

SED-226
SoCalGas Response to SED Data Request 119
I.19-06-016
ALJs: Hecht/Poirier
Date Served: 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 SED-SCG-119 DATED OCTOBER 30, 2020)

SOCALGAS RESPONSE DATED NOVEMBER 9, 2020

SoCalGas provides the following Responses to the Safety and Enforcement Division (SED) data request dated October 30, 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 SED 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 SED 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 SED to SoCalGas.

Please refer to Chapter 1 of SoCalGas' Supplemental Rebuttal Testimony, entitled, "Prepared Supplemental Rebuttal Testimony of Glenn La Fevers on Behalf of Southern California Gas Company" for this set of questions.

QUESTION 1:

Please provide a resume for Mr. LaFevers that shows his education, all of his career positions and experience with SoCalGas, and any additional specialty training that is relevant to his experience with underground gas storage.

**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 SED-SCG-119 DATED OCTOBER 30, 2020)

SOCALGAS RESPONSE DATED NOVEMBER 9, 2020

RESPONSE 1:

SoCalGas objects to this request as vague and ambiguous, particularly with respect to the phrases "career positions and experience" and "specialty training." Subject to and without waiving the foregoing objection, SoCalGas responds as follows. For Mr. La Fevers' SoCalGas work history and education information, please refer to the Witness Qualifications appended to his testimony.

QUESTION 2:

What was Mr. LaFever's job title on November 13, 2015?

RESPONSE 2:

Storage Operations Manager.

QUESTION 3:

Referring to page 2:14-15, which states, "The Release Was an Unavoidable Byproduct of the Well Kill Attempt on November 13, 2015". Also referring to 3:1-2, which states, "Because Aliso Canyon is a depleted oil field there is some residual oil within the field." Also, referring to page 3:3-4, ". . .the release of oil, which was entrained in the resurfaced fluids, [footnote omitted], was an ancillary and unavoidable byproduct of the well kill attempt. . ." With these passages in mind, please answer the following:

- a. In this sentence, define the location(s) of the depleted oil field by reservoir, such as Aliso, Porter, Sesnon, etc.
- b. Identify by Bates number the geologic cross section of SS-25 that shows the reservoirs intersected by SS-25.
- c. How many times from October 23, 2015 through February 28, 2016 was there a release event at SS-25 similar to the one that occurred on November 13, 2015?
 - i. If the answer is more than 1, please list the dates of the additional release events and identify by name or bates numbers all documents that described those releases.
- d. Did "the release of oil, which was entrained in the resurfaced fluids" contain water?
 - i. If yes, provide an estimate of how much water.

**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 SED-SCG-119 DATED OCTOBER 30, 2020)

SOCALGAS RESPONSE DATED NOVEMBER 9, 2020

- ii. If yes, what was the source of the water?
- e. Has SoCalGas experienced release of oil as a byproduct of a well kill attempt before the occurrence at SS-25 on November 13, 2015?
- f. If the answer to question 1a is yes, please list:
 - i. For which wells?
 - ii. On which dates?
 - iii. For each such experience, were mitigation measures recommended relating to the release of oil?
 - iv. If so, which measures?
 - v. Provide documentation to support the answer to questions 1bi through 1biv.
- g. As the release of oil was allegedly unavoidable, did SoCalGas contemplate ways to mitigate its release?
 - i. Provide documents supporting your answer.

RESPONSE 3:

- a. SoCalGas objects to this request as vague and ambiguous, particularly with respect to the phrases "this sentence" and "define the location(s) of the depleted oil field by reservoir." SoCalGas also objects to this request on the ground it is outside the scope of this proceeding as determined in the Assigned Commissioner's Scoping Memo and Ruling dated September 26, 2019. Subject to and without waiving the foregoing objections, SoCalGas responds as follows. SoCalGas interprets this request to ask the title of the gas storage reservoir at Aliso Canyon, where SS-25 is completed, which was converted from oil operation to gas storage. The Sesnon Frew Gas Storage Zone.
- b. SoCalGas objects to this request on the ground it is unduly burdensome to the extent it seeks information that has already been provided to, and thus is equally available to, SED. SoCalGas further objects to this request on the ground it seeks information outside the scope of this proceeding as determined by the Assigned Commissioner's Scoping Memo and Ruling dated September 26, 2019. Subject to and without waiving the foregoing objections, SoCalGas responds as follows. Please see previously provided electronic document with Bates range I1906016_SCG_SED_DR_115_0000001.
- c. SoCalGas objects to this request as overly broad and unduly burdensome, particularly with respect to the request to "identify by name or bates number all documents that described those releases." SoCalGas further objects to this

**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 SED-SCG-119 DATED OCTOBER 30, 2020)

SOCALGAS RESPONSE DATED NOVEMBER 9, 2020

request as vague and ambiguous, particularly with respect to the terms “release event” and “similar.” SoCalGas also objects to this request to the extent it is compound and seeks information that is equally available to SED. Subject to and without waving the foregoing objections, SoCalGas responds as follows. From November 13, 2015 through February 11, 2016, pressure within the SS-25 well caused liquid to become aerosolized during kill events and on a periodic basis between kill attempts. See, e.g., Boots & Coots’ daily reports which were previously provided to SED with Bates range AC_CPUC_SED_DR_16_0025631 – AC_CPUC_SED_DR_16_0025808.

- d. SoCalGas objects to this request as vague and ambiguous and outside the scope of this proceeding as determined by the Assigned Commissioner’s Scoping Memo and Ruling dated September 26, 2019. SoCalGas further objects to this request on the grounds that it calls for speculation. Subject to and without waiving the foregoing objections, SoCalGas responds as follows. The resurfaced fluids were not tested for water composition. It is expected that the resurfaced fluids would have a high water content because of the constituents of the well kill fluids.
- e. SoCalGas objects to this request as vague and ambiguous, particularly with respect to the phrase “experienced release of oil as a byproduct of a well kill attempt.” SoCalGas additionally objects to this request as overly broad and unduly burdensome, including because it fails to specify a period of time to which a response may be tailored. Subject to and without waiving the foregoing objections, SoCalGas responds as follows. SoCalGas is not aware of a similar release of oil as a byproduct of a well kill attempt at SS-25 prior to November 13, 2015.
- f. N/A.
- g. SoCalGas objects to this request to the extent it mischaracterizes or misconstrues SoCalGas’ testimony. SoCalGas further objects to this request as it fails to specify a period of time to which a response may be tailored. Subject to and without waving the foregoing objections, SoCalGas responds as follows. Although the incidental release of oil in conjunction with the November 13, 2015 well kill attempt was unavoidable, it was not expected. As noted in SoCalGas’ Supplemental Rebuttal Testimony, Chapter II (Abel), such an event does not always occur in conjunction with a top kill.

**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 SED-SCG-119 DATED OCTOBER 30, 2020)

SOCALGAS RESPONSE DATED NOVEMBER 9, 2020

QUESTION 4:

Did SoCalGas and Boots & Coots know the release would occur before “the release of oil, which was entrained in the resurfaced fluids”?

- a. If yes, state what field or well data informed SoCalGas and Boots & Coots that the release would occur?
- b. If yes, how much time occurred between when the data was received and when the release occurred?
- c. If yes, did SoCalGas and Boots & Coots have to make a decision to take some action to cause the release?
 - i. If yes, what steps were taken to cause the release?
 - ii. If yes, what steps did SoCalGas and Boots & Coots take to make sure everyone on site would be safe during the event?

RESPONSE 4:

SoCalGas objects to this request on the ground it is compound. SoCalGas further objects to this request to the extent it seeks information that is not within SoCalGas' knowledge or control. Subject to and without waiving the foregoing objections, SoCalGas responds as follows. SoCalGas did not know the release on November 13, 2015 would occur prior to the release. See Response 3.g.

- a. N/A.
- b. N/A.
- c. N/A
 - i. N/A
 - ii. N/A

QUESTION 5:

Referring to page 4:16, which states, “On November 13, 2015, I reported the release to Dispatch.” With this passage in mind:

- a. Please provide the communication that constituted the reporting of the release to Dispatch.

**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 SED-SCG-119 DATED OCTOBER 30, 2020)

SOCALGAS RESPONSE DATED NOVEMBER 9, 2020

RESPONSE 5:

SoCalGas objects to this request on the ground it assumes the report was in writing. Subject to and without waiving the foregoing objection, SoCalGas responds as follows. The communication was verbal. Please see enclosed electronic document with Bates number I1906016_SCG_SED_DR_119_000020.

QUESTION 6:

Referring to page 4:16-18, which states, "Dispatch took the information provided and developed the MCR. Note that dispatch does not have technical expertise, and certainly not with respect to well control operations." Also referring to page 4:8-10, which states, "The text message to which Ms. Felts refers is a Message Center Report (MCR) issued on November 13, 2015 at 3:00 p.m. which states, "[d]uring the repair process to mitigate the Leak at the well head in Aliso Canyon, oil was extracted and vented into the atmosphere." With these passages in mind, please answer:

- a. Precisely how did dispatch know to state in the Message Center Report that "oil was extracted and vented into the atmosphere."?

RESPONSE 6:

SoCalGas objects to this request as vague and ambiguous, particularly with respect to the phrase "how did dispatch know to state." SoCalGas further objects to this request on the ground it calls for speculation. Subject to and without waiving the foregoing objections, SoCalGas responds as follows. SoCalGas is not currently able to pose this question to the Dispatcher.

QUESTION 7:

Referring to pages 5:19 to 6:1-2, which states, "At 3:14 PM, SoCalGas provided its final status update to CalOES, reporting that, "[t]he mist flow has reduced and no off site impact has occurred." [Footnote omitted].

Please refer to the following quote, "On January 11, 2016 Mitchell Englander, the Los Angeles City Councilman representing Porter Ranch, criticized SoCal Gas "operating a

**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 SED-SCG-119 DATED OCTOBER 30, 2020)

SOCALGAS RESPONSE DATED NOVEMBER 9, 2020

facility of this magnitude, [...] feeding 20 million addresses" for not having a backup plan, the delay in bringing necessary equipment on site "from the Gulf states like they did in this particular situation" and the delay in catching the brine, oil and chemical mist "landing on people's homes and turning their cars black".

- a. Does SoCalGas dispute that "brine, oil and chemical mist landed on people's homes and turned their cars black?"
- b. If so, provide the documentation in support of each point that SoCalGas disputes.

RESPONSE 7:

SoCalGas objects to this request on the ground that it is compound, vague and ambiguous, and unintelligible to the extent quotes are offered out of context and it appears to conflate different occurrences. Subject to and without waiving the foregoing objections, SoCalGas responds as follows. SoCalGas understands this request to ask SoCalGas to reconcile its quoted testimony with Mitchell Englander's January 11, 2016 statement that "[t]hey're just learning now that some of the brine and oil and chemicals that are coming up from the ground and are landing on people's homes and turning their cars black - they've now put in a screening system to capture that." Violation 331 and SoCalGas' responsive testimony relate to the November 13, 2015 event. Former Councilman Englander's reference appears to be to reports from certain residents who lived immediately adjacent to the facility that they had found dark brown spots on their properties, which occurred after and is unrelated to the November 13, 2015 event.

QUESTION 8:

Please refer to: Exhibit 1-1, the email from Ben Turner to Lauren, Wolman@mail.house.gov

- a. Who is lauren, Wolman@mail.house.gov?
- b. How did SoCalGas obtain this forwarded message?
- c. Who was the field engineer who wrote the content of the Aliso Update?
- d. Please identify the sentence or section in this update that describes the event that was subject of the MCR dispatch that was sent out on November 13, 2015 at 3:00 pm.

**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 SED-SCG-119 DATED OCTOBER 30, 2020)

SOCALGAS RESPONSE DATED NOVEMBER 9, 2020

RESPONSE 8:

- a. SoCalGas objects to this request to the extent it seeks information that is equally available to SED. Subject to and without waiving the foregoing objection, SoCalGas responds as follows. SoCalGas understands that, as of the date of the email, Ms. Wolman was Legislative Director for the Office of Congressman Brad Sherman.
- b. SoCalGas obtained this document through a California Public Records Act request.
- c. SoCalGas understands the field engineer was Kris Gustafson.
- d. SoCalGas objects to this request on the ground it is unduly burdensome because it seeks information contained in the two-page document referenced by SED in the question and thus is equally available to SED.

QUESTION 9:

Please refer to the documents provided as Exhibit 1-3. If any of these documents were previously provided in response to SED data requests, please provide the bates numbers.

RESPONSE 9:

SoCalGas objects to this request to the extent it assumes the documents provided as Exhibit 1-3 were responsive to an SED data request. SoCalGas further objects to this request as outside the scope of this proceeding as determined in the Assigned Commissioner's Scoping Memo and Ruling dated September 26, 2019. Subject to and without waiving the foregoing objections, SoCalGas responds as follows. N/A.

QUESTION 10:

Please refer to Exhibit 1-7, page 1.

- a. Refer specifically to the last line of the quoted bulleted paragraph beginning "November 14 --. The last sentence reads "At 1:05 pm OES and NRC were notified of release containment and minor additional release of crude oil at 4:30 am." With regards to this quoted last sentence, what does the "4:30 am" time refer to: "release containment," "minor additional release of crude oil," or both?
- b. Provide, or identify by Bates number, the timeline this "November 14" – bullet came from.

**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 SED-SCG-119 DATED OCTOBER 30, 2020)

SOCALGAS RESPONSE DATED NOVEMBER 9, 2020

RESPONSE 10:

a. SoCalGas further objects to this request as outside the scope of this proceeding as determined in the Assigned Commissioner's Scoping Memo and Ruling dated September 26, 2019. SoCalGas further objects to this request to the extent it seeks information that is equally available to SED. Subject to and without waiving the foregoing objections, SoCalGas responds as follows. Minor additional release of crude oil.

b. SoCalGas objects to this request as unduly burdensome to the extent it seeks information that is equally available to SED. Subject to and without waiving the foregoing objection, SoCalGas responds as follows. The referenced timeline was provided to SED in response to a data request on November 15, 2015. SED referenced and included this language in a request to SoCalGas (SED Data Request 33), which is included as an attachment in support of SED's testimony alleging Violation 331 (see SED SUR_REPLY_002198).

QUESTION 11:

Please refer to Exhibit 1-7, Sample Analyses.

- a. Please confirm that all of these analyses are of mud and liquid, not air emissions.
- b. Please provide sample chains of custody and analytical results for all samples collected on November 13, 2015 of the mist that contained oil and was subject of the 3:00 pm MCR dispatch.
- c. Please provide sample chains of custody and analytical results for all gas emission and air quality samples collected on November 13, 2015 on, or about 3 PM, but not more than 30 minutes after the release that was subject of the 3:00 pm MCR dispatch.

RESPONSE 11:

- a. Eurofins reports 15-11-1098 and 15-11-1099 provided in Exhibit I-7 are well fluid samples to determine material properties. These are not samples for ambient air monitoring.
- b. SoCalGas objects to this request on the ground it is unduly burdensome in that it seeks information equally available to SED. Subject to and without waiving the

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 SED-SCG-119 DATED OCTOBER 30, 2020)

SOCALGAS RESPONSE DATED NOVEMBER 9, 2020

foregoing objection, SoCalGas responds as follows. See Exhibit I-7.

- c. SoCalGas objects to this request on the ground it assumes the referenced samples were collected as described. Subject to and without waiving the foregoing objection, SoCalGas responds as follows. N/A.

QUESTION 12:

Provide all communications related to Chapter I.

RESPONSE 12:

SoCalGas objects to this request as overly broad and unduly burdensome pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure. SoCalGas further objects to this request on the grounds it seeks information that is protected from disclosure by the attorney-client communication privilege and/or the attorney work product doctrine.

QUESTION 13:

Provide all communications between SoCalGas and Mr. La Fevers related to Chapter I.

RESPONSE 13:

SoCalGas objects to this request on the ground it is unintelligible in that it fails to recognize that Mr. La Fevers is an employee of SoCalGas. SoCalGas further objects to this request on the grounds it seeks information that is protected from disclosure by the attorney-client communication privilege and/or the attorney work product doctrine. Subject to and without waiving the foregoing, SoCalGas responds as follows. Please see enclosed electronic documents with Bates number I1906016_SCG_SED_DR_119_0000018 - 0000019.

QUESTION 14:

Provide all workpapers related to Chapter I.

**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 SED-SCG-119 DATED OCTOBER 30, 2020)

SOCALGAS RESPONSE DATED NOVEMBER 9, 2020

RESPONSE 14:

See SoCalGas' Supplemental Rebuttal Testimony Chapter I (La Fevers) Exhibits and enclosed electronic documents with Bates number I1906016_SCG_SED_DR_119_0000020 - 0000021.

QUESTION 15:

Provide all documents related to Chapter I.

- c. Please refer to Chapter 2 of SoCalGas' Supplemental Rebuttal Testimony, entitled, "Prepared Supplemental Rebuttal Testimony of L. William Abel on Behalf of Southern California Gas Company" (Chapter II) for this set of questions.

RESPONSE 15:

SoCalGas objects to this request as overly broad and unduly burdensome pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure. SoCalGas further objects to this request on the grounds that it is vague, ambiguous, and unintelligible.

QUESTION 16:

Provide all communications related to Chapter II.

RESPONSE 16:

SoCalGas objects to this request as overly broad and unduly burdensome pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure.

QUESTION 17:

Provide all communications between SoCalGas and Mr. Abel related to Chapter II.

RESPONSE 17:

Please see enclosed electronic documents with Bates number I1906016_SCG_SED_DR_119_0000001 – 0000003;

**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 SED-SCG-119 DATED OCTOBER 30, 2020)

SOCALGAS RESPONSE DATED NOVEMBER 9, 2020

I1906016_SCG_SED_DR_119_00000010.

QUESTION 18:

Provide all workpapers related to Chapter II.

RESPONSE 18:

Please see enclosed electronic documents with Bates number I1906016_SCG_SED_DR_119_0000004 - 0000009; I1906016_SCG_SED_DR_119_0000011 – 0000017.

QUESTION 19:

Provide all documents related to Chapter II.

RESPONSE 19:

SoCalGas objects to this request as overly broad and unduly burdensome pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure.