SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(9th DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION)

Date Requested: December 1, 2016
Date Responded: December 15, 2016

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 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 Southern California Generation Coalition (SCGC) from SCGC's own files, from documents or information in SCGC's possession, or from documents or information that SDG&E and SoCalGas previously released to the public or produced to SCGC. 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 SCGC 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 SCGC'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 9.1:

9.1. With respect to the Applicants' response to SCGC-08, Q.8.12, which states: "The Scoping Memo is incorrect. Line 1600 operating at distribution service pressure of 320 psig does not contribute to the capacity of the SDG&E gas transmission system."

9.1.1. Please identify the lowest service pressure possible for Line 1600 that would still allow the pipeline to continue to operate as a transmission pipeline.

9.1.2. Please explain what would happen hydraulically if the service pressure on Line 1600 drops below the pressure identified in the response to the previous question that would prevent Line 1600 from operating as a transmission line.

9.1.3. If the existing loads that are currently located on Line 1600 were hypothetically increased such that the total of these loads were equal to 40 MMcfd, please state whether Line 1600 would have the capacity to meet these loads if its service pressure was 320 psig.

RESPONSE 9.1:

9.1.1. SDG&E and SoCalGas (Applicants) have not performed the assessment requested. The transmission system must operate between minimum and maximum pressures at all times. Line 1600 contributes 100 MMcfd to the 630 MMcfd system capacity when operating at 640 psig, and does not contribute to the 570 MMcfd system capacity when operating at 320 psig. These capacities represent what is possible while maintaining minimum and maximum system pressures. Line 1600 does not contribute to system capacity at 320 psig, and cannot support any additional demand.

9.1.2. Please refer to the response to Question 9.1.1 above. If Line 1600 were to drop below a minimum pressure required to perform the transmission function, then Line 1600 would not contribute to the SDG&E system capacity.

9.1.3 Whether or not Line 1600 could hypothetically support a demand 40 MMcfd depends upon how that demand is distributed along the pipeline and where the highest concentration of demand is located.

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QUESTION 9.2:

9.2. With respect to the Applicants' response to SCGC-08, Q.8.9, which states: "Line 3602 would operate as part of the transmission system, and operating pressure is dependent upon available compression, supply, and demand. Please refer to the Prepared Direct Testimony of David Bisi for the capacity of Line 3602." Mr. Bisi states in his testimony at page 10: "Installing a new 36-inch diameter pipeline as proposed in San Diego will increase the capacity of the SDG&E system by 200 MMcfd."

9.2.1. Please provide all studies completed including workpapers that support the determination of the added capacity identified by Mr. Bisi.

9.2.2. Please provide the results of any pipeline flow model (hydraulic model) simulations in the form of graphs that show pipeline pressure throughout a 24 hour day that Mr. Bisi relied upon in concluding that the system capacity would increase by 200 MMcfd. A graph should be provided for each location on Line 3602 and any other transmission line that Mr. Bisi reviewed in reaching his conclusion.

RESPONSE 9.2:

9.2.1. Any workpapers associated with this application have been provided.

9.2.2. Specific hydraulic studies for each scenario we are requested to perform are not recorded. Scenarios are run on the hydraulic modeling program using pipeline configurations and customer demand accurate at the time for that scenario, with the results summarized verbally, in testimony, in email form, or in letter form. The specific model runs do not exist and therefore cannot be provided.

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QUESTION 9.3:

Please provide all workpapers that support the statement in Footnote 16 of Mr. Bisi's testimony: "The amount of usable linepack on the SDG&E system will also increase by approximately 22 million cubic feet (MMCF). 'Usable linepack' is the net amount of gas storage in a pipeline operating between its Maximum Allowable Operating Pressure (MAOP) and its Minimum Operating Pressure (MinOP)."

RESPONSE 9.3:

Please refer to the response to Question 9.2.1 above.

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QUESTION 9.4:

Regarding Footnote 10 of Mr. Bisi's testimony that states: "The capacity of a single 30-inch pipeline is 570 MMcfd. Line 3010 by itself can provide slightly more than its 530 MMcfd nominal capacity as part of the SDG&E system."

9.4.1. Please provide all workpapers that support the statement.

9.4.2. Please explain why Line 3010 does not provide the full 570 MMcfd that is the capacity of a "single 30-inch pipeline."

9.4.3. Is Mr. Bisi's discussion assuming that the 30-inch pipeline would be in operation in addition to Line 3010?

RESPONSE 9.4:

9.4.1. Please refer to the response to Question 9.2.1 above.

9.4.2. Line 3010 operates as part of the SDG&E transmission system; as such, the pressure profile across the system, while still within the minimum and maximum operating parameters, is different when a single 30-inch diameter pipeline is also operated between those same parameters, resulting is a slightly different capacity.

9.4.3. No.

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QUESTION 9.5:

9.5. With respect to Mr. Bisi's testimony that states "the loss of all compression capability at Moreno (i.e., "free flowing" supplies from the SoCalGas system, as if bypassing Moreno Compressor Station) will only support an SDG&E demand of 340 MMcfd."

9.5.1. Please provide all workpapers that support the statement.

9.5.2. Please provide the results of any pipeline flow model (hydraulic model) simulations in the form of graphs that show pipeline pressure throughout a 24 hour day that Mr. Bisi relied upon in concluding the SDG&E system in the absence of compression at Moreno could only support an SDG&E demand of 340 MMcfd. A graph should be provided for each location on the transmission system that Mr. Bisi reviewed in reaching his conclusion.

RESPONSE 9.5:

9.5.1. Please refer to the response to Question 9.2.1 above.

9.5.2. Please refer to the response to Question 9.2.2 above.

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QUESTION 9. 6:

9.6. With respect to the Applicants' response to SCGC-07, Q.7.12.1 that states: "The Applicants estimate approximately $5.9 million per year in savings based on 95% reduction in operations at the Moreno Compressor Station if a 36-inch diameter gas transmission pipeline is installed"

9.6.1. How did the Applicants' determine that there would be a 95% reduction in operations at the Moreno Compressor Station if a 36-inch diameter gas transmission pipeline is installed"?

9.6.2. Please provide all studies that were performed in reaching this conclusion.

9.6.3. Please provide all workpapers supporting the studies provided in response to the previous question.

9.6.4. Please provide the results of any pipeline flow model (hydraulic model) simulations in the form of graphs that show pipeline pressure throughout a 24 hour day that the Applicants relied upon in concluding there would be a 95% reduction in operations at the Moreno Compressor Station if a 36-inch diameter gas transmission pipeline is installed. A graph should be provided for each location on the transmission system that the Applicants' experts reviewed in reaching their conclusions.

RESPONSE 9.6:

9.6.1 Applicants estimated 95% reduction in operations is based on engineering judgement that Line 3010 and the Proposed Project can provide sufficient capacity to meet forecast customer demand in San Diego without the operation of the Moreno Compressor Station, except during times of system constraints due to third party damages, pipeline outages and other routine maintenance. Management at Moreno Compressor Station and in Transmission Department reviewed these assumptions and estimated the annual reduction in hours of operations at the compressor station to between 80% and 95% under this scenario. For detailed information regarding this matter, see Attachment A in the direct testimony of Neil Navin submitted as part of this Application (specifically, sub-attachment XII, *Moreno Compressor Station PSRP Report,* contained within Attachment A).

9.6.2. See to Question 9.6.1 above and the report referenced therein.

9.6.3. See response to Question 9.6.2 above and the report referenced therein which contains detailed information including historical data, assumptions and calculations.

9.6.4. See response to Question 9.6.1 above. Applicants did not employ pipeline flow model (hydraulic model) simulations in determining the 95% reduction in operations at the Moreno Compressor Station if a 36-inch diameter gas transmission pipeline is installed.

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QUESTION 9.7:

9.7. With respect to the Applicants' response to SCGC-08, Q.8.8 that states: "The MinOP would from 350 psig to 250 psig depending upon location."

9.7.1. Would the MinOP for the most northern sections of Line 3602 be expected to have a MinOP of 350 psig?

9.7.2. Would the MinOP for the most southern sections of Line 3602 be expected to have a MinOP of 250 psig?

9.7.3. What factors would determine the MinOP of a particular section of Line 3602?

RESPONSE 9.7:

9.7.1. Assuming the primary feed is from Rainbow Metering Station and under the current operating parameters, yes.

9.7.2. Refer to Response 9.7.1 of this data request.

9.7.3. Factors that determine a pipeline's MinOP include but are not limited to: the location and design requirements for transmission and distribution equipment; the location and size of customer demand; and the location and volume of supply receipts.