

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(10th DATA REQUEST FROM THE SIERRA CLUB)**

**Date Requested: July 21, 2017
Date Responded: August 4, 2017**

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 Sierra Club from Sierra Club's own files, from documents or information in Sierra Club's possession, or from documents or information that SDG&E and SoCalGas previously released to the public or produced to Sierra Club. 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 Sierra Club 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 Sierra Club'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.

QUESTION 1:

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In D.16-12-041, the Commission approved an 18.5 MW energy efficiency (EE) contract resulting from SDG&E's all source RFO (see *also* Sierra Club Exh. 3 pp. 5-6 (Application of SDG&E for Approval of the Results of 2016 Track IV LCR RFO)).

- a) Is it Applicants' position that the California Energy Commission ("CEC") demand forecasts reference in the testimony of Ali Yari (see, e.g., Applicants Rebuttal Testimony at p. 121) account for demand reductions resulting from the above referenced EE contract? If yes, please provide documentary support, including, but not limited to, correspondence between the CEC and SDG&E regarding approval of this EE contract by the California Public Utilities Commission and its inclusion in the CEC forecast for San Diego area need.

RESPONSE 1:

In March 2016, SDG&E filed Application (A.) 16-03-014 requesting CPUC approval for the 18.5 MW energy efficiency (EE) contract resulting from SDG&E's 2014 All Source Request for Offers (RFO). Final approval was received in December 2016 in CPUC Decision (D.) 16-12-041.

Due to the timing of the decision, this contract was not included in the California Energy Demand Updated Forecast, 2017-2027 (CED 2016). The estimated value of the contract is based on the annual delivery of capacity reduction totaling 18.5 MW by the end of the six-year term in 2024¹ – meaning that the full benefits would not materialize immediately but over a six-year timeframe.

¹http://www.electricenergyonline.com/detail_news.php?ID=571969&titre=Willdan+Selected+to+Implement+Program+to+Meet+SDG%26E%27s+Energy+Efficiency+Local+Capacity+Requirements&cat=;82

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QUESTION 2:

Page 106 of Applicants’ Rebuttal Testimony includes Figure 2, a nomogram with the x-axis labelled “Total GEN connected to IV area.” Please identify the resource type, total MW, and Net Qualifying Capacity (“NQC”) of all resources connected to the IV area as referred to in Table 2.

RESPONSE 2:

Generator Name	Type	Capacity (MW)	NQC (MW)*
Centinela Solar Energy	Solar	170	115.77
Campo Verde Solar	Solar	150	93.69
Csolar IV South	Solar	130	79.96
ESJ Wind Energy	Wind	155	26.95
Silver Ridge Mount Signal	Solar	200	149.01
Imperial Valley West (Q # 608)	Solar	150	113.02
Ocotillo Wind Energy Facility	Wind	265	30.59
LR2 - La Rosita 2	Gas-Fired	322***	322
TDM	Gas-Fired	625***	591
Jacumba Solar	Solar	20	N/A**
Tule Wind	Wind	193.8	N/A**

* Based on July 2017 Net Qualifying Capacity (NQC) published numbers. Refer to http://www.caiso.com/Documents/NetQualifyingCapacityReport_ComplianceYear2017.xlsx

** Since Jacumba Solar and Tule Wind are new projects, NQC MW are not available yet.

*** Capacity (MW) values for TDM and LR2 represent the amount that is under California Independent System Operator (CAISO) control

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QUESTION 3:

Applicants' response to Sierra Club Data Request 7, Question 6(c) provides a list of what it states are all known instances when the Moreno compressor station experienced an unplanned loss of all compression between the years 2006 and 2015. However, page 8 of the Updated Prepared Direct Testimony of David Bisi states that "The chance of losing all compression at Moreno is relatively small, although such a situation nearly did occur at least once." While the response to Question 6(c) suggests loss of all compression has occurred, Mr. Bisi's testimony states it has only nearly occurred.

- a) Please clarify whether the outage information provided in response to Question 6(c) of Data Request 7 is for the unplanned loss of all compression at Moreno or a single engine. If for all compression, please explain how this response is consistent with the above-cited testimony of Mr. Bisi.

RESPONSE 3:

The outage information provided in response to Question 6(c) of Sierra Club Data Request 7 is for the "unplanned loss of all compression between the years 2006 and 2015," as stated in the response. As further shown in the response, the loss of all compression is relatively infrequent at about two times per year, and has been only for short durations (1.6 hours on average). Short duration outages, even complete outages, do not produce immediate system operational issues or threats to customer service. The scenario described in SDGE-3-R, Mr. Bisi's Updated Prepared Direct Testimony at page 8, lines 3 through 14, which immediately precedes the citation referenced by Sierra Club in this data request, is a Moreno outage that poses operational issues or threatens customer service. This is the scenario Mr. Bisi considered when preparing his testimony.

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QUESTION 4:

Applicants' Rebuttal Testimony at pages 97 – 98 states that "natural gas infrastructure is more likely, not less likely, to exhibit integrity and reliability issues as it ages" and cites to testimony from The Utility Consumer Action Network (UCAN) and its contention that Line 1600 and Line 3010 are "near the end of their useful life." In response to Sierra Club Data Request #9, Question 8, Applicants stated they were not aware of safety concerns with Line 3010 and did not disagree with key findings in the INGAA report titled "The Role of Pipeline Age in Pipeline Safety." (The key findings are reproduced in DR 9, Q, 8).

- a) Is it Applicants' position that Line 3010 is "near the end of its useful life"? If yes, please:
 - i) State the time frame assumed for "near the end" of useful life.
 - ii) Explain how this position is consistent with the key findings in the INGAA report and lack of known safety issues with Line 3010.

RESPONSE 4:

SoCalGas and SDG&E do not contend that Line 3010 is near the end of its useful life. However, Line 3010 is an aged pipeline, and aged infrastructure is more likely to exhibit integrity and reliability issues as the years in service progress. It is for this reason that the integrity management program under 49 CFR Part 192 Subpart O requires the integrity assessment of transmission pipelines every seven years, rather than simply once at the time of pipeline commissioning. The key findings in the INGAA report acknowledge that pipelines may degrade with age, that fitness for service can degrade over time, and that assessment and mitigation may be necessary to remediate anomalies.