



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

FILED

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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.

I.17-02-002
(Filed February 9, 2017)

**JOINT STATUS CONFERENCE STATEMENT OF
SOUTHERN CALIFORNIA GAS COMPANY (U 904 G)
PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)
SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M)
SOUTHERN CALIFORNIA EDISON (U 338 E)
THE INDICATED SHIPPERS
SOUTHERN CALIFORNIA GENERATION COALITION
THE PUBLIC ADVOCATES OFFICE
THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

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December 1, 2021

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Pursuant to the Administrative Law Judge's (ALJ) November 10, 2021 Ruling Setting December 3, 2021 Status Conference (Ruling), Southern California Gas Company (SoCalGas), Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E), Southern California Edison (SCE), the Indicated Shippers, Southern California Generation Coalition (SCGC), the Public Advocates Office (Cal Advocates), and the California Independent System Operator Corporation (CAISO) (collectively, the Joint Parties) hereby submit this Joint Status Conference Statement.¹

The ALJ's Ruling directed parties to file status conference statements which address: (1) potential disputes of material fact; (2) the need for testimony; (3) the parties' plans for discovery, and to identify any discovery disputes; (4) the witnesses from whom testimony will be served,

¹ As permitted by Rule 1.8(d), Counsel for SoCalGas has been authorized to sign this Joint Status Conference Statement on behalf of each of the Joint Parties.

and who will be available for cross examination if an evidentiary hearing is held; and (5) comments on the schedule. Parties were also ordered to meet-and-confer to assess whether agreement exists about the procedural steps, disputed issues of fact, or discovery issues.

1. Summary of Parties' Meet-and-Confer

In accordance with the ALJ's Ruling², SoCalGas held two meet-and-confers on November 22, 2021, and November 30, 2021, respectively. On November 22, 2021, SoCalGas, SCGC, SCE, SDG&E, PG&E, the Indicated Shippers, the Utility Reform Network (TURN), Protect Our Communities Foundation (PCF), Cal Advocates, Sierra Club, and the California Energy Storage Alliance (CESA) attended. A follow-up meet-and-confer was held on November 30, 2021, where SoCalGas, SCGC, CAISO, SCE, SDG&E, PG&E, Indicated Shippers, PCF, Cal Advocates, Sierra Club, and the Center for Energy Efficiency and Renewable Technologies (CEERT) attended. Parties generally agreed that discovery remains open and that disputed issues of material facts exist. While many of the parties agreed on the alternate proposed schedule provided herein, other parties did not comment or disagreed with the alternate proposed schedule.

2. Potential Disputes of Material Fact

The Joint Parties agree that disputed issues of material facts exist, with the exception of the CAISO, which does not take a position at this time.

3. The Need for Testimony

The Joint Parties agree there is a need for testimony. SoCalGas, PG&E, SDG&E, SCE, and the Indicated Shippers anticipate serving written testimony. Cal Advocates and the CAISO

² Pursuant to the ALJ November 10, 2021 Ruling Setting December 3, 2021 Status Conference, the status conference statement of Southern California Gas Company should summarize the results of any meet and confer meetings where parties made efforts to informally resolve issues. If the parties are able to agree on a joint recommendation as to the procedural next steps, they may elect one party to file that status conference statement on their behalf.

anticipate serving testimony to the extent needed. SCGC is unsure as to whether it will be serving testimony at this time. In addition, as reflected in the proposed alternate schedule below, the Joint Parties respectfully request Sur-Reply Testimony be added as part of the procedural next steps.

4. The Parties’ Plans For Discovery and Discovery Disputes

The Joint Parties agree discovery remains open and did not identify any discovery disputes.

5. Witnesses and Cross-Examination

As noted above, the Joint Parties agree there is a need for testimony. SoCalGas, PG&E, SDG&E, SCE, and the Indicated Shippers anticipate serving written testimony. Cal Advocates and the CAISO anticipate serving testimony to the extent needed. SCGC is unsure as to whether it will be serving testimony at this time. In addition, as reflected in the proposed alternate schedule below, the Joint Parties respectfully request including Sur-Reply Testimony as part of the procedural next steps. With regards to witnesses and cross-examination, the Joint Parties are not currently able to provide specificity as to the witnesses from whom testimony will be served, and who will be available for cross examination, if an evidentiary hearing is held, since the Joint Parties have not yet received the additional modeling performed by Energy Division, the FTI/GSC Report, or the Local Reliability Modeling and Analysis proposed in the schedule provided herein.

6. Proposed Alternate Schedule

| EVENT | DATE |
|---|---------------------------|
| Status Conference Statements Due | December 1, 2021 |
| Status Conference | December 3, 2021 @ 9:30AM |
| Response Due to Ruling on Evaluation of Portfolio Costs | December 15, 2021 |

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|---|--|
| Ruling Providing Guidance and Information to CAISO to Perform Local Reliability Modeling and Analysis | January 2022 |
| Energy Division Paper on Additional Modeling Scenario Results | January 2022 |
| Report of Findings and Conclusions by FTI/GSC Issued | January 2022 |
| Opening Comments on Report of Findings and Conclusions by FTI/GSC | 3 Weeks After FTI/GSC Report release (expected date January/February 2022) |
| Reply Comments on Report of Findings and Conclusions by FTI/GSC | 2 Weeks After Opening Comments on FTI/GSC Report (expected date February/March 2022) |
| CAISO Local Reliability Modeling and Analysis | May 2022 |
| Workshop on CAISO Local Reliability Modeling and Analysis | June 2022 |
| Opening Comments on CAISO Local Reliability Modeling and Analysis | 3 Weeks After Workshop on CAISO Local Reliability Modeling and Analysis (expected date June 2022) |
| Reply Comments on CAISO Local Reliability Modeling and Analysis | 2 Weeks After Opening Comments on CAISO Local Reliability Modeling and Analysis (expected date June/July 2022) |
| Opening Testimony Served | September 2022 |
| Reply Testimony Served | October 2022 |
| Sur-Reply Testimony Served | October 2022 |
| Status Conference Regarding Evidentiary Hearings (If Any) | 10 Days After Sur-Reply is Served (expected date November 2022) |
| Evidentiary Hearings (If Necessary) | November 2022 |

Respectfully submitted,

/s/ Setareh Mortazavi

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