

**SAN DIEGO GAS & ELECTRIC COMPANY  
SOUTHERN CALIFORNIA GAS COMPANY  
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)  
(A.15-09-013)  
(DATA REQUEST ORA-48)  
Date Requested: November 9, 2016  
Date Responded: November 28, 2016**

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**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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**QUESTION 1:**

**Subject: Integrity Management**

SCG/SDG&E has stated that Line 1600 would be managed under the Distribution Integrity Management Program if derated, rather than under the Transmission Integrity Management Program (SCG/SDG&E Response to ORA DR-36, Q6; and CEA page 62, FN 122).

- a) Please provide a copy of the written integrity management plan SCG/SDG&E currently uses as required under 49 Code of Federal Regulations §§ 192.1005 and 192.1007.
- b) What specific measures and methods will SCG/SDG&E use to identify and reduce risk on Line 1600 if it is derated?
- c) How are these measures different than if Line 1600 is managed under the Transmission Integrity Management Program?
- d) Please identify each element of 49 CFR §§ 192.1005 and 192.1007 that would be followed by the specific measures and methods provided in response to question 1b.
- e) Please identify each element of 49 CFR §§ 192.1005 and 192.1007 that would not be followed by the specific measures and methods provided in response to question 1b.
- f) Even if Line 1600 is derated, please explain if the Transmission Integrity Management Program measures or Distribution Integrity Management Program measures are more or less likely to identify future problems or risks with the maintenance and operations of Line 1600.

**RESPONSE 1:**

- a. Applicants object to this question on the grounds that it seeks information not relevant to any issue within the scope of this proceeding, which addresses Line 1600, compliance with Public Utilities Code § 958 and D.11-06-017, and whether the Proposed Project best serves the public convenience and necessity. ORA is welcome to schedule an appointment with Applicants to review their DIMP Plan in person.
- b. The primary risk reduction measure for Line 1600 will be lowering its operating pressure and MAOP to below 20% SMYS as proposed in this Application. As explained in the Prepared Direct Testimony of Travis Sera (at page 2, Lines 1-3), “lowering the operating pressure on Line 1600 will permanently and significantly reduce exposure to the risk factors associated with operating a 1949 vintage pipeline at a transmission service stress level above 20% SMYS”. Because of its age, Line 1600 possesses inherent qualities (vintage manufacturing practices) that pose higher risk when operated at higher stress levels.

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Mr. Sera's testimony (at page 9, Lines 6-8) also discusses the benefits of lowering operating stress by referencing a USDOT report which states, in part, that "[T]he analyses presented ... show that a 20-percent reduction is almost as good as a test to 1.25 times MAOP... Therefore, for M [manufacturing] defects, it is a permanent demonstration of stability". Additionally, Mr. Sera's testimony (at page 24, Lines 7-9) states that "Lowering the pressure further so that Line 1600 operates below 20% of the SMYS would create an additional safety margin beyond that already implemented by the Utilities and would effectively nullify the risk of rupture." Any subsequent failures would manifest as leaks and would be integrated into the DIMP analysis for appropriate evaluation and action.

In addition to the above risk reduction measure, the routine programs and activities to address risk will continue to be applied to Line 1600. These routine measures are compliant with 49 CFR 192 and include but are not limited to:

- Pipeline markers;
  - 811 – Call before you dig program;
  - High pressure excavation monitoring and stand by;
  - Public Awareness communications;
  - Monitoring and maintenance of applied cathodic protection;
  - Leak survey;
  - Pipeline Patrol;
  - Valve maintenance;
  - Regulator station maintenance;
  - Remote Pressure monitoring;
- c. The listing of bulleted inspection and maintenance items outlined in response to Question 1(c) above would be the same. The primary difference would be that TIMP has prescriptive code requirements that must be followed to remain compliant under 49 CFR Subpart O. The TIMP specific requirements are not required, but could still be used if deemed appropriate, within DIMP, 49 CFR Subpart P.
- d. The processes and procedures inherent within the Distribution Integrity Management Program include the requirements specified in 49 CFR §§ 192.1005 and 192.1007. These requirements are applied to all pipe, fittings, and components within the DIMP.
- e. All DIMP requirements would be followed. There would be no exclusions.
- f. 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.