

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA



FILED
03/19/21
01:48 PM

ADMINISTRATIVE LAW JUDGES JESSICA T. HECHT and MARCELO
POIRIER, co-presiding

Order Instituting Investigation on) EVIDENTIARY
the Commission's Own Motion into the) HEARING
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) Investigation
Uncontrolled Release of Natural Gas) 19-06-016
from its Aliso Canyon Storage)
Facility. (U904G))

REPORTERS' TRANSCRIPT
Virtual Proceeding
March 16, 2021
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Volume 1

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VIRTUAL PROCEEDING

MARCH 16, 2021 - 10:00 A.M.

* * * * *

ADMINISTRATIVE LAW JUDGE POIRIER: We will be on the record. Good morning. This is the time and place set for the evidentiary hearings in Commission Investigation 19-06-016, the Investigation Into 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 the Order to Show Cause Why Southern California Gas Company Should Not be Sanctioned for Allowing the Uncontrolled Release of Natural Gas in the Aliso Canyon Storage Facility.

My name is Marcelo Poirier and I am one of the co-assigned judges along with Jessica Hecht. The assigned Commissioner to the proceeding is Clifford Rechtschaffen. The Commissioner plans to attend some of the hearings, not today, but his staff will be monitoring the entire proceedings along the way.

Before we start, we're going to be dealing with some ground rules and some housekeeping matters, so we'll start with a

1 formal reading and discussion of the ground
2 rules. First off, we want all parties and
3 counsel to adhere to these rules and maintain
4 professional decorum. When you speak, please
5 speak slowly and clearly. Again, we're doing
6 this through the phone lines and we want to
7 make sure we get the best record possible.

8 Please identify yourself each time
9 you speak. If there is one primary attorney
10 questioning a witness, it is not necessary
11 for the questioning attorney or the witness
12 to restate their name each time. Please do
13 not interrupt or speak over each other.
14 Please speak only when addressed and called
15 on by the ALJs, unless you're making an
16 objection to a question during the course of
17 the examination of a witness.

18 In such instances after the
19 completion of the question, the attorney may
20 orally interject to provide his or her name
21 and briefly state the objection. When there
22 are inaudible statements, the reporter may
23 interrupt the speaker, when it is possible to
24 do so without disrupting the proceeding, or
25 the reporter may insert the word "inaudible"
26 in the transcript when there is a dropped,
27 garbled, or otherwise indecipherable audio.
28 Therefore, to ensure a complete and accurate

1 record of these proceedings, please adhere to
2 the ground rules that we've just discussed.

3 We also have some rules and standard
4 practices that we are following that are
5 specific to these remote proceedings.

6 Because we're using a telephone for audio and
7 Webex for video and document sharing,
8 everybody's Webex will be on mute. When you
9 are not speaking, please mute your phone.

10 As ALJ Hecht said, please make sure
11 when you are going to speak to unmute your
12 phone. We've had this happen in the past so
13 it probably will happen, but please just make
14 sure you unmute when you want to speak.

15 The ALJs will call upon each person
16 directly to speak. You may use the hand
17 button or waive your actual hand to signal
18 that you have something to say and we'll get
19 to you when we can. We'll be monitoring the
20 participant page for the raised hands, but to
21 the extent you can do both, I think that will
22 be help just because we might miss one of the
23 raised hands in that participant panel.

24 A speaking party must have both
25 audio and video activated. You need to be
26 visible when testifying, asking questions,
27 et cetera. If you experience video problems,
28 let us know. We need to know about that.

1 Only the ALJs and the parties that
2 are expected to speak during a particular
3 portion of the hearings may be visible on
4 Webex at a given time. During each session,
5 we're going to ask that each participating
6 party designate a single lead for the
7 session. The other participants, even those
8 who may speak later, should turn off their
9 cameras. So, cameras off, please, unless you
10 are participating.

11 With that, I'll hand it off to ALJ
12 Hecht.

13 ALJ HECHT: As has been referred to
14 already, these hearings are being done
15 remotely. We discussed this at the status
16 conference last week, the need to hold these
17 hearings via telephone and Webex due to the
18 ongoing COVID pandemic. This means that all
19 participants must agree to remote appearances
20 and the remote swearing in of witnesses.

21 In addition to the regular swearing
22 in of witnesses, we will require both the
23 attorneys and the witnesses to agree to a
24 number of attestations that we will go over
25 now. First, I'm going to do the ones for the
26 attorneys. I would appreciate it if all of
27 the attorneys would participate whether or
28 not they are going to speak today. But if

1 you're going to speak later and you're here,
2 I'd still like you to do it. What I will do
3 is I will read the attestation and I think we
4 have a slide.

5 Can that slide be up?

6 That slide is up. We have a slide
7 and this is what I'm going to read out.
8 After that, I'm going to go down a roll call
9 of the attorneys to make sure that everybody
10 agrees.

11 So, do you attest that you agree to
12 the evidentiary hearing in this proceeding
13 being held via Webex;

14 Attest that you agree to the witness
15 testimony and exhibits being presented via
16 Webex;

17 Attest that you agree to the oaths
18 of remote witnesses being received by Webex
19 communication and telephone;

20 Attest that you agree to all formal
21 rules of decorum, including the prohibition
22 against coaching witnesses;

23 Attest that you agree you will not
24 make any recording of the proceeding;

25 Attest that you understand that any
26 recording of the proceeding, including Webex
27 or teleconference or screenshots or any other
28 copying is prohibited;

1 Do you attest that you understand
2 that a violation of these prohibitions may
3 result in sanctions, restricted entry to
4 future hearings, denial of entry to future
5 hearings, or any other sanctions deemed
6 necessary by the Commission;

7 Do you attest that during the
8 evidentiary hearing you will only use
9 exhibits that are premarked and identified to
10 parties and that you will not use documents
11 that have not previously been shared with the
12 parties?

13 We discussed some rules about when
14 and how to share those before. So, those are
15 the attestations. I'm going to go down the
16 list I have of the attorneys who are present
17 who I believe will be representing witnesses.
18 Hopefully you will all say that you agree.

19 Starting at the top of my list with
20 Traci Bone.

21 MS. BONE: Yes, your Honor, I agree to
22 the attestations.

23 ALJ HECHT: Thank you.

24 And Caryn Mandelbaum.

25 MS. MANDELBAUM: Yes, your Honor, I
26 agree to the attestations as well.

27 ALJ HECHT: I don't believe we have
28 Mary Frazier here representing Blade. If you

1 are here, you can speak now. If I don't hear
2 you in about 10 seconds, I will just go back
3 and do that when she is present. Okay. No
4 Mary Frazier today.

5 For the Safety and Enforcement
6 Division, Darryl Gruen.

7 MR. GRUEN: Yes, your Honor, I agree to
8 the attestations.

9 ALJ HECHT: Thank you.

10 Also for SED, Robyn Purchia.

11 MS. PURCHIA: Yes, your Honor, I agree
12 to the attestations.

13 ALJ HECHT: Thank you.

14 And for Southern California Gas
15 Company, we have Mr. Stoddard.

16 MR. STODDARD: Your Honor, would you be
17 able to put the attestations back up because
18 I couldn't see the last three of them before
19 you put them on the screen. I just want to
20 make sure I read them fully.

21 ALJ HECHT: I suspect that we can.

22 MR. STODDARD: I think I can -- if you
23 could just scroll down a little bit.

24 ALJ HECHT: I see, because the windows
25 at the bottom --

26 MR. STODDARD: Yes.

27 ALJ HECHT: -- are covering it up.
28 Would it be sufficient for me to read it

1 aloud again slowly?

2 MR. STODDARD: Just the last couple --
3 oh, there, that helped. Yes, your Honor, we
4 agree to the attestations.

5 ALJ HECHT: Great. Thank you.

6 Now I'll call on the other SoCalGas
7 attorneys. I know many of you won't be
8 speaking today, but this way I don't have to
9 remember to do this later if you do intend to
10 speak.

11 Avisha Patel?

12 MS. PATEL: Yes, your Honor, I agree.

13 ALJ HECHT: Tom Lotterman.

14 MR. LOTTERMAN: Yes, your Honor, I
15 agree to the attestations.

16 ALJ HECHT: Pejman Moshfegh.

17 MR. MOSHFEGH: Yes, your Honor, I agree
18 to the attestations.

19 ALJ HECHT: Setareh Mortazavi, if that
20 person is here.

21 MS. MORTAZAVI: Yes, your Honor, I
22 agree to the attestations.

23 ALJ HECHT: Great.

24 I will also ask for TURN, Katy
25 Morsony, just to be comprehensive in case you
26 do speak later.

27 MS. MORSONY: Yes, your Honor, I agree
28 to the attestations.

1 ALJ HECHT: Okay. Thank you very much.

2 With that, we will talk about the
3 witness schedule. We received a proposed
4 hearing schedule from Southern California Gas
5 yesterday. It starts out in compliance with
6 our instructions, which were to have SED go
7 first, then Blade starting on Monday, and
8 then going from there.

9 Unfortunately, unless I missed it,
10 we did not get a schedule that keeps us
11 within the 13 or so days of hearings that we
12 currently have scheduled. We will start off
13 using the schedule and our first witness will
14 be Ms. Felts as stated on that schedule.
15 After that, we may issue a different or
16 updated schedule if we need to.

17 Does everybody agree to the schedule
18 that SoCalGas sent as possibly modified by
19 the judges later? Obviously, if we make a
20 modification, we will let you know and give
21 you an opportunity to speak.

22 ALJ POIRIER: ALJ Hecht, it looks like
23 Mr. Stoddard has his hand up.

24 ALJ HECHT: Mr. Stoddard, thank you.
25 Yes, you do. Go ahead.

26 MR. STODDARD: Yes, your Honor. Thank
27 you. There were a couple of the schedule
28 items that we did want to discuss,

1 including -- and we can talk about this as
2 well because we have an update on the Boots &
3 Coots witnesses. Is this the appropriate
4 time to speak to that or did you want to get
5 to that next?

6 ALJ HECHT: This is the perfect time to
7 speak to that.

8 MR. STODDARD: Okay. We've spoken with
9 Mr. Walzel, one of the Boots & Coots
10 witnesses, and he has indicated that he will
11 appear. We have to still coordinate with
12 him, or the specifics on the date, but we
13 hope to have clarity on that by the end of
14 this week or, rather, by the beginning of
15 next week. I think we're going to talk with
16 him over the weekend about his specific
17 scheduling. We've spoken to counsel so far
18 for his employer.

19 But I think if we can kind of swap
20 him in probably towards the later end, it
21 will give us enough time to coordinate.
22 Mr. Haghshenas, who was the other witness on
23 the Boots & Coots panel, Halliburton -- just
24 to be clear, Danny Walzel is with a new
25 employer. He's no longer with Halliburton.
26 Mr. Haghshenas is still with Halliburton. He
27 will not be appearing.

28 And so, one of the items we need to

1 discuss with Mr. Walzel are any modifications
2 that may be necessary to his testimony now
3 that Mr. Haghshenas is no longer on the
4 panel, and this wouldn't be additions or
5 anything like that. It would simply be if we
6 have to strike out any portions of the
7 testimony that he's not capable of speaking
8 to.

9 ALJ HECHT: Thank you. That is
10 helpful.

11 Do other parties have comments on
12 this?

13 Mr. Gruen.

14 MR. GRUEN: Your Honor, this comes as a
15 surprise, of course, as SoCalGas is telling
16 us for the first time today that it will not
17 have one of its identified witnesses to
18 answer questions about testimony they propose
19 to sponsor. We would ask in the event that
20 Mr. Walzel is unable to answer questions --
21 the idea of SoCalGas striking testimony also
22 comes as a surprise, of course. We've
23 responded to that.

24 So, rather than that, what SED would
25 request is that SoCalGas provide a witness
26 who can answer questions about the testimony
27 that's been prepared. We think that in lieu
28 of -- since Mr. Haghshenas is not being

1 offered, we would ask that SoCalGas provide a
2 witness who can answer questions about the
3 testimony. One potential witness who may be
4 able to answer questions, we think, is Todd
5 Van de Putte, Mr. Van de Putte from SoCalGas.
6 But that would be our request in light of
7 this new information.

8 (Interruption in proceedings.)

9 ALJ HECHT: We'll be off the record.

10 (Off the record.)]

11 ALJ POIRIER: Back on the record.

12 Mr. Stoddard, do you have a response
13 to Mr. Gruen's statement?

14 MR. STODDARD: Thank you, your Honor,
15 yes.

16 Again, as indicated, that we would
17 be discussing with Mr. Walzel which portions
18 of the testimony he is capable of speaking
19 to. It may be the case that he is capable of
20 speaking to all of it, but we won't know that
21 until we have an opportunity to speak with
22 him further.

23 I further note that we did raise the
24 availability of Hallibur -- of the Boots &
25 Coots' witnesses at the last status
26 conference. And then separately, SED's
27 request that we provide a witness to speak to
28 the testimony offered by Mr. Haghshenas has

1 already been addressed in the Administrative
2 Law Judge's ruling that was issued where SED
3 was asking to provide additional well-kill
4 witnesses. And as your ALJ -- as your Honor
5 ruled, to the degree that any witness is
6 incapable of answering questions related to
7 the testimony, it goes to the weight of the
8 testimony, but this is not an opportunity for
9 doing discovery.

10 ALJ POIRIER: ALJ Hecht, it looks like
11 Mr. Gruen has a response.

12 ALJ HECHT: Go ahead.

13 MR. GRUEN: Thank you, your Honor.

14 What's different here is that
15 SoCalGas, it did not indicate at the status
16 conference that it would not have its
17 witnesses here. It flagged that they might
18 not be here. This is the first time we are
19 hearing. What's different is of course that
20 SoCalGas -- then the motion that Mr. Stoddard
21 referred to is that SoCalGas is in fact now
22 not providing a witness that it said it would
23 provide. Its witness, Mr. Haghshenas, is
24 clearly identified as a sponsor of the
25 testimony. We are learning for the first
26 time today that he won't be available. So
27 that's the difference here.

28 Also a difference and a complete

1 surprise is that SoCalGas is proposing to
2 strike some of its own testimony that has
3 been prepared. That's a surprise, too. That
4 was not discussed at the status conference
5 and we find that objectionable that SoCalGas
6 would elect to modify its testimony at this
7 point.

8 Your Honors at the status
9 conference, my recollection is your Honors
10 had instructed that all red-line testimony
11 were to be provided beforehand. This is more
12 than a red-line. This is proposing now at
13 this late state they actually amend
14 substantively testimony and that shouldn't be
15 allowed.

16 ALJ POIRIER: I think what makes sense
17 is that we're going to need more information
18 on this. So why don't we revisit this issue
19 later in the week, if that sounds okay with
20 you, ALJ Hecht. So we need to have more
21 information about who will actually be
22 available and who will be testifying and I
23 think we can address more of the substantive
24 underlying matters as to the state of the
25 testimony at that point.

26 ALJ HECHT: Yes, I think that is a good
27 idea. We are not going to resolve this
28 today. I will let Mr. Stoddard say one more

1 thing and we'll see if that requires a
2 response. After that, we will move on.

3 We are beginning the schedule today
4 with the SED witness Margaret Felts and I
5 expect she is going to take several days. So
6 that gives us a few days. That gives us a
7 few days to figure out how we are going to
8 address this.

9 And now I am getting a message that
10 I was muted for a couple of sentences a
11 little bit earlier, but I did not intend to
12 say those things on the record because my
13 co-assigned ALJ was speaking. So, I am not
14 going to worry about that right now. All
15 right.

16 Mr. Stoddard.

17 MR. STODDARD: Thank you, your Honor.

18 Finally, this is a related point,
19 but not a -- not a slightly different issue.
20 It does relate to scheduling and this is one
21 of the reasons I initially brought up the
22 Boots & Coots' issue as well.

23 And this kind of goes to some of the
24 scheduling times here in terms of the amount
25 of time reserved.

26 Boots & Coots' testimony as
27 submitted was seven-pages' long and SED has
28 reserved I believe eight hours of

1 cross-examination on that. That's an issue
2 where, you know, it appears to us as though
3 the are intending to do exactly what I
4 described, which is additional discovery
5 through their cross-examination. And it's
6 not going to be specifically limited to the
7 testimony, whether it's amended or not.

8 ALJ HECHT: And does SED want to
9 respond to that?

10 MR. GRUEN: Sure, your Honor. I mean
11 if we're going to talk about the length of
12 time, SoCalGas for SED's witness' reserved
13 15 hours on top of two full days of robust
14 depositions. I mean, we're concerned that
15 SED's going to propound additional discovery
16 during cross-examination doesn't make sense.
17 It's preemptory. They haven't even heard our
18 cross.

19 Your Honors can take a look and hear
20 the cross for what it is on a full set of
21 testimony when we do it and decide for
22 yourselves if it's within the scope of
23 testimony or not. We are prepared to proceed
24 with that and we think that the time that we
25 reserved for Misters Walzel and Haghshenas is
26 entirely appropriate and within the context
27 and the bounds of what has been reserved for
28 other witnesses.

1 ALJ HECHT: If it is okay with my
2 co-assigned judge, we are not going to be
3 resolving this today obviously. And as I
4 said, our first witness is going to be
5 Ms. Felts and she will be on the stand for a
6 few days.

7 Does anybody have an objection to
8 moving forward with Ms. Felts and potentially
9 if we get to next Monday with the Blade
10 witness, Mr. Krishnamurthy, while we figure
11 out these issues related to
12 cross-examination?

13 MR. GRUEN: This is Darryl Gruen from
14 SED. No objections, your Honor.

15 ALJ HECHT: All right. Thank you.
16 Hopefully we will be able to resolve this
17 early next week when we get more information.

18 With that, you can expect to get an
19 updated witness schedule at some future time.

20 Just a couple of reminders: Parties
21 received instructions via procedural e-mail
22 last week with information on exhibit format,
23 numbering and other issues. Parties provided
24 a joint exhibit list. These all seem to
25 match the instructions that were provided and
26 I appreciate that you were able to work
27 together to get those to us.

28 Yesterday, also consistent with the

1 instructions, we received those
2 cross-estimates and at least for the first
3 several days we are going forward with those
4 cross-estimates.

5 Yesterday, SoCalGas also served
6 approximately a hundred potential
7 cross-exhibits. I do not know which of those
8 are going to be used or when or how long, but
9 I want to acknowledge that those were served
10 yesterday. I appreciate that they were
11 provided a day in advance. And as we get to
12 them, we can identify them and determine
13 whether they should be admitted. So we are
14 not doing anything with those now, but they
15 did come in.

16 And the last major thing to talk
17 about today is that yesterday right around
18 the close of business, SoCalGas submitted two
19 motions, a motion for reconsideration of an
20 ALJ ruling and a motion to stay the
21 evidentiary hearing pending a Commission
22 decision on that motion for reconsideration.
23 Those motions remain pending and we will not
24 be addressing them today, and we are moving
25 forward today. They will be addressed in the
26 future.

27 Does ALJ Poirier have anything to
28 add on that, while we are on the exhibit

1 schedule?

2 ALJ POIRIER: Nothing to add. Thank
3 you.

4 ALJ HECHT: Okay. With that, I believe
5 we have addressed all of the prehearing
6 motions that we intended to address. And I
7 am seeing Mr. Stoddard raising his hand,
8 followed by Mr. Gruen.

9 Mr. Stoddard.

10 MR. STODDARD: Thank you, your Honor.

11 There were a couple of housekeeping
12 items we did want to raise, if it's all right
13 with your Honor.

14 ALJ HECHT: Okay.

15 MR. STODDARD: One initial question:
16 Is this being -- is the webcast on the
17 Commission's end being recorded? I know we
18 had -- we had -- we made statements as to
19 that on our end, but for our purposes, is
20 this being recorded?

21 ALJ HECHT: To my knowledge it's not
22 and we are very careful about disclosing
23 before we record, but I will ask the IT
24 people who are online.

25 Can you please confirm whether or
26 not this is being recorded?

27 (No response.)

28 ALJ HECHT: They're there. They don't

1 expect us to address them, so sometimes it
2 takes a moment.

3 MR. HAGA: This is Joe from IT. We are
4 not recording from within Webex and we are
5 not recording through our normal web
6 streaming vendor.

7 ALJ HECHT: Thank you. Having said
8 that, I believe that our court reporters may
9 have recordings that they make as part of
10 their reporting, but that isn't anything that
11 wouldn't happen at the in-person hearing and
12 those are not documents themselves. The
13 final transcript is the official record.

14 And one other thing and then I'll
15 move to Mr. Gruen.

16 MR. STODDARD: I was just wondering if
17 those recordings, to the degree that they
18 exist, would be made available to the
19 participants.

20 ALJ HECHT: Anything that is done by
21 the court reporters is part of the
22 court-reporting process.

23 MR. STODDARD: Oh.

24 ALJ HECHT: That's a "no."

25 MR. STODDARD: Thank you, your Honor.

26 ALJ HECHT: The final and accurate
27 record of the hearing is the transcript by
28 the court reporters. Anything that they do,

1 they are doing in making an accurate
2 transcript. There is no separate document.

3 Mr. Gruen.

4 MR. GRUEN: Thank you, your Honor.

5 With regards to the motions that
6 your Honors flagged, we certainly will follow
7 your instructions not to address them now and
8 are prepared to move forward with hearings as
9 your Honors have instructed.

10 We did ask -- if it's okay with your
11 Honors, we just flagged that SED does plan to
12 per the -- as per the Rules of Practice and
13 Procedure, does plan to provide responses to
14 SoCalGas' motions. If your Honors will
15 indulge that, we wanted to flag that for the
16 record.

17 ALJ HECHT: I think we're going to move
18 on now and we will revisit these issues at a
19 later time. Thank you.

20 MR. GRUEN: Understood, your Honor.

21 ALJ HECHT: And Ms. Patel and then
22 Mr. Stoddard.

23 MS. PATEL: Thank you, your Honor. I
24 apologize I wasn't able to jump in when we
25 were speaking about the written examination
26 estimates that were required yesterday. We
27 had an error on there for Cal Advocates'
28 witnesses. Instead of breaking them down

1 individually, we just noted "Cal Advocates."
2 So we're going to be serving another list
3 today with the individuals identified.

4 (Interjection by Court Reporter.)

5 ALJ HECHT: Off the record.

6 (Off the record.)

7 ALJ HECHT: Thank you. We will be back
8 on the record.

9 While we were off the record, we
10 were reminded that we should all make sure to
11 be speaking loudly and clearly for the
12 benefit of the court reporters.

13 Mr. Stoddard.

14 (Speaker muted.)

15 ALJ HECHT: You are muted.

16 MR. STODDARD: Thank you, your Honor.

17 One other item that we discussed at
18 the last status conference, but we just need
19 clarity on; we had raised the March 1st SED
20 motion to strike SoCalGas' motion to compel.
21 SED indicated that it would be withdrawing
22 that motion. But it wasn't -- there was not
23 -- I didn't see any subsequent
24 correspondence. It's not, you know, a
25 critical item, but we just wanted to make
26 sure that there was clarity on that issue
27 before we proceeded.

28 ALJ HECHT: Mr. Gruen.

1 MR. GRUEN: Your Honor, to clarify, we
2 offered to withdraw it. We didn't actually
3 indicate that we would. We still are
4 prepared to, if that's what your Honors'
5 druthers are to do, and we'll await your
6 guidance and instruction.

7 ALJ HECHT: If there is an outstanding
8 motion that you no longer support or want a
9 ruling on, please withdraw it.

10 MR. GRUEN: Understood. Thank you,
11 your Honor.]

12 ALJ HECHT: Are there -- all right. I
13 am seeing a bunch of things. Sorry. I am
14 not used to this sort of interface.

15 Continuing on, are there any other
16 housekeeping measures that anybody wants to
17 discuss?

18 Yes, Mr. Stoddard.

19 MR. STODDARD: Thank you, your Honor.
20 Understanding you will not be ruling on the
21 motion for stay today, may I make a brief
22 statement on the record on that topic?

23 ALJ HECHT: On which topic?

24 MR. STODDARD: The topic of the motion
25 to stay pending reconsideration.

26 ALJ HECHT: No. We will not be
27 discussing that today. We may make plans to
28 discuss that at a later time.

1 MR. STODDARD: Understood. Thank you,
2 your Honor.

3 ALJ HECHT: Thank you.

4 With that, any other housekeeping?

5 Yes, Mr. Stoddard.

6 MR. STODDARD: Thank you. One
7 technical issue. I'm sorry for the repeated
8 hand-raising. It just seems to be the way
9 this process goes. Mr. Moshfegh, who will be
10 assisting in today's cross-examination with
11 presentation of exhibits, doesn't seem to
12 have the screen-share option enabled through
13 his Webex interface. Is it possible for the
14 Commission's technical support to check on
15 that?

16 ALJ HECHT: Is that something that will
17 be necessary before we take a lunch break?

18 MR. STODDARD: Um, it will be necessary
19 before we take a lunch break if we are
20 planning to start cross-examination before
21 lunch.

22 ALJ HECHT: Okay. Thank you. I am not
23 aware of whether the screen share is enabled
24 for all of the panelists or not. I will look
25 into it. So first we will be off the record
26 rather than belaboring this while we are on
27 the record.

28 (Off the record.)

1 ALJ HECHT: We'll be back on the
2 record.

3 While we were off the record, we
4 verified that Mr. Moshfegh can now use the
5 share screen if he needs to during cross.

6 Any other last questions?

7 Yes, Mr. Stoddard.

8 MR. STODDARD: (Speaker muted.)

9 ALJ HECHT: And you are on mute.

10 MR. STODDARD: Thank you, your Honor.
11 One other item on just a housekeeping matter
12 that we wanted to address with respect to
13 service of exhibits and exhibit lists.
14 Currently we have, you know, a 12:00 noon
15 deadline the day prior to use of any exhibits
16 along with an updated exhibit list. We
17 obviously ran into some technical
18 difficulties yesterday, and the hope is as
19 this proceeding moves forward this will
20 smooth out a little bit. But just for
21 purposes of noting it, to the degree that we
22 discuss with SED and Cal Advocates some
23 alternative, whether it's as to timing or
24 procedural details on how we get that done
25 and we reach agreement with the parties,
26 would your Honors be willing to consider
27 that?

28 ALJ HECHT: I think that we would

1 consider that.

2 Do you agree, Judge Poirier.

3 ALJ POIRIER: Yes. I think if that
4 comes to light, you can bring it to our
5 attention, and we can address it.

6 MR. STODDARD: Thank you.

7 ALJ HECHT: And we do understand that
8 people have technical difficulties. We do
9 urge you, to the extent you can, to try to
10 serve, file, do everything a little bit in
11 advance so that technical difficulties don't
12 necessarily put you over the edge, but
13 sometimes that's not possible. And I
14 recognize that we have a full hearing
15 schedule.

16 All right. With that, I hesitate to
17 ask this, but are there any other
18 housekeeping items before we begin?

19 (No response.)

20 ALJ HECHT: All right. I am not seeing
21 a response. So I am going to move on.

22 ALJ Poirier and I will be
23 co-presiding over these hearings. Generally
24 one of us will be taking the lead on a given
25 day, and you may direct any questions and
26 objections to that ALJ. We will most likely
27 alternate days, but there is no set schedule.
28 Both of us intend to attend all of the days

1 of the hearing, and we will confer as
2 necessary.

3 And with that, I believe that we are
4 ready to call our first witness. We will be
5 calling Margaret Felts, and we'll be off the
6 record.

7 (Off the record.)

8 ALJ HECHT: We'll be back on the
9 record.

10 All right. While we were off the
11 record, our witness, Margaret Felts, took the
12 stand in the virtual sense. We also
13 discussed that we will be identifying and
14 marking the exhibits that were prepared by or
15 sponsored by Ms. Felts, and then we will move
16 on to -- to direct and to cross.

17 Mr. Gruen.

18 MR. GRUEN: (Speaker muted.)

19 ALJ HECHT: And now you're on mute.

20 MR. GRUEN: Pardon me. Darryl Gruen
21 for SED. Thank you, your Honor.

22 DIRECT EXAMINATION

23 BY MR. GRUEN:

24 Q Good morning, Ms. Felts.

25 A (Speaker muted.)

26 ALJ HECHT: And now I think Ms. Felts
27 is on mute.

28 THE WITNESS: Okay. Now I'm off mute.

1 Good morning.

2 BY MR. GRUEN:

3 Q Ms. Felts, for the record, I'm
4 going to identify a number of your
5 testimony-related exhibits and then ask,
6 after I read and identify each one for the
7 record, whether you are sponsoring all of
8 those. So bear with me. It will take a
9 little bit of time.

10 ALJ HECHT: First let's start and have
11 Ms. Felts say her name and spell her name and
12 give a business address, and we'll start with
13 all those basics.

14 THE WITNESS: Margaret Felts,
15 F-E-L-T-S. Business address is 633 Dodge
16 Street, Delta, Colorado 81416.

17 ALJ HECHT: Thank you. Now we can
18 continue with marking the exhibits.

19 MR. GRUEN: Thank you, your Honor.

20 BY MR. GRUEN:

21 Q Ms. Felts, I'm going to read these
22 exhibits and their exhibit numbers for the
23 record, and when I finish, if you clarify for
24 the record if you indeed are sponsoring all
25 these exhibits. Exhibit SED 200, Safety and
26 Enforcement Division Opening Testimony of
27 Margaret Felts. Exhibit SED 201, Safety and
28 Enforcement Division Opening Testimony of

1 Margaret Felts, supporting attachments.
2 Exhibit SED 202, Safety and Enforcement
3 Division Opening Testimony of Margaret Felts,
4 attachment index. Exhibit 2 -- excuse me.
5 Exhibit SED 203, Safety and Enforcement
6 Division Reply Testimony of Margaret Felts.
7 Exhibit SED 204, Safety and Enforcement
8 Division Reply Testimony of Margaret Felts,
9 supporting attachments. Exhibit SED-C 204,
10 Safety and Enforcement Division Reply
11 Testimony of Margaret Felts, supporting
12 attachments, the confidential version.
13 Exhibit SED 205, Safety and Enforcement
14 Division Chapter 1 Prepared Sur-Reply
15 Testimony of Margaret Felts in Response to
16 Reply Testimony of Tim Hower and Charlie
17 Stinson. Exhibit SED 206, Safety and
18 Enforcement Division, Chapter 2, Prepared
19 Sur-Reply Testimony of Margaret Felts in
20 Response to Reply Testimony of Robert A.
21 Carnahan. Exhibit SED 207, Safety and
22 Enforcement Division, Chapter 3, Prepared
23 Sur-Reply Testimony of Margaret Felts in
24 Response to Reply Testimony of L. William
25 Abel. Exhibit SED 208, Safety and
26 Enforcement Division, Chapter 4, Prepared
27 Sur-Reply Testimony of Margaret Felts in
28 Response to Reply Testimony of Danny Walzel

1 and Arash Haghshenas. Exhibit SED 209,
2 Safety and Enforcement Division, Chapter 5,
3 Prepared Sur-Reply Testimony of Margaret
4 Felts in Response to Reply Testimony of
5 Travis Sera. Exhibit SED 210, Safety and
6 Enforcement Division, Chapter 6, Prepared
7 Sur-Reply Testimony of Margaret Felts in
8 Response to Reply Testimony of Amy Kitson.
9 Exhibit SED 211, Safety and Enforcement
10 Division, Chapter 7, Prepared Sur-Reply
11 Testimony of Margaret Felts in Response to
12 Reply Testimony of Dan Neville. Exhibit SED
13 212, Safety and Enforcement Division, Chapter
14 8, Prepared Sur-Reply Testimony of Margaret
15 Felts in Response to Reply Testimony of
16 Darrel Johnson. Exhibit SED 213, Safety and
17 Enforcement Division, Chapter 9, Prepared
18 Sur-Reply Testimony of Margaret Felts in
19 Response to Reply Testimony of Greg Healy.
20 Exhibit SED 214, Safety and Enforcement
21 Division, Sur-Reply Testimony, reading guide
22 and index. Exhibit SED 215, Safety and
23 Enforcement Division Sur-Reply Testimony,
24 supporting attachments. Exhibit SED 216,
25 Safety and Enforcement Division Sur-Reply
26 Testimony of Margaret Felts Related to
27 Violation 331. Exhibit SED 217, Updated
28 Resume.

1 Ms. Felts, having identified those
2 exhibits for the record, do you sponsor all
3 of those exhibits?

4 ALJ HECHT: One moment, Mr. Gruen.
5 Sorry to interrupt. I'd like to swear in the
6 witness before she gives that attestation,
7 please.

8 MR. GRUEN: Sure.

9 ALJ HECHT: I have a somewhat longer
10 oath that we usually use. Usually it's just
11 affirming that you will tell the truth. In
12 this case, it's more similar to what we're
13 using for the attorneys because we are doing
14 this in a remote environment. So I'm going
15 to read it and if you could then say whether
16 you agree, and then we can go on and go back
17 to those exhibits.

18 First, do you swear or attest to
19 tell the truth based on your personal
20 knowledge?

21 Will you testify based on your own
22 knowledge and memory free from external
23 influences and pressures?

24 Will you adhere to all formal
25 requirements of testifying under oath
26 including the prohibition against being
27 coached?

28 Will you attest to only refer to

1 materials previously shared with all parties
2 including exhibits premarked and identified?
3 Will you attest to not making any recording
4 of the proceeding, that you understand that
5 any recording is prohibited and could lead to
6 sanctions?

7 And do you attest that you know that
8 a violation of this prohibition may result in
9 sanctions including removal from the
10 evidentiary hearings, restricted entry to
11 future hearings, denial of entry to future
12 hearings or any other sanctions being
13 necessary to the Commission?]

14 THE WITNESS: I agree.

15 ALJ HECHT: Can you say that one more
16 time because I interrupted you.

17 THE WITNESS: I agree.

18 ALJ HECHT: Thank you very much.

19 Now I will go back to Mr. Gruen.
20 Thank you for bearing with me. I'm a little
21 bit thrown by this interface honestly. All
22 right. Please go ahead.

23 MR. GRUEN: Yes, your Honor. Thank
24 you. Darryl Gruen with SED.

25 DIRECT EXAMINATION (resumed)

26 BY MR. GRUEN:

27 Q Ms. Felts, do you recall my
28 reference in reading into the record

1 Exhibits SED-200 through SED-217?

2 A Yes.

3 Q Do you agree to sponsor those
4 exhibits?

5 A Yes, I do.

6 Q Where there are facts stated in
7 those exhibits, do you agree that those facts
8 are true and accurate to the best of your
9 knowledge?

10 A Yes.

11 Q Where there are opinions or
12 conclusions drawn in those exhibits, do those
13 opinions or conclusions represent your best
14 professional judgment?

15 A Yes.

16 MR. GRUEN: And, your Honor, just as a
17 formality, I'd ask at this point to have
18 Exhibits SED-200 through SED-217 marked as
19 identified.

20 (ALJ Hecht muted.)

21 MR. STODDARD: Your honor, SoCalGas has
22 an objection or a --

23 THE REPORTER: Excuse me,
24 Mr. Stoddard --

25 MR. STODDARD: -- the first item --

26 THE REPORTER: Mr. Stoddard,
27 Mr. Stoddard. I didn't hear the Judge's
28 response. She was on mute. I'm so sorry for

1 the interruption.

2 ALJ HECHT: We'll be -- yes, and I said
3 we'll be off the record but I was on mute so
4 it isn't reflected.

5 (Off the record.)

6 ALJ HECHT: With that, we will be back
7 on the record.

8 Mr. Stoddard, I apologize. While we
9 were off on the record, we had to clarify
10 some things about how to speak and ensure
11 that the court reporters can hear us through
12 no fault of yours or anyone else's. Can you
13 please repeat what you were saying.

14 MR. STODDARD: Yes, Your Honor, thank
15 you. On these exhibits, we have a few
16 questions for SED and potentially objections.

17 ALJ HECHT: Okay. Go ahead.

18 MR. STODDARD: And just for the
19 reporter, are you hearing an echo? I'm
20 getting a loud echo on my end.

21 THE REPORTER: A slight echo, yes. It
22 seems a little bit but not disruptive to what
23 you're saying.

24 MR. STODDARD: Okay. If we could
25 please put up SED-208. We can scroll down
26 to -- this appears to be the prepared reply
27 testimony of the Boots & Coots witnesses. If
28 we could scroll down further.

1 ALJ HECHT: We'll be off the record.

2 (Off the record.)

3 ALJ HECHT: With that, we'll be back on
4 the record. While we were off the record, we
5 put up for screen share one of the exhibits
6 from SED. The SoCalGas lead attorney,
7 Mr. Stoddard, is going to be asking
8 questions. We were told off the record that
9 the questions will be about the testimony
10 generally and not necessarily focused on any
11 given location in it. But now we have that
12 on the screen and I think we're ready to move
13 forward.

14 Go ahead.

15 MR. STODDARD: Thank you, your Honor.
16 It's fairly straightforward. It's just to
17 first establish what this says. The cover
18 page says Exhibit Number SED-208. It is
19 Chapter 4, Prepared Sur-Reply Testimony of
20 Margaret Felts in Response to the Reply
21 Testimony of Danny Walzel and Arash
22 Haghshenas.

23 If you will please turn to page 2,
24 it appears to be that the attachment under
25 this cover page -- and this is just an item
26 for clarification from SED -- is the prepared
27 reply testimony of Boots & Coots, not the
28 reply testimony of Margaret Felts.

1 THE REPORTER: Excuse me, Mr. Stoddard.
2 I can hear you twice now, so I'm not sure if
3 it's the headset with the feedback.

4 ALJ HECHT: We will be off the record.

5 (Off the record.)

6 ALJ HECHT: We'll be back on the
7 record. While we were off the record, we
8 took a 10-minute break and I think they
9 worked out some telephone problems, or
10 perhaps they didn't work out the telephone
11 problems, but they did attempt to. We'll be
12 off the record.

13 (Off the record.)

14 ALJ HECHT: We'll be back on the
15 record. While we were off the record, we
16 discussed some technical problems and a dog
17 barking.

18 So, we will turn to Mr. Gruen. I
19 believe you had something to say.

20 MR. GRUEN: Yes, your Honor. Darryl
21 Gruen for SED. While we were on break, SED
22 has reserved Exhibit SED-208, which is the
23 Safety and Enforcement Division, Chapter 4,
24 Prepared Sur-Reply Testimony of Margaret
25 Felts in Response to Reply Testimony of Danny
26 Walzel and Arash Haghshenas. This should be
27 the accurate document that is indeed SED-208.

28 ALJ HECHT: All right. Shall we

1 continue from where we were?

2 MR. STODDARD: Yes, your Honor. On
3 that item, I would just -- rather than
4 spending time reviewing that document now,
5 since I just -- I'm -- I don't have my e-mail
6 open so I haven't had a chance to look at it.
7 If you prefer that we review it now, I would
8 ask for a very brief break to just go and
9 confirm the document since I haven't seen it
10 yet. Otherwise, I can review it later. But
11 if we're going to be asking Ms. Felts to
12 re-attest to the corrected document, I would
13 ask for a brief break to look at it.

14 ALJ HECHT: I think we are better off
15 taking that break and giving a few minutes to
16 all catch up to the same place.

17 We'll be off the record.

18 MR. GRUEN: Your Honor, may I -- before
19 we go on break, if there are any other items
20 that SoCalGas wants to identify that we can
21 field now in the interest of efficiency, we
22 can do that.

23 MR. STODDARD: That's a good idea. We
24 do have one other item. This is a question
25 for the last exhibit you identified. I
26 believe it was SED-217.

27 MR. GRUEN: Yes.

28 MR. STODDARD: Was that document

1 included with or served as part of testimony?

2 MR. GRUEN: No. My understanding is
3 that it was served -- it was an updated
4 resume we had agreed to serve and correct
5 off-line during the deposition, the first
6 deposition of Ms. Felts, because there was a
7 request to do so. So, it's an updated resume
8 that was provided on -- on -- it was served
9 yesterday at approximately 11:00 a.m.

10 MR. STODDARD: Okay. Are we still on
11 the record? I can't hear you, your Honor.

12 MR. GRUEN: I think we were on break,
13 Jack.

14 ALJ HECHT: Could you repeat that.

15 THE REPORTER: You started to go off
16 the record and then Mr. Gruen said, "Before
17 we go on break," and then he added comments.
18 I believed we were still on the record.

19 ALJ HECHT: Okay. Thank you. I
20 assumed we were off the record, but thank
21 you.

22 MR. STODDARD: Your Honor, that was the
23 other item. We can address that further when
24 we go -- after we take a break. I'll review
25 the other exhibit, we'll go back on, I'll
26 address both at the same time.

27 ALJ HECHT: All right. With that,
28 we're going to take this time a 15-minute

1 break and we'll be off the record.

2 (Off the record.)

3 ALJ HECHT: We'll be back on the
4 record. While we were off the record, we
5 took a 15-minute break and some of our
6 parties took some time to work out some
7 issues with service of some of the documents
8 recently. I am going to ask that everybody
9 please try to identify and work those kinds
10 of things out before we begin in the morning
11 or at the very least during a break.

12 We have 13 days of hearings and more
13 than that amount of testimony that we need to
14 get through, so it would be helpful if people
15 tried to make this effective and efficient.

16 With that, I will go back to
17 Mr. Gruen.

18 MR. GRUEN: Thank you, your Honor.
19 Darryl Gruen for Safety and Enforcement
20 Division. To clarify, apologies, I don't
21 remember if we were on or off the record.
22 SED has re-served Exhibit SED-208. We
23 believe that it is the accurate version of
24 Ms. Felts' sur-reply testimony to Boots and
25 Coots, the witnesses Mr. Haghshenas and
26 Mr. Walzel.

27 With that, we understood also off
28 the record that SoCalGas was reviewing that

1 exhibit as well as Exhibit SED-217. And,
2 your Honor, unless SoCalGas flags any
3 concerns with those exhibits, SED would
4 request that exhibits SED-200 through
5 SED-217, as we had identified earlier this
6 morning on the record, that those all be
7 marked for identification.

8 ALJ HECHT: All right.

9 Do any parties have comments on
10 that?

11 MR. STODDARD: Yes, your Honor. Thank
12 you. Exhibit SED-217, which is an updated
13 resume of Ms. Felts', previously before we
14 broke, Mr. Gruen confirmed that this had not
15 been included with testimony and was instead
16 provided in response to a discovery request.
17 The parties have generally only included
18 exhibits on the exhibit list for direct
19 purposes to enter into the record through the
20 witness prior to turning them over to cross.

21 That should be limited to the direct
22 testimony and exhibits included and served
23 with the direct testimony. This was not
24 included. SED appears to be trying to add
25 it. There are lots of data responses in this
26 proceeding that could be supplemented to
27 various witnesses' testimony if that's going
28 to be the practice, and so we would ask that

1 that exhibit be removed.

2 ALJ HECHT: Mr. Gruen, can you please
3 explain the situation.

4 MR. GRUEN: Sure. Yes, your Honor. We
5 had understood from a deposition of
6 Ms. Felts' to update this per SoCalGas'
7 request. We were doing this because we
8 thought it was something that SoCalGas wanted
9 us to do. So, with that understanding, we're
10 happy to not have the exhibit so marked.
11 This was just meant to accommodate SoCalGas.
12 That's all.

13 With that, in an effort to expedite
14 hearings and move forward with cross, we
15 would modify our request to have Exhibits
16 SED-200 through SED-216 marked for
17 identification.

18 ALJ HECHT: All right. Are there any
19 objections to those being marked for
20 identification now? I'm not seeing any, so
21 those are marked for identification.

22 (Exhibit Nos. SED-200 through
23 SED-216 were marked for
24 identification.)

25 ALJ HECHT: We will start again at the
26 beginning right after the swearing in of the
27 witness and her giving her name and spelling
28 it.

1 MR. GRUEN: Yes, your Honor. Thank
2 you. Darryl Gruen for SED.

3 BY MR. GRUEN:

4 Q Ms. Felts, just checking that you
5 can hear me. Can you hear me okay?

6 A I can hear you.

7 Q Okay. So, Ms. Felts, do you
8 sponsor Exhibits SED-200 through SED-216?

9 A Yes.

10 Q And where there are facts
11 identified in those exhibits, are those facts
12 true and correct to the best of your
13 knowledge?

14 A Yes.

15 Q And where you express or where you
16 provide opinion or conclusions, do those
17 opinions or conclusions in those exhibits
18 reflect your best professional judgment?

19 A Yes.

20 Q Thank you.

21 Your Honor, Ms. Felts is available
22 for cross-examination.

23 ALJ HECHT: All right then. I am
24 assuming that the lead attorney for SoCalGas
25 in this will be Mr. Stoddard, but that may
26 not be correct. Who will be doing the
27 primary cross-examination?

28 MR. STODDARD: Thank you, your Honor.

1 This is Jack Stoddard. I will be doing the
2 cross-examination of Ms. Felts.

3 ALJ HECHT: Okay.

4 Before we begin, I will ask that
5 people who are not directly involved in the
6 cross-examination and that is Mr. Gruen,
7 Ms. Purchia, Ms. Felts, and Mr. Stoddard can
8 turn off their video. That's just a
9 reminder.

10 All right, Mr. Stoddard.

11 MR. STODDARD: Thank you, your Honor.

12 CROSS-EXAMINATION

13 BY MR. STODDARD:

14 Q Ms. Felts, can you hear me? I
15 can't see you right now, but I can see
16 Mr. Gruen.

17 A Yes. I can hear you.

18 Q All right. Good morning,
19 Ms. Felts. We've met twice before. We've
20 had two prior depositions, one in February of
21 2020 and one last month. That's correct?

22 A Yes.

23 Q Before we get started, the parties
24 today, counsel for the parties today, have
25 attested that none of the parties will be
26 recording this via video or audio. It
27 doesn't cover potential third parties that
28 may be listening in.

1 Ms. Felts, can you state for
2 purposes of the record whether you consent to
3 being recorded today?

4 A Yes.

5 ALJ HECHT: I do not consent to being
6 recorded today, and I would like to know the
7 purpose of that question.

8 MR. STODDARD: Thank you, your Honor.
9 The purpose of the question was we wanted to
10 make sure that -- I was -- frankly, I was not
11 expecting a yes answer to that. The purpose
12 of the question was the attestations earlier
13 only covered the parties. We just wanted to
14 make sure that there was no third party
15 recording this in a way that might be used
16 when the parties themselves are not permitted
17 to record it.

18 ALJ HECHT: Thank you. I appreciate
19 that clarification, and I agree. Nobody
20 should be recording this. Certainly there is
21 no official recording. I think that is a
22 helpful clarification. Please continue.

23 MR. STODDARD: Thank you, your Honor.
24 I believe it, you know, unfortunately I
25 believe it does require an answer from
26 Ms. Felts on this issue in terms of, you
27 know, her consent to being recorded here
28 given that she's the witness who would be

1 recorded. May I restate the question?

2 ALJ HECHT: Yes, go ahead.

3 BY MR. STODDARD:

4 Q Ms. Felts, as I noted earlier, the
5 parties to this proceeding have attested that
6 they will not be recording these hearings via
7 video or audio. Ms. Felts, do you consent to
8 being recorded today by any party?

9 A No.

10 Q And do you consent to being
11 recorded today by any nonparty to the
12 proceeding who may be listening in or
13 watching?

14 A No.

15 Q Okay. Thank you, Ms. Felts. So
16 we'll get started. And, you know, we have a
17 couple days with you. We'll see how long
18 this goes. But initially, please let me
19 know -- let us know if you need to take a
20 break, but it will ultimately be up to the
21 ALJs in this proceeding.

22 Do you understand?

23 A Yes.

24 Q Today you're participating
25 remotely. Is there anybody in the room with
26 you today, Ms. Felts?

27 A No.

28 Q Do you have any materials with you

1 today, by which I mean copies of testimony,
2 the Blade report, anything else like that?

3 A All of that stuff is in my office,
4 but it's not on my desk.

5 Q Okay. Are you able to access the
6 exhibits that were served in advance of
7 hearings?

8 A I could. Did you want me to?

9 Q I just wanted to confirm that you
10 know where to find them so if we're
11 presenting them and doing a screen share, to
12 the degree that you want to be able to look
13 at the documents separately, you're able to
14 do so.

15 A Oh, okay. Well, I can get them up
16 on my -- on another computer.

17 Q Well, let's wait and we'll see. If
18 there's a document that you feel you need to
19 review when we're asking you questions, you
20 can ask for an opportunity to do so.

21 A Okay.

22 Q If that's okay with you and your
23 counsel.

24 MR. GRUEN: No objections, your Honor.

25 MR. STODDARD: Thank you.

26 Q All right. And initially just to
27 kind of keep us moving, I'm going to define a
28 few terms so that if I use a shorthand

1 version, we know we're speaking about the
2 same thing. If I say "SED," I'm referring to
3 the Public Utilities Commission's Safety and
4 Enforcement Division.

5 Do you agree?

6 A Yes.

7 Q And if I say "Blade," I'm talking
8 about Blade Energy Partners, the independent
9 investigator that did the root cause analysis
10 investigation related to the October 23,
11 2015, Aliso Canyon gas leak.

12 Do you agree?

13 A Yes.

14 Q And if I refer to Aliso Canyon, I'm
15 referring to Southern California Gas
16 Company's Aliso Canyon gas storage facility.

17 Do you agree?

18 A Yes.

19 Q And by "SS-25," that is the
20 Standard Sesnon 25 Well at Aliso Canyon.

21 Do you agree, Ms. Felts?

22 A Yes.

23 Q Thank you. Ms. Felts, you've
24 provided opening testimony, reply testimony,
25 and sur-reply testimony in this proceeding;
26 correct?

27 A Yeah, I did.]

28 Q And the scope of your testimony is

1 quite broad, would you agree with that?

2 A I guess that's a relative term.

3 Q Okay. And your testimony includes
4 issues related to SoCalGas' well failure
5 investigation practices; is that correct?

6 A Yes.

7 Q And the use of casing inspection
8 tools; is that correct?

9 A What do you mean by that?

10 Q Your testimony addresses issues
11 related to SoCalGas' uses of casing
12 inspection tools such as Vertilog; is that
13 correct?

14 A Yes.

15 Q And your testimony addresses
16 SoCalGas' gas storage risk assessment and
17 management practices; is that correct?

18 A Yes.

19 Q And SoCalGas' well-integrity
20 monitoring policies; is that correct?

21 A Yes.

22 Q And SoCalGas' gas storage well
23 configuration?

24 A Well configuration? You mean how
25 the wells are laid out?

26 Q I think I meant well-specific
27 level, how the wells are constructed
28 specifically with respect to, you know, the

1 casing, configurations, the tubing, the
2 location of equipment down in the well. Your
3 testimony addresses that information,
4 correct?

5 A Yes.

6 Q And you also address the use of
7 realtime pressure monitoring on gas storage
8 wells; is that correct?

9 A Yes.

10 Q And assessment of groundwater
11 depths and gas storage operations at
12 SoCalGas' Aliso Canyon facility; is that
13 correct?

14 A Yes.

15 Q And finally, SoCalGas'
16 recordkeeping practices with respect to its
17 gas storage operations; is that correct?

18 A Yes.

19 Q Ms. Felts, do you believe you have
20 expertise in all of these areas?

21 A I think so. I think I know enough
22 to have an opinion.

23 Q You know enough to have an opinion.
24 Do you believe that you are an expert in all
25 of those areas?

26 A In this proceeding, I am the expert
27 in all of those areas.

28 Q You're being offered as an expert?

1 A Yes.

2 Q Thank you. Ms. Felts, I note that
3 there was a note Statement of Qualifications
4 included with your testimony and your name
5 was not on the front of the testimony either;
6 is that correct?

7 A I don't really know. Can you show
8 me the page, the front page you mean?

9 Q The front, yes the cover page, in
10 written terms of your name.

11 A The --

12 Q Opening testimony.

13 A All of the testimonies or just the
14 opening testimony?

15 Q Thank you for the clarification.
16 Just the opening testimony.

17 A I really just don't remember.

18 Q Okay. Do you recall whether or not
19 a Statement of Qualifications was provided?

20 MR. GRUEN: Your Honor, if I may, just
21 in order to clarify, I note a vagueness
22 objection and ask that Ms. Felts be presented
23 with the area of testimony about what she is
24 being questioned.

25 THE WITNESS: Or I could find the
26 documents on my computer and look at them, if
27 you want.

28 ALJ HECHT: If you want to ask a

1 question, and this is general, about
2 somebody's testimony, you should be prepared
3 to show that testimony on the relevant part
4 of that.

5 With that, I think that we're going
6 to stop and take a couple of minutes to get
7 things back together. And we're getting
8 close to lunch. So I will try to pick this
9 up again one more time before lunch. But we
10 may not get very far.

11 So for a five-minute break, we'll be
12 off the record.

13 (Off the record.)

14 (Break.)

15 ALJ HECHT: We'll be back on the
16 record.

17 We are going to pick up with
18 cross-examination with Mr. Stoddard and the
19 witness Margaret Felts.

20 MR. STODDARD: Thank you, your Honor.

21 Q If we could please introduce -- and
22 Ms. Felts just to confirm, while we were off
23 the record, were you able to get access to
24 the exhibits that we will be referencing so
25 that you will be able to manipulate them
26 yourself?

27 A Yes. I did set that up.

28 Q Okay. Thank you. If we could

1 please bring up Exhibit SoCalGas-47, which is
2 the corrected version of SED's testimony or
3 rather the amended version of SED's opening
4 testimony.

5 Ms. Felts, you see here, this is,
6 at the top it has a docket number for this
7 proceeding which is I.19-06-016 and it
8 identifies Commissioner Rechtschaffen as the
9 Presiding Commissioner. And then below that
10 it has a cover page which identifies opening
11 testimony of the Safety and Enforcement
12 Division. Do you see that?

13 A Yes.

14 Q Are you able to access this exhibit
15 at home so you can scroll through it?

16 A Yes.

17 Q Okay. Ms. Felts, does this appear
18 to be the amended version of your opening
19 testimony?

20 A Yes.

21 Q Okay. Thank you. And Ms. Felts,
22 were any -- was any Statement of
23 Qualifications included with this testimony?

24 A I didn't see any.

25 Q Okay. And do you know whether any
26 Statement of Qualifications was included with
27 your reply or sur-reply testimony? Do we
28 need to consult those documents as well or

1 are you capable of answering the question?

2 A Let me have a look. I don't think
3 so.

4 Q Thank you, Ms. Felts. If we could
5 turn please to Exhibit Number 36,
6 SoCalGas-36.

7 A Okay.

8 Q And one moment while we put it up
9 on the screen share for purposes of the ALJs
10 and others. Thank you, Ms. Felts.

11 Ms. Felts, this is a copy of your
12 résumé from our February 5th, 2020
13 deposition. And you will see there that it
14 says Margaret C. Felts at the top. It shows
15 the date with an exhibit stamp from the first
16 deposition; is that correct?

17 A Yes.

18 Q Okay. Thank you. And if we can
19 turn to page two please, these notes that are
20 made here, there's an arrow. There's a
21 correction. These are your notes; is that
22 correct?

23 A I think so.

24 Q Okay. Thank you. If we could
25 please move on to Exhibit Number 37.

26 And, Ms. Felts, you'll note here
27 that this is an e-mail from counsel to SED
28 Darryl Gruen to myself and his co-counsel.

1 And it says, "Follow-up to SoCalGas'
2 deposition." And it includes an updated copy
3 of your CV or it states it includes an
4 updated copy of your CV in response to the
5 questions from the deposition. Do you see
6 that?

7 A Yes.

8 Q Okay. And that was provided to
9 update and make corrections that were
10 identified in the course of that deposition;
11 is that correct?

12 A Yes.

13 Q Okay. Thank you. And if we could
14 now turn now to your résumé, the last page
15 which includes your education; Ms. Felts, is
16 it correct that you went to -- you got your
17 law degree from Pacific McGeorge Law School
18 in 2000; is that correct?

19 A Yes.

20 Q And you have a Master's in Energy
21 and Environmental Engineering from LaSalle
22 University in 1989; is that correct?

23 A Yes.

24 Q Okay. And you received an
25 undergraduate degree in Petroleum Engineering
26 from Louisiana Tech; is that correct?

27 A Yes.

28 Q Okay. Thank you. And, Ms. Felts,

1 you worked both as a litigation consultant
2 and a licensed attorney; is that correct?

3 A Yes.

4 Q Okay. Much of your legal work has
5 been done on records review; is that correct?

6 A No. My legal work is on veterans'
7 disability claims.

8 Q And your litigation consultant
9 work? Do I have to describe the subject
10 matter?

11 A Utility. Everything utilities,
12 mostly having to do with gas, a few other
13 subjects along the way.

14 Q Gas storage?

15 A Gas storage, yes.

16 Q And can you please describe briefly
17 the cases that you have been involved with
18 that related to gas storage facilities?

19 A I think -- let me look on my
20 résumé. I think they're listed.

21 Q Let's please scroll up.

22 A One is the Montebello Storage, gas
23 storage, on the right, on the -- at 1998 to
24 1999, it's the second one under there.

25 Q And can you briefly describe what
26 that proceeding concerned?

27 A It's been a while, but I think the
28 issue was that there was gas leaking from

1 that storage area. There were some issues
2 having to do with real estate and gas coming
3 up around that real estate. I was asked to
4 look at the leakage issue that -- primarily
5 at what was going on with the gas storage.
6 And so, that's what I did. Yeah. Question.

7 Q And that was related to the
8 integrity of the storage reservoir, correct?

9 A That is correct.

10 Q Not storage wells.

11 A As I sit here today, I don't
12 remember if I was looking at wells too or
13 not, but I do remember the leakage from the
14 storage reservoir.

15 Q If we can just go back to page --
16 the last page in Ms. Felts' résumé, please.

17 ALJ HECHT: I just want to check and
18 make sure that the screen share is working
19 for everybody. If you have a problem with
20 it, please alert us.

21 BY MR. STODDARD:

22 Q Ms. Felts, do you see here where it
23 says:

24 Specialties, discovery and
25 technical strategies for
26 complex cases involving gas
27 and electric utilities --
28 -- gas and electric

1 utilities regulatory cases.

2 Do you see that?

3 A Yes.

4 Q And the first bullet under it which
5 says "Records Management Assessment." Do you
6 see that?

7 A Yes.

8 Q Ms. Felts, can you explain what
9 records management assessment is?

10 A Well, evaluation of the quality of
11 recordkeeping.

12 Q If we could please turn to
13 Exhibit 35.

14 Ms. Felts, you'll see that this is
15 titled the Deposition of Margaret C. Felts in
16 Los Angeles.

17 ALJ HECHT: I do not believe that we
18 have formally identified Exhibit 35; is that
19 correct?

20 MR. STODDARD: I was about to describe
21 it and see if she agreed with the
22 identification.

23 Do you mean we don't have a number
24 for it, ALJ Hecht?

25 ALJ HECHT: Yeah, well, if you're going
26 to describe it now and ask for it to be
27 numbered, then that probably addresses my
28 concern. But when it went up before that

1 happened, I was concerned.

2 MR. STODDARD: Yeah. No. I just
3 needed it to be up so I could describe it.
4 And then I will -- I'll double-check to make
5 sure it's on our exhibit list as Exhibit 35
6 that you were pre-marking exhibits.

7 ALJ HECHT: Please do. Thank you.

8 BY MR. STODDARD:

9 Q Thank you. Okay. It is identified
10 on our exhibit list as SoCalGas-35.

11 Ms. Felts, do you see the cover
12 page? Again, if you can please scroll up,
13 Mr. Moshfegh.

14 Ms. Felts, this is titled The
15 Deposition of Margaret C. Felts, Los Angeles,
16 California, Wednesday, February 5th, 2020,
17 morning session. Do you see that?

18 A Yes.

19 Q And this is SoCalGas Exhibit
20 Number 35.

21 If we could please turn to page 25,
22 line 17, Ms. Felts you'll see there that I
23 asked you the same question then which is:
24 "What exactly is records management
25 assessment?" Do you see that?

26 A Yes.

27 Q And your answer was, "To do a
28 records review to see if the recordkeeping

1 practices are in keeping with standard or
2 what would be expected in the industry that
3 the case is working in."

4 Do you see that?

5 A Yes.

6 Q And by that you meant whether or
7 not the records are in keeping with industry
8 standards or the expectations and practices
9 within the industry; is that correct?

10 A I didn't say industry standards.

11 Q I understand. I am asking you
12 whether in that instance when you say "to do
13 a records review to see if the recordkeeping
14 practices are in keeping with standard,"
15 whether or not by "standard" there, you were
16 referring to industry standards?

17 A Well, no. So there are
18 recordkeeping standards, but they don't
19 necessarily fall into various types of
20 industries.

21 Q And so the next sentence then where
22 you say, "or what would be expected in the
23 industry that the case is working in," you'd
24 mean what would be expected as to practices
25 within the industry, correct?

26 A Yes.

27 Q Thank you, Ms. Felts.

28 If we could turn back to Ms. Felts'

1 resume, Exhibit Number 37. So below there,
2 Ms. Felts, you see where it says, Underground
3 Gas Storage Assessment?

4 A Yes.

5 Q Based on the definition we just
6 read from your deposition earlier, would you
7 agree that underground gas storage assessment
8 is an evaluation of issues related to
9 underground gas storage to evaluate
10 consistency with standards and practices
11 within the industry?

12 A No. That is not what I meant
13 there.

14 Q Please explain what you meant
15 there.

16 A Well, underground storage
17 assessment, which possibly I talked about in
18 my deposition, I'm not sure, but as I would
19 think of it today, it would include
20 engineering issues associated with
21 underground gas storage, not necessarily
22 comparing anything that was going on in the
23 underground gas storage with what's going on
24 somewhere else in the industry.

25 Q So assessment in the context of
26 underground gas storage, do you mean
27 something totally different from assessment
28 in the context of grant records management?

1 A I can't compare the two.

2 Q Generally, on all these where you
3 describe them as assessments which would
4 include records management assessment,
5 incident assessment, pipeline integrity
6 assessment, tree and pole program assessment,
7 Ms. Felts, in those cases that you have
8 identified as "specialties," generally what
9 you're doing there is evaluating practices to
10 assess consistency with standards,
11 requirements and practices within the
12 industry; isn't that correct?

13 A No. When I use the word
14 "assessment," I am talking about looking at
15 the available data, whatever is presented to
16 me, and evaluating that on a technical basis.
17 So, your description of assessment is just
18 different from mine.

19 Q Ms. Felts, would your testimony in
20 this case, the Aliso Canyon Proceeding,
21 qualify as any of these in your view?

22 A My testimony in this current case?

23 Q Yes. Would your testimony in this
24 current case qualify as an underground gas
25 storage assessment, in your view?

26 A I would say it might fall into
27 three categories: Records management,
28 incident and underground gas storage.

1 Q Okay. Let's move on.

2 Ms. Felts, do you have any
3 knowledge of the practices of other gas
4 storage operators in the United States as to
5 maintenance and organization of well records?

6 A Of well records?

7 Q Yes.

8 A I don't think I've had the
9 opportunity to look at the records of another
10 storage facility.

11 Q And now?

12 A That's a "no."

13 Q Ms. Felts, do you have any
14 knowledge of the practices of other gas
15 storage operators as to investigation of well
16 casing failures?

17 A Other operators, not other fields?

18 Q Other operators.

19 A Can you ask that again?

20 Q Yes. Ms. Felts, do you have any
21 knowledge of the practices of other gas
22 storage operators as to investigation of well
23 casing failures?

24 A I believe there are some exhibits
25 that were produced in this proceeding, as
26 well as industry documents that are
27 publicly-available that provide that kind of
28 information and I have read many of them.

1 Q Is that a "yes?"

2 A That would be a "yes."

3 Q Can you identify the specific other
4 gas storage operators?

5 A No, not sitting here. I would have
6 to go back and look in some files to see
7 which operators they were.

8 Q Were you aware of those documents
9 and practices that you referred to a moment
10 ago, prior to your engagement in this
11 proceeding?

12 A Some of them I was because I
13 subscribe to -- I was subscribed to petroleum
14 journals. I do receive one from the SPE,
15 Society of Petroleum Engineers, on a regular
16 basis. I for years subscribed to the
17 petroleum -- what is it called -- the
18 Petroleum Gas Journal, and I have received
19 documents over the internet from various
20 entities that I have read. So I just have
21 file folders that sometimes I throw those
22 things in. Sometimes I don't keep them at
23 all.

24 Q And so --

25 A Excuse me. Go ahead.

26 Q Okay. So you have indicated that
27 you do have knowledge of the practice of
28 other gas storage operators as to

1 investigation of well casing failures. Can
2 you describe those practices, please?

3 A Practices as to well failures?

4 Q Investigation of well casing
5 failures.

6 A Okay. I am not sure I can state
7 with any specificity how another organization
8 goes about doing an investigation. I don't
9 know. I don't know how to answer that.

10 Q Ms. Felts, you have indicated that
11 you don't know specifically which other gas
12 storage operators and you can't name the
13 particular practices. Would you like to
14 revise the answer to that question to a "no"
15 that you're not aware of the practices of
16 other gas storage operators as to
17 investigation of well casing failures?

18 A Did you ask me if I was aware?

19 Q Sorry. No. You're right. I asked
20 you if you had knowledge of.

21 A Well, I guess if you want to -- if
22 you're asking is it in my head today, the
23 answer is no.

24 Q Ms. Felts, do you have knowledge of
25 the practices of other gas storage operators
26 as to risk assessment in gas storage
27 operations?

28 A Not as I sit here today, but I am

1 sure I have read articles about that, too.

2 Q And if asked, you could identify
3 those articles?

4 A Maybe. You're talking about a
5 research project.

6 Q Yeah. I am not asking I guess to
7 do research. I am asking whether or not you
8 have knowledge, even if you would need to
9 consult materials, as to the practices of
10 other gas storage operators with regards to
11 risk assessment.]

12 A I want to say no.

13 Q Okay. And Ms. Felts, do you have
14 knowledge of the practices of other gas
15 storage operators as to wellbore integrity
16 management plans?

17 A You're talking about a plan that
18 would be specifically written by the utility
19 or by a gas storage operator?

20 Q That's correct.

21 A No.

22 Q Ms. Felts, do you have knowledge of
23 the practices of other gas storage operators
24 as to the use of dual mechanical barrier
25 configurations?

26 A Are you asking me if I've seen that
27 information as it belongs to another gas
28 storage operator?

1 Q I'm asking if you have knowledge as
2 to the practices of other gas storage
3 operators with regard to the use of dual
4 mechanical barrier configurations?

5 A Generally, dual mechanical barrier
6 is an industry technology not -- that would
7 apply to oil and gas not just underground gas
8 storage wells or wells, you know. So as far
9 as other underground storage operators, I
10 have not worked for other underground
11 storage -- gas storage operators so I would
12 not have access to their specific documents.

13 Q But you say that the same issue of
14 dual mechanical barrier is also a
15 consideration in oil operations?

16 A Yes. Whenever you drill a well.
17 So as a petroleum engineer, I have -- I have
18 knowledge about that just from having been in
19 the engineering classes.

20 Q Are the operational considerations,
21 in your view, similar or the same?

22 A Yes.

23 Q Are the oil wells operated under
24 pressure?

25 A Well, certainly the tubing is, but
26 the pressure that SoCalGas was exerting on a
27 casing in operating it as a gas well that was
28 utilizing tubing and casing to inject and

1 extract gas from a storage area, that's
2 pretty unique to underground gas storage and
3 that SoCalGas was creating additional
4 pressure on a casing that it probably wasn't
5 designed for.

6 Q Ms. Felts, do you have knowledge of
7 the practices of other gas storage operators
8 as to operating pressures for gas storage
9 wells?

10 A No.

11 Q Ms. Felts, do you have knowledge
12 with respect to the practices of other gas
13 storage operators with respect to the design
14 of wells relative to the pressure --
15 operational pressures?

16 A I haven't looked at that. I
17 suppose I could look at public information to
18 determine that.

19 Q Ms. Felts, do you have knowledge of
20 the practices of other gas storage operators
21 as to well control procedures?

22 A I think I already told you that I
23 haven't had the opportunity to work with
24 other underground gas storage operators. I
25 may have seen some of PG&E's gas storage data
26 when I reviewed their records, but if you're
27 asking -- you're asking a series of questions
28 about whether I have any knowledge about

1 other underground gas storage operators, and
2 I haven't worked for them, so the answer, as
3 a blanket, is no.

4 Q And you'll have to bear with me,
5 Ms. Felts. I apologize if those get a little
6 repetitive, and I understand that. And
7 certain -- some of these questions may be
8 questions you've heard before from
9 depositions, but it's necessary to create a
10 record for purposes of these hearings even if
11 you feel as though you've answered and have
12 been asked these questions before. So I
13 appreciate your patience.

14 But also with respect to the
15 practices, you know, the fact that you
16 haven't been employed by a gas storage
17 operator doesn't necessarily mean you don't
18 have knowledge of their practices. For
19 example, if you are alleging violations
20 against a utility and working for a
21 regulator, you may, as a result of that work,
22 gain knowledge of the practices of other gas
23 storage operators.

24 Do you understand?

25 A Yes.

26 Q Thank you.

27 ALJ HECHT: I'm going to interject.
28 This is Judge Hecht. We are going to break

1 for lunch at 12:30. So if Mr. Stoddard could
2 come to a breaking point, we will do that
3 rather than my just cutting things off.

4 MR. STODDARD: I think I can get
5 through a couple -- thank you, ALJ Hecht. I
6 think I have a few more questions, and then
7 we can break. It will be a stopping point.

8 ALJ HECHT: If you reach your stopping
9 point, then I will assess whether we should
10 break.

11 MR. STODDARD: Okay. Thank you.

12 BY MR. STODDARD:

13 Q Let me see. Where was I.
14 Ms. Felts, do you have any knowledge of
15 practices of other gas storage operators as
16 to corrosion management?

17 A Yes. I think I provided documents
18 in response to a data request about that.

19 Q Which gas storage operators?

20 A The earliest one, I believe, was
21 Standard Oil and possibly Getty. Other than
22 that, I would have to look at them and see
23 who the operators were.

24 Q And that was with respect to gas
25 storage operations?

26 A It was with respect to wells and
27 gas -- underground gas storage.

28 Q And did you have knowledge of those

1 practices prior to your engagement in this
2 matter?

3 A Yes.

4 Q And do you recall what the
5 particular practices were?

6 A As I recall, it was applying
7 cathodic protection to the wells.

8 Q Thank you. Ms. Felts, aside from
9 your undergraduate degree, do you have any
10 training or certification in -- and I can
11 repeat them if you like -- but any of the
12 topics we've just discussed?

13 A Additional training?

14 Q Aside from undergrad, any
15 additional training or certifications related
16 to the topics we've just discussed? And,
17 again, I can repeat the list if you need to
18 refresh your memory.

19 A I don't think so.

20 Q And Ms. Felts, as you stated
21 earlier, you have no operational experience
22 with gas storage fields; is that correct?

23 A That's correct.

24 Q You've never worked for a gas
25 storage operator, as you stated?

26 A That's correct.

27 Q You have no experience with the
28 design or configuration of gas storage wells?

1 MR. GRUEN: Your Honor, I'm going to
2 note an objection. It seems like we're
3 repeating the same questions. So the
4 objection is asked and answered.

5 ALJ HECHT: Yes. Let's not repeat the
6 same questions. Please go ahead with that in
7 mind.

8 MR. STODDARD: Respectfully, this is a
9 different question because it's asking about
10 her specific experience as opposed to her
11 knowledge of practices of other gas storage
12 operators.

13 THE WITNESS: Can you explain that a
14 little more?

15 BY MR. STODDARD:

16 Q Yeah. I'm asking whether you
17 specifically worked -- whether you have
18 experience broadly with the design or
19 configuration of gas storage wells?

20 MR. GRUEN: Your Honor, I'm going to
21 restate the objection. Ms. Felts has
22 identified that she has not worked for prior
23 gas storage operators. It's asked and
24 answered.

25 ALJ HECHT: I think this question is
26 slightly different. If we could answer it
27 and move on.

28 THE WITNESS: Okay. I have not worked

1 as a consultant or as an employee for an
2 underground gas storage operator.

3 BY MR. STODDARD:

4 Q Ms. Felts, have you -- do you have
5 any publications related to gas storage
6 operations generally? And I'll jump back to
7 that as opposed to going back through the
8 list.

9 A No.

10 Q Ms. Felts, have you ever run a
11 casing inspection tool?

12 A Can I back up a minute and say that
13 I have produced testimony related to other
14 underground gas storage facilities.

15 So then what is your next question?

16 Q Well, I'll ask you a follow-up on
17 that, and there you're referring to the
18 testimony you provided in the Montebello
19 proceeding?

20 A In Monte Bello. I also wrote a
21 report on Playa del Rey. I honestly don't
22 know if it was ever published.

23 Q What did that report concern?

24 A Wells at Playa del Rey that were
25 releasing gas around some houses and also
26 some leakage -- or someone thought there was
27 leakage of gas from the storage area into
28 local streams.

1 Q And you were engaged by the
2 California Public Utilities Commission for
3 that work?

4 A Yes.

5 Q Have you ever published any
6 technical publications or academic articles
7 related to gas storage operations?

8 A No.

9 Q I believe I asked a question that I
10 didn't get an answer to, so bear with me.
11 Ms. Felts, you've never run a casing
12 inspection tool; is that correct?

13 A No. As an engineer, I would not do
14 that.

15 Q Ms. Felts, you've never been
16 present when a casing inspection log was run;
17 is that correct?

18 A Not for a gas well but for a water
19 well.

20 Q A water well. And how many water
21 wells have you -- how many times (inaudible).

22 (Interruption by reporter.)

23 BY MR. STODDARD:

24 Q Ms. Felts, approximately how many
25 times do you recall being present for the
26 running of a casing inspection tool on a
27 water well?

28 A More than once, less than five.

1 ALJ HECHT: All right. I think it is
2 about time for a lunch break now. We can
3 pick this up after we have lunch. I'm going
4 to make that lunch break an hour, and we will
5 come back around 1:30. Are there any final
6 housekeeping or other questions before we
7 break for lunch?

8 (No response.)

9 ALJ HECHT: Okay. Seeing none, then we
10 will break for lunch. We'll be off the
11 record.

12 (Whereupon, at the hour of 12:34
13 p.m., a recess was taken until 1:35
p.m.)

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AFTERNOON SESSION - 1:35 P.M.

* * * * *

MARGARET FELTS

resumed the stand and testified further as follows:

ALJ HECHT: We'll be back on the record.

And Mr. Stoddard, you can continue cross-examination.

MR. STODDARD: Thank you, your Honor. I'm not able to see Ms. Felts, but I take it she's online.

ALJ HECHT: She is. And can you see other people?

MR. STODDARD: Yes. I can see Mr. Gruen and the court reporter as well. Thank you. She'll probably appear once she starts talking.

ALJ HECHT: I hope so.

BY MR. STODDARD:

Q I believe where we left off, Ms. Felts, we were discussing water wells and the fact that you had witnessed the running of a casing inspection tool in the context of a water well; is that correct?

A Yes.

1 Q And do you recall the depth of
2 those water wells generally?

3 A I think 400 feet.

4 Q Thank you. So 400 feet which is
5 much shallower than the gas storage well
6 that's at issue here, correct?

7 A Yes.

8 Q And the depth of the gas storage
9 well that's at issue here is generally around
10 how deep?

11 A Well, they vary at Aliso Canyon. I
12 think this SS-25 is 8500 feet. Something
13 like that.

14 Q Thank you. And I only have a few
15 more questions on this subject matter, and
16 then I'll move on but just to get through
17 them.

18 And Ms. Felts, you have no
19 firsthand experience with well kill or well
20 control operations, correct?

21 A No.

22 Q And no firsthand experience with
23 well kill modeling, correct?

24 A No. I don't have any prior to this
25 case.

26 Q Thank you. And you're not a
27 metallurgist, correct?

28 A No, I'm not a metallurgist.

1 Q And no firsthand experience with
2 risk management in the context of gas storage
3 operations, correct?

4 A I think you asked that already, but
5 no.

6 MR. STODDARD: Thank you. All right.
7 Your Honor, at this time, I'd just like to
8 make a brief statement before we move on.
9 It's unclear exactly what's going on here
10 only because SED hasn't included any
11 qualifications for this Expert Witness Felts.
12 So it's not clear whether she's being offered
13 as an expert, although it is her
14 understanding that she's being offered as an
15 expert. Rather than address this issue right
16 now or specifically through, you know, motion
17 practice on the record, we would like to
18 reserve our rights to address her
19 qualifications either in a separate motion or
20 through briefing.

21 ALJ HECHT: (Speaker muted.)

22 MR. GRUEN: Sorry, your Honor. I see
23 your lips moving, but I couldn't hear
24 anything.

25 ALJ HECHT: Forgot to hit that mute
26 button again. Thank you.

27 Mr. Gruen, please go ahead.

28 MR. GRUEN: Thank you, your Honor.

1 Your Honor, SED had offered Exhibit SED 217
2 as Ms. Felts' qualifications, and SoCalGas
3 objected. So we've been prepared to provide
4 those on the record, and now we're hearing
5 SoCalGas does, in fact, want the -- I think
6 does want the qualifications on the record or
7 wants to brief that they weren't put on the
8 record when, in fact, we offered them to.

9 We're looking for clarification as
10 to whether SoCalGas would like the
11 qualifications on the record or not. If
12 they'd like them on the record, we have them
13 available.

14 MR. STODDARD: Your Honor, it's not --
15 the issue isn't, you know, whether -- her
16 qualifications here in the record. We've now
17 asked her questions on this topic
18 sufficiently. My point was it wasn't clear
19 here whether -- Commission Rule 13.8 requires
20 that testimony include the expert's
21 qualifications -- or the reported expert's
22 qualifications.

23 In this instance, SED didn't include
24 it, and notwithstanding the fact that they
25 may have produced her résumé as part of
26 discovery, you know, they didn't include it
27 with her testimony at the time it was served.
28 And so that was the point, was just that it

1 was unclear what they were doing, but we have
2 now conducted voir dire questioning
3 sufficient for purposes of briefing and
4 addressing issues through motions. If
5 necessary, I was suggesting that we reserve
6 that for a later date rather than do it now.

7 ALJ HECHT: Is there an objection from
8 SED to reserving that earlier date?

9 MR. GRUEN: Your Honor, I have to see.
10 I'm not clear exactly what SoCalGas is
11 proposing to reserve. Perhaps counsel can
12 restate.

13 MR. STODDARD: Yeah. So, you know, the
14 idea would be -- it's not -- again, it's not
15 exactly clear what you're suggesting -- what
16 SED is proposing here since expert
17 qualifications were not included with
18 testimony per Rule 13.8, which requires that
19 prepared testimony shall constitute the
20 entirety of the witness' direct testimony and
21 shall include any exhibits to be offered in
22 support of the testimony and, in the case of
23 an expert witness, its statement of the
24 witness' qualifications.

25 So I don't know that a motion is
26 even necessary here, frankly, but again,
27 rather than arguing this issue now, I was
28 proposing that we would reserve the right so

1 that it's clear that we aren't, by proceeding
2 with questioning, waiving any objections that
3 we would have as to Ms. Felts' qualifications
4 or SED's compliance with Rule 13.8.

5 MR. GRUEN: Your Honor, if I may, maybe
6 we could just move forward with this. If
7 counsel would like to stipulate that
8 Exhibit 217 that was provided today and which
9 may well be a match to what SoCalGas has used
10 to cross-examine that that goes into the
11 record and is satisfactory to provide the
12 witness qualifications.

13 ALJ HECHT: I believe that the issue is
14 that it was not served with the testimony and
15 is being made available today; is that
16 correct?

17 MR. STODDARD: The issue is that it was
18 not served with testimony. That's correct.
19 It's not about whether or not it's available
20 today so much it's that it wasn't clear what
21 SED's intent was with respect to this witness
22 given that they hadn't included expert
23 qualifications notwithstanding the fact that
24 we might have had her résumé previously.

25 MR. GRUEN: And your Honor, if I may --
26 this is Darryl Gruen for SED.

27 SED produced Ms. Felts' résumé. I
28 believe this was for a deposition on February

1 5th of 2020. It's more than a year ago.
2 SoCalGas has had adequate time to review her
3 qualifications and prepared clearly robust
4 cross as is illustrated. So if -- to the
5 extent that they are reserving the right to
6 say her testimony isn't valid because we
7 didn't provide a résumé, I just want to
8 clarify for the record they've been provided
9 more than a year's notice of what her
10 qualifications are and provided robust cross
11 this morning.

12 So, you know, I think we -- I think
13 we should resolve the issue here. And again,
14 all we need -- we'd like to stipulate that
15 her education and background goes in. I
16 assume that SoCalGas is going to move that
17 this cross-exhibit goes into the record.
18 That would be adequate as well.

19 ALJ HECHT: These (inaudible) to get a
20 response on that, I will say I think that it
21 has been clear over the past year that
22 Ms. Felts was produced as the person most
23 knowledgeable, and there are specific rulings
24 that refer to that. So I think it was
25 reasonable to believe that she was being
26 offered as an expert witness.

27 Having said that, it's a problem
28 that we didn't have the witness

1 qualifications served with the testimony, and
2 that is something that should not happen
3 again.

4 With that, I will take an answer
5 from Mr. Stoddard.

6 MR. STODDARD: Thank you, your Honor.
7 I would note that they have offered her as a
8 person most knowledgeable in certain -- in
9 certain other instances, which is separate.
10 Under the rules and in general procedure from
11 an expert witness, the Commission's rules on
12 this are clear. And it does make a
13 difference. It's not just about our
14 possession of her résumé, because again, we
15 have served all sorts of data responses and
16 documents in response to SED discovery, none
17 of which we are suggesting we will include
18 with testimony at this time as a direct
19 exhibit, which is what SED is attempting to
20 do here.

21 And where we're at -- you know, so
22 the point here is -- again, the reason we
23 went through that process is because we did
24 have some expectation that they might try to
25 offer her as an expert witness here, but they
26 have not complied with the Commission's Rules
27 of Practice and Procedure, which they are
28 required to do with respect to offering an

1 expert witness.

2 ALJ HECHT: Thank you very much. This
3 is not something that we're going to resolve
4 today. We can have it briefed. Parties will
5 brief on this issue of not having had these
6 served and understanding of expert witness
7 and will provide those briefs on Thursday by
8 close of business. If necessary, we will
9 discuss this again after we receive that
10 briefing.

11 MR. STODDARD: Thank you, your Honor.
12 (Off the record.)

13 ALJ HECHT: We'll be back on the
14 record.

15 While we were off the record, we
16 clarified some things about who made the last
17 statement the last time we were on the
18 record, and we also got a good reminder that
19 everybody should state their name before they
20 speak each time they speak unless we're
21 talking about the witness who is on the stand
22 or the primary cross-examining attorney.

23 So with that, I think -- I think I
24 already stated on the record that there will
25 be briefing, and with that, I think we can
26 continue with cross-examination.

27 MR. STODDARD: Thank you, your Honor.

28

1 BY MR. STODDARD:

2 Q Ms. Felts, moving on. As SED's
3 witness in this preceding, did you assist SED
4 with investigation of the incident?

5 A I assisted with investigation to
6 the extent that I reviewed documents that
7 were produced by SoCalGas and any other
8 documents that were available, for instance,
9 the Blade reports.

10 Q Thank you. Did you assist with
11 strategy as to prosecution of this case?

12 A I'm not sure what you mean about
13 that. I wasn't advising counsel on how to
14 manage their case.

15 Q Did you assist with strategy as to
16 discovery?

17 A I wrote some discovery questions,
18 not all, and I did not review all responses
19 to all discovery.

20 Q Did you prepare data responses from
21 SED to discovery from SoCalGas?

22 A No, I provided answers where my
23 input was required, and the attorneys
24 prepared the responses.

25 Q And when SoCalGas requested
26 production of documents from SED, did you
27 assist with collection and review of those
28 documents?

1 A Yes. If they were documents that I
2 would have, yes, I produced them.

3 Q And independent research?

4 A I did do some independent research
5 on this case, yes.

6 Q If we can turn to Exhibit 40,
7 please. Ms. Felts, can you see the document?

8 A Yes.

9 Q Is this your contract with SED? Do
10 you recognize it? It says at the top: State
11 of California Department of the General
12 Services Standard Agreement, and you'll see
13 that it's dated October 21, 2019 through June
14 30, 2020 and it's signed at the bottom by
15 what appears to be you.

16 A Yes. Although -- I don't have
17 glasses -- uh-oh. I don't have the right
18 glasses. Okay. We'll use these. Okay. So
19 the date I signed it is 11-5-2019. It
20 wouldn't have actually been active until the
21 date that I got -- I think there must be
22 another page where general services signs it.

23 ALJ HECHT: We'll be off the record
24 while everybody finds their place.

25 (Off the record.)

26 ALJ HECHT: We'll be back on the
27 record.

28 While we were off the record, the

1 witness found her place in the documents and
2 I believe now has access to them. She can
3 confirm. So we can move forward.

4 THE WITNESS: Yes, so I found my place
5 in the document. On the second page, there's
6 a signature, which is showing up on the
7 shared screen now, where the contracting
8 agency signed it 11-7-19, and that's the
9 controlling date for the contract.

10 MR. STODDARD: Thank you. Pejman, if
11 we can please scroll down to the scope of
12 work. Thank you.

13 BY MR. STODDARD:

14 Q Ms. Felts, do you see where -- I'm
15 sorry. I just want to scroll down further to
16 where it begins with, "right opening reply."

17 ALJ HECHT: We will be off the record
18 again to find our place.

19 (Off the record.)

20 ALJ HECHT: We will be back on the
21 record.

22 THE WITNESS: Okay.

23 BY MR. STODDARD:

24 Q Ms. Felts, do you see where it says
25 right there, "right opening reply and
26 rebuttal testimony as an expert witness on
27 behalf of the PUC Safety and Enforcement
28 Division, and based on the results of this

1 now, it says, "testify in relation to that
2 testimony at hearings if necessary."

3 A Yes.

4 Q Was it understood at the time that
5 you signed this contract that you would be
6 asserting violations on behalf of SED?

7 A I didn't write the contract. But
8 at -- on -- at least a few days after, I was
9 under contract, I was asked to -- or maybe it
10 was the same day -- I was asked to read the
11 opening testimony and asked if I would
12 sponsor it.

13 Q So you received the -- you received
14 the opening testimony that you were going to
15 be asked to sponsor sometime after 11 --
16 after November the 5th, 2019; is that
17 correct?

18 A Yes.

19 Q Yes. All right. Next if we can
20 please scroll down to "analyze" -- the
21 sentence starting "analyze whether"?

22 A Is that where we just were?]

23 Q I'm sorry.

24 Analyze whether SoCalGas
25 operated its Aliso Canyon
26 natural gas storage
27 facility in compliance with
28 or in violation of federal,

1 state, and California
2 Public Utilities Commission
3 requirements leading up to
4 and including the incident
5 on October 25, 2015,
6 including weather SoCalGas
7 kept and managed traceable
8 verifiable complete and
9 accurate records needed to
10 operate the facility.

11 Do you see that?

12 A Yes.

13 Q Ms. Felts, did you identify the
14 federal or state requirements that SoCalGas
15 either violated or complied with?

16 A I looked at regulations at DOGGR,
17 at federal and state levels. I don't think I
18 identified any specific regulations that were
19 in violation.

20 Q In fact, the only violations of law
21 that you're alleging in connection with the
22 issues within the scope of these hearings
23 which relate to O&M practices, well kill and
24 recordkeeping, are violations of 451; is that
25 correct -- Public Utilities Code 451?

26 A Yes, that's correct. I think
27 that's how it stated it in the opening
28 testimony.

1 Q And finally, down below Pejman
2 where it states you will provide extensive
3 review under -- do you see that?

4 ALJ POIRIER: Mr. Stoddard, this is ALJ
5 Poirier. Could you refer to the number
6 paragraph, if it's 5-B or 5-C. That would be
7 helpful. Thank you.

8 MR. STODDARD: Sure.

9 Q This is paragraph -- if you can
10 scan up a little bit. I just can't see the
11 number -- 5-A after:

12 In preparation of
13 testimony, provide
14 extensive review of
15 Southern California Gas
16 Company records as
17 necessary to assess
18 compliance with safety
19 requirements.

20 Do you see that?

21 A Yes.

22 Q And did you do that?

23 A I have been doing that since I was
24 hired.

25 Q And which particular safety
26 requirements did you refer to?

27 A At this point it was all 451.

28 Q Thank you. If we can turn to

1 Exhibit Number 43 next.

2 ALJ HECHT: We'll be off the record
3 while we find that.

4 (Off the record.)

5 ALJ HECHT: We'll be back on the
6 record. We went off the record to find the
7 place in the testimony.

8 You may continue, Mr. Stoddard.

9 BY MR. STODDARD:

10 Q Ms. Felts, do you see this is an
11 e-mail from Mr. Gruen dated Friday,
12 November 8, 2019, at 9 a.m.?

13 A Yes.

14 Q And it's addressed to you and Karen
15 Shea. Do you see that?

16 A Yes.

17 Q It says below:

18 Hi, Margaret and Karen.

19 See attached EUO

20 transcripts SoCalGas is

21 reviewing for editing

22 purposes and may assert

23 some information is

24 confidential.

25 Do you see that?

26 A Yes.

27 Q Is this the first communication
28 that you had with SED aside from

1 communications relating to the contract that
2 you executed the day prior?

3 A No. You're talking about Karen
4 Shea? Is that what -- is that what you're
5 asking?

6 Q I'm sorry. No. I'm asking about
7 whether this was the first communication you
8 had with SED related to the case at issue
9 here aside from negotiation and execution of
10 your contract that was executed the day
11 prior.

12 A Oh. I don't know.

13 Q If we can refer to Exhibit 35,
14 page 85, lines 14 through 17. You state --
15 the question is "Is this the first e-mail
16 that you received from SED in connection with
17 this matter?" You were referencing this
18 e-mail.

19 Your answer was "Well, I'd say
20 November 8th would be -- it would have to be
21 the first, or there may have been others that
22 came on that date. I didn't receive anything
23 before this."

24 Do you see that?

25 A Yes. I see that, but I'm not sure
26 that's correct because I would have received
27 e-mails related to the contract and to the
28 scope of work.

1 Q Understood. Again, this is -- this
2 is -- the question was was this the first
3 communication you had with SED aside from the
4 contract? Based on your deposition, does
5 that sound as though it is likely correct?

6 A It sounds -- seems reasonable. I
7 don't remember.

8 Q Okay. Thank you. And again, this
9 e-mail was 14 days before your opening
10 testimony was due; correct?

11 A Yes.

12 Q Okay. Thank you. If you can
13 please turn to Exhibit Number 82.

14 ALJ HECHT: We'll be off the record for
15 a moment.

16 (Off the record.)

17 ALJ HECHT: We'll be back on the
18 record. We have found the place in the
19 exhibit.

20 MR. STODDARD: Thank you.

21 Q Ms. Felts, this is an e-mail from
22 Mr. Gruen to you on Friday, November 8, 2019.
23 The subject line is "Scoping Memo,
24 Recordkeeping Language." Again, this is
25 SoCalGas Exhibit Number 82.

26 Do you see that?

27 A Yes.

28 Q It appears it includes a link, and

1 then it states a paragraph, which I believe
2 is from the scoping ruling which says:

3 Did SoCalGas violate any
4 provisions of Public
5 Utilities Commission
6 general orders or decisions
7 or any other applicable
8 regulation and/or engage in
9 unreasonable and imprudent
10 practices with respect to
11 SoCalGas' maintenance and
12 operation of Aliso Canyon
13 and/or SoCalGas' related
14 recordkeeping practices?
15 Do you see that?

16 A Yes.

17 Q Did you have discussions with SED
18 about the meaning of that language?

19 A I don't remember the discussion,
20 but I think there may have been some
21 discussion about the inclusion of
22 unreasonable or imprudent practices in that
23 language in the scoping memo.

24 Q And what was that discussion?

25 A Well, I don't know. I don't
26 remember what it was. It probably had to do
27 with 451 though.

28 Q And whether or not 451 would

1 require demonstrating that SoCalGas' were
2 unreasonable and/or imprudent?

3 A Well, here it relates specifically
4 to recordkeeping practices. It was clear
5 that everything else was a safety violation.

6 Q Can you please -- (inaudible).

7 A Excuse me? I'm sorry. Could you
8 restate.

9 Q Yeah. I was just going to ask you
10 to explain the difference between safety
11 violations and recordkeeping practices in
12 this context.

13 A The way I'm reading 451, it
14 requires that every public utility should
15 furnish and maintain equipment facilities
16 necessary to promote safety of its patrons,
17 employees, and the public, which essentially
18 excludes the reasonableness or to 451, which
19 in my experience applies to the recovery of
20 monies spent in reasonableness hearings
21 primarily, not necessarily tied to safety
22 violations, so I see it as two separate
23 things.

24 Q In your view, Ms. Felts, would it
25 be fair to say that reasonableness doesn't
26 factor into whether or not a safety violation
27 is a violation of 451?

28 A I think that's correct.

1 Q And in your view, any
2 violation of -- or, sorry -- rather, any
3 unsafe condition could be a violation of 451
4 without regard for the reasonableness of the
5 utility's actions; is that correct?

6 A Did you just say the same thing you
7 said before in a different way?

8 Q No, not exactly I don't think, but
9 I can restate the question if you'd like.

10 A Okay.

11 Q Any unsafe condition in your view
12 could be a violation of 451 without regard
13 for the reasonableness of the utility's
14 actions; is that correct?

15 MR. GRUEN: Your Honor, I'm going to
16 note an objection to that. That question has
17 been asked and answered.

18 ALJ HECHT: I'm going to allow the
19 question.

20 Please go ahead.

21 THE WITNESS: I understand your
22 question is I believe that's correct.

23 BY MR. STODDARD:

24 Q Ms. Felts, are you familiar with
25 the concept of strict liability?

26 A Yes.

27 Q Do you think that 451 is a strict
28 liability requirement?

1 MR. GRUEN: Your Honor, I'm going to
2 note another objection here that we're going
3 down the path of calling for multiple legal
4 conclusions on someone who has been offered
5 as a technical witness, so the objection is
6 calls for a legal conclusion.

7 ALJ HECHT: I will take that under
8 advisement. We should take a five-minute
9 break anyway, so we'll be off the record.

10 (Off the record.)

11 ALJ HECHT: We'll be back on the
12 record. While we were off the record, I
13 conferred with the other ALJ in this
14 proceeding. We agree that the objection is
15 sustained. While we were off the record, I
16 also had some technical problems that I hope
17 now have been fixed. So, we should continue.
18 The objection is sustained.

19 MR. STODDARD: Thank you, your Honor.
20 All right. Moving on. Please put up Exhibit
21 Number 44.

22 Q Ms. Felts, can you see the
23 document?

24 A Yes, I can see it.

25 Q And you'll see that this is an
26 e-mail from Darryl Gruen addressed to you on
27 Tuesday, November 19, 2019; is that correct?

28 A Yes.

1 Q And the content of this e-mail
2 says, "Hi, Margaret. A draft of the Aliso
3 Canyon testimony is attached. Darryl."

4 Do you see that?

5 A Yes.

6 Q Thank you. And this is 14 days
7 before opening testimony is due; isn't that
8 correct?

9 A I believe you. Yes.

10 Q Ms. Felts, you didn't write the
11 document that was attached to that e-mail,
12 did you?

13 MR. GRUEN: Objection, your Honor.
14 Without her seeing the document, I'm not sure
15 how she can answer that question. I'd object
16 it's vague.

17 BY MR. STODDARD:

18 Q All right. Can we move to
19 Exhibit 46, please.

20 A 46, okay.

21 Q Ms. Felts, do you see this here?
22 It says "Docket Number I.19-06-016," and
23 below that it says "Safety and Enforcement
24 Division, Opening testimony of the Safety and
25 Enforcement Division Regarding" -- and then
26 it has the date November 14, 2019, there.

27 A Okay. I -- that's five days --

28 Q Five days before the testimony was

1 due?

2 A Five days before the e-mail. The
3 e-mail was dated November 19th and the draft
4 is the 14th. I'm not saying it wasn't. I
5 just don't know how to verify that it was the
6 attachment.

7 Q Have you had a chance to review
8 this document?

9 A Well, I can look right now.

10 Q Let me know when you're ready.

11 A All right. Okay. Just tell me
12 where to go on it.

13 Q I have a general question about it.
14 Ms. Felts, you didn't write this document;
15 correct?

16 MR. GRUEN: Your Honor, I'm going to
17 object as lacking foundation. She hasn't --
18 counsel hasn't established that Ms. Felts
19 recognizes the document or has seen it.

20 ALJ HECHT: I think that's fair. I
21 think we should move on to something else and
22 let's go.

23 BY MR. STODDARD:

24 Q Ms. Felts, I'm going to refer you
25 to Exhibit Number 35.

26 A Okay, 35.

27 Q And this is page 104, 18. This is
28 in reference to the first draft of the

1 testimony that was sent to you by SED. You
2 had indicated at that time -- and this is
3 lines 18 to 21 -- that you wrote part of the
4 document, "I wrote the recordkeeping section.
5 And the rest of it was already drafted when I
6 arrived on the scene."

7 Do you see that?

8 A Yes.

9 Q And that's correct, isn't it?

10 A Yes, but there's no records section
11 on the one you just had up.

12 Q That's correct. I'm referring here
13 to the final testimony that was submitted by
14 SED; is that correct?

15 A Yes.

16 Q Okay. So the testimony that SED
17 has served in this case, the opening
18 testimony in particular, you wrote the
19 recordkeeping section and somebody else at
20 SED drafted the remainder; is that correct?

21 A Yes.

22 Q And you weren't involved in the
23 preparation of the remainder either
24 initially, were you?

25 A Not in the initial writing of it.
26 I did review it and may have suggested some
27 edits. I don't recall exactly.

28 Q And do you recall what your initial

1 reaction was at the time that you received
2 that initial draft from SED?

3 A My initial reaction?

4 Q To SED's draft testimony, yes.

5 A I thought it was well drafted. It
6 was based strictly on the Blade report, and
7 so it was based on the opinions and findings
8 of a group of really highly-qualified
9 experts. I had some concern about a
10 statement in there that said that there were
11 no leaks in SS-25. I'm not sure when I
12 raised that concern, but I did have that
13 concern.

14 Q I'm going to refer you to
15 Exhibit 35, page 147, starting with line 3.
16 I refer to the first draft of the testimony
17 that you received from SED, which included
18 everything other than your recordkeeping
19 section. The question is do you know
20 whether -- sorry -- "And that was the first
21 day that you saw at 5:15 p.m. SED's draft
22 testimony?"

23 Do you see that line?

24 A Yes.

25 Q You said, "Yes."

26 "Do you know whether they were
27 preparing it immediately prior to sending it
28 to you or whether it had been in existence

1 for a while?"

2 Your answer is "I don't know."

3 Question, "And do you know who
4 authored it?"

5 Your answer, "No."

6 Question, "What was your initial
7 reaction?"

8 Your answer, "Well, it's not the
9 type of report that I would write, but it was
10 drawn strictly from the Blade report, and so
11 I felt like -- I think it adequately
12 represented what the Commission was -- or
13 what SED was looking at for violations."

14 Question, "Why was it not the kind
15 of report that you would write?"

16 And your answer, "Oh, I might have
17 done more research in the data and been able
18 to add a little bit more depth to some of the
19 discussion."

20 Question, "So it was a little bit
21 thin?"

22 Answer, "Yes."

23 Ms. Felts, to confirm, when you
24 first received this testimony, you felt it
25 was thin, didn't you?

26 A I'll confirm all those statements
27 you just read.

28 Q Okay. Thank you. Please turn to

1 Exhibit Number 52. This is a November 20,
2 2019, e-mail from Darryl Gruen.

3 Do you see that?

4 A Yes.

5 Q This is two days before testimony
6 was due; correct?

7 A Yes.

8 Q And the subject line is "Edits to
9 Testimony"?

10 A Yes.

11 Q It reads, "Darryl, I can't get the
12 tracking to work. It's possible it would
13 show on your computer, but I am hesitant to
14 put the work into it is it doesn't show."

15 The "is" there is supposed to be
16 "if"; correct?

17 A Yes.

18 Q "So I am going to finish my
19 testimony and you can go ahead and use the
20 SED testimony as is. I don't think I can
21 sponsor it as written."

22 Do you see that?

23 A Yes.

24 Q And a few moments ago you referred
25 to a pre-existing leak that was a concern of
26 yours that wasn't included in SED's draft
27 testimony; is that correct?

28 A Yes.

1 Q And was that your concern here
2 about why you didn't think you could sponsor
3 it is because it didn't include discussion of
4 the pre-existing leak?

5 A I think that was my only issue, so
6 it must have been. I can't really tell you
7 from this e-mail. I don't remember this
8 e-mail, but I eventually resolved that issue.

9 Q Do you still believe that there was
10 a pre-existing leak in SS-25?

11 A Yes. I think that's reflected in
12 my sur-reply and all of the attachments to
13 it.

14 Q And when you say that you've since
15 resolved the issue, do you mean you resolved
16 it by adding it to the opening testimony or
17 something else?

18 A No. No. I researched in the Blade
19 documents there the source of their
20 statement, and somewhere I discovered that
21 their statement was in relation to the leaks,
22 the shallow leaks that they were tasked to
23 investigate. In other words, they were
24 saying there's no history of leaks on SS-25
25 in the area of the shallow leak or the leak
26 where it failed on October 23, 2015. So we
27 were talking about two different things, and
28 I was okay with that.

1 Q Did you believe that there was a
2 leak that you were -- the pre-existing leak
3 at SS-25 that you were concerned about, was
4 it a casing leak?

5 A It was identified on many
6 temperature surveys that the leak at the
7 bottom of the well, sometimes characterized
8 as possibly a shoe leak.

9 Q And do you believe it was a shoe
10 leak?

11 A Based on the data that I have
12 looked at since then, I think it might have
13 been a casing leak, not specifically a shoe
14 leak.

15 Q Can we turn to Exhibit Number 70,
16 please. Ms. Felts, do you see this is
17 SoCalGas Exhibit 70? This is Blade's
18 response to Data Request SED-58.

19 Do you see that?

20 A Yes.

21 Q Thank you. If we can go down to
22 page 43, please. You see here, Ms. Felts,
23 under 2.19.1 -- or, sorry, 2.19 Statement 19.
24 It states, "Some temperature surveys over the
25 years reported possible slight leakage in the
26 vicinity of the production casing shoe and
27 noise logs were run following a number of
28 these temperature surveys. SoCalGas

1 performed noise logs in SS-25," and then it
2 lists 10 dates.

3 Do you see that?

4 A Yes.

5 Q And then it says these dates range
6 from 1978 through 2012; correct?

7 A Yes.

8 Q And it states, "None of these noise
9 logs indicate a gas leak in the production
10 casing. None of these noise logs indicate a
11 gas leak in the production casing or the
12 production casing shoe."

13 A I see that.

14 Q Okay. And then the question was
15 "Does Blade Energy Partners agree or disagree
16 with the statement?"

17 Do you see that?

18 A Yes.

19 Q Okay. And the answer was they
20 agree with none of these noise logs indicate
21 a gas leak in the production casing.

22 Do you see that?

23 A Yes.

24 Q But you disagree with that
25 statement?

26 A Based on more recent data that I've
27 seen, I would disagree, but I don't have
28 proof.

1 Q You don't have? I'm sorry, I
2 couldn't hear your last word.

3 A Absolute proof. I mean all I can
4 do is look at data, which is, of course, what
5 Blade can do, too.

6 Q And you think that you have more
7 recent data than Blade?

8 A I think I might. I don't know.

9 Q What's your basis for that opinion?

10 A Over the last few months I've
11 looked at a lot more data than I expect Blade
12 looked at, so I think it's possible that
13 somewhere in all of the e-mails that I've
14 reviewed that were submitted to SED that I
15 found data that may not have been made
16 available to Blade.

17 Q Ms. Felts, next question, "If Blade
18 disagrees with any portion of this statement,
19 why?"

20 Do you see that?

21 A Yes.

22 Q And it says:

23 One of the noise logs,
24 performed on April 1984
25 identified a possible leak
26 near the production casing
27 shoe. Multiple temperature
28 logs and a radioactive

1 tracer survey were run
2 during this period.

3 Do you see that?

4 A Yes.

5 Q "This casing shoe leak was not
6 observed in subsequent noise logs."]

7 More importantly, there was never
8 any indication by a noise or temperature lock
9 with any casing integrity issues prior to the
10 October 23rd, 2015 incident."

11 Do you see that?

12 A Yes.

13 Q Did you consider the subsequent
14 noise logs and the other surveys that Blade
15 is discussing here in your assessment of the
16 pre-existing leak?

17 A I think I have looked at all of --

18 Q And you believe you have additional
19 data, more recent than what Blade has, that
20 indicates that Blade is wrong?

21 A Well, I think I have a different
22 opinion from Blade, based on the information
23 that I have looked at and which includes what
24 Blade looked at. And I think Blade has made
25 a reasonable -- drawn a reasonable conclusion
26 based on what they looked at. So I think,
27 you know, you're talking about difference of
28 opinion here. And certainly I think that the

1 people at Blade have the qualifications to
2 make the statements that they made. So I
3 don't think this is necessarily that they're
4 wrong. I just think that I have a different
5 opinion.

6 ALJ POIRIER: Excuse me. This is ALJ
7 Poirier.

8 Ms. Felts, can you adjust your
9 camera a little bit, I think.

10 THE WITNESS: I'm sorry. I'm sorry.
11 I'm falling off the bottom there. Okay.

12 MR. STODDARD: I am going to introduce
13 another exhibit here that I wasn't planning
14 to introduce, if we can take a short
15 30 seconds off the record just so I can
16 identify the Exhibit Number.

17 ALJ POIRIER: Off the record.

18 (Off the record.)

19 ALJ POIRIER: Back on the record.

20 MR. STODDARD: I am going to introduce
21 or show rather Exhibit Number SED-51. No,
22 I'm sorry. This is SoCalGas-51. And this is
23 Ms. Felts.

24 Q Ms. Felts, do you see this, that
25 this says a docket number at the top and it
26 says Safety and Enforcement Division, Chapter
27 One Prepared Sur-Reply Testimony of Margaret
28 Felts. Do you see that?

1 A Yes.

2 Q Okay. If we can please turn to
3 Chapter 2, this is a combined document and
4 I'm going to go to page 8, Chapter 2 -- top
5 of page 7. Sorry. Bottom of page 7 top of
6 page 8. All right. Got there.

7 Ms. Felts, you see there where it
8 says, "My point in showing these exhibits,"
9 and this is referring to -- this is a section
10 starting at line 12 which is titled Prior
11 Leaks in SS-25 Casing Existed. Do you see
12 that?

13 A Yes.

14 Q And you say:

15 My point in showing these
16 exhibits is not that it was
17 a cause of the SS-25
18 failure, but that these
19 indications on temperature
20 and noise surveys went
21 unaddressed by SoCalGas and
22 that there were no
23 interoffice memos in the
24 file that discussed these
25 survey results as I found
26 in other wells, which as
27 recordkeeping issue.

28 Do you see that?

1 A Yes.

2 Q Referring back to Exhibit 70,
3 page 43, Question 3, the question is:
4 Is there any context either
5 in or outside of
6 Mr. Carnahan's testimony
7 that Blade wishes to add in
8 order to explain its
9 answers? If so, please
10 provide it and explain.

11 And the first answer is referring
12 to Figure 5, which isn't relevant for the
13 purposes of the text we're about to read:

14 Denoted in yellow in the
15 Results and Remarks section
16 is possible slight shoe
17 leakage migrating higher
18 than 8,440 at a shut-in
19 pressure of 1,595 psa (sic)
20 -- psi. Note the purpose
21 of the survey was to check
22 for shoe leak.

23 This is from an April 11, 1984 log.
24 Do you see that?

25 A Yes.

26 Q Okay. And then referring back to
27 page 43, Question 3, the second part of that
28 refers to Figure 6, and if you want to

1 briefly reference Figure 6. And do you know
2 what kind of document this is, Ms. Felts, the
3 one that's the imagine of FLO-LOG?

4 A That's a noise and temperature
5 survey.

6 Q Okay. And you'll note that the
7 date is July 27, 1984. Do you see that?

8 A Yes. Yes.

9 Q Okay. And it says:
10 Denoted in yellow in the
11 Results and Remarks
12 section, "no indication of
13 any gas leakage."
14 Do you see that?

15 A Yes.

16 Q So, SoCalGas ran a log in April 11,
17 1984 and then another log in July 27, 1984,
18 just a few months later; is that correct?

19 A Based on those headers, it looks
20 like it, yes.

21 Q Yeah. And they didn't -- and that
22 was for the purpose of checking bad --
23 indication of a prior leak, correct?

24 A Yes.

25 Q Okay. So your statement that we
26 read back a few moments ago in testimony that
27 these implications on temperature and noise
28 surveys went unaddressed by SoCalGas, that's

1 not accurate, is it?

2 A It is accurate in that there is no
3 analysis in the well file about these
4 potential leaks. And that's what I was
5 looking for.

6 Q Let's refer back, please, to the
7 documents in 70 that are shown in the -- in
8 Blade's images. And those are exhibits
9 Figure 5 and Figure 6. These are documents
10 in the well file, correct?

11 A This is the header to a log that's
12 quite long that shows the, you know, the
13 actual log of the well. And in fact I know
14 that this particular one in Figure 6 actually
15 does show cooling at the bottom of the well.
16 I've looked at it a number of times. I have
17 no idea why they said no indication of any
18 gas leak. It's crazy.

19 Q And you're referring to
20 specifically the log from July 27, 1984 that
21 you say shows an indication of cooling that
22 both SoCalGas and Blade got wrong?

23 A This is my -- I don't know if they
24 looked at the whole log, but I am relatively
25 sure this particular one shows cooling at the
26 bottom of the log, though it's possible they
27 have some other explanation for it. And
28 that's the reason I was looking for

1 interoffice communications, later called
2 interoffice memos, where in other well files
3 I would see maybe a lengthy discussion of
4 what's going on on a log that indicates
5 leakage, a shoe leak or any other kind of
6 leak and some sort of analysis and
7 recommendation.

8 Well file SS-25 doesn't have any
9 memos like that that I could find that would
10 discuss these indications of leakage or what
11 to do going forward, leave it, let -- you
12 know, sometimes in other well files there's a
13 calculation that the amount of gas that is
14 leaking out of a shoe leak doesn't warrant
15 spending the money to fix it. There is
16 nothing like that in that SS-25 well file.
17 And that's what I was looking for.

18 Q Are you aware of the -- of those,
19 of the existence of memos like that outside
20 of the SS-25 well file?

21 A Yes. Other well files have them.

22 Q That wasn't my question. Are you
23 aware of the existence of interoffice memos
24 related to SS-25 that exist outside of the
25 well file?

26 A No.

27 Q Are you aware of SED asking
28 SoCalGas data request for the production of

1 interoffice memos related to the SS-25 --
2 related to Well SS-25?

3 A Yes. I looked at those. I don't
4 recall seeing anything that addressed this
5 issue.

6 Q But you are aware of the existence
7 of interoffice memoranda related to Well
8 SS-25, correct?

9 MR. GRUEN: Your Honor, I am going to
10 object to that as asked and answered.

11 MR. STODDARD: Your Honor, I have
12 contradictory answers on this.

13 ALJ HECHT: I am going to deny the
14 objection. Go ahead, Mr. Stoddard.

15 MR. STODDARD: Thank you.

16 Q Ms. Felts, just to confirm, I
17 believe you previously said there were no
18 interoffice memoranda regarding SS-25. I was
19 clarifying that you have seen interoffice
20 memoranda related to SS-25 stored separately
21 from the well file.

22 A Okay. Can I answer --

23 Q Yes.

24 A -- before it's asked again? Okay.

25 So there are a few interoffice -- I
26 think they were called communications at this
27 time -- before 1980 related to SSSVs, the
28 replacement of safety valves in the well file

1 for SS-25. When we asked for interoffice
2 memos, SoCalGas produced a number documents
3 including some interoffice memos, in response
4 to that data request. I don't remember the
5 data request number and I don't remember
6 SoCalGas saying where they came from, but
7 some of them I had not seen in the well file.
8 So they were somewhere else.

9 Q Thank you. Referring back to
10 Ms. Felts' Sur-Reply testimony, Exhibit
11 Number 51, and again, here where you say that
12 "these indications on temperature and noise
13 surveys went unaddressed by SoCalGas,"
14 Ms. Felts, as we just discussed, they ran a
15 log in April 1984 and another one a few
16 months later in July.

17 That second log wouldn't have been
18 a requirement, correct, by regulations, to
19 your understanding?

20 A Regulations require one temperature
21 survey a year; no noise surveys, unless
22 they're required to verify a leak. But I
23 would say that there are a lot of temperature
24 surveys, the logs themselves, in the SS-25
25 well file. So clearly, somebody in SoCalGas
26 thought that something was going on at the
27 bottom of the well or they wouldn't have run
28 that many surveys. But that doesn't address

1 my statement in my Sur-Reply. My Sur-Reply
2 is that there were no interoffice memos in
3 the file that discuss the survey results,
4 which is something I found in other well
5 files.

6 Q And again, those interoffice memos
7 aren't specifically required by any
8 requirement or regulation; is that correct?

9 A No.

10 Q Okay. And can you explain briefly
11 how these logs work?

12 A What do you mean?

13 Q How the tools -- let's take noise
14 logs. Can you explain briefly how noise logs
15 work?

16 A They put a tool down the well that
17 measures the temperature going from the top
18 to the bottom and you get a trace on a --
19 what looks like a graph paper that runs with
20 an identification of the depth of the
21 measurement and then the trace of the
22 temperature to as far down as they go in the
23 well.

24 Q You said "temperature" there. That
25 was in reference to temperature logs or noise
26 logs?

27 A Temperature.

28 Q Okay. Can you explain briefly how

1 noise logs work?

2 A Noise logs look for noise in four
3 different -- at four different frequencies
4 and they trace four lines showing those
5 measured frequencies in the well, going again
6 from the top of the well to the bottom of the
7 well.

8 Q And when you describe an anomaly or
9 as the term is generally used by Blade or in
10 your testimony, what is an anomaly?

11 A On a temperature survey you would
12 see a line. The temperature line would
13 shift; sometimes like a little bubble, other
14 times quite dramatically to the left showing
15 a lower temperature or cooling in the well.
16 And that's a indication typically -- it's
17 taken to be an indication of a leak because
18 when gas expands through a hole, it would
19 cool the casing and the temperature around it
20 and so you would get a cooling on the
21 temperature survey line. And that would be
22 the anomaly.

23 Q An anomaly is an indication of a
24 potential leak, correct?

25 A That's true.

26 Q It's not necessarily indicative,
27 which was why they run subsequent logs such
28 as a noise log; is that correct?

1 A Yes. So they'll run a noise log to
2 see if they can hear gas escaping. Neither
3 of those logs is perfect.

4 Q But the two would be used in
5 conjunction so that if you have an indication
6 on one, you would use the other to see if it
7 confirms the presence of a leak, correct?

8 A That's what they were doing.

9 Q And how about a tracer survey?

10 A A tracer survey, I am a little less
11 familiar with the technology, but the theory
12 is that you put a tracer down the well and
13 see if you can detect escaping gas.

14 Q Okay. Ms. Felts, in terms of how
15 SoCalGas in your view should have addressed
16 the leak or potential leak rather, in your
17 view, at the shoe at 8,440 feet, what in your
18 view should have been done?

19 A Well, in other wells at Aliso
20 Canyon, they shut down the well and put the
21 appropriate equipment down the well to look
22 to see if there was actually a hole. And if
23 there was, they would repair it. And then
24 there's other instances where they just
25 decide to leave the leak.

26 Q And can you explain briefly how you
27 would go about requiring a hole at 8,440
28 feet?

1 A Well, I think they had different
2 methods depending on what they were trying to
3 do and what the depth was. They could put a
4 patch in. They could put a liner in the
5 casing. They could squeeze cement through
6 the hole in the casings. It kind of depends
7 on the pressure that the casing is going to
8 see at that point.

9 Q Okay. And then in terms of what
10 you -- and then again, as you explained
11 earlier, you would have also expected to see
12 specifically discussion of this issue in some
13 form of an interoffice memo?

14 A Yes.

15 Q That isn't required by regulation
16 or log check?

17 A Yes. I was surprised that they
18 would run so many additional unrequired
19 temperature surveys and noise surveys and not
20 at least have a discussion of it written
21 somewhere.

22 Q Okay.

23 ALJ HECHT: If that is a good stopping
24 place, I think this would be a good time for
25 an afternoon break of 10 minutes. Does
26 anybody object to taking that break?

27 (No response.)

28 ALJ HECHT: No. Okay. We'll be off

1 the record.

2 (Off the record.)

3 (Break.)

4 ALJ HECHT: We'll be back on the
5 record. Okay.

6 While we were off the record, I took
7 a break and I was thinking about how to end
8 today. I got the question of whether we have
9 a set end time for these hearings. We don't
10 have a set end time. We do generally try to
11 end between 3:30 and 4:00. Sometimes it goes
12 a little later and sometimes it's a little
13 shorter. Today, since I believe our witness
14 will still be on the stand again tomorrow, I
15 would like to kind of call a stop today at
16 about 3:40 and at that point we can do
17 whatever housekeeping we need to do including
18 making sure that we have identified all of
19 the exhibits and that we have identified all
20 the people identified speaking tomorrow and
21 we are kind of ready to go. And that would
22 be very helpful for me and I think for the
23 people who are supporting us from IT in our
24 proceedings of course.

25 I will also retract my request
26 earlier for briefing on that issue on
27 Thursday. Thinking about it, I would prefer
28 everybody focus on the hearings of this week,

1 and we may combine that briefing with other
2 briefing later.

3 All right. With that, we are on the
4 record and I think Mr. Stoddard and Ms. Felts
5 can continue.

6 MR. STODDARD: Thank you, your Honor.

7 Q Ms. Felts, we were discussing
8 Exhibit Number 70, which is Blade's data
9 response related to the pre-existing leak
10 issue, you recall?

11 A Number 70?

12 Q Yes.

13 A Okay.

14 Q And Ms. Felts, you indicated that
15 you still believe that there was a
16 pre-existing leak at the bottom of the well,
17 notwithstanding Blade's responses here, in
18 particular because you said that you thought
19 you might have had access to data that Blade
20 didn't have, correct?

21 A Yes.

22 Q And do you recall whether you
23 consulted the data that you were discussing
24 after receiving this data response?

25 A Could you say that again? Did I
26 consult the data?

27 Q Yeah. After you saw this data
28 response from Blade, Exhibit Number 70, did

1 you go back and look again at the data that
2 you had been reviewing before to see if you
3 confirm your opinion or change it?

4 A Yes. I have looked at that data
5 multiple times since then.

6 Q And can you describe what that data
7 in particular is, understanding maybe not
8 specific dates yet, but what type of data is
9 it?

10 A And you're asking me what I
11 reviewed?

12 Q Yes.

13 A I went back and looked at history
14 files, well sketches, well view files and
15 temperature and noise recordings for the life
16 of the Well SS-25.

17 Q And in terms of the documents that
18 you believe Blade didn't have, is it all of
19 those or is it a particular category?

20 A I'm not sure which documents Blade
21 had. I can't really answer that.

22 Q You indicated that you thought you
23 may have had data more recent or newer than
24 the data that Blade was looking at.

25 A Well if I said that, I misspoke.
26 It was new to me. It's not new data.

27 Q New to you but not new, meaning
28 that -- but also you don't think that Blade

1 had it?

2 A Yes. I think -- I can't say that
3 they didn't have it. I would think that
4 maybe they didn't factor it into their
5 analysis.

6 Q Okay. So in the course of
7 producing their root cause analysis, you
8 think they may not have thoroughly considered
9 the SS-25 well file on records?

10 MR. GRUEN: Your Honor, if I may jump
11 in on this, this is a fairly long, lengthy
12 line of questions. It's calling for
13 Ms. Felts to speculate about Blade's process
14 with coming up with its report. I will note
15 that Blade is available next week to answer
16 direct questions about how exactly they
17 prepared their reports. So the objection is
18 calls for speculation.

19 ALJ HECHT: Let's avoid speculation.
20 We will be having a Blade witness next week
21 who can confirm what they did or did not
22 have. Questions should be directed at what
23 the witness knew.

24 BY MR. STODDARD:

25 Q Okay. Ms. Felts, you don't know
26 whether or not Blade had the information that
27 you were looking at, do you?

28 A That's correct. And I also would

1 like to correct something I just said. I
2 think I said that everything I looked at was
3 in the well file SS-25 but it wasn't. For
4 instance, a well view image would not be in
5 the well file. History reports were in the
6 well file. The temperature and noise surveys
7 were mostly in the well file, I think, maybe
8 all of them. One was attached to an e-mail
9 that I think that was the 2012 noise survey
10 that was attached to an e-mail. The e-mail
11 would not have been in the well file. So I
12 have been looking at literally over the last
13 year, months and months, thousands of
14 documents. I don't know how many of those
15 were produced to Blade.

16 Q And just to clarify, by "data,"
17 when you refer to "data," you mean documents?

18 A Well, yes. Documents include data.
19 Data can be found in some documents, not all.

20 Q Do you have any data that is not a
21 document that you are relying on for purposes
22 of your testimony on this issue?

23 A No. Everything has been recorded.
24 Everything I look at came in some sort of a
25 document.

26 Q Okay. Ms. Felts, I asked a moment
27 ago whether -- to confirm, you don't know
28 what Blade had or didn't have. And you don't

1 know what Blade considered or didn't consider
2 with respect to this issue, correct?

3 A That's correct.]

4 Q Okay. Moving back to your opening
5 testimony that we were discussing, Ms. Felts,
6 during the course of your work in this
7 proceeding, SED has been storing records
8 produced by SoCalGas on the Diamond Database;
9 is that correct?

10 A I don't actually know the status of
11 that, but yes, initially I knew that there
12 were -- was -- were documents that were
13 submitted in response to SED data requests
14 that were stored on the Diamond Drive.

15 Q And you were provided access to
16 that drive for purposes of your work; is that
17 correct?

18 A I was for the first few months, but
19 I no longer have access to that drive.

20 Q And that drive includes SoCalGas'
21 data responses; is that correct?

22 A Yes.

23 Q And also wildfire records; is that
24 correct?

25 A Everything that was provided to SED
26 up to a point. About the time I came on the
27 case, I think the data stored on a Diamond
28 Drive was no longer kept up-to-date.

1 Q By SED?

2 A Right.

3 Q So how do you get access to the
4 data information that you have looked at
5 since the time that you no longer had access
6 to the Diamond Drive?

7 A With the help of Mr. Gruen, I moved
8 everything to the hard drive on my computer
9 so that I could access it quickly because the
10 remote access was just unwieldy.

11 Q If we could refer to Exhibit
12 Number 54, page 388, line 15. And you'll see
13 the start of the sentence, Ms. Felts, it
14 says, "In contrast to Violations 89 to 92,
15 which it sounds like were withdrawn after you
16 reconsidered your position in response to new
17 information, I'm going to turn to Violations
18 80 to 82, which, as I understand, you
19 withdrew because you decided it was more of
20 a -- you know, an idea that could work in
21 practice but wasn't feasible in reality."

22 Do you see that?

23 A Yes.

24 Q And then I go onto ask, "Ms. Felts,
25 with regard to Violation 80 to 82, would you
26 agree that those violations were withdrawn
27 based on your opinion regarding the
28 feasibility of developing well kill programs

1 in advance?" And your answer is, "That was
2 one reason. The other reason was that when I
3 reviewed documents I found that SoCalGas
4 actually took steps to develop well kill
5 plans for the relief wells."

6 Do you see that?

7 A Yes.

8 Q And then the question is, "So there
9 was new information obtained after you
10 initially alleged the violations had impacted
11 your opinion?" And your answer is "Yes."

12 A Yes. New to me.

13 Q New to you. And then the question
14 is, "Do you recall specifically what
15 documents or data you're referring to?" And
16 the answer is, "No, not offhand."

17 Do you see that?

18 A Yes.

19 Q "Question: Do you recall whether
20 that was information that was provided after
21 your opening testimony?" Your answer,
22 "Subject to check, I believe that those were
23 documents that were attached to or following
24 emails among thousand of emails provided in
25 response to Data Response 16."

26 A Yes.

27 Q "Question: So then it was
28 information that was already in your (sic)

1 possession of SED at the time that you
2 submitted your opening testimony?"
3 "Mr. Gruen: Objection. Misstates testimony.
4 Assumes facts." Back to Mr. Stoddard. "Ms.
5 Felts, isn't it correct that SoCalGas'
6 response to SED 15 was provided in advance of
7 your opening testimony?" And again Mr. Gruen
8 objects. The witness answers. "It was
9 provided to SED. I do not know the dates,
10 just sitting here, when it was provided. I
11 assume it was before testimony was published.
12 This was a data set, like I said, of actually
13 probably over a hundred thousand emails. I
14 did not have access to them until months
15 later." And then I asked, "Why didn't you
16 have access to them until months later?" And
17 your answer, "Most of this data was on a PUC
18 Diamond Drive, and they attempted to make it
19 possible for me to access data on the Diamond
20 Drive, but it didn't work out remotely. It
21 was just really too time consuming. I could
22 spend up to 5 to 10 minutes just trying to
23 open one of those emails. And so later we
24 were able to get the -- get the data moved to
25 my computer where I can look at it." And
26 then my question is, "By "the data," you mean
27 data that was on the Diamond Drive?" And
28 your answer is "Yes." And then I ask, "Okay.

1 Do you recall when that occurred?" And you
2 said, "It's still occurring."

3 Do you see that?

4 A Yes.

5 Q And I asked, "It's still
6 occurring?" And you say, "Years. It's taken
7 all year to get documents." And the question
8 is, "So you still don't have access to
9 Diamond Drive directly when you're working
10 remotely?" You said, "I had it. I could
11 probably get it again, but I do not have it
12 and I have not had access for the last few
13 months." "Question: Okay. So if there are
14 records you need to review, you need to ask
15 for those records specifically from SED?"
16 And you say, "I asked Darryl to download them
17 for me."

18 Do you see that?

19 A Yes.

20 Q Ms. Felts, this seems to suggest
21 that the Diamond Drive issue is an issue
22 that's been kind of going on off and on and
23 intermittently. Is that not correct?

24 A Um. No, it might have been correct
25 at the time of this deposition, but we've
26 resolved this. And I have all of the data.
27 I believe that I don't have everything that
28 SoCalGas gave to SED because I think some of

1 the files were corrupted, and we were never
2 able to recover those. But sitting here
3 today, I can't tell you what that is. I
4 think I have everything that I need from the
5 Diamond Drive. And then after we started
6 moving documents when SoCalGas provided a new
7 response that included documents Darryl --
8 excuse me -- Mr. Gruen asked SoCalGas to
9 provide a link for me to download directly
10 the documents, and that's what I have been
11 doing.

12 Q Ms. Felts, just to clarify, this
13 deposition was last month. So your statement
14 here -- and to read the next question
15 starting at line 16 --

16 MR. GRUEN: Your Honor, if I may -- if
17 I may object. That didn't sound like a
18 question. Counsel is not testifying here.
19 So if he'd like to lay a foundation for her
20 to establish the timing.

21 ALJ HECHT: Please stick with asking
22 questions.

23 MR. STODDARD: Mr. Moshfegh, please go
24 to page -- there you go.

25 BY MR. STODDARD:

26 Q So Ms. Felts, you see here that the
27 cover of this deposition transcript says,
28 "February 24, 2021," correct?

1 A Yes. Yes. I see that, and I -- I
2 think --

3 Q So --

4 A -- when I was answering this
5 question then and said it was ongoing, then
6 I'm referring to when you're looking for
7 something specific and I don't have it on my
8 hard drive, then I have to ask Mr. Gruen to
9 find it and download it to me.

10 Q All right. And just to -- just to
11 confirm here, Mr. Felts, on line 16, you see
12 where it says -- my question -- "So at the
13 time you submitted your reply, that's when
14 you still didn't have full access to the
15 records in SED's possession; is that
16 correct?" And your answer, "You're asking me
17 if at the time of my reply testimony did I
18 have all records or access to all of them?"
19 And I say, "Yes." And the -- and your answer
20 on line 23 is, "The answer is no. I'm still
21 missing records that were submitted."

22 A Yes. I see that.

23 Q Okay. And is that accurate?

24 A Yes.

25 Q Okay. Thank you. Ms. Felts,
26 earlier we were discussing the testimony that
27 you submitted in this proceeding, your
28 opening testimony, which, as you explained,

1 you drafted the section related to records
2 management, but the other section of the
3 testimony were largely or entirely drafted
4 before you joined SED in this effort. When
5 you received that testimony and in the
6 process of finalizing it, you didn't talk
7 with anyone else from SED, did you?

8 A No.

9 Q Aside from Mr. Gruen?

10 A No, I didn't talk to anyone.

11 Q Did you ask to speak with the
12 person who prepared it?

13 A No.

14 Q Did you ask to speak with any
15 individuals with knowledge of the incident or
16 who witnessed aspects of the incident?

17 A No. My understanding was that the
18 testimony was based on the Blade report, and
19 the violations came directly out of
20 statements made by Blade in the Blade report,
21 and so what I did was I reviewed the Blade
22 report. There wasn't any indication to me
23 that there was a previous investigation for
24 anyone assigned to the project.

25 Q You had no knowledge, just to
26 confirm, of SED's pre-formal investigation
27 that had taken places over the prior
28 three-and-a-half years plus?

1 A Not at that time.

2 Q And you don't know who wrote the
3 testimony that you sponsored, correct?

4 A I would be guessing.

5 Q And you didn't ask to inspect any
6 physical evidence that had been collected?

7 A I didn't know there was any
8 physical evidence that had been collected by
9 SED.

10 Q And you didn't ask to speak with
11 Blade, correct?

12 A No.

13 Q And you never spoke with SED
14 investigator Randy Holter; is that correct?

15 A No.

16 Q And you didn't visit Aliso Canyon;
17 is that correct?

18 A No, I had an opportunity and
19 decided not to.

20 Q Why did you decide not to?

21 A It was in relation to reviewing
22 records, but it was years after the incident.
23 And my feeling was that SoCalGas had plenty
24 of time to get their records in order. So me
25 looking at them now really wouldn't provide
26 any substantive information as far as what it
27 looked like -- what the well files looked
28 like at the end of 2015 or early 2016.

1 Q As we established earlier,
2 Ms. Felts, the scope of your testimony is
3 very broad and much broader than records,
4 correct?

5 A Yes.

6 Q And you didn't have any interest in
7 seeing the facility that was at issue in a
8 case in which you were alleging violations of
9 law against the gas storage operator?

10 A I've been present and walked around
11 gas production fields, which is not much
12 different than what's happening at Aliso
13 Canyon, and basically all you can see is
14 whatever's above the ground, which is not
15 subject to this case.

16 Q And just to confirm, you've never
17 been to Aliso Canyon, correct?

18 A No. I've driven by it.

19 Q Earlier you indicated that at the
20 time you weren't aware of SED's pre-formal
21 investigation at the time of -- that you were
22 preparing your testimony. That indicates
23 that you're now aware of it; is that correct?

24 A Oh. Well, I'm aware of it because
25 you're asking questions about it, and then
26 also, I think I probably have seen one or two
27 emails among all of the emails that I've
28 reviewed that involved Mr. Holter maybe

1 making a site visit or being on a conference
2 call where his name was included with a list
3 of other people's.

4 Q Were you included on those emails?

5 A No. This was before I was
6 involved.

7 Q So since you've become -- were you
8 aware of the pre-formal investigation before
9 today's deposition, just to be clear? I'm
10 sorry. Before today's examination, just to
11 be clear?

12 A I was aware that people from the
13 PUC were listed or included on conference
14 calls and in meetings and possible site
15 visits associated with Aliso during the
16 incident or after -- right after the
17 incident.

18 Q And when -- sorry. You weren't
19 done. Continue.

20 A I'm just not sure about the timing
21 on those emails. They were a while before I
22 was involved in the case.

23 Q Generally, when do you believe you
24 became aware of it, you know, not a specific
25 date but roughly?

26 A Well, this is not -- not that I was
27 aware of a pre-formal investigation but only
28 that I was aware that people from the

1 Commission had been incorporated into some of
2 the discussions about the incident back in
3 2015 and 2016. And when I became aware was
4 whenever I happened to see that name on
5 emails that were provided by SoCalGas to SED
6 in response to data requests.

7 Q So you were generally aware as a
8 member of just the public of the fact that
9 there was a PUC investigation going on
10 related to the incident; is that correct?

11 A What do you mean by "a member of
12 the public"?

13 Q Before you were even engaged by
14 SED.

15 A Was -- ask me that again. I'm
16 sorry. I didn't understand.

17 Q After the occurrence of the leak
18 but before you became engaged by SED, were
19 you aware of a PUC investigation related to
20 the incident?

21 A Um. I think I was only -- I
22 probably assumed there was a PUC
23 investigation. I was on the mailing list for
24 the little flyers that SoCalGas was sending
25 out about the incident. I was aware of the
26 incident. I was kind of following the news
27 on it when it happened.

28 Q And since you became aware of SED's

1 pre-formal investigation, have you asked to
2 speak to anybody -- speak with anyone that
3 was involved with it?

4 A No.

5 Q Okay. Thank you. If we can move
6 on to Exhibit Number 54, please.

7 (Interruption by reporter.)

8 ALJ HECHT: Off the record.

9 (Off the record.)

10 ALJ HECHT: We'll be back on the
11 record.

12 We went off the record due to a
13 technical issue, which has been resolved.

14 And Mr. Stoddard.

15 MR. STODDARD: Thank you very much.
16 All right. Actually, you can take down
17 Exhibit Number 54, Pejman.

18 BY MR. STODDARD:

19 Q You referred to the zero here, Ms.
20 Felts, but would it be accurate to say that
21 for the most part your testimony relies on
22 analysis and conclusions from the Blade
23 report as your testimony relates to
24 operations, maintenance and well kill related
25 issues; is that correct?

26 A In sponsoring the opening
27 testimony, I rely on the expertise of Blade
28 almost entirety except for the record

1 section.

2 Q And except for where you disagree
3 with Blade, such as the existence of a
4 preexisting leak, correct?

5 A I don't think we changed the
6 opening testimony to reflect that.

7 Q How about in your subsequent
8 testimony?

9 A Where I wrote the reply and
10 sur-reply and the sur-reply to -- for
11 Violation 331. So I'm not sure what you're
12 asking there. I was not relying on Blade for
13 those.

14 Q That's correct. So your testimony,
15 although it generally relies on Blade, you do
16 deviate from Blade's conclusions in other
17 areas and their opinions and their analysis
18 on other topics, correct?

19 MR. GRUEN: I'm going to object to
20 that, if I may. This is Darryl Gruen for
21 SED, your Honor.

22 That is a misstatement of Ms. Felts'
23 testimony to say that she deviates from
24 Blade's report in other areas. It's also
25 vague.

26 ALJ HECHT: I find it vague. Could you
27 please restate the question more clearly.

28 MR. STODDARD: Yes, your Honor.

1 BY MR. STODDARD:

2 Q Again, on -- same, for example,
3 with Violation 331 that you just referenced.
4 That is a violation that's based on your own
5 analysis and review of documents, nothing
6 from the Blade report, correct?

7 A That's correct.

8 Q Okay. And your testimony, both
9 today and in your prepared testimony relating
10 to the preexisting leak, that's based on your
11 own opinions and review of documents, not the
12 Blade report, correct?

13 A Yes. That's correct.

14 Q And then it finally -- your
15 analysis and opinions related to SoCalGas'
16 records, that's based on your own opinions
17 and analysis, not the Blade report, correct?

18 A Yes.

19 Q Okay. Thank you. Ms. Felts, what
20 prior experience do you have with root cause
21 analysis?

22 A I have never done a root cause
23 analysis as -- similar to the one that was
24 done by Blade. I guess some analysis that
25 I've done you might call them a root cause
26 analysis but not the same as the one on
27 SS-25.

28 Q And is the purpose of an RCA to

1 identify solutions to prevent similar
2 incidents, in your view?

3 A I think whatever Blade was tasked
4 to do is part of the root cause analysis that
5 they prepared.

6 Q Is your understanding of the
7 purpose of a root cause analysis to identify
8 solutions to prevent similar future
9 incidents?

10 A That's one objective.

11 Q What other objectives are there?

12 A To figure out exactly what happened
13 in the incident that caused that particular
14 problem, or in this case, the failure of
15 SS-25, the root cause analysis was not just
16 to figure out how to avoid it in the future
17 but also what happened in the past that --
18 and during the incident that caused the well
19 to fail in the way it failed.

20 Q And an RCA should consider all
21 potential causes, correct?

22 A Well, I would think so.

23 Q But ideally should determine a
24 single root cause, would you agree?

25 A Well, I think if it's a good
26 investigation they would be able to figure
27 out exactly what happened. And, you know, we
28 looked for a failure analysis in a case like

1 this to assess the quality of the casing when
2 it failed, what factors were there that
3 caused it to be in a condition that would
4 fail and then what caused it and what the
5 chain of events was during the failure, what
6 the result of the failure was and then --

7 Q Are you -- are you referring here
8 to SoCalGas' investigations of prior
9 failures, or are you -- I wasn't following --
10 you were referring to what you found here?

11 A I'm referring to what -- what
12 should have been done in a root cause
13 analysis like the one that Blade prepared.

14 Q Okay. My question was for a good
15 root cause analysis should it determine a
16 single root cause?

17 A Not necessarily.

18 Q If we can refer to Exhibit 35,
19 please, line 211. And this is -- I'll read
20 the Bates number when we get there in a
21 moment. Page 211, line 17. And this is
22 SoCalGas 35.0211. And this, again, is marked
23 as Exhibit 35. On page 211, line 17 -- and
24 the question -- sorry. Starting at 14, "And
25 would you agree that a root cause analysis
26 investigator should include all potential
27 causes?" And your answer was, "Well, I mean,
28 if they did a really good root cause

1 analysis, they should be able to determine
2 what the cause was, not a range of causes."

3 Do you agree with that statement,
4 Ms. Felts?

5 A Yes.

6 Q Okay. And a root cause analysis
7 should consider root causes whether or not
8 the root cause relates to something that is
9 required by law; is that correct?

10 A Right. I don't think -- law
11 usually doesn't get involved in a root cause
12 analysis.

13 Q And whether or not the root cause
14 relates to an issue required by regulation?

15 A Didn't I just answer that?

16 Q I asked first law. Now I'm asking
17 regulation.

18 A Oh. Okay. Yes, I agree.
19 Regulations wouldn't be involved either
20 necessarily.

21 Q And a good root cause analysis also
22 should consider all potential causes whether
23 or not the root causes were foreseeable,
24 correct?

25 A Yes.

26 MR. STODDARD: Thank you.

27 Your Honor, in light of your --
28 that's the end of the line of questioning on

1 this issue. It's a stopping point in light
2 of your earlier statement about stopping at
3 3:40. Do you want me to start a new line of
4 questioning, or should we stop here?

5 ALJ HECHT: I think this is a good
6 stopping place. I think we should have a
7 brief discussion of the exhibits off the
8 record and then go back on.

9 We'll be off the record.

10 (Off the record.)

11 ALJ HECHT: We will be back on the
12 record.

13 While we were off the record, the
14 attorney for SoCalGas found the exhibits and
15 listed down the numbers for himself, and
16 shortly we will go through those exhibit
17 numbers and exhibit descriptions so that we
18 have clearly identified what was used today.

19 We -- I had a clarifying question
20 during time off the record, which is, are we
21 simply identifying and marking those today or
22 are we also going to entertain objections to
23 entering them in the record. We are just
24 going to identify and mark today. And when
25 we are finished with the witness, we will
26 then face the question of whether to put them
27 into evidence, and I expect the objections
28 will come up at that time.

1 Are there any other questions before
2 I ask Mr. Stoddard to go through that list of
3 exhibits?

4 (No response.)

5 ALJ HECHT: Mr. Stoddard, whenever
6 you're ready.

7 MR. STODDARD: Thank you, your Honor.
8 First is SoCal -- Exhibit No. SoCalGas 35,
9 and the description is the Deposition
10 Transcript of Margaret C. Felts, February
11 5th, 2020. Next -- and tell me if I'm going
12 too fast, please. Next is SoCalGas 36,
13 Margaret C. Felts' CV. Next is SoCalGas 37,
14 Email from Darryl Gruen to Jack Stoddard and
15 Nicholas Sher, February 25th, 2020,
16 forwarding Margaret Felts' CV. Next is
17 SoCalGas 40, Standard Contracting Agreement
18 Between Margaret C. Felts and the California
19 Public Utilities Commission, November 5th,
20 2019. Next SoCalGas 43, Email from Darryl
21 Gruen to Margaret Felts and Karen M. Shea,
22 November 8th, 2019, forwarding EUO
23 transcripts. SoCalGas 44, Email from Darryl
24 Gruen to Margaret Felts, November 19, 2019,
25 forwarding draft of Alison Canyon testimony.
26 Exhibit No. SoCalGas 46, SED's Draft Opening
27 Testimony, November 14th, 2019. SoCalGas 51,
28 Chapters 1 through 9, Prepared Sur-Reply

1 Testimony of Margaret Felts, June 30, 2020.
2 SoCalGas 52, Email from Margaret Felts to
3 Darryl Gruen, November 20, 2019, reedits to
4 testimony. Exhibit No. SoCalGas 54,
5 Deposition Transcript of Margaret C. Felts,
6 February 24th through 25th, 2021. SoCalGas,
7 750, Blade Energy Partners' Response to SED
8 Data Request 58.

9 ALJ HECHT: And is that the complete
10 list for today?

11 MR. STODDARD: Double-checking one more
12 time.

13 MR. GRUEN: Mr. Stoddard, if I may, I
14 have 82 listed. Did you already say that?
15 An email, November 8th.

16 MR. STODDARD: Ah. SoCalGas 82, Email
17 from Darryl Gruen to Margaret Felts, November
18 8th, 2019, Re: Scoping memo recordkeeping
19 language.]

20 ALJ HECHT: And that description is
21 helpful. Go on.

22 MR. STODDARD: I'm sorry, your Honor.
23 I think I interrupted you.

24 ALJ HECHT: Yes, I apologize. That's
25 why the description is helpful so we can
26 identify the document. I appreciate
27 everybody complying with that.

28 We need to identify the attorneys

1 and witnesses for tomorrow. I think that's
2 going to be pretty straightforward. They
3 will pretty much be the same as the attorneys
4 and witness today, but I will ask if anybody
5 has anything to add to that.

6 (No response.)

7 ALJ HECHT: Okay. Predictably, I do
8 not see anything to add to that. That means
9 that tomorrow we will continue the
10 cross-examination of witness Margaret Felts
11 and we will start tomorrow at 10:00 a.m. Are
12 there any other housekeeping or other issues
13 to be taken care of before the end of the
14 day?

15 Yes, Mr. Gruen.

16 MR. GRUEN: Your Honor, off the record
17 I had understood that your Honor would like
18 us to withdraw our motion as we had indicated
19 for the record here today. So, if you'd
20 like, I can proceed with that.

21 ALJ HECHT: Yes, please.

22 MR. GRUEN: Okay.

23 Your Honor, SED filed a motion to
24 strike a Southern California Gas Company
25 motion to compel. It was identified earlier
26 for the record today. I can get the specific
27 information on the date if it would help for
28 the record by tomorrow, but SED notes it

1 would request to withdraw that motion at this
2 time.

3 ALJ HECHT: Great. Thank you very
4 much.

5 Are there any other housekeeping
6 issues before we go?

7 Yes, Mr. Stoddard.

8 MR. STODDARD: Yes, your Honor.
9 Apologies, I have one correction. I had
10 missed one exhibit, if I may add it to the
11 list.

12 ALJ HECHT: Yes, please.

13 MR. STODDARD: SoCalGas-47, SED'S
14 Opening Redlined Testimony, November 22,
15 2019.

16 ALJ HECHT: Okay. Thank you. We will
17 get an exhibit list, an updated exhibit list.

18 Judge Poirier, do you have anything
19 to add before we adjourn?

20 ALJ POIRIER: Nothing further. I just
21 want to thank everybody for today and bearing
22 with the technological challenges. I'll see
23 you all tomorrow.

24 ALJ HECHT: Yep. Thank you so much.
25 We'll be adjourned. We'll be off the record.

26 MR. GRUEN: Thank you, your Honor.

27 MR. STODDARD: Thank you, your Honor.

28 (Whereupon, at the hour of 3:50
p.m., this matter having been continued

1 to Wednesday, March 17, 2021, at 10:00
2 a.m., via virtual proceeding, the
Commission then adjourned.)]

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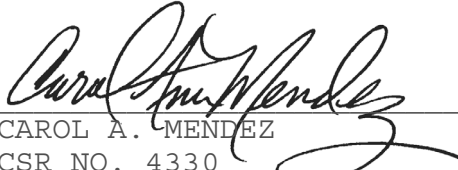
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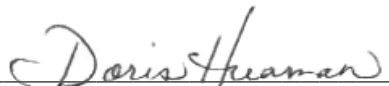

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