, the
3 Exhibits to the Prepared Reply Testimony of
4 Travis Sera, also dated March 20, 2020?

5 A I do.

6 Q Were these documents prepared by
7 you or at your direction?

8 A Yes.

9 Q And do you adopt them as your
10 testimony in this proceeding?

11 A I do.

12 Q Mr. Sera, what is the purpose of
13 your testimony?

14 A The purpose of my testimony is to
15 respond to SED and Cal PA and to discuss the
16 estimation of risk as it relates to the SS-25
17 failure.

18 Q Okay. And just one final question.
19 The parties to this proceeding have attested
20 that they will not audio or video record
21 these proceedings, but that does not apply to
22 third parties. So just in case some third
23 party attempts to do this, I am stating on
24 the record that I do not consent to being
25 recorded. Do you consent to being recorded
26 by any third party?

27 A I do not.

28 MS. PATEL: Thank you.

1 Your Honor, the witness is ready for
2 cross-examination.

3 ALJ POIRIER: Thank you.

4 Mr. Gruen, please go ahead.

5 MR. GRUEN: Thank you, your Honor.

6 CROSS-EXAMINATION

7 BY MR. GRUEN:

8 Q Good afternoon, Mr. Sera.

9 A Good afternoon.

10 Q My name is Darryl Gruen and I am an
11 attorney representing the Safety and
12 Enforcement Division in this proceeding.

13 So just to establish a couple of
14 introductory questions for you and maybe to
15 establish a common understanding in terms,
16 we'll start there. And if you will indulge
17 me for that, I will get started.

18 So, first off, just to ask, since
19 we are doing this remotely, a couple of
20 questions. Are you alone?

21 A Yes, I am.

22 Q And are you able to communicate
23 separately or privately with anyone while you
24 communicate through the Webex communication
25 you have to the hearings here today?

26 A No.

27 Q Okay. Do you consent -- I want to
28 ask the question slightly more broadly than

1 Ms. Patel has on direct about recording.

2 Do you consent to allow anyone, not
3 just a third party, but anyone, to record or
4 in any way transcribe your testimony in this
5 proceeding, other than the court reporter who
6 is approved by the California Public
7 Utilities Commission?

8 A I do not.

9 Q Thank you. So just if I do press
10 your memory on anything, if you can't recall,
11 please just say so. If you don't know,
12 please let us know. And we will take that
13 answer and we will move on with the cross.
14 Do you understand that?

15 A I do.

16 Q Okay. So just to establish a
17 common understanding of a few terms, when we
18 talk about Blade today, can we agree we are
19 referring to Blade Energy Partners?

20 A Yes.

21 Q And when we talk about Aliso Canyon
22 facility or Aliso, for short, can we agree we
23 are talking about SoCalGas Aliso Canyon
24 natural gas storage facility?

25 A Yes.

26 Q And when we use the term root cause
27 analysis or RCA, do you agree that can refer
28 to Blade's root cause analysis and

1 supplemental reports that were issued in May
2 of 2019?

3 A Yes.

4 Q And I see your lights have gone
5 off. If you prefer, I can -- I know it's a
6 motion sensor from prior witnesses. Do you
7 want to take a moment to get your lights back
8 on?

9 A There we go.

10 Q Okay. Continuing on. When we
11 refer to SS-25, would you agree, for purposes
12 of the cross-examination, that refers to
13 Standard Sesnon 25, the well that is at the
14 Aliso Canyon facility?

15 A Yes.

16 Q And when we use the term
17 "incident," do you agree that that can refer
18 to the release of gas from the SS-25 facility
19 that was discovered beginning October 23rd,
20 2015?

21 A Yes.

22 Q Okay. Thank you. All right. Well
23 with that, if we could go to your reply
24 testimony, and we'll bring it up to shared
25 content here, so this is Exhibit SoCalGas-12
26 Prepared Reply Testimony of Travis Sera. And
27 with that, just after reading the cover page
28 there, if we could go to page 6 of your reply

1 testimony.

2 And you see that there the Bates
3 number is SoCalGas-12.0008. And if we scroll
4 back up on page 6, if you look at lines 9
5 through 11, the specific part that talks
6 about you being a registered Professional
7 Metallurgical Engineer in the state of
8 California. That's correct, is it not?

9 A That is correct.

10 Q And when did you become registered?

11 A If memory serves me correctly and
12 it may not, I believe that is probably around
13 2008, but I am having a hard time
14 specifically remembering when I passed the
15 exam.

16 Q Okay. "Approximately 2008" is good
17 enough for the question. That's
18 approximately, it was 2008?

19 A It's somewhere in that general time
20 frame, but I don't specifically remember.

21 Q Understood. So, continuing on. If
22 you would scroll up a little bit, Mr. Zarchy.
23 You continue on line 4, you joined SoCalGas,
24 lines 3 and 4, excuse me. You joined
25 SoCalGas in 1995 and have held various
26 positions of increasing responsibility within
27 the Gas Engineering and System Integrity
28 Department. Do you see that?

1 A I do.

2 Q Would you describe each of those
3 positions at a high level?

4 A Yes. My first full-time employment
5 with SoCalGas was in the -- at the
6 Engineering Analysis Center in Pico Rivera,
7 where I worked in the metallurgical
8 laboratory, and this was part of the --
9 ultimately part of the Engineering Department
10 with the company. And that continued through
11 roughly, if my memory serves me correctly,
12 around the year 2000, when I then transferred
13 to the predecessor of what would become the
14 Integrity Management Department. At the
15 time, it was referred to as the Pipeline
16 Integrity Department. And I worked in the
17 Pipeline Integrity Department since that
18 transfer, starting primarily with integrity
19 assessment work related to the integrity
20 management role and then progressively moving
21 through different aspects of the program.

22 And then I briefly left SoCalGas to
23 join Structural Integrity Associates and then
24 returned as a senior engineer and from that
25 point again within the integrity management
26 group predecessor of the Pipeline Integrity
27 Department, worked in levels of increasing
28 responsibility until my most recent position

1 today.

2 Q Okay. Thank you, Mr. Sera. And
3 working in the metallurgical labs seems
4 self-explanatory, but with regards to your
5 work in the Integrity Management Department,
6 did you also -- did your responsibilities
7 include metallurgical work there as well?

8 A I was -- it was related to
9 metallurgy work. I think it wouldn't be
10 classical metallurgy in the sense the kind
11 that's conducted in the laboratory, but I
12 certainly reviewed metallurgical materials,
13 and I certainly worked on metallurgical-
14 related issues with respect to pipeline
15 integrity concerns. So, no laboratory
16 metallurgy work, but certainly engineering
17 metallurgy work, yes.

18 Q And would you -- would it be
19 accurate to characterize metallurgy-related
20 work in your current role, as well as the
21 Director of integrity management that that
22 role includes those responsibilities?

23 A My current role includes those
24 responsibilities, but in my current role of
25 Director, it's not a direct responsibility.
26 I certainly have responsibility over
27 individuals who deal with metallurgical
28 issues, but I don't directly respond to

1 metallurgical issues in my existing role.

2 Q Okay. Thank you. So, just given
3 your metallurgical background, both
4 professionally and with your registration --
5 by the way, did you -- as part of your
6 education, did you study Metallurgical
7 Engineering when you were at Cal Poly, San
8 Luis Obispo, as well?

9 A Yes. That's correct. I did.

10 Q Okay. Thank you. So given your
11 background and your education, I want to ask
12 you specifically about if you looked at the
13 causes of failures of leaks in SoCalGas
14 storage facilities. Have you done that as
15 part of your work for SoCalGas?

16 A Can you be -- I think the best
17 answer is yes. "Facilities" is a broad term,
18 and I have certainly reviewed failures within
19 storage facilities.

20 Q And I can be more specific, if you
21 were about to ask me that.

22 So, with regards to the facilities,
23 the storage facilities, have you looked at
24 the causes of failures of leaks or leaks?
25 Let me re-ask that.

26 Have you looked at the causes of
27 leaks in pipes in storage facilities?

28 A Yes.

1 Q And have you looked at the causes
2 of leaks in wells in storage facilities as
3 well?

4 A No, not as part of the -- not as
5 part of my direct responsibility, no.

6 Q Okay. Since you have looked at the
7 causes of leaks in pipes, have you looked at
8 the causes of leaks in pipes specifically at
9 the Aliso Canyon storage facility?

10 A Yes.

11 Q Okay. Has anyone talked to you
12 about the reasons that well SS-25 failed?

13 A Can you be specific about "anyone?"

14 Q Go ahead. I'm sorry.

15 A No. I'm sorry. I was just trying
16 to clarify my question. When you say
17 "anyone" --

18 Q Anyone from -- I interrupted you
19 again. Go ahead. I'm sorry.

20 A I was just -- I'm sorry. We are
21 crossing. There is a bit of a delay. I was
22 just waiting for you to restate the question.

23 Q I will. Has anyone from SoCalGas
24 talked to you about the reasons that well
25 SS-25 failed?

26 A As a general matter, yes.

27 Q Okay. Has anyone from SoCalGas
28 asked for your metallurgical opinion

1 regarding the reasons that SS-25 failed?

2 A I believe so.

3 Q Okay. And have you provided your
4 opinion as to why well SS-25 failed?

5 A No, not specifically.

6 Q Why not?

7 A Well, I didn't conduct the
8 investigation and I don't have -- I don't
9 have any direct responsibility over the root
10 cause analysis that was conducted. So I
11 didn't formulate any sort of a particular
12 response to the failure itself.

13 Q Okay. How about this: There --
14 you're not -- I believe there are others with
15 metallurgical backgrounds, or if you will
16 indulge the term, other metallurgists who are
17 on staff; is that correct?

18 A Yeah, that's correct.

19 Q And there were other metallurgists
20 on staff at SoCalGas during the incident; is
21 that also correct?

22 A That's correct.

23 Q To your knowledge, were any of
24 those metallurgists asked to render an
25 opinion about the reasons that well SS-25
26 failed?

27 MS. PATEL: Your Honor, I am going to
28 object here to this line of questioning.

1 Blade was specifically retained at the
2 direction in part of the CPUC to perform the
3 root cause analysis. Moreover, this witness'
4 testimony does not pertain to that.

5 ALJ POIRIER: I am going to overrule.
6 I am going to allow the witness to answer to
7 the best of his ability.

8 THE WITNESS: I was not aware of any
9 other individuals with a metallurgical
10 background at the company providing an
11 opinion about SS-25.

12 BY MR. GRUEN:

13 Q Okay. Thank you. Turning to -- if
14 we could turn to page 5 of your testimony.
15 Actually, if I could just round up that line
16 with one other question. I believe I have
17 this right, but I just want to be sure.

18 As far as SoCalGas employees go,
19 you're the only one with a metallurgical
20 background employee for SoCalGas, who's
21 actually testifying as a witness in this
22 proceeding; is that right?

23 A I believe that's correct. I'm not
24 a hundred percent certain, but I believe that
25 is correct.

26 Q Okay. Thank you. All right.

27 Let's go to page 5. And if we
28 could -- yeah. Thank you, Mr. Zarchy.

1 You're a step ahead of me.

2 I will read the Bates number,
3 SoCalGas-12.0007. And if we scroll up to the
4 Conclusion, just the Conclusion, including
5 all of it, it says there, starting on
6 line 11:

7 For the foregoing reasons, a
8 failure analysis of any of the
9 historical leaks described in the
10 Blade report would very likely not
11 have informed or predicted the
12 SS-25 incident.

13 Do you see that?

14 A Yes, I do.

15 Q Can you describe what a failure
16 analysis is, as you are using it in that
17 sentence?

18 A A failure analysis is a general
19 term to conduct an investigation of a
20 failure; specifically the way I used failure
21 analysis in this statement is to imply that
22 in response to a failure that a structured
23 investigation is conducted, and that
24 structured investigation would include some
25 sort of a direct analysis of the failed
26 location itself. So by that I mean the
27 ability to actually observe, measure and
28 analyze the point of failure.

1 Q Okay. Bear with me. I am making
2 notes. Thank you, Mr. Sera.

3 Would the understanding of the
4 cause of the failure, in your opinion, be
5 part of the of the failure analysis as you
6 describe it there?

7 A That depends. Sometimes failure
8 analyses can be purely limited to simply the
9 mechanism of failure. And sometimes a
10 failure analysis can be broadened to include
11 causal factors.

12 So I think my response to whether a
13 failure analysis includes cause, it really
14 depends on the scope and the approach itself.

15 Q Okay. And your conclusion
16 specifically talks about failure analysis as
17 it relates to the SS-25 incident. So if I
18 can ask you just specifically with regards to
19 the SS-25 incident, do you mean failure
20 analysis to include an understanding of the
21 cause of the failure of well SS-25 in that
22 conclusion?

23 MS. PATEL: Your Honor, I am going to
24 object that this is a broad and an
25 overly-broad question. In prior points in
26 the testimony, the witness described multiple
27 different leaks that he is looking at and
28 referring to.

1 ALJ POIRIER: Mr. Gruen.

2 MR. GRUEN: I am surprised to hear the
3 objection, your Honor. Frankly, it's asking
4 directly about his testimony. I don't see
5 what else I can say.

6 ALJ POIRIER: I am going to overrule
7 the objection. Mr. Gruen, you can restate.

8 MR. GRUEN: Thank you.

9 Q With regards, Mr. Sera, to the
10 SS-25 incident, would you agree -- or I'm
11 sorry. Would a failure analysis in that
12 sentence specifically include an
13 understanding of the cause of the SS-25
14 failure?

15 MS. PATEL: Your Honor, again I am
16 going to object. This misstates the witness'
17 testimony. He is referring here to a failure
18 analysis of the historical leaks that are
19 described in the Blade report and then
20 separately stating that they would not have
21 informed or predicted the SS-25 incident. He
22 is not referring to a failure analysis of the
23 SS-25 incident itself.

24 ALJ POIRIER: Mr. Gruen, I think
25 looking at this testimony, I tend to agree
26 that the failure analysis seems to relate to
27 the historic leaks. Can you restate?

28 MR. GRUEN: Okay. I can try, your

1 Honor. Thank you.

2 Q So with regards to the historic
3 leaks then, that you say would very likely
4 not have informed or predicted the SS-25
5 incident, do you mean for any of those
6 historic leaks to include as causal -- an
7 understanding of the cause of those leaks?

8 MS. PATEL: I am just going to object
9 that it's compound.

10 MR. GRUEN: Your Honor, may I respond
11 to that, please?

12 ALJ POIRIER: Go ahead.

13 MR. GRUEN: I would like to ask to have
14 a bit less interference from counsel. Now we
15 estimated our cross-estimates to end by
16 tomorrow morning, but if this is going to be
17 the tactic of SoCalGas to object to every
18 single question at this point that we're
19 starting to ask, it's going to take a lot
20 longer. We may be going into May, at this
21 rate. I would like to request that there be
22 less interference from counsel.

23 ALJ POIRIER: Okay. Let's try to move
24 forward and be efficient with the witness. I
25 am overruling the objection.

26 Mr. Sera, please answer to the best
27 of your ability.

28 THE WITNESS: Can you repeat the

1 question please, Mr. Gruen?

2 BY MR. GRUEN:

3 Q I can. I will do my best to
4 restate it as best I can. I may not get an
5 exact repetition, but with regards to the
6 historical leaks that you discuss in the
7 conclusion that you say you testified you
8 would very likely not have informed or
9 predicted this SS-25 incident, those
10 historical leaks that you talk about, would
11 those failure analysis that you discussed
12 there, is it your opinion that those failure
13 analysis -- analyses should include an
14 understanding of the cause of those leaks?

15 A No, not necessarily.

16 Q Okay. Thank you.

17 If we could turn to page 4, and
18 lines 13 to 14. Excuse me. Bates number
19 SoCalGas-12.0006. And if we go to lines 13
20 and 14, you state:

21 However, in the case of the
22 SS-25 failure, no known examples
23 of this type of well casing
24 rupture associated with
25 microbially-influenced corrosion,
26 or MIC, attack exist in the
27 industry record.

28 Do you see that?

1 A I do.

2 Q And you state on the same page,
3 lines 20 through 22:

4 Given the available information,
5 it is difficult if not impossible
6 to relate the nature of the
7 failure of FF-34A to the nature of
8 the failure of SS-25.

9 Do you see that?

10 A I do.

11 Q Okay. With regards to those, have
12 you ever done an analysis of a weld on a
13 piece of pipe?

14 A I'm sorry. Did you say "weld,"
15 w-e-l-d?

16 Q Yes. I'll restate. That is
17 correct, and with that, stick with that
18 understanding, have you ever done a failure
19 analysis of a weld, w-e-l-d, on a piece of
20 pipe?]

21 A Yes.

22 Q Okay. Have you ever overseen a
23 failure analysis on a weld, w-e-l-d, on a
24 piece of pipe?

25 A I believe I have, yes.

26 Q Okay. So to your knowledge, I
27 believe you said earlier -- just for purposes
28 of laying foundation, I believe you testified

1 earlier that no one at SoCalGas to your
2 knowledge did a failure analysis of well
3 SS-25 related to the incident.

4 Did I state that correctly?

5 A I'm sorry, can you please repeat
6 that one more time.

7 Q Sure. Maybe I'll just ask it
8 positively. To your knowledge, did anyone at
9 SoCalGas do a failure analysis of well SS-25
10 related to the incident?

11 A Not to my knowledge, no.

12 Q Okay. Isn't part of the bailiwick
13 of a metallurgical engineer to study the
14 causes of pipe and weld failures?

15 A Can be, yes.

16 Q Let's go to page 6 of your reply
17 testimony. If we go to the bottom again just
18 to read the Bates number just so we have it
19 in the record, that's SoCalGas-12.0008. If
20 we scroll back up to the very end, line 12
21 says, "I have previously testified before the
22 Commission."

23 I'd like to ask you about that.
24 Can you briefly describe the different
25 proceedings in which you have previously
26 testified before the Commission.

27 MS. PATEL: Your Honor, I'm just going
28 to state an objection here on relevance.

1 ALJ POIRIER: Overruled.

2 THE WITNESS: I've previously testified
3 before the Commission regarding the Pipeline
4 Safety and Reliability Plan. Mr. Gruen, I
5 believe you were the one who cross-examined
6 me on that proceeding. I'm drawing a blank.
7 I'm sorry I can't remember. I participated
8 as a witness on a separate proceeding that's
9 eluding my memory at the moment. I'm sorry,
10 I simply can't remember.

11 BY MR. GRUEN:

12 Q Understood. And the one where you
13 testified when I was cross-examining you,
14 maybe we can go there. Just for the
15 record -- and if you don't remember, I
16 understand -- my recollection is that that
17 was Application 15-09-013.

18 Does that ring a bell?

19 A It does not. I didn't commit any
20 of the proceeding numbers to memory.

21 Q Understandably so. Was that
22 related to SoCalGas -- do you recall if it
23 was related to SoCalGas Line 1600?

24 A Yes. It was related to SoCalGas
25 Line 1600. I believe I provided the -- some
26 testimony in that proceeding, and I believe
27 it had corrections on the stand as well,
28 although I can't specifically remember what

1 those were.

2 Q Okay. Understood. So if we could
3 go to -- let me just ask you with regards to
4 Line 1600, do you recall testifying about the
5 term "maximum allowable operating pressure"
6 in the Line 1600 proceeding?

7 A Generally I do, yes.

8 Q Okay. If we go to -- I think
9 it's -- if we scroll up on page 2 of your
10 current testimony. Yeah, the -- if we go --
11 and which is Bates stamped SoCalGas-12.0004,
12 here, if we scroll to just right here, this
13 graph at the bottom.

14 Mr. Zarchy, if we could get it --
15 that's fine. Yeah. If you could include the
16 top of the graph in particular, Mr. Zarchy.
17 That's helpful right there. That's fine.
18 Now we just reduced it just in size.

19 Are you able to see it, Mr. Sera?

20 A I am.

21 Q Okay. Great. So you're
22 referencing maximum allowable operating
23 pressure here as well in the form of saying
24 "MAOP" in the box that's entitled "Pipe
25 Characteristics"; is that right?

26 A That's correct.

27 Q Okay. And are you familiar with a
28 regulation that requires SoCalGas to

1 calculate the maximum allowable operating
2 pressure?

3 MS. PATEL: Your Honor, I'm going to
4 object here. This is far outside the scope
5 of the witness' testimony.

6 ALJ POIRIER: Mr. Gruen.

7 MR. GRUEN: Thank you, your Honor.
8 It's not outside the scope of his testimony.
9 He references maximum allowable operating
10 pressure here. I'd like to probe his
11 understanding not only of MAOP that he
12 describes here, but all the other pipe
13 characteristics that are squarely apparent
14 for everyone to see in his testimony.

15 ALJ POIRIER: Objection overruled.

16 Mr. Sera, please answer the
17 question.

18 THE WITNESS: Can you repeat it,
19 please, Mr. Gruen.

20 BY MR. GRUEN:

21 Q Absolutely. Are you familiar with
22 the regulation that requires SoCalGas to
23 calculate maximum allowable operating
24 pressure or, as you've stated it here, MAOP?

25 A Yes, I am. As it relates to
26 pipeline operation, I am.

27 Q And what is the name of that
28 regulation?

1 A That would be CFR 49, Part 192.

2 Q Okay. If we could refer -- so CFR
3 49, Part 192 provides a definition of maximum
4 allowable operating pressure; is that
5 correct?

6 A Yes, it is.

7 Q And what's the definition of
8 maximum allowable operating pressure as you
9 understand it?

10 A I don't have the technical
11 definition committed to memory, but just by
12 way of summary, the maximum allowable
13 operating pressure is a limit placed on the
14 pressure that the pipeline system is allowed
15 to be subjected to.

16 Q Thank you. And 49 CFR, Part 192
17 has specific requirements of how to calculate
18 the maximum allowable operating pressure as
19 well; isn't that correct?

20 A Correct.

21 Q What sections of 49 CFR, Part 192
22 provide those requirements as you understand
23 it?

24 A I don't have them memorized.

25 Q Okay.

26 A I can certainly recognize them if I
27 have a code book in front of me.

28 Q We can bring that up. Why don't we

1 bring up Exhibit SED-224, please. It's not
2 meant to be a memory quiz so pardon that, but
3 here we've got reference to 49 CFR, Part
4 192.105. If you scroll down, that's Exhibit
5 SED-224, pardon me.

6 Mr. Sera, as you look at this
7 today, this 49 CFR, Part 192.105 provides the
8 design formula for calculating maximum
9 allowable operating pressure of steel pipe?

10 A That's correct for transmission and
11 distribution pipelines. That's correct.

12 Q Transmission and distribution,
13 understood. And in particular, you see D
14 talks about the normal outside diameter of
15 the pipe in inches under 49 CFR,
16 Section 192.105; is that correct?

17 A Correct.

18 Q And T talks about the nominal wall
19 thickness under 192.105; correct?

20 A That's correct.

21 Q And S talks about the yield
22 strength in pounds per square inch determined
23 under 192.107; correct?

24 A Yes.

25 Q And if I use the term "SMYS", do
26 you understand that term to be synonymous
27 with S as it's used here?

28 A S? Yes, I -- the specified minimum

1 yield strength is typically associated with
2 the term "S" here.

3 Q Thank you for indulging me. I
4 suspect that your understanding of it is
5 better than mine so I appreciate you
6 conceding that. So if you could maybe help
7 define just so we have an understanding for
8 the record, what does SMYS mean?

9 A Specified minimum yield strength.

10 Q Okay. And that's the words.
11 What's your understanding of the definition
12 of specified minimum yield strength?

13 A It provides the minimum strength
14 that a material would need to exhibit before
15 yielding.

16 Q Yielding in lay terms would mean
17 starting to bend?

18 A It would mean before the material
19 experiences permanent deformation.

20 Q Fair enough. Thank you. If we go
21 back to your testimony, if we could go back
22 to the page we had up. So just for purposes
23 of orienting ourselves, you have under the
24 pipe characteristics of page -- I think this
25 is page -- well, I see it's PDF page 5, but
26 the pipe characteristics term has "OD."

27 Does that stand for outside
28 diameter?

1 A Yes.

2 Q Comparable to what we were just
3 looking at under 49 CFR, Section 192.105?

4 A It's the same as the diameter,
5 that's correct.

6 Q And T -- pardon me -- we have T as
7 referencing -- why don't you tell me. What
8 does T stand for again?

9 A T in this graph is the wall
10 thickness.

11 Q Okay. And that's the same
12 definition as 49 CFR, Section 192.105. It
13 provides for wall thickness as described as T
14 as well; correct?

15 A That's correct.

16 Q And similarly, the SMYS, specified
17 minimum yield strength, that you have here
18 under your pipe characteristics, that's the
19 same term that's used in 49 CFR,
20 Section 192.105; is that right?

21 A They both refer to yield strength,
22 that's correct.

23 Q Okay. And the same thing, if we go
24 to maximum allowable operating pressure, I
25 can refer to it if you need to, but is
26 maximum allowable operating pressure a term
27 that's also provided in 49 CFR, Part 192?

28 A It is.

1 Q Okay. What about the term "Charpy
2 value"? Do you see that in your testimony?

3 A I do, yes.

4 Q And what does Charpy value mean?

5 A A Charpy value is the measure of
6 the material's toughness.

7 Q Okay. If we go back to the
8 exhibit -- I'm sorry. If we could introduce
9 Exhibit SED-260. Here this is Exhibit
10 SED-260, Title 49, Code of Federal
11 Regulations, Section 192.712. If we scroll
12 down -- the first page is fine, Mr. Zarchy.
13 Thank you. If we scroll down just slightly,
14 you see 712 describes analysis of predicted
15 failure pressure.

16 Do you see reference to -- I think
17 you corrected me on this -- Charpy value?
18 That's in reference to crack and crack-like
19 defects on a piece of pipe; is that right?

20 A I don't see the reference to Charpy
21 value at the moment. I'm reading through the
22 document that's showing on the screen.

23 Q Let's see if we can find it.

24 Mr. Zarchy, can you scroll down to
25 the next page. Let's look at section --
26 yeah. I see it there. It says section D(2).
27 Okay. And do you see reference to it here?
28 That's fine, Mr. Zarchy. Thank you.

1 Yeah, if you look on -- go ahead,
2 I'm sorry.

3 A I see the references on the screen
4 now that we've scrolled down.

5 Q Thank you. I appreciate the
6 correction. And that's --
7 specifically there's extensive discussion of
8 the Charpy versus notch toughness value as
9 described under the subheading "Cracks that
10 survive pressure testing"; is that right?

11 A That's correct.

12 Q And just to be sure I have
13 foundation laid, you're familiar with 49 CFR,
14 Section 192.105 that we looked at earlier and
15 Section 192.712 that we've just gone through;
16 is that right?

17 A That's right. The previous
18 Section 105 was the design portion of the
19 code. This section that you're displaying
20 now is the newer -- it's commonly referred to
21 as the "Mega Rule." This is the
22 newly-created portion of the transmission
23 code.

24 Q Understood. To your knowledge, is
25 Charpy value referenced prior to the
26 introduction of the Mega Rule?

27 A You know, I don't know. I don't
28 recall.

1 Q Okay. Have you worked -- okay.
2 Understood. Have you applied the Charpy
3 value prior to the introduction of the Mega
4 Rule? Have you looked at that for purposes
5 of metallurgical analysis?

6 A Yes.

7 Q And was it your understanding when
8 you looked at the Charpy value for purposes
9 of metallurgical analysis that SoCalGas was
10 required to look at that value when you were
11 doing the analysis?

12 A I don't know if I used the term
13 "required." We'd used Charpy v-notch
14 toughness values as part of our routine work
15 on pipeline matters depending on the
16 circumstances. So Charpy values are
17 certainly both known to SoCalGas and used by
18 SoCalGas. I can't specifically recall if the
19 code is mandating the use of the Charpy
20 value, but it is used.

21 Q And would you agree that the code
22 provides as an option for evaluating certain
23 metallurgical principles of the pipe?

24 A Well --

25 MS. PATEL: I'm sorry, your Honor. I
26 want to state an objection here again for the
27 record. Is this Part 192? I apologize. I
28 don't see it in front of me, but this

1 specifically applies to pipelines, and
2 Mr. Sera has provided testimony in this
3 proceeding which specifically deals with the
4 storage wells.

5 ALJ POIRIER: Mr. Gruen.

6 MR. GRUEN: Your Honor, I can move on.

7 ALJ POIRIER: Let's go ahead and do
8 that. I think we're spending -- if we could
9 get to the -- I think get to where you're
10 going on the core questions, that would be
11 helpful. Thank you.

12 MR. GRUEN: Okay.

13 Q If we go back to page 2 of your
14 testimony, I think we need to scroll up to
15 get to page 2, Mr. -- if you could scroll up,
16 Mr. Zarchy. Keep going. Oh, no, we are on
17 page 2. I'm sorry. Okay. The chart on
18 page 2, we need to go back to it. Pardon me.

19 That describes the leak-to-rupture
20 threshold. That's referring to the
21 leak-to-rupture threshold in the red line; is
22 that correct?

23 A In part that is correct. It does
24 describe the leak-to-rupture threshold.

25 Q As identified by the red line
26 there?

27 A Correct.

28 Q And the leak-to-rupture threshold

1 has a relationship to the SMYS value that you
2 describe in the pipe characteristics; is that
3 right?

4 A It is related partly to the
5 specified minimum yield strength, that's
6 correct.

7 Q Okay. Are you aware that there is
8 an American Gas Association report from 2001
9 that summarized the findings of three Gas
10 Technology Institute studies that showed the
11 likelihood of rupture diminishes greatly
12 below 30 percent of the SMYS?

13 A I am.

14 MS. PATEL: Your Honor, I'm going to
15 object here as well. If Mr. Gruen has an
16 exhibit he'd like to show the witness, he
17 should show the exhibit rather than
18 testifying as to the contents of an exhibit
19 we haven't seen.

20 ALJ POIRIER: Mr. Gruen, please
21 respond.

22 MR. GRUEN: We can show the exhibit,
23 your Honor. There's no intent -- it's not
24 meant to be a memory test. I thought we
25 could move faster, but we can show the
26 exhibit. It's no problem. If we could
27 introduce -- I'm sorry, your Honor.

28 ALJ POIRIER: No, it's okay. I just

1 wanted to clarify. I'm thinking of an
2 afternoon breakdown. How long do you think
3 you have on this line of questioning?

4 MR. GRUEN: Thank you, your Honor.
5 Bear with me a moment. Your Honor, my
6 estimate is we can likely get through the
7 rest of this in another 15 to 20 minutes
8 perhaps if we continue at about this pace.

9 ALJ POIRIER: Let's take a break now.
10 Let's take a 10-minute break and I'll allow
11 you to get that document ready.

12 MR. GRUEN: Okay.

13 ALJ POIRIER: Okay?

14 MR. GRUEN: Understood.

15 ALJ POIRIER: We'll take a 10-minute
16 break until 2:20. We'll be off the record.
17 Thank you.

18 (Off the record.)

19 ALJ POIRIER: We'll be back on the
20 record. We just took a 10-minute break. We
21 left off with Mr. Gruen of SED
22 cross-examining the witness.

23 Please continue, Mr. Gruen.

24 MR. GRUEN: Good afternoon, your Honor.
25 Can you hear me?

26 ALJ POIRIER: Yes, we can.

27 MR. GRUEN: I'm sorry about that. I
28 was cut off unexpectedly. If everyone else

1 is ready, your Honor, I am as well.

2 ALJ POIRIER: Please go ahead,
3 Mr. Gruen.

4 MR. GRUEN: Thank you.

5 Q Mr. Sera, before the break, you
6 recall I was asking about the American Gas
7 Association report from 2001?

8 A Yes, I do.

9 Q Okay. And if we could pull up
10 Exhibit SED-232 and turn -- Mr. Zarchy, I
11 think you know where it is. I think it's --
12 I believe it's page -- I'm sorry, Exhibit 232
13 just for the record is A.15-09-013,
14 Supplemental Testimony of SDG&E and SoCalGas.
15 If we could go to page 103. And there if --
16 my eyesight isn't what it once was -- but
17 SED -- I believe the Bates number, if we
18 could expand it slightly, is SED-232.102.
19 It's also page 97 of the testimony. If we
20 scroll up to the bottom paragraph.

21 First of all, Mr. Sera, do you
22 recognize this -- why don't we go up to the
23 top actually of this page just for purposes
24 of laying foundation. You see there there's
25 reference to the witness, Travis Sera.

26 Mr. Sera, do you recognize
27 Chapter 13 of this document as your testimony
28 in the Line 1600 proceeding?

1 A Yes, I do.

2 Q Okay. And if we scroll down to the
3 bottom of the page, the bottom paragraph,
4 thank you. Do you see there the lines 14
5 through 20, does that talk about the
6 leak-to-rupture threshold with relation to
7 the percent SMYS?

8 A Can you repeat your question one
9 more time, Mr. Gruen. I was just reading the
10 document.

11 Q Apologies. Absolutely. Just to
12 summarize, does your testimony here relate a
13 leak-to-rupture threshold to the percentage
14 SMYS that's provided by 49 CFR, Part 192?

15 A Yes, it does. The reference to
16 49 CFR, Part 192, which is the transmission
17 code, is the -- it's not nec -- this
18 statement is not necessarily limited to only
19 Part 192.

20 Q I'm not sure I'm following. What's
21 not limited to Part 192?

22 A The definition of SMYS -- SMYS is
23 used as a broad concept across a wide range
24 of the industry, so I didn't want to limit
25 this response to only part 192. SMYS can be
26 used in a number of contexts.

27 Q But you're talking about SMYS here
28 as it relates to Part 192; is that right?

1 A In this particular case, yes.

2 Q And you're talking -- I see. And
3 you're also relating the leak-to-rupture
4 threshold, you're relating it to SMYS, the
5 percentage of SMYS in this case?

6 A In this case, yes, this is
7 discussing the Line 1600 pipeline and that's
8 certainly correct.

9 Q Okay. And there's -- you see per
10 counsel's suggestion there's reference
11 starting at line 16 to an American Gas
12 Association report from 2001. It talks about
13 the likelihood of the rupture diminishing
14 greatly below 30 percent SMYS, and no rupture
15 conditions reasonably expected to occur
16 before -- below 20 percent SMYS; is that
17 right?

18 A That's correct.

19 Q So if we go to -- if we could
20 introduce the next exhibit, SED-223. This is
21 49 CFR, Section 192.14.

22 Mr. Sera, are you familiar with
23 this provision of 49 CFR, Part 192?

24 A I have a general familiarity with
25 it.

26 Q Okay. So I want to ask you, probe
27 about this since we've been talking about
28 other parts of your testimony that seemed to

1 also have a relation to 49 CFR, Part 192. So
2 with regards to --

3 MS. PATEL: Your Honor, I'm going to
4 object as a mischaracterization of Mr. Sera's
5 testimony. Again, this regulation deals --
6 is applicable to pipelines, not to
7 underground natural gas storage. There are
8 different regulations that apply to
9 underground natural gas storage.

10 ALJ POIRIER: Mr. Gruen, can you start
11 with a reference in the testimony and then we
12 can go from there. I think, you know, we
13 spent a lot of the time on the foundational
14 parts. I would like us to get to the core
15 focus on this topic if we can. Thank you.

16 MR. GRUEN: Okay.

17 Q Mr. Sera, let me just ask this. I
18 think counsel's been clear about this, but I
19 want to be sure that you are. Is SoCalGas
20 contending that 49 CFR, Part 192 applies to
21 well SS-25?

22 A No, we're not. This is a
23 transmission pipeline regulation.

24 Q Okay. And leak-to-rupture
25 threshold you described throughout your
26 testimony is based on concepts from 49 CFR,
27 Part 192 that you contend do not apply to
28 well SS-25; isn't that right?

1 A The concept at play here can be
2 applied to a range of structures and to a
3 range of contexts. So the graph that I
4 provided as part of my testimony is a generic
5 graph intended to provide an example of the
6 relationship between defect depth, defect
7 length, and stress level.

8 So when we talk about defects and
9 we talk about depths and lengths and stress
10 level, there are certainly parallels between
11 depth, length, and width in a down-hole
12 structure, and a depth, length, and width in
13 a pipeline structure. But when it comes to
14 the specific codes that apply, the codes are
15 very different because the context, the
16 operating environment, the conditions at hand
17 are completely different in a transmission
18 environment, a distribution environment, or a
19 storage environment.

20 So conceptually, these are common
21 themes, but I am not using this code when I
22 am creating the example graph that you see in
23 the testimony.]

24 Q Let's go back to the graph if we
25 can. And notably absent is the reference to
26 the code. But interestingly also the
27 reference to T and OD and things like that
28 and SMYS values. Are those some examples of

1 -- are those all references to provisions
2 that apply to down well?

3 A I'm not sure I understand the
4 question, Mr. Gruen. The -- I think -- this
5 graph, as I stated before, is providing an
6 example of the relationship between depth,
7 length, and stress level, as it pertains to
8 families of flaws.

9 And each one of those is in turn
10 affected by generic characteristics such as
11 diameter, wall thickness, grade, pressure,
12 and so on. And so when you see this graph,
13 this graph is very generic in nature. This
14 graph is intended to take generic
15 characteristics and simply represent how
16 families of flaws are understood to fail and
17 the mode of failure. It's not intended to
18 reflect a particular aspect of any one of
19 these codes we're discussing right now.

20 Q I see. So you're taking concepts
21 including terms that are used to calculate
22 maximum allowable operating pressure,
23 borrowing that from the transmission line
24 code, and applying it here for purposes of
25 the leak-to-rupture threshold. Is that what
26 you're doing?

27 A To be more specific, the MAOP shown
28 here, this is an artifact of the program

1 that's used to generate this graph. The MAOP
2 shown here is simply to represent a pressure.
3 It did not necessarily need to be MAOP. I
4 could have generically designated this as
5 simply pressure, example pressure. And the
6 concepts would have remained the same.

7 Q But you chose MAOP.

8 A I did not choose MAOP. This is an
9 artifact of the program that's used when you
10 generate this graph.

11 Q What program is that?

12 A This particular program if I'm
13 remembering correctly is either Kapa,
14 K-a-p-a, or Rstring. And I can't recall
15 specifically which program we were utilizing
16 to develop this set of curves.

17 Q Is the program used to comply with
18 49 CFR, Part 192 in terms of calculating
19 maximum allowable operating pressure?

20 A No, no, no. This program is
21 recognized by the transmission code as a
22 acceptable method to estimate/predict failure
23 pressure. But the graph itself, which is a
24 product of this program applies in a number
25 of contexts. It describes generically how
26 you would expect any pipeline defect to
27 behave given these particular assumptions and
28 given these particular sets of circumstances.

1 So it's a generic example meant to
2 describe how one might anticipate a flaw will
3 behave.

4 Q Okay. So while it's a generic
5 example, you're borrowing certain concepts
6 from the transmission regulations that seem
7 to apply generally here as well; is that
8 right?

9 A I think it's the other way. I
10 would say that the transmission regulations
11 are borrowing from defect assessment
12 methodologies and not the other way around.
13 It's not the -- it is the code that is
14 recognizing defect assessment methodologies
15 as applicable for example to a corrosion flaw
16 found in transmission. But because these are
17 defect assessment methodologies, they are --
18 they're not specific to pipeline only. They
19 can be generally applied to any tubular
20 structure.

21 Q Okay. Let me be sure I'm
22 understanding that. Because you're starting
23 to talk a little bit above my understanding,
24 but I think I got the gist. Basically the
25 transmission code has recognized certain
26 leak-to-rupture flaws that you're talking
27 about here. And they're capturing those
28 leak-to-rupture flaws for purposes of

1 prescribing certain things that the operators
2 can do in that code; is that accurate?

3 A I had a hard time with that
4 question, Mr. Gruen. But let me see if I can
5 respond a little bit differently. The
6 pipeline industry decades ago sponsored
7 research to develop advanced
8 fracture-mechanic-spaced methodologies to
9 assess and analyze how one would expect a
10 defect to fail. And the cumulative result of
11 that effort was adoption of these
12 methodologies into the code.

13 So when I was speaking about it's
14 the code allowing and adopting these defect
15 assessment methods, that's what I meant. But
16 further to that, the research -- the research
17 world has also recognized and adapted these
18 methodologies and provided ways to apply them
19 in the downhole environment as well.

20 So the roots of these
21 fracture-mechanic methodologies are all the
22 same. They all lead to the same source.
23 There was a body of work conducted to
24 understand how to take a pressure mechanics
25 approach and do predictive -- to generate
26 failure predictions on tubular structures.
27 If that tubular structure is in transmission
28 or distribution, the code certainly allows

1 the application of these methodologies.

2 If the application is downhole,
3 that methodology has to be modified given how
4 different the downhole environment is. And
5 then once you have provided for some
6 modifications, certainly these principles
7 apply. And from an engineering perspective,
8 you can apply them to a defect in a well
9 environment.

10 Q Okay. Just a couple things. So
11 let me -- if I can, this is not the first
12 time that -- for me anyways that I've talked
13 past an engineer. So if we're talking past
14 each other, I'm doing the best I can. But
15 thank you for offering some clarity.

16 If I could just to get on the
17 record, you mentioned KAPA. And Maybe you
18 could describe for the record what KAPA
19 stands for?

20 A I will do my best. This is a
21 little bit of a memory test for me. But I
22 believe it's "Keiner & Associates Pipeline
23 Assessment or Analysis." That I can't
24 specifically recall.

25 Q Okay. Thank you. And what's the
26 purpose of KAPA? What does it do?

27 A KAPA is a fracture-mechanics based
28 program that provides a methodology to create

1 predicted failure pressure for a metal loss
2 flaw or for a crack-like defect.

3 Q Okay. Thank you. And just it's --
4 KAPA is not specifically for purposes of
5 detecting or related to corrosion; is that
6 right?

7 A KAPA is an analysis tool. So it's
8 not related to defect detection. Once you
9 detected a defect, you would then apply KAPA
10 to determine predictive failure pressure.

11 Q Okay. And just when you say
12 "defect," that would include corrosion. That
13 would be an example of a defect that KAPA is
14 not for purposes of detecting; is that right?

15 A To repeat KAPA is not a detection
16 methodology. KAPA is essentially an equation
17 that's used to take defect information and
18 then analyze that information to consume that
19 information gained from inspection in order
20 to make a prediction about failure pressure.
21 It applies to corrosion or just generically
22 to wall loss. And it applies in some
23 circumstances to crack-like flaws.

24 Q I think I want to just -- but it's
25 not used for purposes of detecting corrosion.
26 That's the piece I want to understand; right?

27 A That's correct. KAPA is not an
28 inspection tool.

1 Q Okay. It's looking at defects such
2 as defects in pipe resulting from corrosion
3 after, in fact, that's been discovered. In a
4 layperson's understanding, would you agree
5 with that statement?

6 A That's correct. KAPA is a tool to
7 analyze and digest inspection data.

8 Q Okay. All right. Fair enough. So
9 why don't I just ask if I can, I think I
10 wanted to get one other piece down. Because
11 I think if I'm understanding it again at a
12 lay level, you're taking a concept from this
13 pipe -- from this graph, excuse me, talking
14 about the pipe characteristics, and you're
15 recognizing the 49 CFR, Part 192. Takes
16 certain concepts like leak-to-rupture
17 threshold and codifies those concepts for
18 purposes of prescribing what operators should
19 do on transmission and distribution pipe. Is
20 that a fair characterization?

21 A Can you restate that just one more
22 time, please?

23 Q I can. Is 49 CFR, Part 192 taking
24 concepts from your graph here and codifying
25 them and then prescribing what operators
26 should do based upon certain of these
27 concepts?

28 A I don't -- I would not put it that

1 way. I would -- rather I would say that the
2 transmission code recognizes that one avenue
3 of analysis includes this approach and this
4 program.

5 Q Okay.

6 A It is codified. But the code is
7 not taking these principles and then adopting
8 them and then prescribing them to a
9 transmission pipeline practitioner what to do
10 or not to do. The code is simply allowing
11 this as an acceptable methodology for
12 analyzing flaws.

13 Q Understood. The code isn't telling
14 the operator what to do in essence. It's
15 providing options for what it can do is what
16 I'm hearing you say; is that accurate?

17 A I would agree with that; that's
18 correct.

19 Q Okay. Just to clarify the reason
20 for your understanding of the code, is
21 because 49 CFR, Part 192 applies to many
22 transmission and distribution pipes in
23 Southern California Gas Company's system; is
24 that right?

25 A That's correct. It applies to
26 transmission and distribution pipelines;
27 that's correct.

28 Q Including transmission lines that

1 run through the Aliso Canyon Natural Gas
2 Storage Facility?

3 A It applies to any pipeline in
4 transmission that meets the definition in the
5 code.

6 Q And pipes that run through Aliso
7 meet the definition of transmission line in
8 the code, do they not?

9 A I'd have to double check, but I
10 believe there are lines that meet the
11 definition of transmission pipe at Aliso.
12 But, again, I'd need to specifically review.

13 ALJ POIRIER: Mr. Gruen, how much -- do
14 you have a lot on this line of questioning?
15 We spent quite a bit of time on this graph.

16 MR. GRUEN: Thank you, your Honor, no.
17 We can move on. Thank you. And indeed I
18 think we're pretty close to wrapping up with
19 Mr. Sera and I appreciate the incite.

20 Q So if we could just switch. Just
21 with your experience as a metallurgical
22 engineer, do you know who Bret Lane is?

23 A I do, yes.

24 Q And do you know what Mr. Lane's
25 role at SoCalGas was during the SS-25
26 incident?

27 A I know that Bret was -- his
28 specific role with regard to the SS-25

1 incident, no. I don't know what his
2 involvement was. I don't know what role he
3 played specifically for SS-25.

4 Q Okay.

5 A I was not part of the storage
6 operations. So I don't have an awareness of
7 the different -- I don't have an awareness to
8 storage operation.

9 Q Understood. And apologies for
10 jumping in there. Just specifically to drill
11 down on this last bit before we wrap up.

12 Did you talk to Mr. Lane about the
13 reason or reasons for the SS-25 incident?

14 A No.

15 Q Okay. Did you talk to Mr. Lane
16 about the causes of the SS-25 incident?

17 A No. I don't recall having any
18 conversations with Mr. Lane about SS-25.

19 Q Okay.

20 MR. GRUEN: Your Honor, those are all
21 of SED's questions on cross-examination.
22 Thank you.

23 ALJ POIRIER: Thank you, Mr. Gruen.

24 Let's go off the record.

25 (Off the record.)

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

28 We were discussing the remaining

1 cross times. Cal Advocates indicated that it
2 had no cross-examination. SoCalGas indicated
3 that it does have redirect. But we're going
4 to take a break and recommence with that for
5 15 minutes. Let's go to 3:01.

6 And we'll be off the record.

7 (Off the record.)

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

10 We just returned from a 15-minute
11 break. When we broke, we were going to start
12 the redirect of Mr. Sera.

13 Please go ahead, Ms. Patel.

14 REDIRECT EXAMINATION

15 BY MS. PATEL:

16 Q Thank you, your Honor.

17 All right, Mr. Sera, we're going to
18 make this pretty quick.

19 Mr. Gruen asked you why you didn't
20 conduct an investigation of the cause of
21 failure of SS-25. Did you want to expound on
22 your response?

23 A Yes, I do. The root cause
24 investigation of SS-25 was controlled by
25 Blade. And it was understood broadly and
26 certainly my understanding was that Blade was
27 entirely responsible for conducting that
28 investigation. So I did not have any access

1 whatsoever to any of the location, field
2 components, or any other materials associated
3 with the well.

4 Q Okay. And you had a fairly lengthy
5 discussion with Mr. Gruen regarding various
6 portions of 49 CFR, Part 192. Do any of
7 those apply to underground gas storage?

8 A No, they do not.

9 Q And you aware whether PHMSA has
10 specific regulations that do apply to
11 underground gas storage?

12 A Yes, I am. I am aware.

13 Q I'm sorry. Let me ask that
14 clearer. Does PHMSA have separate
15 regulations that pertain to underground gas
16 storage?

17 A Yes, that's correct. PHMSA has
18 created underground gas storage specific
19 regulations.

20 Q Okay. And then Mr. Gruen
21 questioned you about some of your testimony
22 in a different proceeding. I believe that
23 proceeding No. Was A. 15-09-013, which I
24 think we referred to as the "PFRP
25 Proceeding." Did that proceeding in any way
26 relate to storage?

27 A No, it did not.

28 Q Okay. And then final question.

1 Mr. Gruen questioned you about welds,
2 w-e-l-d. Are there any welds on any
3 below-ground well structures?

4 A No.

5 MS. PATEL: Your Honor, that's all I
6 have.

7 ALJ POIRIER: Thank you, Ms. Patel.

8 Mr. Gruen, do you have any re-cross?

9 RE-CROSS-EXAMINATION

10 BY MR. GRUEN:

11 Q Yes, your Honor. Just briefly. I
12 think this should be very quick.

13 Mr. Sera, just with regards to the
14 PHMSA regulations that apply to underground
15 storage, were those regulations in effect at
16 the time of the SS-25 incident?

17 A No.

18 Q Okay. Would you know if -- with
19 regards to the leak versus rupture formula in
20 your testimony, were there any industry
21 standards that were in affect to apply those
22 to underground -- leak-to-rupture threshold
23 to underground storage well casings at the
24 time of the incident?

25 A I don't know.

26 Q What about the tubings?

27 A No. For me that would be the same
28 response. I don't specifically recall.

1 Q Okay. Okay.

2 MR. GRUEN: That's all we have, your
3 Honor. Thank you.

4 ALJ POIRIER: Thank you, Mr. Gruen.

5 Ms. Bone, do you have any recross?

6 MS. BONE: No, your Honor. We do not.

7 ALJ POIRIER: Thank you.

8 Ms. Patel, any redirect?

9 MS. PATEL: No, your Honor.

10 ALJ POIRIER: Okay. Thank you.

11 Thank you, Mr. Sera. You're
12 released. Thank you for your appearing
13 today.

14 THE WITNESS: Thank you.

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

17 (Off the record.)

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

20 While we were off the record, we had
21 a brief discussion on the rest of today's
22 activities.

23 Ms. Patel, would you like to proceed
24 with moving exhibits?

25 MS. PATEL: Yes, your Honor. Thank
26 you. SoCalGas moves to admit into the record
27 the exhibits that have been marked as
28 SoCalGas-12, The Prepared Reply Testimony of

1 Travis Sera. Dated March 20th, 2020; and
2 SoCalGas-13, The Exhibits to the Prepared
3 Reply Testimony of Travis Sera. Also dated
4 March 20th, 2020.

5 ALJ POIRIER: Does any party object to
6 the moving of these two exhibits?

7 MR. GRUEN: Sorry. I was on mute. No
8 objection from SED, your Honor.

9 ALJ POIRIER: Okay. Hearing none we
10 grant the motion to move exhibits SoCalGas-12
11 and SoCalGas-13 into the record.

12 (Exhibit Nos. SoCalGas-12 through
13 SoCalGas-13 were received into
evidence.)

14 ALJ POIRIER: Mr. Gruen.

15 MR. GRUEN: Your Honor, at this time,
16 SED moves to admit into the record exhibits
17 marked as SED-222, 49 -- Title 49 Code of
18 Federal Regulations Section 192.3; Exhibit
19 SED-224, 49 Code of Federal Regulations
20 Sections 192.105, 192.107, 192.109, and
21 192.619; Exhibit SED-232 A. 15-09-013,
22 Supplemental Testimony of SGD&E and SoCalGas;
23 and Exhibit SED-260, Title 49 of the Code of
24 Federal Regulations Section 192.712.

25 ALJ POIRIER: SoCalGas, do you have any
26 objections to these?

27 MS. PATEL: Exhibit-222 I do not
28 believe it was shown to the witness. He was

1 not asked any questions on that exhibit. As
2 to Exhibit 223, 224, 232 -- well, excuse me.
3 Let me stick with 223, 224, and 260. I
4 believe we established during
5 cross-examination that those were
6 inapplicable pipeline regulations.

7 And as for Exhibit-260 -- or excuse
8 me. 232, I apologize. That is testimony
9 from a proceeding relating to a particular
10 pipeline, and it had nothing to do with
11 storage or the witness's testimony.

12 ALJ POIRIER: Okay. Let's break up
13 that process. So let's start with the first.
14 You indicated --

15 (Crosstalk.)

16 MS. PATEL: Exhibit-222. I do not
17 believe that the witness was questioned on
18 Exhibit-222.

19 ALJ POIRIER: Mr. Gruen.

20 MR. GRUEN: We'll concede that, your
21 Honor. Appreciate the correction.

22 Your Honor, may we go off the record
23 for a moment?

24 ALJ POIRIER: Off the record.

25 (Off the record.)

26 ALJ POIRIER: Let's go back on the
27 record.

28 We just had a brief discussion over

1 the exhibits. SED has moved -- has removed
2 222 from being moved. It's still asking for
3 SED-223, 224, 232, and 260; is that correct,
4 Mr. Gruen?

5 MR. GRUEN: Your Honor, we're not
6 moving SED-223 in. But we are requesting to
7 move 224, 232, and 260 in.

8 ALJ POIRIER: Okay. I'm going to grant
9 SED's motion to move 224, 232, and 260. And
10 these exhibits will be given the weight
11 appropriate and parties can raise that at the
12 time. Okay.

13 (Exhibit No. SED-224 was received
14 into evidence.)

15 (Exhibit No. SED-232 was received
16 into evidence.)

17 (Exhibit No. SED-260 was received
18 into evidence.)

19 MR. GRUEN: Thank you, your Honor.

20 ALJ POIRIER: Do we have any more
21 issues to bring up? Housekeeping before we
22 end for the day?

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

24 MS. BONE: None from Cal Advocates,
25 your Honor.

26 ALJ POIRIER: Okay.

27 MS. PATEL: None from SoCalGas.

28 ALJ POIRIER: Okay.

Well, I think that means that we'll

1 conclude a little bit early today. We'll be
2 starting with Mr. Abel first thing. We'll
3 start with the attestation and direct
4 testimony. And then we'll proceed with the
5 cross-examination.

6 We'll be starting tomorrow at
7 10:00 a.m. as usual. And please, everybody,
8 have a good rest of the day. Thank you.

9 And we'll be off the record.

10 (Off the record.)

11 (Whereupon, at the hour of 3:12 p.m.
12 this matter having been continued to
13 10:00 a.m. April 7, 2021, the
Commission then adjourned.)

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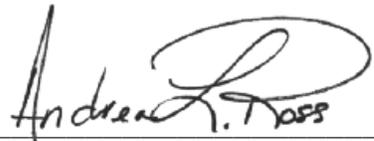
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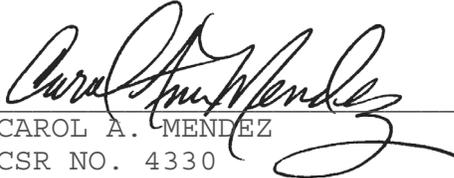
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