

Docket:	<u>I.19-06-016</u>
Exhibit Number	<u>CalPA-451</u>
Commissioner	<u>Rechtschaffen</u>
Admin. Law Judge	<u>Hecht/Poirier</u>
Witness	_____



PUBLIC ADVOCATES OFFICE
CALIFORNIA PUBLIC UTILITIES COMMISSION

Exhibit CalPA-451

SoCalGas's Response to Data Request 57 dated March 8, 2022

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-57 DATED OCTOBER 19, 2021)

SOCALGAS RESPONSE DATED NOVEMBER 2, 2021

SOCALGAS SUPPLEMENTAL RESPONSE DATED MARCH 8, 2021

SoCalGas provides the following Responses to the Public Advocates Office (Cal Advocates) data request dated October 19, 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 all communications between SoCalGas and Boots & Coats between January 1, 2015, and October 18, 2021, regarding the Aliso Canyon incident.

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RESPONSE 1:

**Confidential and Protected Materials Pursuant to
PUC Section 583, GO 66-D, and D.17-09-023**

SoCalGas objects to this request on the grounds it is overly broad and unduly burdensome, and exceeds the scope determined for this proceeding in the Assigned Commissioner's Scoping Memo and Ruling and also exceeds the relevant time period. SoCalGas additionally objects to this request on the grounds it seeks documents that are protected by attorney-client privilege and/or the attorney work product doctrine. SoCalGas further objects to the extent that the question seeks communications "regarding the Aliso Canyon incident" that pre-date the incident itself. SoCalGas further objects to this request to the extent that it is duplicative of Cal Advocates' Data Request 35 dated March 11, 2020 and seeks documents already in the possession of Cal Advocates by virtue of SoCalGas' response to that data request (which was also accompanied by a privilege log). Subject to and without waiving the forgoing objections, SoCalGas responds as follows. See documents Bates numbered: I1906016_SCG_CALADVOCATES_0067042 - 68156 and I1906016_SCG_CALADVOCATES_0068158 - 69656.

QUESTION 2:

Please provide all communications between SoCalGas and Halliburton Energy Services between January 1, 2015, and October 18, 2021, regarding the Aliso Canyon incident.

RESPONSE 2:

**Confidential and Protected Materials Pursuant to
PUC Section 583, GO 66-D, and D.17-09-023**

SoCalGas objects to this request on the grounds it is overly broad and unduly burdensome, and exceeds the scope determined for this proceeding in the Assigned Commissioner's Scoping Memo and Ruling and also exceeds the relevant time period. SoCalGas additionally objects to this request on the grounds it seeks documents that are protected by 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
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SoCalGas further objects to the extent that the question seeks communications “regarding the Aliso Canyon incident” that pre-date the incident itself. SoCalGas further objects to this request to the extent that it is duplicative of Cal Advocates’ Data Request 35 dated March 11, 2020 and seeks documents already in the possession of Cal Advocates by virtue of SoCalGas’ response to that data request (which was also accompanied by a privilege log). Subject to and without waiving the forgoing objections, SoCalGas responds as follows. See documents Bates numbered I1906016_SCG_CALADVOCATES_0069658 – 70928.

QUESTION 3:

Please provide all communications between SoCalGas and Boots & Coots regarding efforts to obtain Boots & Coots as witnesses for cross-examination in I.19-06-016.

RESPONSE 3:

**Confidential and Protected Materials Pursuant to
PUC Section 583, GO 66-D, and D.17-09-023**

SoCalGas objects to this request on the grounds it is overly broad and unduly burdensome, and exceeds the scope determined for this proceeding in the Assigned Commissioner’s Scoping Memo and Ruling and also exceeds the relevant time period. Subject to and without waiving the forgoing objections, SoCalGas responds as follows. See documents Bates numbered I1906016_SCG_CALADVOCATES_0067042 – 0068157.

QUESTION 4:

Please provide all communications between SoCalGas and Halliburton Energy Services regarding efforts to obtain Boots & Coots as witnesses for cross-examination in I.19-06-016.

RESPONSE 4:

SoCalGas objects to this request on the grounds it is overly broad and unduly

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burdensome, and exceeds the scope determined for this proceeding in the Assigned Commissioner's Scoping Memo and Ruling. Subject to and without waiving the forgoing objections, SoCalGas responds as follows. N/A.

QUESTION 5:

Please provide all communications between SoCalGas and Boots & Coots regarding efforts to obtain Boots & Coots' answers to the Cal Advocates data request to Boots & Coots dated July 8, 2021

RESPONSE 5:

SoCalGas objects to this request on the grounds it is overly broad and unduly burdensome, and exceeds the scope determined for this proceeding in the Assigned Commissioner's Scoping Memo and Ruling. Subject to and without waiving the forgoing objections, SoCalGas responds as follows. N/A.

QUESTION 6:

Please provide all communications between SoCalGas and Halliburton Energy Services regarding efforts to obtain Boots & Coots' answers to the Cal Advocates data request to Boots & Coots dated July 8, 2021.

RESPONSE 6:

SoCalGas objects to this request on the grounds it is overly broad and unduly burdensome, and exceeds the scope determined for this proceeding in the Assigned Commissioner's Scoping Memo and Ruling. Subject to and without waiving the forgoing objections, SoCalGas responds as follows. N/A.