

Docket:	<u>I.19-06-016</u>
Exhibit Number	<u>CalPA-417</u>
Commissioner	<u>Rechtschaffen</u>
Admin. Law Judge	<u>Hecht/Poirier</u>
Witness	_____



PUBLIC ADVOCATES OFFICE
CALIFORNIA PUBLIC UTILITIES COMMISSION

Exhibit CalPA-417

Response 4 of SoCalGas to Data Request 52 dated November 12, 2021

San Francisco, California
March 18, 2022

**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 CAL ADVOCATES-SCG-52 DATED JUNE 24, 2021)

SOCALGAS SUPPLEMENTAL RESPONSE DATED NOVEMBER 12, 2021

SoCalGas provides the following Responses to the Public Advocates Office (Cal Advocates) data request dated June 24, 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 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.

QUESTION 1:

Please provide documentation showing SoCalGas policies and or procedures for data retention and recovery that are currently in place, including, without limitation:

- (a) Data retention policies and procedures;
- (b) Data recovery policies and procedures;
- (c) Data restoration policies and procedures;
- (d) System recovery procedures;
- (e) Procedures and policies regarding data retention and recovery as they apply

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to SoCalGas contractors; and
(f) Restoration and recovery testing procedures.

RESPONSE 1 (DATED JULY 9, 2021):

SoCalGas objects to this request on the grounds that it conflicts with the April 7, 2021 Ruling granting the motion of the CPUC – Safety and Enforcement Division limiting further discovery in I.19-06-016 with the exception of the following issues:

1. Discovery regarding the real-time transcription issue
2. Data requests on third-party witnesses
3. Discovery from SoCalGas to CalPA to further address meeting with Blade identified in cross-examination.¹

SUPPLEMENTAL RESPONSE 1 (DATED SEPTEMBER 8, 2021):

SoCalGas understands this request to seek SoCalGas' Information Management Policy as of September 8, 2021. Please see electronic documents with Bates range I1906016_SCG-CALADVOCATES_0066215 through I1906016_SCG-CALADVOCATES_0066218.

QUESTION 2:

Please provide the same documentation described in Question 1 that was in place at the time SoCalGas hired Boots and Coots to perform the well kill operations at Aliso Canyon in 2015.

RESPONSE 2 (DATED JULY 9, 2021):

SoCalGas objects to this request on the grounds that it conflicts with the April 7, 2021 Ruling granting the motion of the CPUC – Safety and Enforcement Division limiting further discovery in I.19-06-016 with the exception of the following issues:

1. Discovery regarding the real-time transcription issue
2. Data requests on third-party witnesses

¹ See I.19-06-016, Hearing Transcript, Volume 12, Page 1723, Line 7 to Page 1727, Line 7.

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3. Discovery from SoCalGas to CalPA to further address meeting with Blade identified in cross-examination.²

SUPPLEMENTAL RESPONSE 2 (DATED SEPTEMBER 8, 2021):

SoCalGas interprets this request to seek SoCalGas' Information Management Policy as of 2015. Please see electronic documents with Bates range I1906016_SCG-CALADVOCATES_0066215 through I1906016_SCG-CALADVOCATES_0066218.

REVISED SUPPLEMENTAL RESPONSE 2 (DATED SEPTEMBER 10, 2021):

SoCalGas interprets this request to seek SoCalGas' Records Management and Retention Policy as of 2015. Please see electronic documents with Bates range I1906016_SCG-CALADVOCATES_0066224 through I1906016_SCG-CALADVOCATES_0066226.

QUESTION 3:

Please explain how the policies and procedures currently in place, produced in response to Question 1, differ from those produced in response to Question 2.

RESPONSE 3 (DATED JULY 9, 2021):

SoCalGas objects to this request on the grounds that it conflicts with the April 7, 2021 Ruling granting the motion of the CPUC – Safety and Enforcement Division limiting further discovery in I.19-06-016 with the exception of the following issues:

1. Discovery regarding the real-time transcription issue
2. Data requests on third-party witnesses
3. Discovery from SoCalGas to CalPA to further address meeting with Blade identified in cross-examination.³

SoCalGas further objects to this request on the ground that it is unduly burdensome under Rule 10.1 of the Commission's Rules of Practice and Procedure in that it does not seek data or information but rather seeks an analysis of differences between two

² See I.19-06-016, Hearing Transcript, Volume 12, Page 1723, Line 7 to Page 1727, Line 7.

³ See I.19-06-016, Hearing Transcript, Volume 12, Page 1723, Line 7 to Page 1727, Line 7.

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documents sought.

SUPPLEMENTAL RESPONSE 3 (DATED NOVEMBER 12, 2021):

The policy provided in response to Question 1 reflects SoCalGas' Information Management Policy as of September 8, 2021 and the policy provided in response to Question 2 reflects SoCalGas' Records Management and Retention Policy as of 2015. Differences between these policies are apparent from comparison and review of the two documents.

QUESTION 4:

Please explain how, consistent with SoCalGas policies and procedures, SoCalGas would have performed the following back up scenarios at the time it learned of the Boots & Coots' laptop theft:

(a) A complete data backup for computing systems and computers located on SoCalGas premises. (b) A complete data backup for computing systems and computers that are off SoCalGas premises.

(c) A system back up, for computing systems and computers located on SoCalGas premises.

(d) A system back up, for computing systems and computers that are off SoCalGas premises.

(e) Differential/incremental back up for computing systems and computers located on SoCalGas premises.

(f) Differential/incremental back up, for computing systems and computers that are off SoCalGas premises.

RESPONSE 4 (DATED JULY 9, 2021):

SoCalGas objects to this request on the grounds that it conflicts with the April 7, 2021 Ruling granting the motion of the CPUC – Safety and Enforcement Division limiting further discovery in I.19-06-016 with the exception of the following issues:

1. Discovery regarding the real-time transcription issue
2. Data requests on third-party witnesses

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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
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3. Discovery from SoCalGas to CalPA to further address meeting with Blade identified in cross-examination.⁴

Furthermore, SoCalGas objects to this request on the ground it is outside the scope of this proceeding as determined by the Assigned Commissioner's Scoping Memorandum and Ruling.

SUPPLEMENTAL RESPONSE 4 (DATED NOVEMBER 12, 2021):

SoCalGas learned about the theft of Mr. Walzel's laptop at Mr. Walzel's February 21, 2020 deposition, over four years after it was stolen in December 2015. Because Mr. Walzel's modeling for well kill attempts 4–6 resided on only Mr. Walzel's laptop, SoCalGas could not have backed up Mr. Walzel's modeling under any scenario at the time it learned of the computer theft. Moreover, it is SoCalGas' understanding that Mr. Walzel performed transient modeling using a licensed software called Drillbench, which resided locally on Mr. Walzel's laptop. (See SoCalGas' responses to SED Data Request 57.)

QUESTION 5:

For each of the backup scenarios identified in response to Question 4, please identify:

- (a) The frequency of backups;
- (b) The number of backups and location of backups;
- (c) The backup retention time i.e. how long a specific back up instance is retained;
- (d) Whether data is backed up to the cloud;
- (e) Whether data is backed up to a third party;
- (f) Restoration procedures; and
- (g) Data recovery procedures.

RESPONSE 5 (DATED JULY 9, 2021):

SoCalGas objects to this request on the grounds that it conflicts with the April 7, 2021 Ruling granting the motion of the CPUC – Safety and Enforcement Division limiting further discovery in I.19-06-016 with the exception of the following issues:

⁴ See I.19-06-016, Hearing Transcript, Volume 12, Page 1723, Line 7 to Page 1727, Line 7.

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1. Discovery regarding the real-time transcription issue
2. Data requests on third-party witnesses
3. Discovery from SoCalGas to CalPA to further address meeting with Blade identified in cross-examination.⁵

Furthermore, SoCalGas objects to this request on the ground it is outside the scope of this proceeding as determined by the Assigned Commissioner's Scoping Memorandum and Ruling.

SUPPLEMENTAL RESPONSE 5 (DATED NOVEMBER 12, 2021):

Not applicable. See Supplemental Response 4.

QUESTION 6:

Please respond to Questions 4 and 5 based on the policies and procedures that are currently in place.

RESPONSE 6 (DATED JULY 9, 2021):

SoCalGas objects to this request on the grounds that it conflicts with the April 7, 2021 Ruling granting the motion of the CPUC – Safety and Enforcement Division limiting further discovery in I.19-06-016 with the exception of the following issues:

1. Discovery regarding the real-time transcription issue
2. Data requests on third-party witnesses
3. Discovery from SoCalGas to CalPA to further address meeting with Blade identified in cross-examination.⁶

Furthermore, SoCalGas objects to this request on the ground it is outside the scope of this proceeding as determined by the Assigned Commissioner's Scoping Memorandum and Ruling.

⁵ See I.19-06-016, Hearing Transcript, Volume 12, Page 1723, Line 7 to Page 1727, Line 7.

⁶ See I.19-06-016, Hearing Transcript, Volume 12, Page 1723, Line 7 to Page 1727, Line 7.

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SUPPLEMENTAL RESPONSE 6 (DATED NOVEMBER 12, 2021):

Not applicable. See Supplemental Responses 3 and 4.

QUESTION 7:

Was SoCalGas' failure to have access to Boots & Coot's transient modeling of the Aliso Canyon well kill efforts consistent with SoCalGas policies and procedures at the time of contracted services? Please explain why or why not.

RESPONSE 7 (DATED JULY 9, 2021):

SoCalGas objects to this request on the grounds that it conflicts with the April 7, 2021 Ruling granting the motion of the CPUC – Safety and Enforcement Division limiting further discovery in I.19-06-016 with the exception of the following issues:

1. Discovery regarding the real-time transcription issue
2. Data requests on third-party witnesses
3. Discovery from SoCalGas to CalPA to further address meeting with Blade identified in cross-examination.⁷

Furthermore, SoCalGas objects to this request on the grounds it is argumentative, calls for a legal conclusion, and that it is outside the scope of this proceeding as determined by the Assigned Commissioner's Scoping Memorandum and Ruling.

SUPPLEMENTAL RESPONSE 7 (DATED NOVEMBER 12, 2021):

Mr. Walzel performed the transient modeling for well kill attempts 4-6 using a specialized software called Drillbench, which is licensed by Schlumberger Limited. The use of transient modeling is not a widely utilized practice in the industry for controlling well failures by top kill. Aside from the SS-25 incident, SoCalGas has never worked with a contractor that prepared transient kill modeling for a well control operation at Aliso Canyon. Thus, SoCalGas' policies and procedures did not require SoCalGas to purchase, or require access to, a proprietary transient modeling software like Drillbench for purposes of accessing a third-party contractor's transient model in the very rare circumstance that a well fails and requires emergency intervention from an expert well

⁷ See I.19-06-016, Hearing Transcript, Volume 12, Page 1723, Line 7 to Page 1727, Line 7.

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control company.

QUESTION 8:

Was SoCalGas' failure to have a record of Boots & Coot's transient modeling of the Aliso Canyon well kill efforts consistent with SoCalGas policies and procedures? Please explain why or why not.

RESPONSE 8 (DATED JULY 9, 2021):

SoCalGas objects to this request on the grounds that it conflicts with the April 7, 2021 Ruling granting the motion of the CPUC – Safety and Enforcement Division limiting further discovery in I.19-06-016 with the exception of the following issues:

1. Discovery regarding the real-time transcription issue
2. Data requests on third-party witnesses
3. Discovery from SoCalGas to CalPA to further address meeting with Blade identified in cross-examination.⁸

Furthermore, SoCalGas objects to this request on the grounds it is argumentative, calls for a legal conclusion, and that it is outside the scope of this proceeding as determined by the Assigned Commissioner's Scoping Memorandum and Ruling.

SUPPLEMENTAL RESPONSE 8 (DATED NOVEMBER 12, 2021):

SoCalGas' policies and procedures did not require SoCalGas to purchase, or have access to, a proprietary transient modeling software like Drillbench for purposes of accessing a third-party contractor's transient model in the very rare circumstance that a well fails and requires emergency intervention from an expert well control company. With respect to the modeling that Mr. Walzel performed in connection with kill attempts 4–6, the outputs of such modeling were incorporated into the well kill plans that Boots & Coots prepared in advance of each well kill attempt, and which SoCalGas reviewed and approved. The well kill plans were produced and are in the evidentiary record of this proceeding as Exhibit SoCalGas-09 at 09.0448 - 0452.

⁸ See I.19-06-016, Hearing Transcript, Volume 12, Page 1723, Line 7 to Page 1727, Line 7.