

SED-257
SoCalGas Response to SED Data Request 129
I.19-06-016
ALJs: Hecht/Poirier
Date Served: April 5, 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-129 DATED JANUARY 4, 2021)

SOCALGAS RESPONSE DATED JANUARY 19, 2021

SoCalGas provides the following Responses to the Safety and Enforcement Division (SED) data request dated January 4, 2021 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.

QUESTION 1:

Provide the definition of Well File that SoCalGas uses today.

- a. Provide the SoCalGas standard that:
 - i. Defines a well file;
 - ii. States the format for the well file;
 - iii. States what records are to be kept in the well file.
 - iv. Identify the page number or page numbers of the provided standard that addresses points ai, aii, and aiii.

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b. If the standard SoCalGas provides in response to 1.a. is dated after October 23, 2015, then also identify previous versions of the standard and provide a copy of the most recent version dated prior to October 23, 2015. Be sure to apply subparts 1a(i-v) to this question.

RESPONSE 1:

SoCalGas objects to this request as vague and ambiguous, particularly with respect to the term "SoCalGas standard." Subject to and without waiving the foregoing objection, SoCalGas responds as follows. SoCalGas interprets this request to seek formal written company gas standards providing the definition, organization and format of an underground gas storage well file. N/A. Please refer to Section II of SoCalGas's Reply Testimony, Chapter VII (Neville).

QUESTION 2:

Please confirm that SoCalGas has provided to SED every document that was or is contained in the current SS-25 well file.

- a. State how many pages are in the current hard copy SS-25 well file.
- b. Identify the names of the subsections of the hard copy SS-25 well file.

RESPONSE 2:

SoCalGas objects to this request as vague and ambiguous, particularly with respect to the phrase "current SS-25 well file." SoCalGas further objects to this request on the ground it is unduly burdensome to the extent it seeks information previously provided to SED. SoCalGas also objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which allows discovery "regarding any matter... that is relevant to the subject matter involved in the pending proceeding, if the matter is itself admissible in evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence." Subject to and without waiving the foregoing objections, SoCalGas responds as follows. Please refer to SoCalGas' November 7, 2018 response to Question 21 of SED Data Request 32 dated October 12, 2018. Please see Response 1. To the extent that well files are maintained in hard copy and in electronic

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databases that include records associated with the original design, construction, subsurface maintenance, and inspection data, SoCalGas has not provided the full current well file for SS-25.

QUESTION 3:

Identify in a list the operations and maintenance data that is or has been recorded by SoCalGas, but is not kept in a well file.

- a. For each item listed, identify the type of file (hard copy or electronic) and where the files are kept (Office name, Building number, Street name, City).
- b. For each item listed, identify the SoCalGas and Contractor person(s) who have full access (read/write/manage) to these files and those SoCalGas and Contractor person(s) who can only view/read the files.

RESPONSE 3:

SoCalGas objects to this request on the ground it is vague and ambiguous, particularly with respect to the phrase "operations and maintenance data." SoCalGas also objects to this request on the ground it is unduly burdensome to the extent it seeks information previously provided to SED. SoCalGas further objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which allows discovery "regarding any matter... that is relevant to the subject matter involved in the pending proceeding, if the matter is itself admissible in evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence." Subject to and without waiving the foregoing objections, SoCalGas responds as follows. Please refer to SoCalGas' April 27, 2018 response to Question 17 of SED Data Request 17 dated March 30, 2018.

QUESTION 4:

Provide the names of all persons, contractors and SoCalGas personnel, who were present at the time the Well Files were scanned for delivery to SED in electronic form.

- a. As a subset to this question, specifically identify the persons who were present when Well Files were scanned during 2015-2016.
- b. As a subset to this question, specifically identify the persons who were present

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when Well Files were scanned during 2020.

c. As a subset to this question, specifically identify the persons who were present when Well Files were scanned from 2017 to 2019.

RESPONSE 4:

SoCalGas objects to this request to the extent it assumes that the well files were “scanned for delivery to SED.” SoCalGas also objects to this request as vague and ambiguous, particularly with respect to the term “scanned for delivery to SED.” SoCalGas further objects to this request as unduly burdensome pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, which allows discovery “regarding any matter... that is relevant to the subject matter involved in the pending proceeding, if the matter is itself admissible in evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence.” SoCalGas also objects to the extent the request assumes SoCalGas scanned well files in response to SED data requests.

QUESTION 5:

From October 23, 2015 to present, identify all activities, by date and subject, that occurred related to the management of the Aliso Canyon Well Files. (Example activities: moving files, consolidating files, making new folders for files, reorganizing files, cleaning up files, arranging files for scanning, removing duplicates from files, etc)

a. For each date listed, provide the names of the persons present during the activity.

b. For each date listed, state what Well Files were subject of the activity.

RESPONSE 5:

SoCalGas objects to this request on the grounds it is overly broad and unduly burdensome pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, which allows discovery “regarding any matter... that is relevant to the subject matter involved in the pending proceeding, if the matter is itself admissible in evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of

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admissible evidence.” SoCalGas further objects to this request as vague and ambiguous, in particular with respect to the phrase “activities, by date and subject, that occurred related to the management of the Aliso Canyon Well Files.”

QUESTION 6:

Identify all SoCalGas personnel present when Aliso Canyon Well Files that were provided to SED in response to data requests were scanned.

RESPONSE 6:

SoCalGas objects to this request on the ground it is unduly burdensome pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, which allows discovery “regarding any matter... that is relevant to the subject matter involved in the pending proceeding, if the matter is itself admissible in evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence.” SoCalGas also objects to this request to the extent it is duplicative of Request 4 herein.

QUESTION 7:

With regards to question 4, did SoCalGas provide the same scanned Aliso Canyon Well Files to SED as the ones it used to operate and maintain Aliso Canyon?

RESPONSE 7:

SoCalGas objects to this request as vague and ambiguous, particularly with respect to the phrase “as the ones it used to operate and maintain Aliso Canyon.” SoCalGas further objects to this request on the ground it is unduly burdensome to the extent it seeks information previously provided to SED. SoCalGas also objects to this request as unduly burdensome pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, which allows discovery “regarding any matter... that is relevant to the subject matter involved in the pending proceeding, if the matter is itself admissible in evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence.” Subject to and without waiving the foregoing objections,

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SoCalGas responds as follows. Please refer to SoCalGas' November 7, 2018 response to Question 21 of SED Data Request 32 dated October 12, 2018.

QUESTION 8:

If the answer to question 7 is anything other than an unqualified "yes", then please do the following:

- a. Identify each Aliso Canyon Well File SoCalGas provided to SED that was different than what it used to operate and maintain Aliso Canyon.
- b. Explain why SoCalGas provided SED with a different Aliso Canyon Well File.
- c. Provide the Aliso Canyon Well File that SoCalGas used to operate and maintain Aliso Canyon.

RESPONSE 8:

SoCalGas objects to this request as vague and ambiguous, particularly with respect to the phrase "as the ones it used to operate and maintain Aliso Canyon." SoCalGas further objects to this request on the ground it is unduly burdensome to the extent it seeks information previously provided to SED. SoCalGas also objects to this request as unduly burdensome pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which allows discovery "regarding any matter... that is relevant to the subject matter involved in the pending proceeding, if the matter is itself admissible in evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence." Subject to and without waiving the foregoing objections, SoCalGas responds as follows. See Response 7.

QUESTION 9:

Did SoCalGas personnel or contractors scan documents in each Well File in the exact order as the documents were kept in the hard copy Well File?

- a. If the answer to this question is not an unqualified YES, for each Well File provided to SED in response to data requests, state exactly how each well file scanned differs from the hard copy version.

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RESPONSE 9:

SoCalGas objects to this request as vague and ambiguous, particularly with respect to the term "exact." Subject to and without waiving the foregoing objection, SoCalGas responds as follows. Please refer to Section V of SoCalGas's Reply Testimony, Chapter IX (Healy).

QUESTION 10:

Did SoCalGas purposely include duplicate emails in the sets of emails provided in response to DR 16?

- a. If the answer to this question is not an unqualified NO, explain why several sets of the exact emails are included in the responses to DR 16.

RESPONSE 10:

SoCalGas objects to this request as vague and ambiguous, particularly with respect to the term "purposely." SoCalGas also objects to this request on the ground it is not relevant to the matters scoped within this proceeding pursuant to the Assigned Commissioner's Scoping Memo and Ruling. Subject to and without waiving the foregoing objection, SoCalGas responds as follows. No.

QUESTION 11:

Did SoCalGas check to see whether it provided duplicate emails in the sets of emails provided in response to DR 16?

- a. If the answer to this question is yes, did SoCalGas eliminate those emails from the sets of emails provided in response to DR 16?
- b. If the answer to question 11a is no, why not?

RESPONSE 11:

SoCalGas objects to this request on the ground it is not relevant to the matters scoped within this proceeding pursuant to the Assigned Commissioner's Scoping Memo and Ruling. Subject to and without waiving the foregoing objection, SoCalGas responds as follows. See Response 10.

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QUESTION 12:

When SoCalGas prepared responses to DR 16, were attachments to the emails also included in the responses?

- a. If the answer to 12 is Yes, can SED accurately assume a document that appears after an email, but is Bates stamped with a new bates number, is the attachment to the email that precedes it?
- b. If the answer to 12.a. is No, please explain how SED can identify which document goes with an email that had an attachment.
- c. If the answer to 12 is No, please provide one copy of each attachment to every email provided in response to DR 16. Be sure to identify on each attachment the date and time of the email to which it was attached.

RESPONSE 12:

SoCalGas objects to this request on the ground it is not relevant to the matters scoped within this proceeding pursuant to the Assigned Commissioner's Scoping Memo and Ruling. SoCalGas also objects to this request as seeking information within SED's possession. Subject to and without waiving the foregoing objection, SoCalGas responds as follows. Yes.

- a. Yes.
- b. N/A.
- c. N/A.

QUESTION 15:

What was the first date that Mr. Neville observed the Well Files kept at the centralized location at Aliso Canyon?

RESPONSE 15:

February 2007.

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QUESTION 16:

State Mr. Neville's personal responsibilities related to the Aliso Canyon Well Files prior to October 23, 2015.

RESPONSE 16:

SoCalGas objects to this request as vague and ambiguous and unintelligible, particularly with respect to the phrase "personal responsibilities."

QUESTION 17:

State Mr. Neville's personal responsibilities related to the Aliso Canyon Well Files after October 23, 2015.

RESPONSE 17:

SoCalGas objects to this request as vague and ambiguous and unintelligible, particularly with respect to the phrase "personal responsibilities."

QUESTION 18:

Are all documents that are kept in each Well File also kept in Well View?

- a. If the answer to 11 is No, please specify what Well File documents are also kept in Well View.
- b. Provide the SoCalGas standard that defines what information and documents are kept in Well View.
- c. Please state the date SoCalGas began keeping Well Files in Well View.
- d. Please state the date SoCalGas began accessing Well Files from Well View for purposes of operating and maintaining Aliso Canyon Natural Gas Storage Facility.
- e. If the dates in response to questions 18c and 18d are different, explain.
- f. Please state when all SS-25 Well Files were accessible in Well View.

RESPONSE 18:

SoCalGas objects to this request on the ground it is unduly burdensome to the extent it

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seeks information previously provided to SED. SoCalGas further objects to this request on the ground it is unduly burdensome pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which allows discovery "regarding any matter... that is relevant to the subject matter involved in the pending proceeding, if the matter is itself admissible in evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence." Subject to and without waiving the foregoing objections, SoCalGas responds as follows. Please refer to SoCalGas' November 7, 2018 Response to SED Data Request 32 dated October 12, 2018.

QUESTION 19:

Identify the sponsors for each response to each question.

RESPONSE 19:

SoCalGas objects to this request as vague and ambiguous, particularly with respect to the term "sponsors." Subject to and without waiving the foregoing objections, SoCalGas responds as follows. SoCalGas understands this request to ask who prepared the responses herein. This response was prepared by counsel and regulatory personnel working at the direction of counsel.