

SED-228
SoCalGas Response to SED Data Request 153
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-153 DATED FEBRUARY 22, 2021)

SOCALGAS RESPONSE DATED MARCH 5, 2021

SoCalGas provides the following Responses to the Safety and Enforcement Division (SED) data request dated February 22, 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.

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SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST SED-SCG-153 DATED FEBRUARY 22, 2021)

SOCALGAS RESPONSE DATED MARCH 5, 2021

For this set of questions, please refer to the attached March 21, 2019 Letter from Jimmie I. Cho to Angelo Bellomo.

QUESTION 1:

Based upon his experience with incident beginning on October 23, 2015 at Aliso Canyon Natural Gas Storage facility, does Mr. Glenn La Fevers recognize the facts in this letter as true?

RESPONSE 1:

SoCalGas objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure to the extent it seeks information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence based on the fact that SED Violation 88 was withdrawn by SED. Moreover, SoCalGas objects to this request on the basis it is vague and ambiguous, including because the letter states what are alleged to be facts by the recipient, and then facts that refute those. As such, this question is unintelligible. Subject to and without waiving the foregoing objections, SoCalGas responds as follows. Mr. La Fevers has no reason to doubt the veracity of what is stated by Mr. Cho.

QUESTION 2:

If the answer to this question is anything other than an unqualified "yes," please identify which facts Mr. La Fevers does not recognize as true?

RESPONSE 2:

SoCalGas objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure to the extent it seeks information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence based on the fact that SED Violation 88 was withdrawn by SED. Moreover, SoCalGas objects to this request on the basis it is vague and ambiguous, including because the letter states what are alleged to be facts by the recipient, and then facts that refute those. As such, this question is unintelligible. Subject to and without waiving the foregoing objections, SoCalGas responds as follows.

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Please see response to Question 1.

QUESTION 3:

Does Mr. La Fevers disagree with any of the facts in this letter?

RESPONSE 3:

SoCalGas objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure to the extent it seeks information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence based on the fact that SED Violation 88 was withdrawn by SED. Moreover, SoCalGas objects to this request on the basis it is vague and ambiguous, including because the letter states what are alleged to be facts by the recipient, and then facts that refute those. As such, this question is unintelligible. Subject to and without waiving the foregoing objections, SoCalGas responds as follows. Please see response to Question 1.

QUESTION 4:

If so, please identify which ones, and explain how he would correct them so that he agrees.

RESPONSE 4:

SoCalGas objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure to the extent it seeks information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence based on the fact that SED Violation 88 was withdrawn by SED. Moreover, SoCalGas objects to this request on the basis it is vague and ambiguous, including because the letter states what are alleged to be facts by the recipient, and then facts that refute those. As such, this question is unintelligible. Subject to and without waiving the foregoing objections, SoCalGas responds as follows. Please see response to Question 1.