

SoCalGas-126

SoCalGas' Ninth Set of Data Request to SED.

I.19-06-016

ALJs: Hecht/Poirier

Date Served: March 15, 2021

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

**Exhibit
2-28**

2/25/2021
M. Felts

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. (U904G).

I.19-06-016
(Filed June 27, 2019)

**SOUTHERN CALIFORNIA GAS COMPANY'S NINTH SET OF DATA REQUESTS TO
THE SAFETY AND ENFORCEMENT DIVISION**

PLEASE TAKE NOTICE that Southern California Gas Company ("SoCalGas") hereby requests the Safety and Enforcement Division of the California Public Utilities Commission ("SED") to provide a written response to this Data Request in accordance with the Rules of Practice and Procedure of the California Public Utilities Commission ("Commission").

In accordance with Article 10 of the Commission's Rules of Practice and Procedure, please produce the following information and described categories of DOCUMENTS. Please provide YOUR response no later than the due date requested below. If YOU are unable to provide the information by this date, please provide a written explanation as to why the response date cannot be met and YOUR best estimate of when the information can be provided. Please e-mail all responses that can be transmitted electronically. If attachments cannot be electronically transmitted, please notify the undersigned via e-mail or phone and arrangements will be made for the alternate submission of said attachments.

INSTRUCTIONS

1. Answer in the greatest detail YOU are able for each of the Data Requests.
2. Include a copy of each data request that the response addresses before each response.

3. Return the completed and signed copy of YOUR answers to APatel@socalgas.com and GHealy@socalgas.com as an attachment to electronic mail by close of business on **April 30, 2020**.
4. Any of the Data Requests and YOUR answers thereto may be offered as evidence in any hearing in the above-styled and numbered cause.
5. In answering the Data Requests, YOU are required to set forth each responsive fact, circumstance, act, omission, or course of conduct, whether or not admissible in evidence at trial about which YOU have or had information, or which is or will be the basis for any contention made by YOU with respect to the Application.
6. The Data Requests shall be interpreted to make requests for information inclusive rather than exclusive.
7. YOU are required to supplement YOUR answers to include information acquired after filing YOUR responses to the Data Requests if YOU obtain information upon the basis of which YOU know that the response was incorrect or incomplete when made, or YOU know that the response that was originally correct and complete when made is no longer true and complete and the circumstances are such that “[f]ailure to amend the answer is in substance misleading.
8. If YOU are not capable of answering any of the Data Requests completely, please state the portion of the Data Request that YOU are unable to answer, and to the extent possible set forth the reasons for YOUR inability to answer more fully, and state whatever knowledge or information YOU have concerning the unanswered portion.
9. If requested information is not available in exactly the form requested, furnish carefully prepared estimates, designated as such, and explain the basis of the estimate, or indicate that YOU are unable to obtain the information and explain the reason that YOU cannot obtain the information. Where information is supplied pursuant to this instruction, explain why the information is being supplied in a form different from that requested.
10. If YOU withhold under a claim of privilege any document(s) responsive to the Data Requests, furnish a list specifying each document so identified, then set forth separately with respect to each document:
 - a. the type of document;
 - b. the date of the document;
 - c. for email or other correspondence, the author, sender(s), and recipient(s); and,
 - d. the legal and factual basis of privilege claim.
11. Please include such privilege log in service of responses to the Data Requests.

12. If a responsive document has been destroyed, is alleged to have been destroyed, or exists but is unavailable or no longer in YOUR possession, custody or control, please provide the following:
 - a. the date of the document;
 - b. the names and titles of the author(s), sender(s), and recipients(s) of the document;
 - c. the reason for the document's destruction, disposition, or non-availability;
 - d. person(s) having knowledge of its destruction, disposition, or non-availability;
and
 - e. the person(s) responsible for its destruction, disposition, or non-availability.
13. As to any document produced in response to the Data Request, state the Data Request to which the document is made available as a response.
14. Where the context herein makes it appropriate, each singular word shall include its plural and each plural word shall include its singular. All words and phrases shall be construed as masculine, feminine or neuter gender according to the context.
15. Documents to be produced include all documents in YOUR possession, custody or control, which includes not only actual physical possession, but constructive possession, and the right to obtain possession from a third party, such as an agent or representative.
16. For each request below that calls for an admission, please state whether YOU admit or deny. For any response that is not an unqualified admission, 1) state all facts upon which YOU base YOUR response; 2) state the names, addresses, and telephone numbers of all persons who have knowledge of those facts; and 3) identify all documents and other tangible things that support YOUR response, and state the name, address, and telephone number of the person who has each document or thing.

DEFINITIONS

1. "YOU," "YOUR," or "SED" means the Commission's Safety and Enforcement Division or its predecessors.
2. "LEAK" means the October 23, 2015 incident involving well SS-25 at SoCalGas' Aliso Canyon gas storage field.
3. "DOCUMENTS" means, without limitation, the following items, whether in electronic form, printed, recorded, or written or reproduced by hand: reports, studies, statistics, projections, forecasts, decisions, and orders, intra-office and interoffice communications, correspondence, memoranda, financial data, summaries or records of conversations or interviews, statements, returns, diaries, calendars, work papers, graphs, notebooks, notes, charts, computations, plans, drawings, sketches, computer printouts, summaries of records of meetings or conferences, summaries or reports of investigations or

negotiations, opinions or reports of consultants, photographs, bulletins, records or representations or publications of any kind (including but not limited to microfilm, videotape, and records however produced or reproduced), electronic or mechanical or electrical records of any kind (including, without limitation, tapes, tape cassettes, discs, emails, and records) other data compilations (including without limitation, input/output files, source codes, object codes, program documentation, computer programs, computer printouts, cards, tapes, discs and recordings used in automated data processing, together with the programming instructions and other material necessary to translate, understand, or use the same), and other documents or tangible things of whatever description which constitute or contain information within the scope of these data requests.

DATA REQUESTS

1. Are YOU aware of the policies or practices of other gas storage operators, prior to or at the time of the LEAK, with respect to well integrity management of underground gas storage facilities? If so,
 - a. Please identify each such operator.
 - b. For each operator identified, please describe the operator's policies or practices with respect to well integrity management of underground gas storage facilities.
 - c. For each operator identified, please produce all records documenting such policies or practices.
 - d. For each operator identified, describe whether YOU have ever audited or investigated the operator for its well integrity management practices related to underground gas storage, including when the audit/investigation occurred and the outcome of the audit/investigation.
2. Are YOU aware of the policies or practices of other gas storage operators, prior to or at the time of the LEAK, with respect to groundwater relative to underground gas storage well casings? If so,
 - a. Please identify each such operator.
 - b. For each operator identified, please describe the operator's policies or practices with respect to their understanding of groundwater relative to underground gas storage well casings.
 - c. For each operator identified, please produce all records documenting such policies or practices.
 - d. For each operator identified, describe whether YOU have ever audited or investigated the operator for failure to understand groundwater relative to its underground gas storage well casings, including when the audit/investigation occurred and the outcome of the audit/investigation.
3. Are YOU aware of the policies or practices of other gas storage operators, prior to or at the time of the LEAK, with respect to the application of cathodic protection to surface casing? If so,
 - a. Please identify each such operator.
 - b. For each operator identified, please describe the operator's policies or practices with respect to the application of cathodic protection to surface casing.

- c. For each operator identified, please produce all records documenting such policies or practices.
 - d. For each operator identified, describe whether YOU have ever audited or investigated the operator for its failure to apply cathodic protection to its underground gas storage well casing(s), including when the audit/investigation occurred and the outcome of the audit/investigation.
- 4. Are YOU aware of the policies or practices of other gas storage operators, prior to or at the time of the LEAK, with respect to well specific well kill plans? If so,
 - a. Please identify each such operator.
 - b. For each operator identified, please describe the operator's policies or practices with respect to well specific well kill plans.
 - c. For each operator identified, please produce all records documenting such policies or practices.
 - d. For each operator identified, describe whether YOU have ever audited or investigated the operator for its failure to have in place well specific well kill plans, including when the audit/investigation occurred and the outcome of the audit/investigation.
- 5. Are YOU aware of the policies or practices of other gas storage operators, prior to or at the time of the LEAK, with respect to gas storage well failure investigations? If so,
 - a. Please identify each such operator.
 - b. For each operator identified, please describe the operator's policies or practices with respect to gas storage well failure investigations.
 - c. For each operator identified, please produce all records documenting such policies or practices.
 - d. For each operator identified, describe whether YOU have ever audited or investigated the operator for its failure to conduct underground gas storage well failure investigations, including when the audit/investigation occurred and the outcome of the audit/investigation.
- 6. Are YOU aware of the policies or practices of other gas storage operators, prior to or at the time of the LEAK, with respect to mechanical integrity testing of gas storage wells? If so,
 - a. Please identify each such operator.
 - b. For each operator identified, please describe the operator's policies or practices with respect to mechanical integrity testing of gas storage wells.
 - c. For each operator identified, please produce all records documenting such policies or practices.
 - d. For each operator identified, describe whether YOU have ever audited or investigated the operator for its failure to conduct mechanical integrity testing of its underground gas storage wells, including when the audit/investigation occurred and the outcome of the audit/investigation.

7. Are YOU aware of the policies or practices of other gas storage operators, prior to or at the time of the LEAK, with respect to maintenance of records for daily site inspections of underground gas storage wells? If so,
 - a. Please identify each such operator.
 - b. For each operator identified, please describe the operator's policies or practices with respect to maintenance of records for daily site inspections of underground gas storage wells.
 - c. For each operator identified, please produce all records documenting such policies or practices.
 - d. For each operator identified, describe whether YOU have ever audited or investigated the operator for its failure to maintain records for daily site inspections of underground gas storage wells, including when the audit/investigation occurred and the outcome of the audit/investigation.
8. Are YOU aware of the policies or practices of other gas storage operators, prior to or at the time of the LEAK, with respect to transient kill modeling for well control operations of uncontrolled releases of hydrocarbons from gas storage wells.
 - a. Please identify each such operator.
 - b. For each operator identified, please describe the operator's policies or practices with respect to maintenance of records for daily site inspections of underground gas storage wells.
 - c. For each operator identified, please produce all records documenting such policies or practices.
 - d. For each operator identified, describe whether YOU have ever audited or investigated the operator for its failure to conduct transient kill modeling prior to implementing a well control operation by top kill, including when the audit/investigation occurred and the outcome of the audit/investigation.
9. Do YOU contend that transient modeling must be performed prior to all well control operations by top kill?
 - a. If so, produce any and all documents, publications, or industry standards that support YOUR position.
 - b. If not, please describe how a well control operator would determine the circumstances under which transient modeling would be necessary or required for a well control operation by top kill?
10. Produce all DOCUMENTS related to SED's review of SoCalGas' 2012 Gas Safety Plan.
11. Produce all DOCUMENTS related to SED's review of SoCalGas' 2013 Gas Safety Plan.
12. Produce all DOCUMENTS related to SED's review of SoCalGas' 2014 Gas Safety Plan.