

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(DATA REQUEST ORA-32)**

Date Requested: August 15, 2016

Date Responded: August 29, 2016

PRELIMINARY STATEMENT

1. These responses and objections are made without prejudice to, and are not a waiver of, SDG&E and SoCalGas' right to rely on other facts or documents in these proceedings.
2. By making the accompanying responses and objections to these requests for data, SDG&E and SoCalGas does not waive, and hereby expressly reserves, its right to assert any and all objections as to the admissibility of such responses into evidence in this action, or in any other proceedings, on any and all grounds including, but not limited to, competency, relevancy, materiality, and privilege. Further, SDG&E and SoCalGas makes the responses and objections herein without in any way implying that it considers the requests, and responses to the requests, to be relevant or material to the subject matter of this action.
3. SDG&E and SoCalGas will produce responses only to the extent that such response is based upon personal knowledge or documents in the possession, custody, or control of SDG&E and SoCalGas. SDG&E and SoCalGas possession, custody, or control does not include any constructive possession that may be conferred by SDG&E or SoCalGas' right or power to compel the production of documents or information from third parties or to request their production from other divisions of the Commission.
4. A response stating an objection shall not be deemed or construed that there are, in fact, responsive information or documents which may be applicable to the data request, or that SDG&E and SoCalGas acquiesces in the characterization of the premise, conduct or activities contained in the data request, or definitions and/or instructions applicable to the data request.
5. SDG&E and SoCalGas objects to the production of documents or information protected by the attorney-client communication privilege or the attorney work product doctrine.
6. SDG&E and SoCalGas expressly reserve the right to supplement, clarify, revise, or correct any or all of the responses and objections herein, and to assert additional objections or privileges, in one or more subsequent supplemental response(s).
7. SDG&E and SoCalGas will make available for inspection at their offices any responsive documents. Alternatively, SDG&E and SoCalGas will produce copies of the documents. SDG&E and SoCalGas will Bates-number such documents only if SDG&E and SoCalGas deem it necessary to ensure proper identification of the source of such documents.
8. Publicly available information and documents including, but not limited to, newspaper clippings, court papers, and materials available on the Internet, will not be produced.

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9. SDG&E and SoCalGas object to any assertion that the data requests are continuing in nature and will respond only upon the information and documents available after a reasonably diligent search on the date of its responses. However, SDG&E and SoCalGas will supplement its answers to include information acquired after serving its responses to the Data Requests if it obtains information upon the basis of which it learns that its response was incorrect or incomplete when made.
10. In accordance with the CPUC's Discovery: Custom And Practice Guidelines, SDG&E and SoCalGas will endeavor to respond to ORA's data requests by the identified response date or within 10 business days. If it cannot do so, it will so inform ORA.
11. SDG&E and SoCalGas object to any ORA contact of SDG&E and SoCalGas officers or employees, who are represented by counsel. ORA may seek to contact such persons only through counsel.
12. SDG&E and SoCalGas objects to ORA's instruction to send copies of responses to entities other than ORA.

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Subject: SDG&E Memo on Pressure Testing

QUESTION 1:

In response to ORA DR-25 Q1, SoCalGas/SDG&E provided a Confidential Excel File.

- a. Please provide the copy the “SDG&E Memo” referred to in column L of the excel file.
- b. How many feet of pipeline are addressed in the “SDG&E Memo”?
- c. Please explain how and where SoCalGas/SDG&E discovered the memo.

RESPONSE 1:

- a. The “SDG&E Memo” is attached.
- b. Please refer to the memo provided in response to Question 1(a) above.
- c. SDG&E and SoCalGas (Applicants) object to this data request as not relevant to the subject matter involved in this proceeding because it is not itself admissible in evidence nor does it appear reasonably calculated to lead to the discovery of admissible evidence. Applicants further object that this data request is unduly burdensome.

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QUESTION 2:

- a. Have there been any events on Line 1600 in which the operating pressure exceeded 640 psig?
- b. If so, please describe each occurrence including the date, psig, duration of the psig exceeding 640 psig, and mitigation efforts SoCalGas/SDG&E took after the exceedance, if any.
- c. Have there been any events on Line 1600 in which the operating pressure exceeded 800 psig?
- d. If so, please describe each occurrence including the date, psig, duration of the psig exceeding 800 psig, and mitigation efforts SoCalGas/SDG&E took after the exceedance, if any.

RESPONSE 2:

Applicants object to this data request as not relevant to the subject matter involved in this proceeding because it is not itself admissible in evidence nor does it appear reasonably calculated to lead to the discovery of admissible evidence. Applicants further object that subparts (a) and (b) are vague, ambiguous, potentially overbroad and unduly burdensome with respect to time period, given that the line was placed in service in 1949 and normally operated at pressures exceeding 640 psig, and given the fact that Applicants voluntarily reduced the Line 1600 maximum allowable operating pressure to 640 psig from 800 psig in 2011.

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QUESTION 3:

Please reference the SoCalGas/SDG&E document entitled “Comments of San Diego Gas & Electric Company and Southern California Gas Company on Draft Resolution No. SED-1”, (Comments) dated August 8th, 2016 for the following questions. Specifically, please bear the following quotes from this document in mind. On page 2, the Comments state, “The Draft Resolution, however, does not bring Line 1600 into compliance with natural gas pipeline safety requirements. . .” Also on page 2, the Comments state, “The PSRP would bring Line 1600 into compliance with modern safety standards. . .” On page 3, the Comments state, “The Draft Resolution does not bring Line 1600 into compliance with the Public Utilities Code. . .” Also on page 3, the Comments state, “As knowledgeable operators of the integrated SDG&E and SoCalGas natural gas transmission system, the Utilities have concluded that additional safety and reliability enhancements are necessary and appropriate.”

- a. Please list all natural gas pipeline safety requirements with which Line 1600 does not comply.
- b. For each requirement listed in response to question 3a, please state the duration of time that Line 1600 did not comply.
- c. By the term “modern safety standards” on page 2 of the Comments, does SoCalGas and SDG&E mean for this term to include compliance with 49 CFR Sections 190, 191 and 192; Cal. Pub. Util. Code, Commission General Order 112-F, and Operational Health and Safety Act requirements?
- d. Please define what is meant by the term “modern safety standards”, as written on page 2 of the Comments.
- e. Please list all sections of the Public Utilities Code, as written on page 3 of the Comments, with which Line 1600 currently does not comply.
- f. For each section of the Public Utilities Code, as written on page 3 of the Comments, with which Line 1600 currently does not comply, please state the duration of time that Line 1600 did not comply.
- g. By concluding on page 3 of the Comments that “additional safety. . .enhancements are necessary and appropriate”, does this mean that Line 1600 is currently not in compliance with any safety requirements? If so, which ones?

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- h. For each safety requirement, listed in response to question 3g, with which Line 1600 currently does not comply, please state the duration of time that Line 1600 did not comply.
- i. How many other SoCalGas and SDG&E lines and miles currently do not meet the SoCalGas and SDG&E's definition of "modern safety standards"?

RESPONSE 3:

- a. See California Public Utilities Code (P.U. Code) Section 958 and Commission Decision (D.) 11-06-017.
- b. Please refer to the response to Question 3(a) above.
- c. "Modern standards for safety" includes but is not limited to 49 CFR Sections 190, 191 and 192; California Public Utilities Code, Commission General Order 112-F, and Operational Health and Safety Act requirements. Additionally, as part of the Pipeline Safety Enhancement Plan, compliance with "modern standards for safety" includes ending historic exemptions and pressure testing or replacing pipelines without record of a Subpart J pressure test: "Historic exemptions must come to an end" and "all natural gas transmission pipelines in service in California must be brought into compliance with modern standards for safety." (D.11-06-017, mimeo., at 18): Additional discussion may be found in the Prepared Direct Testimonies of Travis Sera, Deanna Haines, and Doug Schneider.
- d. Please refer to the response to Question 3(c) above.
- e. Please refer to the response to Question 3(a) above.
- f. Please refer to the response to Question 3(a) above.
- g. Please refer to the response to Question 3(a) above.
- h. Please refer to the response to Question 3(a) above.
- i. Applicants object to this data request as not relevant to the subject matter involved in this proceeding because it is not itself admissible in evidence nor does it appear reasonably calculated to lead to the discovery of admissible evidence