

**SAN DIEGO GAS & ELECTRIC COMPANY  
SOUTHERN CALIFORNIA GAS COMPANY**

**PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)**

**(A.15-09-013)**

**(16<sup>th</sup> DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION)**

**Date Requested: March 23, 2017**

**Date Responded: April 12, 2017**

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**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 16.1:**

Is the Tecolote Station at the southern terminus of Line 3010 a pressure limiting station?

16.1.1 If not, what is it?

**RESPONSE 16.1:**

Yes.

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**QUESTION 16.2:**

Is the Mission Station at the southern terminus of Line 1600 a pressure limiting station?

16.2.1 If not, what is it?

**RESPONSE 16.2:**

Yes.

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**QUESTION 16.3:**

Is there a name that the Applicants generally use for the approximately 4.7 mile portion of Line 1600 from the Kearny Villa PLS to the Mission Station?

**RESPONSE 16.3:**

Line 1600.

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**QUESTION 16.4:**

Do the Applicants believe that the approximately 4.7 miles of Line 1600 between the Kearny Villa Pressure Limiting Station (“PLS”) and the Mission Station are subject to Resolution SED-1?

16.4.1 If the answer to the previous question is “no,” please provide the rationale for your answer.

**RESPONSE 16.4:**

Yes.

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**QUESTION 16.5:**

What is the current Maximum Allowable Operating Pressure (“MAOP”) at which the Applicants are operating the portion of Line 1600 between the Kearny Villa PLS and the Mission Station?

**RESPONSE 16.5:**

The MAOP of Line 1600 is consistent for the entire pipeline, and is currently 640 psig, though it is currently being operated with a MOP of 512 psig in accordance with Resolution SED-1.

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**QUESTION 16.6:**

If the Applicants de-rated Line 1600 to a pressure below 20 percent of SMYS, i.e., below 320 MAOP, would the de-rating include the portion of Line 1600 between the Kearny Villa PLS and the Mission Station?

- 16.6.1 If the answer to the previous question is “no,” please provide the rationale for your answer.
- 16.6.2 If the Applicants do not intend to de-rate the portion of Line 1600 between the Kearny Villa PLS and the Mission Station to below 20 percent of SMYS, i.e., to below 320 psig, what would be the percentage of SMYS and what would be the MAOP at which the Applicants would operate the portion of Line 1600 between the Kearny Villa PLS and the Mission Station?

**RESPONSE 16.6:**

The Proposed Project’s scope as filed includes replacing the transmission function of the northern 45 miles of Line 1600. The southern 4.7 miles of Line 1600 are currently outside the scope of Applicants’ request. It is likely that if the Proposed Project is constructed and the northern 45 miles of Line 1600 are de-rated to 320 psig and repurposed as a distribution pipeline, that the southern 4.7 miles would also be de-rated to 320 psig and operated as a distribution pipeline. In this hypothetical scenario, the southern segment would not need to be hydrotested. If the Commission denies Applicants’ Application, Applicants will consider the Commission’s findings and develop a plan for addressing the southernmost 4.7 miles of Line 1600.

- 16.6.1 See above response to Question 16.6 above.
- 16.6.2 As discussed in the response to Question 16.6 above, if the Proposed Project is constructed, the southern 4.7 miles would likely be de-rated and operated as a distribution pipeline. However, if the Commission denies Applicant’s Application, Applicants will consider the Commission’s findings and develop a plan for addressing the southernmost 4.7 miles of Line 1600. In the hypothetical scenario presented in this question, that the southern 4.7 mile segment of Line 1600 is not de-rated but instead hydrotested so that it remained in transmission level service, it is likely that the pipeline would be operated with a MAOP of 640 psig which corresponds to 39% of SMYS.



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**QUESTION 16.7:**

Please confirm that the portion of Line 1600 between the Kearny Villa PLS and the Mission Station can be supplied at the Kearny Villa PLS by supplies transported through Lines 2010 and 3011.

**RESPONSE 16.7:**

Confirmed.

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**QUESTION 16.8:**

When the Applicants refer to a “customer MSA” in response to SCGC Data Request Question 10.4, what does the abbreviation “MSA” mean?

**RESPONSE 16.8:**

“MSA” is the abbreviation for Meter Set Assembly, which is a meter, service regulator(s), and all appurtenances necessary to make meter connections between a riser and customer houseline.

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**QUESTION 16.9:**

Have the Applicants identified any instances of hook cracking in the portion of Line 1600 that extends from the Kearny Villa PLS and the Mission Station?

**RESPONSE 16.9:**

No. The presence of hook cracking has not been confirmed on any portion of the pipeline from Kearny Villa PLS to Mission Gate Station.

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**QUESTION 16.10:**

In his testimony (at 5), witness Sera says “In accordance with 49 CFR 192.921(a)(3) and 192.937(c)(1), two TIMP related assessments have been conducted on Line 1600: External Corrosion Direct Assessment (ECDA) in 2007 and in-line inspection (ILI, also known as “smart pigging”) from 2012-2015.” Was the segment of Line 1600 between the Kearny Villa PLS and the Mission Station tested as described in the quoted portion of Mr. Sera’s testimony?

**RESPONSE 16.10:**

Yes. To clarify, the ECDA did not assess all pipeline segments from Kearny Villa PLS to Mission Station, but rather the covered pipe segments (e.g. pipe segments in HCA). For ILIs, all segments were assessed.

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**QUESTION 16.11:**

If the answer to the previous question is “yes” please provide a table formatted like Mr. Sera’s Table 2 (at 7) showing in-line inspection reported anomalies for the portion of Line 1600 from the Kearny Villa PLS to the Mission Station.

**RESPONSE 16.11:**

| Anomaly Categories | Phase 2           |            |
|--------------------|-------------------|------------|
|                    | AMFL and Geometry | CMFL       |
| Crack-like         | 0                 | 2          |
| Deformation        | 8                 | 11         |
| Long Seam          | 10                | 16         |
| Manufacturing      | 4                 | 20         |
| Metal Loss         | 41                | 112        |
| <b>TOTAL</b>       | <b>63</b>         | <b>161</b> |

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**QUESTION 16.12:**

In his testimony (at 7), Mr. Sera says that “a total of 62 direct examinations (excavations) of Line 1600 were conducted to validate the anomalies reported by smart pigs.”

- 16.12.1 What was the total number of direct examinations conducted on the portion of Line 1600 from the Kearney Villa PLS to the Mission Station?
- 16.12.2 How many of the examinations either directly confirmed hook cracking or confirmed anomalies that were likely to be hook-crack-related?
- 16.12.3 How many of the examinations were performed at locations where hook-crack-like anomalies were reported and hook cracking was confirmed?
- 16.12.4 How many examinations were performed at locations where manufacturing related metal loss was detected at the longitudinal seam.
- 16.12.5 At how many locations was hook cracking confirmed?
- 16.12.6 At how many locations was hook cracking determined to be likely?

**RESPONSE 16.12:**

- 16.12.1 Four.
- 16.12.2 Two.
- 16.12.3 Zero.
- 16.12.4 Two.
- 16.12.5 Zero.
- 16.12.6 Two.

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**QUESTION 16.13:**

At page 8 of his testimony, Mr. Sera describes cylindrical replacements, repair bands, and grind repairs. Please identify:

- 16.13.1. How many cylindrical replacements were on the portion of Line 1600 from the Kearny Villa PLS to the Mission Station?
- 16.13.2. How many repair bands were installed to remediate defects on the portion of Line 1600 from the Kearny Villa PLS to the Mission Station?
- 16.13.3. How many grind repairs were done on the portion of Line 1600 from the Kearny Villa PLS to the Mission Station?

**RESPONSE 16.13:**

- 16.13.1. Zero.
- 16.13.2. Two.
- 16.13.3. Fifteen.

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**QUESTION 16.14:**

Referring to the response to SCGC Data Request Question 10.4.3:

- 16.14.1. What is the current MAOP for Line 1206?
- 16.14.2. What is the current MAOP for Line 401?
- 16.14.3. What is the current MAOP for Line 806?
- 16.14.4. What is the current MAOP for Line 403?
- 16.14.5. What is the current MAOP for Line 49-130?
- 16.14.6. What is the current MAOP for Line 49-11?

**RESPONSE 16.14:**

The MAOP information highlighted in gray below is confidential and provided pursuant to the Non-Disclosure and Protection Agreement between SDG&E/SoCalGas and SCGC. The MAOP of Lines 401, 403, 806, and 1206 are currently [REDACTED] psig. The MAOP of Line 49-11 and Line 49-130 is [REDACTED] psig.



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**QUESTION 16.15:**

How many customers that are served by the portion of Line 1600 from the Kearny Villa PLS to the Mission Station or are served by the lines that are connected to that portion of Line 1600 require service at a pressure higher than 320 psig?

- 16.15.1. How many of the customers that require service at a pressure higher than 320 psig are electric generators?
- 16.15.2. For the customers that are electric generators, please identify the generation capacity of each electric generation station that is served by the portion of Line 1600 between the Kearny Villa PLS and the Mission Station or is served by a line that is supplied by that portion of Line 1600.

**RESPONSE 16.15:**

Applicants object to this question on the grounds that it calls for speculation and seeks information that is outside of Applicants' possession, control or custody. Applicants are not able to say what level of pressure any customer "requires". Further, this question seeks customer specific information which due to customer confidentiality requirements cannot be disclosed by SDG&E/SoCalGas. Subject to and without waiving this objection, SoCalGas and SDG&E respond as follows:

One electric generator receives service from the segment of Line 1600 between the Kearny Villa PLS and Mission Station.

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**QUESTION 16.16:**

Does Line 1206 require deliveries out of Line 1600 at a pressure higher than 320 psig?

- 16.16.1. If the answer is “yes,” please identify the pressure that is required to deliver gas from Line 1600 into Line 1206.
- 16.16.2. If the answer is “yes,” please identify the measures that the Applicants would take if the portion of Line 1600 from Kearny Villa PLS to Mission Station were derated to 320 psig to maintain the higher pressure into Line 1206.

**RESPONSE 16.16:**

Line 1206 provides service to a customer from this segment of Line 1600. Please refer to the response to Question 16.15 above. No detailed study has been completed to analyze any measures that might need to be taken with respect to Line 1206 for the hypothetical scenario of derating this segment of Line 1600 to a MAOP of 320 psig. Therefore, the requested information is not available.

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**QUESTION 16.17:**

Does Line 401 require deliveries out of Line 1600 at a pressure higher than 320 psig?

- 16.17.1. If the answer is “yes,” please identify the pressure that is required to deliver gas from Line 1600 into Line 401.
- 16.17.2. If the answer is “yes,” please identify the measures that the Applicants would take if the portion of Line 1600 from Kearny Villa PLS to Mission Station were derated to 320 psig to maintain the higher pressure into Line 401.

**RESPONSE 16.17:**

Please refer to the response to Question 16.16 above. In addition, no detailed study has been completed to analyze any measures that might need to be taken with respect to Line 401 for the hypothetical scenario of derating this segment of Line 1600 to a MAOP of 320 psig. Therefore, the requested information is not available.

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**QUESTION 16.18:**

Does Line 806 require deliveries out of Line 1600 at a pressure higher than 320 psig?

- 16.18.1. If the answer is “yes,” please identify the pressure that is required to deliver gas from Line 1600 into Line 806.
- 16.18.2. If the answer is “yes,” please identify the measures that the Applicants would take if the portion of Line 1600 from Kearny Villa PLS to Mission Station were derated to 320 psig to maintain the higher pressure into Line 806.

**RESPONSE 16.18:**

Please refer to the response to Question 16.16 above. In addition, no detailed study has been completed to analyze any measures that might need to be taken with respect to Line 806 for the hypothetical scenario of derating this segment of Line 1600 to a MAOP of 320 psig. Therefore, the requested information is not available.

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**QUESTION 16.19:**

Does Line 403 require deliveries out of Line 1600 at a pressure higher than 320 psig?

- 16.19.1. If the answer is “yes,” please identify the pressure that is required into deliveries into Line 403.
- 16.19.2. If the answer is “yes,” please identify the measures that the Applicants would take if the portion of Line 1600 from Kearny Villa PLS to Mission Station were derated to 320 psig to maintain the higher pressure into Line 403.

**RESPONSE 16.19:**

Please refer to the response to Question 16.16 above. In addition, no detailed study has been completed to analyze any measures that might need to be taken with respect to Line 403 for the hypothetical scenario of derating this segment of Line 1600 to a MAOP of 320 psig. Therefore, the requested information is not available.

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**QUESTION 16.20:**

Does Line 49-130 require deliveries out of Line 1600 at a pressure higher than 320 psig?

- 16.20.1. If the answer is “yes,” please identify the pressure that is required to deliver gas from Line 1600 into Line 49-130.
- 16.20.2. If the answer is “yes,” please identify the measures that the Applicants would take if the portion of Line 1600 from Kearny Villa PLS to Mission Station were derated to 320 psig to maintain the higher pressure into Line 49-130.

**RESPONSE 16.20:**

The MAOP information highlighted in gray below is confidential and provided pursuant to the Non-Disclosure and Protection Agreement between SDG&E/SoCalGas and SCGC. Line 49-130 is designed to operate with a MAOP of [REDACTED] psig. No detailed study has been completed to analyze measures that would need to be taken with respect to Line 49-130 and/or Line 1600 for the hypothetical scenario of derating this segment of Line 1600 to a MAOP of 320 psig. Therefore, the requested information is not available. However, it is known that due to Line 49-130 operating with a MAOP of [REDACTED] psig and the hypothetical scenario of a derated Line 1600 operating at 320 psig, some modifications would be required at the interconnection of these two lines to prevent Line 49-130 from overpressurizing Line 1600. Though no detailed study has been completed, these modifications could consist of measures such as installing pressure limiting equipment and/or a check valve.

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**QUESTION 16.21:**

Does Line 49-11 require deliveries out of Line 1600 at a pressure higher than 320 psig?

- 16.21.1. If the answer is “yes,” please identify the pressure that is required to deliver gas from Line 1600 into Line 49-11.
- 16.21.2. If the answer is “yes,” please identify the measures that the Applicants would take if the portion of Line 1600 from Kearny Villa PLS to Mission Station were derated to 320 psig to maintain the higher pressure into Line 49-11.

**RESPONSE 16.21:**

The MAOP information highlighted in gray below is confidential and provided pursuant to the Non-Disclosure and Protection Agreement between SDG&E/SoCalGas and SCGC. Line 49-11 is designed to operate with a MAOP of [REDACTED] psig. No detailed study has been completed to analyze measures that would need to be taken with respect to Line 49-11 and/or Line 1600 for the hypothetical scenario of derating this segment of Line 1600 to a MAOP of 320 psig. Therefore, the requested information is not available. However, it is known that due to Line 49-11 operating with a MAOP of [REDACTED] psig and the hypothetical scenario of a derated Line 1600 operating at 320 psig, some modifications would be required at the interconnection of these two lines to prevent Line 49-11 from overpressurizing Line 1600. Though no detailed study has been completed, these modifications could consist of measures such as installing pressure limiting equipment and/or a check valve.

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**QUESTION 16.22:**

In his testimony (at 5), Mr. Bisi says “several large noncore customers and single-sourced distribution systems are served directly by Line 1600.” How many large noncore customers are served directly by Line 1600?

**RESPONSE 16.22:**

Currently, there are three large volume customers supplied directly by Line 1600.



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**(16<sup>th</sup> DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION)**

**Date Requested: March 23, 2017**

**Date Responded: April 12, 2017**

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**QUESTION 16.23:**

In his testimony (at 5), Mr. Bisi says that an “EG peaking facility along with a gas turbine manufacturing and testing facility are located at the southern end of the pipeline.”

- 16.23.1. Are these two facilities located on the portion of Line 1600 between the Kearny Villa PLS and the Mission Station?
- 16.23.2. Are these the only noncore customers located on the 4.7 miles between the Kearny Villa PLS and the Mission Station?
- 16.23.3. If the answer to the previous question is “no,” how many other noncore customers are on the segment of Line 1600 between Kearny Villa PLS and the Mission Station?

**RESPONSE 16.23:**

- 16.23.1 Yes
- 16.23.2 These are the only large noncore customers on Line 1600 south of Kearny Villa PLS.
- 16.23.3 N/A

**SAN DIEGO GAS & ELECTRIC COMPANY  
SOUTHERN CALIFORNIA GAS COMPANY  
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**Date Requested: March 23, 2017**

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**QUESTION 16.24:**

In his testimony (at 12, footnote 24), Mr. Bisi says that there will be several unit retirements, including “Kearny (120 MW), Miramar (36 MW), El Cajon (16 MW). . . .”

- 16.24.1. Please identify which of these facilities are located on the portion of Line 1600 from Kearny Villa PLS to the Mission Station.
- 16.24.2. For the facilities that are not located on the portion of Line 1600 from Kearny Villa PLS to the Mission Station, please identify the pipelines that directly serve the units that Mr. Bisi says will be retired.

**RESPONSE 16.24:**

Applicants object to Question 16.24 on the grounds that it (a) seeks customer specific information, disclosure of which would violate customer confidentiality policies; and (b) seeks customer specific information that it neither admissible in evidence, nor likely to lead to the discovery of admissible evidence, as the issues within the scope of this proceeding involve Line 1600 safety, system reliability and system operational flexibility, not which specific customers may leave or join the system or which specific pipeline serves such customers.

**SAN DIEGO GAS & ELECTRIC COMPANY  
SOUTHERN CALIFORNIA GAS COMPANY**

**PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)**

**(A.15-09-013)**

**(16<sup>th</sup> DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION)**

**Date Requested: March 23, 2017**

**Date Responded: April 17, 2017**

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**QUESTION 16.25:**

Please provide the confidential responses and all attachments (confidential and non-confidential) to ORA Data Requests 27 through 69.

**RESPONSE 16.25:**

Some of the attachments contain **confidential information and/or protected materials provided pursuant to the Non-Disclosure Agreement between SDG&E/SoCalGas and SCGC**. Please refer to the attached responses for attachments and/or confidential responses to ORA DR 27-69, if applicable. Not included in this submittal are customer specific information or proprietary revenue requirement models (detailed workpapers are included). Customer specific information cannot be released publicly unless the customer consents to the release in writing per D.01-07-032.

**SAN DIEGO GAS & ELECTRIC COMPANY  
SOUTHERN CALIFORNIA GAS COMPANY  
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)  
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**(16<sup>th</sup> DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION)**

**Date Requested: March 23, 2017**

**Date Responded: April 17, 2017**

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**QUESTION 16.26:**

Please provide the workpapers to the derivation of Table 5 on page 159 of the Applicants' supplemental testimony dated February 21, 2017.

**RESPONSE 16.26:**

The documents described below refer to SDGE-12: Supplemental Testimony of SDG&E and SoCalGas at page 159, Table 5:

The Core 1-in-10 Year Cold Day Demand Forecasts were derived from forecasts for each core market segment. Please see the forecasts and footnotes in "SDGE Workpapers 2016 CGR REDACTED", page 145, for details and descriptions of the derivation, which may be obtained from: <https://www.socalgas.com/regulatory/cgr.shtml>

The 1-in-10 Year Cold Day Demand Forecasts for the Core and Noncore C&I segments were derived from their 2016 CGR forecasts. The entire set of workpapers to the 2016 CGR, excluding the EG section on pages 140-141, are relevant. These workpapers, "SDGE Workpapers 2016 CGR REDACTED", may be found at: <https://www.socalgas.com/regulatory/cgr.shtml>

For the workpapers supporting the EG 1-in-10 Year Cold Day Demand Forecasts please see the attached files.