

SAFETY POLICY DIVISION DATA REQUEST SPD-DR 005

SDG&E/SOCALGAS 2021 RAMP REPORTS- A.21-05-011/014

DATE RECEIVED: JULY 8, 2021

DATE RESPONDED: JULY 21, 2021

Question 01:

Page 4-11 mentions that the incident rates with safety consequences were calculated as the product of the national average (the frequency of an incident per field) and the number of fields SoCalGas operates currently. Wouldn't a better measure be incidents per storage well, since the number of wells per field can vary?

SDG&E/SoCalGas Response 01:

The scope of the Storage Incident Risk in the 2021 RAMP includes both above ground and below ground assets; therefore, the incident rate used is based on incidents occurring at fields generally and is not limited to well incidents. With respect to well incidents, SoCalGas utilized an internally derived incident rate per well.¹

¹ See SDG&E & SoCalGas response to SPD DR03-Supplemental in A.21-05-011/14 provided to SPD via email on July 9, 2021 (Rows 36-38 on Risk Scoring Workpaper tab in Storage Incident risk Workpaper spreadsheet).

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Question 02:

How were the impacts of Aliso Canyon reflected in the CoRE calculation?

SDG&E/SoCalGas Response 02:

SoCalGas objects to this request as vague and ambiguous, particularly with respect to the phrase “impacts of Aliso Canyon.” Subject to and without waiving the foregoing objection, SoCalGas responds as follows:

SoCalGas interprets this request to seek information related to if/how the October 23, 2015 gas leak at the Aliso Canyon storage field (Aliso Canyon Incident) contributed to data used in analyses associated with the Storage Incident risk in SoCalGas’s 2021 RAMP. SoCalGas considered the Aliso Canyon Incident in the development of the sub attributes for the Storage Incident Risk and factored impacts into the expected values of consequence where appropriate. Refer to Responses 3 through 6 for more detail.

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Question 03:

Does the Safety Index value of 0.29 include injuries of the kinds resulting from Aliso Canyon? I suppose most of the injuries are not considered serious enough to include; but it seems that some consideration should be made?

SDG&E/SoCalGas Response 03:

SoCalGas objects to this request as vague and ambiguous, particularly with respect to the phrase “injuries of the kinds resulting from Aliso Canyon.” SoCalGas further objects to this request to the extent it assumes that there were injuries that resulted from the October 23, 2015 gas leak at the Aliso Canyon storage field (Aliso Canyon Incident). Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

SoCalGas interprets this request to seek information related to if/how the Aliso Canyon Incident contributed to data used in analyses associated with the Storage Incident risk in SoCalGas’s 2021 RAMP. SoCalGas utilized available data to determine the likelihood of an event and its resulting consequences.

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Question 04:

Does the Financial CoRE incorporate the financial loss and penalties resulting from Aliso Canyon?

SDG&E/SoCalGas Response 04:

SoCalGas objects to this request as vague and ambiguous, particularly with respect to the phrase “the financial loss and penalties resulting from Aliso Canyon.” SoCalGas further objects to this request to the extent it assumes penalties resulted from the October 23, 2015 gas leak at the Aliso Canyon storage field (Aliso Canyon Incident). Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

As reflected in the Level 2 supplemental workpaper for SoCalGas’s Storage Incident risk,² the financial CoRE is calculated using historical SoCalGas incident costs.

² See SDG&E & SoCalGas response to SPD DR03-Supplemental in A.21-05-011/14 provided to SPD via email on July 9, 2021 (Rows 55-56 on Risk Scoring Workpaper tab in Storage Incident risk Workpaper spreadsheet).

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Question: 05:

Does the Reliability CoRE reflect loss of service from the reduced capacity of Aliso Canyon?

SDG&E and SoCalGas Response 05:

SoCalGas objects to this request as vague and ambiguous, particularly with respect to the phrase “loss of service from the reduced capacity of Aliso Canyon.” SoCalGas further objects to this request to the extent it assumes a “loss of service” at Aliso Canyon. Subject to and without waiving the foregoing objections, SoCalGas responds as follows:

SoCalGas interprets this request to seek information regarding if/how the CPUC’s imposed limitation on inventory levels at Aliso Canyon contributed to data used in analyses associated with the Storage Incident risk in SoCalGas’s 2021 RAMP. The reliability attribute for the Storage Incident Risk takes into account withdrawal capacities for all four of SoCalGas’s fields in 2019, which includes a reduced capacity at Aliso Canyon.

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Question: 06:

The release of methane from Alison Canyon is considered a Greenhouse Gas emission. Was there any consideration for GHG costs, such as social cost of methane?

SDG&E/SoCalGas Response 06:

SoCalGas objects to this request as vague and ambiguous, particularly with respect to the phrases “the release of methane from Aliso Canyon,” “GHG costs” and “social cost of methane.” Subject to and without waiving the foregoing objection, SoCalGas responds as follows:

SoCalGas interprets this request to seek information related to if/how mitigation of greenhouse gas emissions from the October 23, 2015 gas leak at the Aliso Canyon storage field (Aliso Canyon Incident) were considered in analyses associated with the Storage Incident risk in SoCalGas’s 2021 RAMP. Under a settlement agreement with the Los Angeles City Attorney’s Office, the County of Los Angeles, the California Office of the Attorney General, and the California Air Resources Board to resolve claims by those government bodies against SoCalGas related to the Aliso Canyon Incident, SoCalGas has contributed \$34.1 million to establish the Aliso Canyon Methane Emissions Mitigation Fund to support a portfolio of projects that capture methane from dairy farms and convert that energy into renewable gas for use in transportation, sufficient to mitigate methane emissions from the leak. These shareholder costs were not considered in the analyses associated with the Storage Incident risk in SoCalGas’s 2021 RAMP.