

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

(6TH DATA REQUEST FROM PROTECT OUR COMMUNITIES FOUNDATION)

**Date Requested: January 2, 2017
Date Responded: January 5, 2018**

PRELIMINARY STATEMENT

1. These responses and objections are made without prejudice to, and are not a waiver of, SDG&E's 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 do 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, as set forth in the California Public Utilities Commission ("Commission or CPUC") Rules of Practice and Procedure. SDG&E and SoCalGas possession, custody, or control does not include any constructive possession that may be conferred by SDG&E's and 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 expressly reserves 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 or additional response(s).
6. 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.
7. Publicly available information and documents including, but not limited to, documents that are part of the proceeding record, newspaper clippings, court papers, and materials available on the Internet, will not be produced.

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GENERAL OBJECTIONS

1. SDG&E and SoCalGas object to each instruction, definition, and request to the extent that it purports to impose any requirement or discovery obligation greater than or different from those under the CPUC Rules of Practice and Procedure, Statutes, and the applicable Orders of the Commission.
2. SDG&E and SoCalGas object to each request that is overly broad, unduly burdensome, or not reasonably calculated to lead to the discovery of admissible evidence.
3. SDG&E and SoCalGas object to each instruction, definition and data request to the extent that it seeks information protected from disclosure by the attorney-client privilege, deliberative process privilege, attorney work product doctrine, or any other applicable privilege. Should any such disclosure by SDG&E and SoCalGas occur, it is inadvertent and shall not constitute a waiver of any privilege.
4. SDG&E and SoCalGas object to each instruction, definition and data request as overbroad and unduly burdensome to the extent it seeks documents or information that are readily or more accessible to Protect Our Communities Foundation (POCF) from POCF's own files, from documents or information in POCF's possession, or from documents or information that SDG&E and SoCalGas previously released to the public or produced to POCF. Responding to such requests would be oppressive, unduly burdensome, and unnecessarily expensive, and the burden of responding to such requests is substantially the same or less for POCF as for SDG&E and SoCalGas.
5. SDG&E and SoCalGas object to each instruction, definition and data request to the extent that it seeks the production of documents and information that were produced to SDG&E and SoCalGas by other entities and that may contain confidential, proprietary, or trade secret information.
6. To the extent any of POCF's data requests seek documents or answers that include expert material, including but not limited to analysis or survey materials, SDG&E and SoCalGas object to any such requests as premature and expressly reserves the right to supplement, clarify, revise, or correct any or all responses to such requests, and to assert additional objections or privileges, in one or more subsequent supplemental response(s) in accordance with the time period for exchanging expert reports set by the Commission.
7. SDG&E and SoCalGas incorporate by reference every general objection set forth above into each specific response set forth below. A specific response may repeat a general objection for emphasis or some other reason. The failure to include any general objection in any specific response does not waive any general objection to that request. Moreover, SDG&E and SoCalGas do not waive their right to amend any responses.

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QUESTION 1:

For each of the six transmission pipeline segments, excluding Line 1600, listed in A.15-09-013, Response Of Applicants San Diego Gas & Electric Company (U902G) And Southern California Gas Company (U904G) In Opposition To The Motion Of The Office Of Ratepayer Advocates To Dismiss Applicants' Application For A Certificate Of Public Convenience And Necessity To Construct Line 3602, July 1, 2016, Attachment B, Declaration of Travis Sera, Exhibit 1, Table 3, p. 10 (attached), provide the following information:

1. Diameter (inches), Wall thickness (inches), Length (miles)
2. MAOP prior to 2011, any MAOP reductions that occurred between 2011 operation and date of hydrostatic test, current MAOP
3. What was pre-2011 MAOP as % SYMS?
4. What date was inline testing completed?
5. What date was hydrostatic testing completed or is expected to be completed?
6. What was the hydrostatic test pressure and spike test pressure?
7. What was the MAOP after hydrostatic testing was completed?
8. Did SED recommend derating or retirement of pipeline segment prior to, or after, hydrostatic test? If so, what was the recommended percentage reduction in MAOP, or if pipeline segment was retired, how was gas supply to affected customers maintained following the retirement?

RESPONSE 1:

SDG&E and SoCalGas object to POC Data Request #6 on the following grounds:

- (1) It seeks information not admissible in evidence or reasonably calculated to lead to the discovery of admissible evidence because Table 3 of Exhibit 1, Declaration of Travis Sera, of Attachment B to the Response Of Applicants San Diego Gas & Electric Company (U902G) And Southern California Gas Company (U904G) In Opposition To The Motion Of The Office Of Ratepayer Advocates To Dismiss Applicants' Application For A Certificate Of Public Convenience And Necessity To Construct Line 3602, dated July 1, 2016, is the same as Table 3 of Exhibit SDGE-02: Prepared Direct Testimony of Travis Sera (Exh. SDGE-02), which was admitted into evidence on Phase 1 issues identified in the November 4, 2016 Scoping Memo and Ruling of Assigned Commissioner, as amended by the December 22, 2016 Assigned Commissioner And Administrative Law Judge's Ruling Modifying Schedule And Adding Scoping Memo Questions. Evidentiary hearings and briefing on Phase 1 issues is complete, with the narrow exception identified in the December 20, 2017 Administrative Law Judge's Ruling Setting Aside Submission And Reopening The Record To Enter Safety And Enforcement Division (SED) Advisory Opinion And San Diego Gas & Electric Company And Southern California Gas Company Response To SED Data Request Into The Record And To Take Supplemental

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Testimony, which is not applicable to any issues raised by POC Data Request #6 with respect to Exh. SDGE-02 at 10, Table 3. POC had ample opportunity to present testimony regarding Phase 1 issues and completed its cross-examination of SDG&E and SoCalGas witnesses on Phase 1 issues. Further data requests regarding Phase 1 issues seek information not admissible in evidence or reasonably calculated to lead to the discovery of admissible evidence.

- (2) It seeks information not admissible in evidence or reasonably calculated to lead to the discovery of admissible evidence because Exh. SDGE-02, Table 3 identifies other transmission pipelines in SoCalGas/SDG&E service territory that contain flash welded seams. The information sought regarding such SoCalGas/SDG&E pipelines is not relevant to any issue in this proceeding, which seeks authorization to construct a new gas transmission line (proposed Line 3602) and to de-rate existing Line 1600 to distribution service to enhance safety, reliability and operational flexibility of the SDG&E gas transmission system.
- (3) It is unduly burdensome given the number of pipelines identified, the amount of information sought, and its lack of relevance to any issue in this proceeding.