

SED-322

SoCalGas Response to SED Data Request 131

I.19-06-016

ALJs: Hecht/Poirier

Date Served: May 17, 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
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SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST SED-SCG-131 DATED JANUARY 4, 2021)

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SoCalGas provides the following Responses to the Safety and Enforcement Division (SED) data request dated January 4, 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.

Please see SoCalGas Data Request 21, question 8, which states: "Has SED produced all COMMUNICATIONS that are responsive to SoCalGas' Third Set of Data Requests to SED, Question 27c ("Produce any and all COMMUNICATIONS by and between SED and the [LADPH] from October 23, 2015 through and including December 6, 2019")? If not, please produce all COMMUNICATIONS."

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QUESTION 1:

Does SoCalGas contend that SED has not provided communications that are responsive to SoCalGas' third set of data requests to SED, Question 27c?

RESPONSE 1:

SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which allows discovery "regarding any matter. . . that is relevant to the subject matter involved in the pending proceeding, if the matter is itself admissible in evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence." SoCalGas understands this question to ask whether SED has not provided at least some communications between SED and LADPH that fall within the time period, October 23, 2015 through December 6, 2019. Subject to and without waiving the foregoing objection, SoCalGas responds as follows. No.

QUESTION 2:

If so, provide those communications which SoCalGas has that it contends SED has not provided and that are responsive to SoCalGas' third set of data requests to SED, Question 27c.

RESPONSE 2:

See Response 1.

QUESTION 3:

Provide all communications SoCalGas had with LADPH in which LADPH represented to SoCalGas that it did not have a common interest privilege agreement with SED RELATED to the INCIDENT.

RESPONSE 3:

SoCalGas objects to this request on the ground it is unduly burdensome and overly

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broad. SoCalGas further objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which allows discovery "regarding any matter. . . that is relevant to the subject matter involved in the pending proceeding, if the matter is itself admissible in evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence." Subject to and without waiving the foregoing objection, SoCalGas responds as follows. Please see electronic documents with Bates range: I1906016_SCG_SED_DR_131_0001095 – I1906016_SCG_SED_DR_131_0001096.

QUESTION 4:

Provide all communications SoCalGas had with LADPH in which LADPH represented to SoCalGas that it did not have any sort of agreement with SED that protected communications related to the INCIDENT.

RESPONSE 4:

SoCalGas objects to this request on the ground it is unduly burdensome and overly broad. SoCalGas further objects to this request as vague and ambiguous, particularly with respect to the phrase "any sort of agreement with SED that protected communications." SoCalGas further objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which allows discovery "regarding any matter. . . that is relevant to the subject matter involved in the pending proceeding, if the matter is itself admissible in evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence." Subject to and without waiving the foregoing objections, SoCalGas responds as follows. See Response 3.

QUESTION 5:

Provide all communications between SoCalGas and LADPH related to the INCIDENT.

- a. If such communications were verbal:
 - i. Identify the names of the individuals who had them.
 - ii. Identify the dates they were had.

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RESPONSE 5:

SoCalGas objects to this request on the ground it is unduly burdensome and overly broad. SoCalGas further objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which allows discovery "regarding any matter. . . that is relevant to the subject matter involved in the pending proceeding, if the matter is itself admissible in evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence." Subject to and without waiving the foregoing objections, SoCalGas responds as follows. See Response 3.

QUESTION 6:

For this next set of questions, please refer to SED Data Request 91, questions 1 and 2 and response to those questions, which are quoted here for reference.

QUESTION 1: Has SoCalGas, Sempra Utilities, and/or any of its affiliates, and/or anyone on behalf of SoCalGas, Sempra Utilities, and/or any of its affiliates, communicated with any State of California Senators or their staff, or Assembly Members or their staff related to settlement of Commission Investigation 19-06-016?

RESPONSE 1: SoCalGas objects to this request on the ground it seeks information that is outside the scope of this proceeding as determined by the Assigned Commissioner's Scoping Memo and Ruling dated September 26, 2019 and is not consistent with Rule 10.1 of the Commission's Rules of Practice and Procedure, which requires that discovery "is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonable calculated to lead to the discovery of admissible evidence." Subject to and without waiving the foregoing objection, SoCalGas responds as follows. Yes.

QUESTION 2: Identify all communications related to settlement of Commission Investigation 19-09-016 that SoCalGas, Sempra Utilities, and/or any of its affiliates, and/or anyone on behalf of SoCalGas, Sempra Utilities, and/or any of its affiliates, have had with State of California Senators and/or State of California

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Assembly Members, including:

- a. The date of the communication.
- b. Individuals at SoCalGas, Sempra Utilities, and/or any of its affiliates, and/or anyone on behalf of SoCalGas, Sempra Utilities, and/or any of its affiliates, who participated in the communication.
- c. Individuals at the Senators' office who participated in the communication.
- d. Individuals at Assembly Members' office who participated in the communication.
- e. The contents of the communication.
- f. Documents shared that were part of the communication.

RESPONSE 2: SoCalGas objects to this request on the grounds it seeks information that is outside the scope of this proceeding as determined by the Assigned Commissioner's Scoping Memo and Ruling dated September 26, 2019 and is not consistent with Rule 10.1 of the Commission's Rules of Practice and Procedure, which provides that discovery "is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonable calculated to lead to the discovery of admissible evidence." SoCalGas further objects to this request as vague and ambiguous, particularly with respect to the term "contents" and phrase "settlement of Commission Investigation 19-09-016." SoCalGas does not have a transcription of the discussions. Subject to and without waiving the foregoing objections, SoCalGas responds as follows, based on a reasonable and diligent search and the information currently available to SoCalGas. SoCalGas interprets this request to seek a general description of SoCalGas' communications related to settlement of Commission Investigation 19-06-016.

On or about March 11, 2020, on behalf of SoCalGas, Kent Kauss and Israel Salas participated in an in-person communication with Senator Stern's staff member Gil Topete regarding Microgrids. During that conversation, Messrs. Kauss and Salas stated Eugene Mitchell would be reaching out to Senator Stern to discuss settlement of Commission Investigation 19-06-016. No documents were shared as part of this communication.

On or about March 11, 2020, on behalf of SoCalGas, Eugene Mitchell participated in a telephone communication with Senator Stern. Mr. Mitchell

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expressed to Senator Stern that SoCalGas was interested in settling Commission Investigation 19-06-016 and inquired if resolution of this matter was a priority for Senator Stern and the Commission. No documents were shared as part of this communication.

With these questions and responses in mind, please answer the following:

- a. Please update the responses to questions 1 and 2.
- b. At the time of the in-person communication with Senator Stern's staff member on or about March 11, 2020:
 - i. What was the title and role of Kent Kauss?
 - ii. Does Kent Kauss still serve in this role today?
 - iii. What was the role of Israel Salas?
 - iv. Does Israel Salas still serve in this role today?
- c. Identify all communications related to settlement of Commission Investigation 19-09-016 that SoCalGas, Sempra Utilities, and/or any of its affiliates, and/or anyone on behalf of SoCalGas, Sempra Utilities, and/or any of its affiliates, have had with elected officials and/or their personnel, including but not limited to United States Senators, and United States Congresspeople, including:
 - i. The date of the communication.
 - ii. Individuals at SoCalGas, Sempra Utilities, and/or any of its affiliates, and/or anyone on behalf of SoCalGas, Sempra Utilities, and/or any of its affiliates, who participated in the communication.
 - iii. Individuals at the Senators' office who participated in the communication.
 - iv. Individuals at Assembly Members' office who participated in the communication.
 - v. The contents of the communication.
 - vi. Documents shared that were part of the communication.
- d. For this question set, refer to SoCalGas Data Request 20, Question 1, which states:

RESPONSE 6:

SoCalGas objects to this request on the grounds it seeks information that is outside the scope of this proceeding as determined by the Assigned Commissioner's Scoping

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Memo and Ruling dated September 26, 2019. SoCalGas also objects to this request as overly broad and unduly burdensome. SoCalGas further objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which allows discovery "regarding any matter. . . that is relevant to the subject matter involved in the pending proceeding, if the matter is itself admissible in evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence."

QUESTION 7:

Refer to the following statements in Chapter 8 of Ms. Felts' SUR-REPLY TESTIMONY on page 4:3-16: Finally, in a response to SEDs data request DR 33 SoCalGas provided a Draft Timeline of Events. The entry for November 13, 2015 states: November 13 – Tubing perforation activities performed and attempted stop the flow of gas by putting fluids down the well. During this operation, there was a release of mist into the air. Based on the information at this time, it is not believed that these materials pose a threat to public health. Out of an abundance of caution, residents were notified to stay inside. Once determined that the mist was contained to our facility, residents were again notified that there was no reason to remain inside. Office of Emergency Services and National Response Center were notified of the release. They were updated at 3:14 pm that flow was reduced. SoCalGas provided no evidence to support the statements regarding reporting the incident or notifying the residents.

a. Admit that on November 13, 2015, YOU were notified about the "release of mist into the air" that is referenced above.

With this passage in mind, answer the following:

- a. Provide all documentation that provides SoCalGas' basis to request that SED admit it was notified about the "release of mist into the air".
- b. For each document provided, explain why SoCalGas alleges this document provides a basis that SED was notified about a "release of mist into the air."

RESPONSE 7:

SoCalGas objects to this request on the ground it is unduly burdensome to the extent it seeks information available to SED. SoCalGas further objects to this request as overly

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broad. Subject to and without waiving the foregoing objections, SoCalGas responds as follows. For documentation that illustrates SED was notified about the release on November 13, 2015, please see electronic documents with Bates range: I1906016_SCG_SED_DR_131_0001093 – I1906016_SCG_SED_DR_131_0001094.

QUESTION 8:

Has SoCalGas deposed or interviewed Blade Energy Partners related to I.19-06-016?

RESPONSE 8:

SoCalGas objects to this request as vague and ambiguous, particularly with respect to the term “interviewed” and phrase “related to I.19-06-016.” SoCalGas further objects to this request pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, which allows discovery “regarding any matter. . . that is relevant to the subject matter involved in the pending proceeding, if the matter is itself admissible in evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence.” SoCalGas further objects to this request to the extent it seeks information that is already in possession of SED. Subject to and without waiving the foregoing objections, SoCalGas responds as follows. SoCalGas participated in the deposition of Ravi M. Krishnamurthy of Blade Energy Partners who was deposed pursuant to the subpoena issued by civil plaintiffs in the Southern California Gas Leak Cases (JCCP No. 4861).

QUESTION 9:

If yes:

- a. What date was each such deposition?
- b. What date was each such interview?
- c. Who from SoCalGas asked questions at each deposition?
- d. Who from SoCalGas asked questions at each interview?
- e. Who from Blade Energy partners was at each deposition?
- f. Who from Blade Energy partners was at each interview?
- g. Why did SoCalGas not inform SED that it was moving forward with each deposition?

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- h. Why did SoCalGas not inform SED that it was moving forward with each interview?
- i. Provide transcripts for each deposition. Please include all exhibits used.
- j. Provide transcripts for each interview. Please include all exhibits used.

RESPONSE 9:

SoCalGas objects to this request as vague and ambiguous, particularly with respect to the term "interview." SoCalGas further objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which allows discovery "regarding any matter. . . that is relevant to the subject matter involved in the pending proceeding, if the matter is itself admissible in evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence." SoCalGas further objects to this request to the extent that it assumes inaccurate facts, or to the extent that the information requested is within SED's knowledge or possession. SoCalGas also objects to this request to the extent it is duplicative. Subject to and without waiving the foregoing objections, SoCalGas responds as follows. Please see electronic documents with Bates range: I1906016_SCG_SED_DR_131_0000001 – I1906016_SCG_SED_DR_131_0001092.

QUESTION 10:

For this question set, please refer to the following passage from SoCalGas Data Request 23. SoCalGas believes the Update was written by DOGGR.20 However, certain facts in this Update do not precisely match the ones stated in other documents, such as the Standard Sesnon 25 Chronology Summary, a report referenced by Blade, which was written by the same person at DOGGR.22 for reference, this report will be called the "Chronology Summary". 20 See Exhibit 2, SoCalGas Response to SED Data Request 119, Question 8(c), pdf p. 8. . .

Question 4: Do YOU contend that the "Update" was not written by personnel employed by DOGGR?

With this in mind, please answer the following:

- a. Was the "Update" written by personnel employed by DOGGR?

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b. If yes:

- i. Provide all documentation that shows the "Update" was written by personnel employed by DOGGR.
- ii. Provide complete transcripts of all interviews and depositions with the personnel employed by DOGGR that SoCalGas alleges wrote the "Update".
- iii. Identify the quote or quotes, page numbers and line numbers in these transcripts that show that the "Update" was written by personnel employed by DOGGR.

RESPONSE 10:

SoCalGas objects to this request on the ground it is unduly burdensome to the extent it seeks information previously provided to SED. SoCalGas further objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which allows discovery "regarding any matter. . . that is relevant to the subject matter involved in the pending proceeding, if the matter is itself admissible in evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence." Subject to and without waiving the foregoing objections, SoCalGas responds as follows. Please refer to SoCalGas' Response to SED Data Request 123 dated November 20, 2020.

QUESTION 11:

For this question set, please refer to the following passage from SoCalGas Data Request 23. "Do YOU contend that Mr. La Fevers should have signed a visitor list at Aliso Canyon?"

With this question in mind, please answer:

- a. Please provide and explain SoCalGas' policy with regards to those who are required to sign a visitor list at Aliso Canyon and those who are not.
- b. For those who are not required to sign a visitor list at Aliso Canyon, why not?
- c. Does SoCalGas follow its own policy with regards to signing in all those who are required to sign a visitor list at Aliso Canyon?
- d. If the answer is yes, how long does SoCalGas keep the records that show it follows its own policy?

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- e. Did SoCalGas preserve all records of those who signed a visitor list at Aliso Canyon after October 23, 2015?
- f. If yes, provide all such records?

RESPONSE 11:

SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which allows discovery "regarding any matter. . . that is relevant to the subject matter involved in the pending proceeding, if the matter is itself admissible in evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence."

QUESTION 12:

For this question set, please refer to the following passage from SoCalGas Data Request 23: "Do YOU contend that the text of the MCR represents a verbatim transcription of the message Mr. La Fevers' verbally communicated to Dispatch?" With this question in mind, please answer:

- a. Does SoCalGas make transcripts of communications with Dispatch?
- b. Provide all SoCalGas policies, guidances, standards, protocols and other documentation that provides for the making of transcripts of communications with Dispatch.
- c. Provide all SoCalGas policies, guidances, standards, protocols and other documentation that provides for the keeping of transcripts of communications with Dispatch.
- d. Does SoCalGas make recordings of communications with Dispatch?**
- e. Provide all SoCalGas policies, guidances, standards, protocols and other documentation that provides for the making of recordings of communications with Dispatch.
- f. Provide all SoCalGas policies, guidances, standards, protocols and other documentation that provides for the keeping of recordings of communications with Dispatch.
- g. Why did SoCalGas provide the text of the MCR rather than the transcript in support of Mr. LaFevers' testimony?

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RESPONSE 12:

- a. SoCalGas objects to this request as vague and ambiguous, particularly with respect to the phrase “make transcripts of communications.” Subject to and without waving the foregoing objection, SoCalGas responds as follows. SoCalGas interprets this request to ask whether SoCalGas prepares written transcripts of all dispatch communications. No.
- b. SoCalGas objects to this request as vague and ambiguous, particularly with respect to the phrase “making of transcripts of communications.” Subject to and without waving the foregoing objection, SoCalGas responds as follows. See Response 12.a.
- c. SoCalGas objects to this request as vague and ambiguous, particularly with respect to the phrase “keeping transcripts of communications.” Subject to and without waving the foregoing objection, SoCalGas responds as follows. See Response 12.a.
- d. SoCalGas objects to this request as vague and ambiguous, particularly with respect to the phrase “make recordings of communications.” Subject to and without waiving the foregoing objection, SoCalGas responds as follows. SoCalGas interprets this request to ask whether SoCalGas records dispatch communications. **Yes.**
- e. SoCalGas objects to this request on the ground it is unduly burdensome to the extent it seeks information previously provided to SED. SoCalGas further objects to this request as vague and ambiguous, particularly with respect to the phrase “making recordings of communications.” Subject to and without waiving the foregoing objections, SoCalGas responds as follows. See SoCalGas’ Response to SED Data Request 130 dated January 14, 2021.
- f. SoCalGas objects to this request on the ground it is unduly burdensome to the extent it seeks information previously provided to SED. SoCalGas further objects to this request as vague and ambiguous, particularly with respect to the phrase “keeping recordings of communications.” Subject to and without waiving the foregoing objections, SoCalGas responds as follows. See SoCalGas’ Response to SED Data Request 130 dated January 14, 2021.
- g. SoCalGas objects to this request on the ground it is unduly burdensome to the extent it seeks information previously provided to SED. SoCalGas further objects to this request to the extent it assumes a transcript was prepared. SoCalGas also objects to this request pursuant to Rule 10.1 of the Commission’s Rules of

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Practice and Procedure, which allows discovery “regarding any matter. . . that is relevant to the subject matter involved in the pending proceeding, if the matter is itself admissible in evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence.” Subject to and without waiving the foregoing objections, SoCalGas responds as follows. Please refer to SoCalGas’ Response to SED Data Request 120 Question 2, dated November 19, 2020.

QUESTION 13:

For this question set, please refer to the following passage from SoCalGas Data Request 23. “Do YOU contend that Mr. Abel did not have time to review the records SoCalGas produced in response to SED data requests?”

With this passage in mind, please answer:

- a. At the time Mr. Abel prepared his reply testimony to Violation 331:
 - i. Identify all records SoCalGas produced in response to SED data requests that Mr. Abel reviewed.
 - ii. If Mr. Abel did not review all of the records SoCalGas produced in response to SED data requests, explain why not.
- b. Has any individual from SoCalGas reviewed all of the records SoCalGas produced in response to SED data requests?
- c. If yes, please identify that individual.
- d. Has any expert witness from SoCalGas reviewed all of the records SoCalGas has produced in response to SED data requests?
- e. If yes, please identify those expert witnesses.

RESPONSE 13:

- a. SoCalGas objects to this request on the grounds that it is duplicative of prior data requests to which SoCalGas has already responded. Subject to and without waiving the foregoing objection, SoCalGas responds as follows. See SoCalGas’ Response to SED DR 127, Question 1 and SED DR 119, Questions 14 and 18.
- b. SoCalGas objects to this request on the ground it is unduly burdensome and overly broad. SoCalGas further objects to this request pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, which allows discovery

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(I.19-06-016)**

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“regarding any matter. . . that is relevant to the subject matter involved in the pending proceeding, if the matter is itself admissible in evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence.”

- c. See Response 13.b.
- d. SoCalGas objects to this request on the ground it is unduly burdensome and overly broad. SoCalGas further objects to this request pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, which allows discovery “regarding any matter. . . that is relevant to the subject matter involved in the pending proceeding, if the matter is itself admissible in evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence.”
- e. See Response 13.d.

QUESTION 14:

For this question set, please refer to the following passage from SoCalGas data request 23.

Although SoCalGas has produced no reports regarding geyser types of releases from SS-25 associated with well kill attempts, I recently reviewed a technical document in the Journal of Petroleum Science and Engineering, issue 161 (2018) pp.158-164 which was written by engineers from the Lawrence Berkeley National Laboratory. Apparently, some or all of the authors participated in the last SS-25 kill event in December 2015. In this study, failed kill events were modeled utilizing data from those events, resulting in a unique explanation for the failures and, especially, for the geysers, which apparently occurred more than once.

...

This study explains that normal kill procedures could not kill the well, because there were holes in the tubing from a safety valve (SSV) that had been removed years before. Also according to the study, when SoCalGas installed a plug just above those holes and perforated the tubing above the plug, the configuration was such that a column of kill fluid could not be created at reservoir depth.

- a. Does SoCalGas dispute any points in this passage?

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b. If so:

- i. Which points?
- ii. Explain why SoCalGas disputes these points.
- iii. Provide all facts supporting SoCalGas' explanation provided in question 13b.
- iv. Provide all documents supporting SoCalGas' explanation provided in question 13b.
- v. For each point that SoCalGas disputes, re-state exactly how SoCalGas would revise the passage.

RESPONSE 14:

SoCalGas objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure, which allows discovery "regarding any matter. . . that is relevant to the subject matter involved in the pending proceeding, if the matter is itself admissible in evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence."

QUESTION 15:

For this question set, please refer to the following passage from SoCalGas data request 23.

For Questions 31-32, refer to the following excerpt from YOUR SURREPLY TESTIMONY at 20:3 – 20:5: The plug was installed the day before the second kill event, November 13, 2015. I have not found in documents produced any explanation as to why this plug was installed.

Question 31:

Do YOU contend that SoCalGas never provided a data response to YOU explaining why the plug was installed?

- a. Identify all data responses that SoCalGas believes explained why the plug was installed.
- b. Provide all facts that show the explanations communicated as to why the plug was installed leading up to the point in time that it was installed.
- c. Provide all documents that show the explanations communicated as to why the

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plug was installed leading up to the point in time that it was installed.

RESPONSE 15:

SoCalGas objects to this request as unduly burdensome to the extent the information is available to SED. SoCalGas further objects to this request as overly broad. Subject to and without waiving the foregoing objections, SoCalGas responds as follows. See SoCalGas' Response to Question 10 of SED DR 33 dated October 23, 2018.

QUESTION 16:

Identify the sponsor(s) for the response to each question.

RESPONSE 16:

SoCalGas objects to this request as vague and ambiguous, particularly with respect to the term "sponsors." Subject to and without waiving the foregoing objections, SoCalGas responds as follows. SoCalGas interprets this request to ask who prepared the responses contained herein. This response was prepared by counsel and SoCalGas regulatory personnel working at the direction of counsel.