

SED-258  
SoCalGas Response to SED Data Request 143  
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-143 DATED JANUARY 27, 2021)**

**SOCALGAS RESPONSE DATED FEBRUARY 19, 2021**

SoCalGas provides the following Responses to the Safety and Enforcement Division (SED) data request dated January 27, 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 SET 1:**

Please refer to the Bates Numbers AC\_CPUC\_SED\_DR\_16\_0043472 to 0043473.

- A. Confirm these Bates numbers are on a letter from SoCalGas' outside counsel, Latham and Watkins, to Boots & Coots, that states in part,

“As you know, Boots & Coots has been retained to assist the Southern California Gas Company in its response to the gas leak at one of its gas storage wells (SS-25) located at the Aliso Canyon Storage facility. Because

**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-143 DATED JANUARY 27, 2021)**

**SOCALGAS RESPONSE DATED FEBRUARY 19, 2021**

the incident may lead to legal or regulatory proceedings, on behalf of SoCalGas, we request that B&C take steps to preserve all documents and other evidence that relates to well SS-25 and to SoCalGas' and its consultants response to the leak.”

- B. Did SoCalGas issue any similar communications to SoCalGas personnel?
- C. If so, provide all such communications.
- D. Did SoCalGas internally communicate to staff instructions related to preserving all documents related to well SS-25?
- E. If so, provide all such communications.
- F. Did SoCalGas internally communicate to staff instructions related to preserving all evidence that relates to well SS-25?
- G. If so, provide all such communications.

**RESPONSE 1:**

A. SoCalGas objects to this request to the extent it seeks information previously provided to SED. Subject to and without waiving the foregoing objection, SoCalGas responds as follows. The Bates Numbers AC\_CPUC\_SED\_DR\_16\_0043472 to 0043473 are on a letter from SoCalGas' outside counsel, Latham and Watkins, to Boots & Coots, dated November 12, 2015, that states in part,

“As you know, Boots & Coots has been retained to assist the Southern California Gas Company in its response to the gas leak at one of its gas storage wells (SS-25) located at the Aliso Canyon Storage facility. Because the incident may lead to legal or regulatory proceedings, on behalf of SoCalGas, we request that B&C take steps to preserve all documents and other evidence that relates to well SS-25 and to SoCalGas' and its consultants response to the leak.”

B – G. SoCalGas' counsel has issued legal holds, on or around November 6, 2015, to relevant SoCalGas employees regarding preservation of documents and evidence relating to legal and regulatory proceedings arising from the SS-25 leak. The substance of such legal holds, and communications between SoCalGas' counsel and SoCalGas employees relating to such legal holds, are protected by the attorney-client privilege and/or the attorney work product doctrine.

**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-143 DATED JANUARY 27, 2021)**

**SOCALGAS RESPONSE DATED FEBRUARY 19, 2021**

**QUESTION SET 2:**

Please refer to Bates Numbers AC\_CPUC\_SED\_DR\_17\_0000128 to 0000187

- A. Confirm that this is a document entitled "Company Operations Standard Gas Operations, Routine Well Kills, SCG 224.045, with the stated purpose to "Provide direction in killing a gas storage well in a routine situation", published on 10/10/2014.
- B. Provide a list of all "Company Operations Standards" related to Aliso Canyon Natural Gas Storage Facility gas operations.
- C. Provide a list of all "Company Operations Standards" related to Aliso Canyon Natural Gas Storage Facility gas maintenance.
- D. Provide a list of all "Company Operations Standards" related to Aliso Canyon Natural Gas Storage Facility.
- E. Identify the date that each standard listed in response to questions B, C, and D was first published.

**RESPONSE 2:**

- A. SoCalGas objects to this request to the extent it seeks information previously provided to SED. Subject to and without waiving the foregoing objection, SoCalGas responds as follows. The document entitled "Company Operations Standard Gas Operations, Routine Well Kills, SCG 224.045, with the stated purpose to "Provide direction in killing a gas storage well in a routine situation", published on 8/08/2014 was previously produced in Bates Numbers AC\_CPUC\_SED\_DR\_17\_0000128 to AC\_CPUC\_SED\_DR\_17\_0000137.
- B. SoCalGas objects to this request as vague and ambiguous, particularly with respect to the phrase "gas operations." SoCalGas further objects to this request as duplicative and overly broad and unduly burdensome, including because this request seeks information previously provided to SED.
- C. SoCalGas objects to this request as vague and ambiguous, particularly with respect to the phrase "gas maintenance." SoCalGas further objects to this request as duplicative and overly broad and unduly burdensome, including because this request seeks information previously provided to SED.
- D. SoCalGas objects to this request as vague and ambiguous. SoCalGas further objects to this request as duplicative and overly broad and unduly burdensome, including because this request seeks information previously provided to SED.
- E. SoCalGas objects to this request as vague and ambiguous. SoCalGas further

**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-143 DATED JANUARY 27, 2021)**

**SOCALGAS RESPONSE DATED FEBRUARY 19, 2021**

objects to this request as duplicative and overly broad and unduly burdensome, including because this request seeks information previously provided to SED. Subject to and without waiving the foregoing objection, SoCalGas responds as follows. The Published Date is identified on the Document Profile Summary contained in the Company Operations Standard.