

SED-225
SoCalGas Response to SED Data Request 124
I.19-06-016
ALJs: Hecht/Poirier
Date Served: March 24, 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-124 DATED NOVEMBER 17, 2020)

SOCALGAS RESPONSE DATED NOVEMBER 20, 2020

SoCalGas provides the following Responses to the Safety and Enforcement Division (SED) data request dated November 17, 2020 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.

For this set of questions, please refer to SED Data Request 119, Question 11b, and SoCalGas' answer thereto. For reference, that question and answer are quoted here.

SED Question 11b.

Please refer to Exhibit 1-7, Sample Analyses. b. Please provide sample chains of custody and analytical results for all samples collected on November 13, 2015 of the mist that contained oil and was subject of the 3:00 pm MCR dispatch.

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SoCalGas Response to Question 11b.

SoCalGas objects to this request on the ground it is unduly burdensome in that it seeks information equally available to SED. Subject to and without waiving the foregoing objection, SoCalGas responds as follows. See Exhibit I-7.

With SED DR 119 Question 11b, and SoCalGas' response to DR 119, Question 11b in mind, please answer:

QUESTION 1:

Is SoCalGas assuming that the analysis it provided in Exhibit I-7 is representative of the mist that was discharged into the atmosphere on November 13, 2015?

RESPONSE 1:

SoCalGas objects to this request on the ground it is vague and ambiguous, particularly with respect to the terms and phrases "assuming," and "representative of the mist that was discharged." Moreover, SoCalGas objects to this request on the ground it poses an incomplete hypothetical: the question does not identify the purpose of the assumption inquired about. As a result, SoCalGas additionally objects to this request on the basis it is unintelligible. Subject to and without waiving the foregoing objections, SoCalGas responds as follows. SoCalGas notes a distinction between this question and SED's testimony regarding Violation 331, which alleges "SoCalGas Purposely Extracted and Vented Oil into the Atmosphere...." The characterization in the testimony, of a purposeful extraction, is incorrect. This question asks about a "mist that was discharged into the atmosphere," and this characterization better describes the occurrence. Report 15-11-1098, which was provided in SoCalGas Supplemental Rebuttal Testimony, Chapter I (La Fevers), Exhibit I-7, includes a sample of the fluids released during the well kill attempt on November 13, 2015.

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QUESTION 2:

Confirm that SoCalGas did not take samples of the mist asked about in question 11b.

RESPONSE 2:

SoCalGas objects to this request to the extent it assumes SoCalGas did not take samples of the mist on November 13, 2015. Subject to and without waiving the foregoing objection, SoCalGas responds as follows. See Response 1.