

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Order Instituting Investigation pursuant to Senate Bill 380 to determine the feasibility of minimizing or eliminating the use of the Aliso Canyon natural gas storage facility located in the County of Los Angeles while still maintaining energy and electric reliability for the region.

Investigation 17-02-002
(Filed February 9, 2017)

**JOINT STATUS CONFERENCE STATEMENT OF
SOUTHERN CALIFORNIA GAS COMPANY (U 904 G)
SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M)
PACIFIC GAS AND ELECTRIC COMPANY (U 39 M)
SOUTHERN CALIFORNIA EDISON COMPANY (U 338 E)
SOUTHWEST GAS CORPORATION (U 905 G)
IMPERIAL IRRIGATION DISTRICT
THE INDICATED SHIPPERS
SOUTHERN CALIFORNIA GENERATION COALITION
THE PUBLIC ADVOCATES OFFICE
THE UTILITY REFORM NETWORK
THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION
ALLIANCE FOR RETAIL ENERGY MARKETS
CALIFORNIA COMMUNITY CHOICE ASSOCIATION
THE PROTECT OUR COMMUNITIES FOUNDATION**

SETAREH MORTAZAVI

Attorney for

SOUTHERN CALIFORNIA GAS COMPANY
555 West Fifth Street, Suite 1400
Los Angeles, California 90013
Telephone: (213) 244-2975
Facsimile: (213) 629-9620
E-mail: SMortazavi@socalgas.com

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Pursuant to the Administrative Law Judge's (ALJ) June 30, 2023 Ruling Setting Status Conference (Ruling), Southern California Gas Company (SoCalGas), San Diego Gas & Electric Company (SDG&E), Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), Southwest Gas Corporation (Southwest Gas), Imperial Irrigation District (IID), the Indicated Shippers, Southern California Generation Coalition (SCGC), the Public Advocates Office (Cal Advocates), the Utility Reform Network (TURN), the California Independent System Operator Corporation (CAISO), the Alliance for Retail Energy Markets (AReM), the

California Community Choice Association (CalCCA), and the Protect Our Communities Foundation (PCF) (the Joint Parties), hereby submit this Joint Status Conference Statement.¹

I. INTRODUCTION

The Ruling directs parties to file status conference statements which address: (1) potential disputes of material fact; (2) plans for discovery, and possible discovery disputes; (3) witnesses who will be available for cross examination if an evidentiary hearing is held; and (4) a proposed schedule. The Ruling also directs parties to meet-and-confer to assess whether agreement exists about the procedural steps, the disputed issues of material fact, or discovery issues, prior to filing the status conference statements. In addition, the Ruling directs that the status conference statement of SoCalGas summarize the result of any meet-and-confers where the parties made efforts to informally resolve issues. The Ruling also provides that, if the parties agree on a joint status conference statement, the parties may elect one party to file that status conference statement on their behalf.

II. SUMMARY OF MEET-AND-CONFER EFFORTS

In accordance with the Ruling, SoCalGas held a meet-and-confer on July 18, 2023, to assess whether agreement exists among the parties regarding the procedural steps, potential disputed issues of material fact, and discovery issues. The following parties attended the meet-and-confer: SoCalGas, SDG&E, SCE, PG&E, Southwest Gas, IID, the Indicated Shippers, Cal Advocates, CAISO, AReM, CalCCA, Issam Najm, and PCF. While TURN and SCGC were not able to participate in the meet-and-confer, on July 19, 2023, TURN and SCGC provided

¹ Pursuant to the Ruling, and as permitted by CPUC Rule of Practice and Procedure 1.8(d), Counsel for SoCalGas has been authorized to sign this Joint Status Conference Statement on behalf of each of the Joint Parties.

SoCalGas their positions regarding the procedural steps, potential disputed issues of material fact, and discovery issues.

With regards to potential disputed issues of material fact, SoCalGas, SDG&E, PG&E, SCE, Southwest Gas, the Indicated Shippers, SCGC, Cal Advocates, TURN, Issam Najm, and PCF agreed that disputed issues of material fact exist. IID and CAISO took no position since neither party submitted testimony in the proceeding. AReM and CalCCA also took no position on this issue since the testimony AReM and CalCCA submitted in the proceeding relate to policy and not factual issues.

With regards to discovery issues, SoCalGas, SDG&E, PG&E, SCE, Southwest Gas, IID, the Indicated Shippers, SCGC, Cal Advocates, TURN, CAISO, AReM, CalCCA, and Issam Najm stated they currently have no plans for discovery. PCF noted it plans to conduct discovery in the first part of August. None of the parties identified any present discovery disputes.

With regards to procedural steps, SoCalGas, SDG&E, PG&E, SCE, Southwest Gas, the Indicated Shippers, SCGC, Cal Advocates, AReM, CalCCA, and Issam Najm agreed that no evidentiary hearings are needed. SCE and Indicated Shippers pointed out that many of the material facts in dispute are with the FTI Consulting and Gas Supply Consulting, Inc. (FTI/GSC) analysis, and this analysis is hearsay; therefore, unless supported by one or more qualified witnesses under oath at a hearing, an evidentiary hearing would not help to resolve factual disputes regarding that material. IID, CAISO, and TURN took no position regarding evidentiary hearings since they did not submit testimony in the proceeding. PCF provided that evidentiary hearings are needed and should be scheduled for the week of September 18, 2023.

SoCalGas, SDG&E, SCE, PG&E, Southwest Gas, the Indicated Shippers, SCGC, Cal Advocates, AReM, and CalCCA supported the next procedural steps which are reflected in the

proposed schedule provided in Section VI. CAISO, IID, and TURN took no position on the next procedural steps; however, IID supported the opportunity to discuss settlement. Issam Najm did not support the next procedural steps and stated there is no reason for settlement. On July 20, 2023, Issam Najm presented an alternate schedule. PCF did not support the next procedural steps, but noted it wants to learn more about settlement.

III. POTENTIAL DISPUTES OF MATERIAL FACT

SoCalGas, SDG&E, PG&E, SCE, Southwest Gas, the Indicated Shippers, SCGC, Cal Advocates, TURN, and PCF believe there are potential disputes of material fact. IID, CAISO, AReM, and CalCCA take no position on whether there are potential disputes of material fact. SCE, Indicated Shippers, and SoCalGas note that many of the material facts in dispute are with the FTI/GSC analysis, and this analysis is hearsay; therefore, unless supported by one or more qualified witnesses under oath at a hearing, an evidentiary hearing would not help to resolve factual disputes regarding that material.

IV. DISCOVERY

SoCalGas, SDG&E, SCE, PG&E, Southwest Gas, IID, Indicated Shippers, SCGC, Cal Advocates, TURN, CAISO, AReM, and CalCCA currently have no plans for discovery. PCF plans to conduct discovery in the first part of August. The Joint Parties are not aware of any present discovery disputes.

V. POTENTIAL WITNESSES

SoCalGas, SDG&E, PG&E, SCE, Southwest Gas, the Indicated Shippers, SCGC, Cal Advocates, AReM, and CalCCA believe that no evidentiary hearings are needed. IID, CAISO, and TURN take no position regarding evidentiary hearings. PCF believes evidentiary hearings

are needed. If evidentiary hearings are held, SoCalGas, SDG&E, PG&E, SCE, Southwest Gas, the Indicated Shippers, SCGC, Cal Advocates, AReM, and CalCCA would make witness(es) that submitted testimony in this proceeding available for cross examination; however, SCE and PG&E would first work with parties to try to agree to introduce material into the record that may obviate the need for cross-examination of its witnesses. PCF will make Bill Powers available. In addition, SoCalGas notes that, if an evidentiary hearing is held, Energy Division and FTI/GSC witness(es) should be made available for cross-examination regarding their analyses in this proceeding. SCE, PG&E, and the Indicated Shippers support for making FTI/GSC witness(es) available for cross-examination.

VI. PROPOSED SCHEDULE

SoCalGas, SDG&E, SCE, PG&E, Southwest Gas, the Indicated Shippers, SCGC, Cal Advocates, AReM, and CalCCA support the proposed schedule below. CAISO, TURN, and IID take no position on the proposed schedule. PCF does not support the proposed schedule.

Event	Date
Status Conference	July 26, 2023
Ruling Setting the Schedule	August 21, 2023
Joint Motion to Enter Testimony and Evidence into the Record	September 22, 2023
Settlement Conference	October 30, 2023
Opening Briefs	November 17, 2023
Reply Briefs	December 18, 2023
Proposed Decision	March 2024
Final Decision	April 2024

Respectfully submitted,

/s/ Setareh Mortazavi

Setareh Mortazavi
SOUTHERN CALIFORNIA GAS COMPANY
555 West Fifth Street, Suite 1400
Los Angeles, California 90013
Telephone: (213) 244-2975
Facsimile: (213) 629-9620
E-mail: SMortazavi@socalgas.com

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