

Docket:	<u>A.19-06-016</u>
Exhibit Number:	<u>CalPA-411</u>
Reference Number:	<u>CalAdvocates-10</u>
Date Served:	<u>April 29, 2021</u>
Commissioner:	<u>C. Rechtschaffen</u>
Admin. Law Judge:	<u>Poirier/Kenney</u>



**THE PUBLIC ADVOCATES OFFICE**  
**CALIFORNIA PUBLIC UTILITIES COMMISSION**

**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**

**SoCalGas' Response to CalAdvocates-SCG-DR-049**

San Francisco, California  
March 30, 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 CAL ADVOCATES-SCG-49 DATED MARCH 24, 2021)**

**SOCALGAS RESPONSE DATED MARCH 26, 2021**

SoCalGas provides the following Responses to the Public Advocates Office (Cal Advocates) data request dated March 24, 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:**

On exhibit SoCalGas-153 p. SoCalGas-153.0002, first paragraph, there is a mention for Western Atlas Report. Exhibit SoCalGas-153 is not complete without including this report. Please provide Western Atlas Report mentioned in the exhibit SoCalGas-153.

**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-49 DATED MARCH 24, 2021)**

**SOCALGAS RESPONSE DATED MARCH 26, 2021**

**RESPONSE 1:**

SoCalGas objects to this request to the extent it assumes a formal written Western Atlas report was prepared. Exhibit – SCG-153 states, “[u]nless the Western Atlas research group can provide a more conclusive report as to the inaccuracy of the Vertilog, their accuracy has probably been established.” Subject to and without waiving the foregoing objection, SoCalGas responds as follows. SoCalGas reviewed its records and has not identified the Western Atlas report referred to in Exhibit SoCalGas-153.