

Docket:	<u>A.19-06-016</u>
Exhibit Number:	<u>CalPA 407</u>
Reference Number:	<u>CalAdvocates-06</u>
Date Served:	<u>April 29, 2021</u>
Commissioner:	<u>C. Rechtschaffen</u>
Admin. Law Judge:	<u>Poirier/Kenney</u>



**THE PUBLIC ADVOCATES OFFICE
CALIFORNIA PUBLIC UTILITIES COMMISSION**

**Order Instituting Investigation on the Commission's Own Motion
into the 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 Uncontrolled Release of Natural Gas from Its Aliso Canyon
Storage Facility**

SoCalGas' Response to CalAdvocates-SCG-DR-037

San Francisco, California
March 24, 2021

ORDER INSTITUTING INVESTIGATION ON THE COMMISSION'S OWN MOTION INTO THE 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 UNCONTROLLED RELEASE OF NATURAL GAS FROM ITS ALISO CANYON STORAGE FACILITY (I.19-06-016)

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALADVOCATES-SCG-37 DATED APRIL 1, 2020)

SOCALGAS RESPONSE DATED APRIL 16, 2020

SoCalGas provides the following Responses to Cal Advocates data request dated April 1, 2020 in I.19-06-016. The Responses are based upon the best available, nonprivileged information that SoCalGas was able to locate through a diligent search within the time allotted to respond to this request, and within SoCalGas' possession, custody, or control. SoCalGas' responses do not include information collected or modeled by Blade Energy Partners' during its Root Cause Analysis Investigation. SoCalGas reserves the right to supplement, amend or correct the Responses to the extent that it discovers additional responsive information.

SoCalGas objects to the instructions submitted by Cal Advocates and to the continuing and indefinite nature of this request on the grounds that they are overbroad and unduly burdensome. Special interrogatory instructions of this nature and continuing interrogatories are expressly prohibited by California Code of Civil Procedure Section 2030.060(d) and 030.060(g), respectively. SoCalGas will provide responsive documents in existence at the time of its response. Should Cal Advocates seek to update its request, SoCalGas will respond to such a request as a new data request in the future.

SoCalGas submits these Responses, while generally objecting to any Request that fails to provide a defined time period to which SoCalGas may tailor its Response, and to the extent that any Request is overly broad, vague, ambiguous, unduly burdensome, assumes facts, or otherwise fails to describe with reasonable particularity the information sought. SoCalGas further submits these Responses without conceding the relevance of the subject matter of any Request or Response. SoCalGas reserves the right to object to use of these Responses, or information contained therein, in any dispute, matter or legal proceeding. Finally, at the time of this Response, there are no pending oral data requests from Cal Advocates to SoCalGas.

In SoCalGas' Reply Testimony filed on March 20, 2020, SoCalGas states: First, prior to 2007 SoCalGas did assess risk as part of ongoing operations, even if it was not documented as a formal risk assessment program; this was consistent with the standard practices of other operators.[] Second, starting in 2007 SoCalGas had a formal risk assessment program, which focused on wellbore integrity management. SoCalGas implemented a 'Replace and Inspect' initiative....¹

¹ I.19-06-016, SoCalGas' Reply Testimony Chapter 1, p. 28.

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SoCalGas also states that “[i]n 2007, SoCalGas began a well integrity program to inspect, evaluate, and mitigate downhole well integrity issues.”²

This data request relates to the inspection and remediation activities specified below for pre-“Replace and Inspect” and post-“Replace and Inspect”, as defined and stated by SoCalGas in its Reply Testimony at Chapter 1, page 28 and quoted above.

QUESTION 1:

Please provide:

- a) The start date, preferably to the day and month, of the implementation of the “Replace and Inspect” program referred to above and in SoCalGas’ Reply Testimony.
- b) The start date, preferably to the day and month, of the implementation of the Storage Integrity Management Program (SIMP).
- c) Documentation evidencing the dates provided in subparts (a) and (b).

RESPONSE 1:

- a) SoCalGas objects to this request as vague and ambiguous, particularly with respect to the term “implementation.” Subject to and without waiving the foregoing objection, SoCalGas responds as follows. SoCalGas began running ultrasonic inspection logs under the “Replace and Inspect” initiative on or around May 2007.
- b) SoCalGas objects to this request as vague and ambiguous, particularly with respect to the term “implementation.” Subject to and without waiving the foregoing objection, SoCalGas responds as follows. SoCalGas began workovers and casing inspection logs associated with the SIMP Pilot Program on or around June 2014.
- c) Please see electronic documents with Bates range I1906016_SCG_CALADVOCATES_0044123 – 44141.

² I.19-06-016, SoCalGas’ Reply Testimony Chapter 6, p. 1.

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QUESTION 2:

Please provide a summary of SoCalGas' "Replace and Inspect" program with supporting documentation.

RESPONSE 2:

SoCalGas objects to this request as vague and ambiguous, particularly with respect to the term "summary." SoCalGas further objects to this request as to "supporting documentation" as overly broad and unduly burdensome pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure. Subject to and without waiving the foregoing objections, SoCalGas responds as follows. Please see SoCalGas' Prepared Reply Testimony, Chapter VI (Kitson). Supporting documentation is contained within the well files of the "Replace and Inspect" initiative wells.

QUESTION 3:

Please state the number of ultrasonic inspections on gas well production casings performed per year at SoCalGas' Aliso Canyon facilities:

- a) Between January 1, 2000 and when SoCalGas's "Replace and Inspect" program was implemented in 2007;
- b) Between SoCalGas' implementation of the "Replace and Inspect" program and when SIMP was implemented.

RESPONSE 3:

- a) Between 2000 and 2006, SoCalGas ran, on average, 1 ultrasonic inspection per year at Aliso Canyon.
- b) Between 2007 and 2013, SoCalGas ran, on average, 3.57 ultrasonic inspections per year at Aliso Canyon.

QUESTION 4:

Please state the number of magnetic flux leakage inspections on gas well production casings performed per year at SoCalGas' Aliso Canyon facilities:

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- a) Between January 1, 2000 and when SoCalGas' "Replace and Inspect" program was implemented in 2007;
- b) Between SoCalGas' implementation of the "Replace and Inspect" program and when SIMP was implemented.

RESPONSE 4:

- a) Between 2000 and 2006, SoCalGas did not utilize any magnetic flux leakage inspection tools at Aliso Canyon.
- b) Between 2007 and 2013, SoCalGas ran 1 magnetic flux leakage inspection tool at Aliso Canyon.

QUESTION 5:

Please state the number of pressure tests on gas well production casings performed above the differential working pressure (between the inside of the production casing and the formation surrounding it) per year at SoCalGas' Aliso Canyon facilities:

- a) Between January 1, 2000 and when SoCalGas's "Replace and Inspect" program was implemented in 2007;
- b) Between when SoCalGas' implementation of the "Replace and Inspect" program and when SIMP was implemented.

RESPONSE 5:

SoCalGas objects to this request as unintelligible, and vague and ambiguous, particularly with respect to the phrase "differential working pressure." Subject to and without waiving the foregoing objections, SoCalGas responds as follows. SoCalGas interprets this request to seek whether SoCalGas pressure tested between the formation and production casing of wells. SoCalGas has not pressure tested between the formation and production casing of wells at Aliso Canyon.

QUESTION 6:

Please state the number of secondary mechanical barriers installed in gas well production casings per year at SoCalGas' Aliso Canyon facilities:

- a) Between January 1, 2000 and when SoCalGas's "Replace and Inspect"

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program was implemented in 2007;

b) Between SoCalGas' implementation of the "Replace and Inspect" program and when SIMP was implemented.

RESPONSE 6:

SoCalGas objects to this request as vague and ambiguous, particularly with respect to the phrase "secondary mechanical barrier installed." Subject to and without waiving the foregoing objections, SoCalGas responds as follows. SoCalGas interprets this request to seek whether SoCalGas operated its gas storage wells at Aliso Canyon as tubing flow only. SoCalGas operated certain wells as tubing flow only during the time period requested.

QUESTION 7:

Please state the number of gas wells taken out of service due to production casing wall loss per year at SoCalGas' Aliso Canyon facilities:

a) Between January 1, 2000 and when SoCalGas's "Replace and Inspect" program was implemented in 2007;

b) Between SoCalGas' implementation of the "Replace and Inspect" program and when SIMP was implemented.

RESPONSE 7:

SoCalGas objects to this request as vague and ambiguous, particularly with respect to the phrase "casing wall loss" and "taken out of service." Subject to and without waiving the foregoing objections, SoCalGas responds as follows. SoCalGas interprets "casing wall loss" to refer to results from a casing inspection tool. In addition, SoCalGas understands "taken out of service" to mean isolating a gas storage well from the reservoir for the purpose of a workover. A well is first taken out of service and then a casing inspection tool is run to determine whether there is metal loss in the production casing of the well. Therefore, a well is taken out of service before a casing inspection tool is run in the well and wall loss is determined.