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January 29, 2016

Kenneth Bruno, Program Manager
Program Manager – Safety and Enforcement Division, CPUC
California Public Utilities Commission
505 Van Ness Avenue
San Francisco CA 94102-3298

Dear Mr. Bruno:

On behalf of Southern California Gas Company (SoCalGas), I am responding to the January 26, 2016 data request (DR) of the Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC) and the Division of Oil, Gas & Geothermal Resources (DOGGR) of the California Department of Conservation. The DR does not call for a response until February 1, 2016, but SoCalGas wishes to provide an initial response as soon as possible.

The DR includes over 125 individual questions, and many of these ask for quantities of data covering 30-40 years. As the DR anticipates in its last section, it is not possible for SoCalGas to answer these inquiries in three business days. The purpose of this letter is to advise SED and DOGGR that it will take SoCalGas some time to (a) review the DR questions with SoCalGas personnel with appropriate expertise; (b) identify those questions to which we may have an objection or need further clarification; (c) establish priorities for our responses (we hope in consultation with SED and DOGGR); and (d) locate responsive documents and prepare answers that are as accurate and complete as possible.

In addition to the above considerations, I am sure that you understand the other demands on the personnel who must be involved in preparing answers to this DR. They include individuals directly involved in stopping the leaking well at Aliso Canyon. I am sure that you agree with me that it is reasonable to assign priority to that effort.

I also note that some of the questions in this DR are identical or call for essentially the same information as has already been provided to DOGGR. Given the quantity of information being requested by the various agencies, it is important to avoid duplication of efforts both at the agency level and at SoCalGas. Similarly, some of the DR specifications ask for documents that by definition are also in the possession of DOGGR and/or the CPUC (e.g., copies of all correspondence between SoCalGas and the DOGGR Ventura district office). We are in the process of reviewing the DR to identify those questions that fall into this category.

For all of these reasons, our initial response to the DR is to advise SED and DOGGR that SoCalGas will not be able to provide answers to the DR by February 1, 2016. However, we will contact SED by February 1, 2016, to discuss a preliminary schedule for responses.

SoCalGas continues to be committed to working with SED and DOGGR to provide the information you need, taking into account the other priorities facing us.

Yours truly,

A handwritten signature in black ink that reads "Michael R. Thorp". The signature is written in a cursive style with a large, looping initial "M".

Michael R. Thorp