

**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 CAL ADVOCATES-SCG-51 DATED JUNE 23, 2021)**

**SOCALGAS SUPPLEMENTAL RESPONSE DATED NOVEMBER 12, 2021**

SoCalGas provides the following Responses to the Public Advocates Office (Cal Advocates) data request dated June 23, 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 Cal Advocates 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 Cal Advocates 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 Cal Advocates to SoCalGas.

**QUESTION 1:**

Please provide documentation showing SoCalGas policies and/or procedures for data retention and recovery that were in place at the time SoCalGas learned that the Boots and Coots laptop with all of the modeling data related to the Aliso Canyon gas leak incident was stolen.

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**RESPONSE 1 (DATED JULY 8, 2021):**

SoCalGas objects to this request on the grounds that it conflicts with the April 7, 2021 Ruling granting the motion of the CPUC – Safety and Enforcement Division limiting further discovery in I.19-06-016 with the exception of the following issues:

1. Discovery regarding the real-time transcription issue
2. Data requests on third-party witnesses
3. Discovery from SoCalGas to CalPA to further address meeting with Blade identified in cross-examination.<sup>1</sup>

**SUPPLEMENTAL RESPONSE 1 (DATED SEPTEMBER 8, 2021):**

SoCalGas interprets this request to seek SoCalGas' Information Management Policy as of February 21, 2020. Please see electronic documents with Bates range I1906016\_SCG-CALADVOCATES\_0066215 through I1906016\_SCG-CALADVOCATES\_0066218.

**REVISED SUPPLEMENTAL RESPONSE 1 (DATED SEPTEMBER 10, 2021):**

SoCalGas interprets this request to seek SoCalGas' Information Management Policy as of February 21, 2020. Please see electronic documents with Bates range I1906016\_SCG-CALADVOCATES\_0066219 through I1906016\_SCG-CALADVOCATES\_0066223.

**QUESTION 2:**

Please provide any documentary evidence you have that supports your claim that Boots and Coots performed transient modeling for the well kill efforts.

**RESPONSE 2 (DATED JULY 8, 2021):**

SoCalGas objects to this request on the grounds that it conflicts with the April 7, 2021 Ruling granting the motion of the CPUC – Safety and Enforcement Division limiting further discovery in I.19-06-016 with the exception of the following issues:

1. Discovery regarding the real-time transcription issue

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<sup>1</sup> See I.19-06-016, Hearing Transcript, Volume 12, Page 1723, Line 7 to Page 1727, Line 7.

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2. Data requests on third-party witnesses
3. Discovery from SoCalGas to CalPA to further address meeting with Blade identified in cross-examination.<sup>2</sup>

SoCalGas further objects to this question on the ground it is unduly burdensome pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure in that the request is duplicative and seeks information that was previously provided to CalPA or otherwise is available to CalPA.

**SUPPLEMENTAL RESPONSE 2 (DATED NOVEMBER 12, 2021):**

SoCalGas understands this request to seek documentary evidence that relates to the transient modeling performed by Boots & Coots in connection with top kill attempts 4 – 7. Please see the following:

- Blade Energy Report, *Root Cause Analysis of the Uncontrolled Hydrocarbon Release from Aliso Canyon SS-25*, May 16, 2019 (See e.g., pp. 4, [noting transient modeling was conducted for kill attempt No. 7]; *Id.*, Vol 3, *SS-25 Transient Well Kill Analysis*, pp. 37-38, including referenced documents: AC\_BLD\_0082977–78; AC\_BLD\_0082979; AC\_BLD\_0075832 through AC\_BLD\_0075859; AC\_BLD\_0075853.)
- SoCalGas-08 (Prepared Reply Testimony of L. William Abel), pp. 6-8
- SoCalGas-09 (Exhibits to Reply Testimony of L. William Abel), pp. SoCalGas-09.0198 - 0446 [(Danny Walzel Depo. Tr. 76:18-25 (Feb. 21, 2020)]
- SoCalGas-10 (Prepared Reply Testimony of Danny Walzel and Dr. Arash Haghshenas), p. 3.
- SoCalGas' Responses to SED Data Request 57, including the following referenced documents: AC\_CPUC\_0173909 – AC\_CPUC\_0173913; AC\_CPUC\_0173168 – AC\_CPUC\_0173172.
- SoCalGas' Responses to SED Data Request 61
- SoCalGas' Responses to SED Data Request 85

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<sup>2</sup> See I.19-06-016, Hearing Transcript, Volume 12, Page 1723, Line 7 to Page 1727, Line 7.

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**QUESTION 3:**

Regarding communications between Mr. Walzel and SoCalGas employees:

- (a) Please identify the SoCalGas employees who were aware of the transient modeling allegedly being performed by Mr. Walzel.
- (b) Please identify how Mr. Walzel communicated with those SoCalGas employees regarding the well kill efforts, and whether any written assumptions were used in the modeling were provided to those SoCalGas employees.
- (c) If SoCalGas employees overseeing the modeling by Mr. Walzel were not provided any information regarding the assumptions used to model the well kill efforts, please explain how those employees would have been able to properly analyze or comment on the proposed well kill efforts, or the results of the prior well kill efforts.

**RESPONSE 3 (DATED JULY 8, 2021):**

SoCalGas objects to this request on the grounds that it conflicts with the April 7, 2021 Ruling granting the motion of the CPUC – Safety and Enforcement Division limiting further discovery in I.19-06-016 with the exception of the following issues:

1. Discovery regarding the real-time transcription issue
2. Data requests on third-party witnesses
3. Discovery from SoCalGas to CalPA to further address meeting with Blade identified in cross-examination.<sup>3</sup>

SoCalGas further objects to this question on the ground it is unduly burdensome pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure in that the request is duplicative and seeks information that was previously provided to CalPA or otherwise is available to CalPA.

**SUPPLEMENTAL RESPONSE 3 (DATED NOVEMBER 12, 2021):**

- a) SoCalGas employee, Rodger Schwecke was aware that Mr. Walzel was performing modeling analysis to support the preparation of the well kill plan for the kill attempts. On information and belief, former SoCalGas employee Bret Lane was also aware of the same. However, SoCalGas personnel were not

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<sup>3</sup> See I.19-06-016, Hearing Transcript, Volume 12, Page 1723, Line 7 to Page 1727, Line 7.

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aware during this period that Mr. Walzel's modeling analysis specifically consisted of "transient" modeling.

- b) SoCalGas understands this compound question to ask (1) how Mr. Walzel communicated with the SoCalGas employees regarding the well kill efforts, and (2) whether any written assumptions used by Mr. Walzel in his modeling for kill attempts 4–6 were provided to the SoCalGas employees identified in sub-question (a). Regarding the first portion of this request, Mr. Walzel communicated with SoCalGas personnel regarding the well kill efforts both verbally and by email. Regarding the second portion of the question, Mr. Walzel and SoCalGas personnel verbally discussed the results and observations of each well kill attempt (kill attempts 4–6) between each well kill attempt, and discussed what modifications might assist in executing a successful well kill attempt. (See e.g., Evidentiary Hearing (May 18, 2021) Tr. 2681:16 - 2684:5 (R. Schwecke).) Because Mr. Walzel's kill modeling data is not in SoCalGas' possession, SoCalGas cannot verify whether any "written assumptions" used in Mr. Walzel's modeling were later provided to SoCalGas.
- c) SoCalGas employees oversaw the well kill efforts overall, but they did not "oversee[] the modeling" specifically. As described in the Prepared Sur-Reply Testimony of L. William Abel, SoCalGas personnel oversaw and approved Boots & Coots' recommended well control plans, but did not determine the manner in which Boots & Coots prepared or executed its well kill operations since Boots & Coots were hired for their specific expertise. (See SoCalGas-29.0006 - 0007 [noting, "As Mr. Walzel testified during his deposition, SoCalGas had a 'clear command structure,' held daily meetings with Boots & Coots, solicited Boots & Coots' views, provided the information that Boots & Coots needed, observed every well kill attempt, brought on the local contractors and suppliers that Boots & Coots needed, and discussed every kill attempt with Boots & Coots, weighing the 'pros and cons' to come up with an 'agreed plan.']; Evidentiary Hearing (May 18, 2021) Tr. 2681:16 - 2684:5 (R. Schwecke).) This process allowed SoCalGas to evaluate and comment on Boots & Coots' proposed well kill efforts, as well as the results of the prior well kill efforts, without prescribing how the experts should prepare and execute their job.

**QUESTION 4:**

Please identify any provisions of the contract between SoCalGas and Boots and Coots that required Boots and Coots to preserve information related to its well kill efforts at

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Aliso Canyon.

**RESPONSE 4 (DATED JULY 8, 2021):**

SoCalGas objects to this request on the grounds that it conflicts with the April 7, 2021 Ruling granting the motion of the CPUC – Safety and Enforcement Division limiting further discovery in I.19-06-016 with the exception of the following issues:

1. Discovery regarding the real-time transcription issue
2. Data requests on third-party witnesses
3. Discovery from SoCalGas to CalPA to further address meeting with Blade identified in cross-examination.<sup>4</sup>

SoCalGas further objects to this question on the ground it is unduly burdensome pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure in that the request seeks information that was previously provided to CalPA or otherwise is available to CalPA.

**SUPPLEMENTAL RESPONSE 4 (DATED NOVEMBER 12, 2021):**

The governing contract was previously provided in response to Cal Advocates Data Request 9 dated October 10, 2019 (please refer to electronic documents with Bates range I1906016\_SCG-CALADVOCATES\_0017018 through I1906016\_SCG-CALADVOCATES\_0017046). In addition, a public version of the Boots & Coots contract is included in pages SED 00001-through SED 00029 of [Exhibit SED 201](#).

Whether any provision requires Boots & Coots to preserve information related to its well kill efforts at Aliso Canyon is a question of legal interpretation calling for a legal conclusion.

**QUESTION 5:**

Please provide all documents provided by SoCalGas to Boots & Coots staff regarding the well kill efforts, including without limitation, any wellbore schematics of the wells at Aliso Canyon. If these documents have been provided in response to other data requests, identify the data response in which they were provided and specifically where these documents are contained within that data response.

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<sup>4</sup> See I.19-06-016, Hearing Transcript, Volume 12, Page 1723, Line 7 to Page 1727, Line 7.

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**RESPONSE 5 (DATED JULY 8, 2021):**

SoCalGas objects to this request on the grounds that it conflicts with the April 7, 2021 Ruling granting the motion of the CPUC – Safety and Enforcement Division limiting further discovery in I.19-06-016 with the exception of the following issues:

1. Discovery regarding the real-time transcription issue
2. Data requests on third-party witnesses
3. Discovery from SoCalGas to CalPA to further address meeting with Blade identified in cross-examination.<sup>5</sup>

SoCalGas further objects to this question on the ground it is unduly burdensome pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure in that the request is duplicative and seeks information that was previously provided to CalPA or otherwise is available to CalPA.

**SUPPLEMENTAL RESPONSE 5 (DATED NOVEMBER 12, 2021):**

Documents responsive to this request were provided in response Cal Advocates Data Request 35 (see I1906016\_SCG\_CALADVOCATES\_0018894 - I1906016\_SCG\_CALADVOCATES\_0043718; I1906016\_SCG\_CALADVOCATES\_0044171 - I1906016\_SCG\_CALADVOCATES\_0065108. Additionally, as Mr. Schwecke testified during the evidentiary hearing, SoCalGas provided Boots & Coots the hard copy well file for well SS-25 (Evidentiary Hearing (May 18, 2021) Tr. 2752:11 – 2753:10 (R. Schwecke).) An electronic version of the SS-25 well file was produced in this proceeding (see Exhibit SED-R-295 [738-page PDF containing portions of SS-25 well file]).

**QUESTION 6:**

Please provide all of the Boots & Coots Daily Operating Reports (aka "DOR") related to the Aliso Canyon well kill efforts performed between 2015 and 2016.1 If the DORs have been provided in response to other data requests, identify the data response in which they were provided and specifically where these documents are contained within that

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<sup>5</sup> See I.19-06-016, Hearing Transcript, Volume 12, Page 1723, Line 7 to Page 1727, Line 7.

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data response.

**RESPONSE 6 (DATED JULY 8, 2021):**

SoCalGas objects to this request on the grounds that it conflicts with the April 7, 2021 Ruling granting the motion of the CPUC – Safety and Enforcement Division limiting further discovery in I.19-06-016 with the exception of the following issues:

1. Discovery regarding the real-time transcription issue
2. Data requests on third-party witnesses
3. Discovery from SoCalGas to CalPA to further address meeting with Blade identified in cross-examination.<sup>6</sup>

SoCalGas further objects to this question on the ground it is unduly burdensome pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure in that the request is duplicative and seeks information that was previously provided to CalPA or otherwise is available to CalPA, as acknowledged within the question itself.

**SUPPLEMENTAL RESPONSE 6 (DATED NOVEMBER 12, 2021):**

The Boots & Coots Daily Operations Reports are available in the record of this proceeding. (See Exh. SoCalGas-09 at 9.0019 – 9.0196 or Exh. SED-227 [Boots & Coots' Daily Operations Reports from October 26, 2015 through February 18, 2016].)

**QUESTION 7:**

Please provide copies of all legal hold orders or other orders or instructions requiring you to preserve evidence related to the Aliso Canyon leak incident.

**RESPONSE 7 (DATED JULY 8, 2021):**

SoCalGas objects to this request on the grounds that it conflicts with the April 7, 2021 Ruling granting the motion of the CPUC – Safety and Enforcement Division limiting further discovery in I.19-06-016 with the exception of the following issues:

1. Discovery regarding the real-time transcription issue
2. Data requests on third-party witnesses

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<sup>6</sup> See I.19-06-016, Hearing Transcript, Volume 12, Page 1723, Line 7 to Page 1727, Line 7.



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3. Discovery from SoCalGas to CalPA to further address meeting with Blade identified in cross-examination.<sup>7</sup>

SoCalGas further objects to this question on the ground it is unduly burdensome pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure in that the request is duplicative and seeks information that was previously provided to CalPA or otherwise is available to CalPA.

**SUPPLEMENTAL RESPONSE 7 (DATED NOVEMBER 12, 2021):**

SoCalGas understands this request to seek all legal hold orders or other orders or instructions received by SoCalGas from third-parties requiring SoCalGas to preserve evidence related to the Aliso Canyon leak incident. Documents responsive to this request are provided with this response and bates numbered I1906016\_SCG\_CALADVOCATES\_0066227-66333.

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<sup>7</sup> See I.19-06-016, Hearing Transcript, Volume 12, Page 1723, Line 7 to Page 1727, Line 7.