

SoCalGas-128

**SED's Response to SoCalGas' Data Request 9, Question 10 through 12
(May 15, 2020).**

I.19-06-016

ALJs: Hecht/Poirier

Date Served: March 15, 2021

Subject: Safety and Enforcement Division's Response to Southern California Gas Company's Ninth Set of Data Requests, Questions 10 through 12.

Date: May 15, 2020

Question 10. Produce all DOCUMENTS related to SED's review of SoCalGas' 2012 Gas Safety Plan.

SED also objects that the data request seeks to elicit information that is not permitted under Commission Rule of Practice and Procedure Rule 10.1. Namely, the question is neither admissible in evidence, and does not appear reasonably calculated to lead to the discovery of admissible evidence. Namely, SED's review of the 2012, 2013, and 2014 Gas Safety Plan does not relate to matters below the wellhead (down well) in Aliso Canyon.

SED also objects to this question as vague and ambiguous, asking about the "Gas Safety Plan" without providing the document. SED also objects to the question as overly broad, asking about all documents related to the Gas Safety Plan. SED also objects to the question is unduly burdensome, asking SED to retrieve extensive amounts of documents related to SED's review of the Gas Safety Plan, including those which SED already provided to SoCalGas. SED also objects that the data request seeks to elicit information that is not permitted under Commission Rule of Practice and Procedure Rule 10.1. Namely, the question is neither admissible in evidence, and does not appear reasonably calculated to lead to the discovery of admissible evidence. Moreover, the intrusiveness of the data request clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence.

Question 11. Produce all DOCUMENTS related to SED's review of SoCalGas' 2013 Gas Safety Plan.

SED incorporates its answer to question 10 by reference.

Question 12. Produce all DOCUMENTS related to SED's review of SoCalGas' 2014 Gas Safety Plan.

SED incorporates its answer to question 10 by reference.