

Docket: : I.19-06-016
Exhibit Number : CalPA-461
Commissioner : Rechtschaffen
Admin. Law Judge : Hecht
Witness : _____



PUBLIC ADVOCATES OFFICE
California Public Utilities Commission

SoCalGas's Response to Data Request 60
dated March 7, 2022

Exhibit CalPA-461

San Francisco, California
May 13, 2022

**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)**

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SoCalGas provides the following Responses to the Public Advocates Office (Cal Advocates) data request dated February 1, 2022 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.

On September 9, 2010, a Pacific Gas and Electric Company (PG&E) gas transmission pipeline ruptured in a residential neighborhood in San Bruno, California. Gas escaping from the rupture ignited, causing an intense fire which killed eight people, injured 58 others, destroyed 38 homes, and damaged another 70. Among other things, the National Transportation Safety Board (NTSB) concluded that the San Bruno explosion was caused by a gas pipe that was defective when PG&E installed it in 1956, and that the defect "would have been

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visible when it was installed.”¹ The NTSB identified two probable causes for the accident. The first was PG&E’s “inadequate quality assurance and quality control” which allowed installation of the defective line in 1956.² The second was PG&E’s “inadequate pipeline integrity management program” – a records-based program – which “failed to detect and repair or remove the defective pipe section.”³ In addition, an Independent Review Panel (IR) concluded that PG&E’s integrity management program was “not identifying all threats, as required by regulation; [] not identifying the segments of highest risk and remediating significant anomalies; and hence [was] not taking programmatic actions to prevent or mitigate threats.”⁴

QUESTION 1:

Was SoCalGas aware of the San Bruno explosion at the time it occurred?

RESPONSE 1:

SoCalGas objects to this request as vague and ambiguous, in particular with respect to the phrases “Was SoCalGas aware” and “at the time it occurred.” SoCalGas further objects to this request as beyond the scope of issues in I.19-06-016, as defined by the Assigned Commissioner’s Scoping Memo and Ruling.

Subject to and without waiving the foregoing, SoCalGas responds as follows. SoCalGas became aware of the rupture of a PG&E transmission pipeline located in San Bruno shortly after it occurred.

QUESTION 2:

Was SoCalGas aware of the findings made by the NTSB and others regarding the causes of the San Bruno explosion? If not, please explain why SoCalGas was not monitoring the findings made by the NTSB and others regarding the causes of the San Bruno explosion.

¹ NTSB Report, p. x. The NTSB Report, issued August 20, 2011, is available on the NTSB’s website.

² NTSB Report, p. xii.

³ NTSB Report, p. xii.

⁴ IRP Report, p. 8 (emphases added). The IRP Report is available on the CPUC’s website, as well as the American Gas Association’s website (www.aga.org).

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RESPONSE 2:

SoCalGas objects to this request as vague and ambiguous, in particular with respect to the phrases “was SoCalGas aware,” “findings made by the NTSB and others,” and “monitoring the findings,” and also to the extent it fails to specify an applicable time period. SoCalGas further objects to this request as beyond the scope of issues in I.19-06-016, as defined by the Assigned Commissioner’s Scoping Memo and Ruling. SoCalGas also objects to this request as overly broad and unduly burdensome.

Subject to and without waiving the foregoing, SoCalGas responds as follows. SoCalGas became aware of NTSB’s findings shortly after they were publicly available. One example of how relevant matters were communicated to SoCalGas by the CPUC: on January 3, 2011, Executive Director Paul Clanon of the CPUC notified SoCalGas that the NTSB had issued safety recommendations to PG&E in connection with its investigation of the natural gas pipeline rupture in San Bruno, California on September 9, 2010. The safety recommendations, as described by the CPUC, are as follows. Recommendations included substantially the same descriptions of findings by NTSB as a result of the initial stages of its investigation of the San Bruno pipeline rupture and fire. The NTSB first explained that PG&E’s as-built drawings and alignment sheets showed Line 132 was constructed using 30-inch-diameter seamless steel pipe, but the ruptured pipe segment was in fact constructed with longitudinally seam-welded pipe. The NTSB further explained that accurate pipeline records are critical to establish a valid Maximum Allowable Operating Pressure (MAOP) up to which the pipeline can normally be safely operated. Although recognizing hydrostatic and spike testing can, in certain circumstances, be used to determine a valid MAOP, the NTSB concluded that it was preferable to use available design, construction, inspection, testing and other related records to determine a valid MAOP.

QUESTION 3:

To the extent SoCalGas was aware of the findings made by the NTSB and others regarding the causes of the San Bruno explosion, what steps, if any, did SoCalGas take to confirm that the Aliso Canyon facility was in appropriate operating condition following the San Bruno explosion?

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RESPONSE 3:

SoCalGas objects to this request as vague and ambiguous, in particular with respect to the phrases "SoCalGas was aware," "findings made by NTSB and others," "what steps, if any, did SoCalGas take," and "appropriate operating condition." SoCalGas further objects to this request as overly broad and unduly burdensome, including to the extent it fails to specify an applicable time period. SoCalGas further objects to this request as unintelligible to the extent it seeks to draw parallels between learnings from the transmission pipeline involved in the San Bruno rupture, which pertained to long seams on lateral pipelines, and storage wells, which do not have long seams and are not pipelines.

Subject to and without waiving the foregoing, SoCalGas responds as follows. On January 3, 2011, Mr. Clanon directed SoCalGas to report on those "steps [we] will take proactively to implement corrective actions as appropriate" for our natural gas transmission pipeline systems in light of three of the NTSB recommendations. Those recommendations generally require analysis and action of all pipeline segments located in Class 3 and Class 4 locations and Class 1 and Class 2 high consequence areas that have not been strength tested. No pipeline footage at the Aliso Canyon storage facility met the applicable criteria.

On February 1, 2011, SoCalGas and SDG&E sent a letter to Executive Director Clanon, outlining the steps we were taking in response to the NTSB recommendations, and assuring the Executive Director that SoCalGas was giving the Commission's directive the highest priority.

To that end, SoCalGas and SDG&E assembled a large team, under the direction of senior management, to perform a comprehensive, in-depth, and exhaustive review of the records for the more than 1,600 miles of pipelines in SoCalGas' (1,416 miles) and SDG&E's (206 miles) service territories that meet the NTSB's criteria (Criteria Miles). These records span many decades and include numerous documents, such as work orders, design data sheets, hydrostatic test records and recording charts, material records, construction drawings, etc. The goal of our records review process was to conduct an intensive records search to identify gas transmission lines that had not previously been pressure tested and to develop plans for those lines to verify that they are being operated within an appropriate safety margin. For a more detailed description of that process, our findings, and the actions we are taking or intend to take in light of

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those findings please refer to SoCalGas' report on actions taken in response to the NTSB safety recommendations.⁵

The ultimate response to the NTSB report developed and ratified in Commission proceedings is SoCalGas' Pipeline Safety Enhancement Plan (PSEP).⁶

QUESTION 4:

Did SoCalGas have anything like a quality assurance and quality control program in place at Aliso Canyon?

- a. If not, why not?
- b. If so, please provide the name of the program and describe whether the SoCalGas program was reviewed for deficiencies in light of the findings regarding the San Bruno explosion;
- c. If the program was reviewed for deficiencies, please identify the changes made to improve the program;
- d. Please identify the SoCalGas staff who worked on the program review; and
- e. Please provide any documents that reflect that changes were made to improve the program.

RESPONSE 4:

SoCalGas objects to this request as vague and ambiguous, in particular with respect to the phrases "anything like," "quality assurance and quality control program," and "in

⁵ <https://www.socalgas.com/regulatory/documents/r-11-02-019/reportInResponseToNTSBrecommendations.pdf>

⁶ The Commission initiated and/or presided over a number of formal proceedings following and based on or related to the San Bruno rupture, in which SoCalGas participated: Order Instituting Rulemaking on the Commission's Own Motion to Adopt New Safety and Reliability Regulations for Natural Gas Transmission and Distribution Pipelines and Related Ratemaking Mechanisms (R.11-02-019), SoCalGas and SDG&E's Application for Pipeline Safety Enhancement Plan (PSEP) (A.11-11-002), Application for Rehearing of D.14-06-007 and D.14-11-021, Application to Recover Costs Recorded in their Pipeline Safety and Reliability Memorandum Accounts (PSRMA) (A.14-12-016), Application to Proceed with Phase 2 of their PSEP and Establish Memorandum Accounts to Record Phase 2 Costs (A.15-06-013), Application for a Certificate of Public Convenience and Necessity for the Pipeline Safety & Reliability Project (PSRP) (A.15-09-013), 2016 PSEP Reasonableness Review Application (A.16-09-005), 2017 PSEP Forecast Application (A.17-03-021), 2018 PSEP Reasonableness Review Application (A.18-11-010), 2019 General Rate Case – Direct Testimony of Rick Phillips – PSEP Exhibit SCG-15-R (A.17-10-008), Advice Letter 5617, and Petition for Modification of D.19-09-051.

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place at Aliso Canyon,” and also to the extent it fails to specify an applicable time period. Subject to and without waiving the foregoing, SoCalGas responds as follows.

SoCalGas’ Transmission Integrity Management Program (TIMP) provides a specific program and framework to address transmission piping at Aliso Canyon.

SoCalGas had monitoring procedures and well inspection procedures for subsurface casing at Aliso Canyon, as described in Exhibit SoCalGas-01, Prepared Opening Testimony of Dan Neville.⁷

- a. SoCalGas additionally objects to this request as vague and ambiguous, particularly with respect to the phrase “reviewed for deficiencies in light of the findings regarding the San Bruno explosion.” SoCalGas further objects to this request as unintelligible to the extent it seeks to draw parallels between learnings from the transmission pipeline involved in the San Bruno rupture, which pertained to long seams, and storage wells, which do not have long seams. Subject to and without waiving the foregoing, SoCalGas responds as follows. Please refer to SoCalGas’ responses to questions 3 and 4 above.
- b. Please refer to SoCalGas’ response to question 4a herein.
- c. Please refer to SoCalGas’ response to question 4a herein.
- d. Not Applicable.

QUESTION 5:

Assuming SoCalGas had a data-informed integrity management program in place at Aliso Canyon prior to the San Bruno explosion:

- a. Please provide the name of the program and describe whether that integrity management program (and the quality of the data supporting it) was reviewed for deficiencies in light of the findings regarding the San Bruno explosion;
- b. If the program was reviewed for deficiencies, please identify the changes made to improve the program;

⁷ <https://www.socalgas.com/sites/default/files/SoCalGas-01.pdf>

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- c. If the integrity management program and its supporting data were not reviewed, please explain why not;
- d. Please identify the SoCalGas staff who worked on the program review; and
- e. Please provide any documents that reflect that changes were made to improve the program.

RESPONSE 5:

SoCalGas objects to this request on the grounds it is vague and ambiguous, including with respect to the phrase "prior to the San Bruno explosion," and overly broad and unduly burdensome, including because it fails to identify an applicable timeframe. SoCalGas further objects to this request as unintelligible to the extent it seeks to draw parallels between learnings from the transmission pipeline involved in the San Bruno rupture, which pertained to long seams, and storage wells, which do not have long seams.

Subject to and without waiving the foregoing, SoCalGas responds as follows. Please refer to the written and oral testimonies of Tim Hower and Charlie Stinson of MHA Petroleum Consultants and Amy Kitson).

QUESTION 6:

Please provide the names and titles of the SoCalGas Staff primarily responsible for the substantive responses to this data request.

RESPONSE 6:

SoCalGas objects to this request as overly broad and unduly burdensome, particularly given the current stage of the proceeding. Subject to and without waiving the foregoing, SoCalGas responds as follows. The response was prepared by counsel with information provided by subject matter experts, including Dan Neville, Glenn La Fevers, Travis Sera, Amy Kitson, Bill Kostelnik, Carol Mak and Andrea Fils.