

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(89th DATA REQUEST FROM ORA)**

**Date Requested: May 26, 2017
Date Responded: June 2, 2017**

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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In response to ORA Data Request 84, Question 11, SoCalGas/SDG&E stated:

Applicants provided the information for the relevant segments that was in Applicants' High Pressure Database at the time of the original and updated responses. As discussed above, the High Pressure Database was updated from conservative default values for certain segments to actual values for those segments between the May 12, 2016 response to ORA DR-06, Q12 and the June 13, 2016 response to SED DR 3, Q2, a copy of which was provided to ORA in Applicants' July 15, 2016 response to ORA DR 19 and subsequently resubmitted to ORA on August 4, 2016 following an August 2, 2016 amended response to SED DR 3 Q2.

In response to ORA Data Request 84, Question 1a, SoCalGas/SDG&E stated (confidential data redacted):

In May 2016, when the original response to ORA DR-06, Q12 was provided, Applicants' High Pressure database had not been updated with documented wall thickness information and therefore the wall thickness defaulted to unknown for the CUM Station XXX to XXX. When a wall thickness value is unknown in the database, it is conservatively assigned a wall thickness value that provides a margin of safety. The conservative value assigned based on the diameter and year of installation, and which was reflected in the database at the time the May 12, 2016 response to ORA DR-06, Q12 was prepared, was XXX wall thickness for CUM Station XXX to XXX.

Ex. ORA-02-C Confidential Workpapers of M Botros, tab "Low Design Feet – CONF" identified a certain number of segments with weaker design features based on the May 2016 response to ORA Data Request 6, Question 12. In total 0.5 miles of weaker pipeline were identified as compared to the majority of Line 1600.

With these facts in mind:

QUESTION 1:

- a. In May 2016, when the original response to ORA DR-06, Q12 was provided, please confirm that the data provided in the original response to ORA Data Request 6, Question 12 was the data from the High Pressure Database prior to the update SoCalGas/SDG&E

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stated in response to ORA Data Request 84 Question 1a. If not, provide the values in the High Pressure Database from that time.

- b. If SoCalGas/SDG&E confirm the answer to question 1a immediately above, please also confirm that the original response to ORA DR-06, Q12 provided in May 2016 was the same information that was contained in the High Pressure Database at the time SoCalGas/SDG&E filed Application 15-09-013. If these two sets of information are not the same, please explain and provide all supporting evidence.
- c. Identify all segments of Line 1600 including their length in feet, and their yield strength using Barlow's Formula, that had assumptions in the High Pressure Database at the time the application was filed.
- d. At the time SoCalGas/SDG&E provided their original direct testimony, please confirm that the data provided in response to ORA Data Request 6, Question 12 was the data from the High Pressure Database. If not, provide the values in the High Pressure Database from that time.
- e. Identify all segments of Line 1600 including their length in feet, and their yield strength using Barlow's Formula, that had assumptions in the High Pressure Database at the time the original direct testimony of SoCalGas/SDG&E was filed.
- f. Please confirm that the High Pressure Database as of May 2016, prior to being updated as stated in response to ORA DR 84 Question 1a, identified engineering stations 17-131 as having a weaker MAOP of design than the majority of Line 1600.
- g. Please confirm that based on the data in the High Pressure Database at the time of the August 2016 update to SED-3 demonstrates that the MAOP of Line 1600 would be approximately 24% of SMYS if operated at 320 psig.
- h. Please confirm that Applicants had not proposed replacing engineering stations 17-131 as part of their proposal to derate Line 1600. If Applicants assert otherwise, please provide a specific reference to the testimony where SoCalGas/SDG&E stated they would replace this portion of Line 1600.
- i. Provide a version of the information provided in SED-3 Question 2 at the time the application was filed.
- j. Provide a version of the information provided in SED-3 Question 2 at the time the original direct testimony was filed.

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- k. Please confirm that by June 2014 SoCalGas/SDG&E had completed “active” MAOP validation of its entire natural gas transmission system. If not, please explain.
- l. Please confirm that by June 2014 SoCalGas/SDG&E had completed “active” MAOP validation of Line 1600. If not, please explain.
- m. Provide an active Excel spreadsheet that includes the following:
 - 1. Shows each of the items needed to complete Barlow’s Formula under 49 CFR Section 192.105.
 - 2. Beginning with the date that Application 15-09-013 was filed, and ending with the date of this data request, identify each instance SoCalGas/SDG&E became aware of actual pipeline feature information on Line 1600 that was different from the information SoCalGas/SDG&E used to calculate pressure under 49 CFR Section 192.105. Be sure to identify each attribute that was different.
 - 3. For each event identified in response to m.2, provide the supporting documentation.
 - 4. For each even identified in response to m.2, include the date the supporting documentation was identified, the date the supporting documentation was entered into the High Pressure Database, and the date the safety attribute from the supporting documentation was used to calculate design pressure in compliance with 49 CFR Section 192.105.
 - 5. For each event identified in response to m.2, identify when SoCalGas/SDG&E notified the Commission that updated information had become available regarding Line 1600, and what steps SoCalGas/SDG&E took to explain the updated information.
 - 6. For each event identified in response to m.2, identify when SoCalGas/SDG&E notified Safety and Enforcement Division that updated information had become available regarding Line 1600, and what steps SoCalGas/SDG&E took to explain the updated information.
 - 7. Has SoCalGas/SDG&E clarified to Safety and Enforcement Division that its data response to SED 3 was based upon updated information in the High Pressure Database, which had not been updated at the time Safety and Enforcement Division issued data request SED-3? If the answer is anything but an unqualified no, please provide all documentation showing that such clarification was shown to SED.
 - 8. For each event identified in response to m.2, identify when SoCalGas/SDG&E notified parties to A.15-09-013 that updated information had become available regarding Line

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1600, what specific information had been updated, and what steps SoCalGas/SDG&E took to explain the basis updated information.

RESPONSE 1:

SDG&E and SoCalGas (Applicants) object that Question 1 seeks information not within the scope of this proceeding and which is unduly burdensome. ORA has records establishing the documented values for the Line 1600 segments that were amended in Applicants' April 27 and May 22, 2017 Corrected and Updated Confidential Attachments to Applicants' response to ORA DR-06, Q.12. Applicants' response to ORA DR-84 explained the changes in Applicants' High Pressure Database from the conservative default values included in Applicants' original May 12, 2016 response to ORA DR-06, Q.12 to the documented values in Applicants' later responses to SED and ORA. Question 1 now seeks extensive information regarding the data reflected in the High Pressure Database at various times in the past and calculations based upon that information. As ORA has documented values that establish that all segments of Line 1600 would be below 20% SMYS if de-rated to a 320 psig MAOP, such information is not relevant to any issue in this proceeding and the process of compiling such information is unduly burdensome. Without waiving and subject to their objections, Applicants respond as follows:

ORA appears to seek information regarding why Applicants concluded that de-rating Line 1600 to a 320 psig MAOP would result in all segments being under 20% SMYS, thus rendering Line 1600 a distribution line under 49 CFR § 192.3, at a time when the High Pressure Database still contained conservative default values for certain segments of Line 1600. Based upon what was known about Line 1600's construction, maintenance and operation, Applicants were confident that the weakest segments were constructed in 1949 using the original A.O. Smith pipe (wall thickness 0.250 and yield strength of 52,000) and that later installed segments were built to withstand equal or greater pressures (with equivalent or greater wall thickness and/or yield strength). Applicants intended to confirm this assumption before de-rating Line 1600, if approved by the Commission, either through records review and/or field data collection, non-destructive testing or destructive testing; if the assumption was not correct, then Applicants would have replaced the pipe segments before de-rating Line 1600.

Applicants note that following the removal of the pipe segment for engineering stations 17-131, and the subsequent testing of the pipe segment, it was determined that it had the attributes of the original A.O. Smith pipe (wall thickness 0.250 and yield strength of 52,000), as anticipated, also confirming the conservatism of the interim values.