

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(11th DATA REQUEST FROM UCAN)
Date Requested: August 16, 2017
Date Responded: August 22, 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 UCAN from UCAN's own files, from documents or information in UCAN's possession, or from documents or information that SDG&E and SoCalGas previously released to the public or produced to UCAN. 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 UCAN 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 UCAN'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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The following questions are related to the proposal, as outlined in testimony by SDG&E/SCG to de-rate line 1600 to distribution service. As presently proposed, the applicants are asking to de-rate line 1600 to distribution service only if CPUC approves the construction of Applicants' proposed line 3602, and only after the proposed line 3602 is built.

QUESTION 1:

Are the Applicants able to de-rate line 1600 to distribution service prior to any replacement line being constructed? If not, why not?

RESPONSE 1:

No. See SDGE-12 Supplemental Testimony of SDG&E and SoCalGas at 108-113 (regarding Scoping Memo Issue 16), SDGE-13 Rebuttal Testimony of SDG&E and SoCalGas at 63-71, and the responses to SCGC Data Request 10, Question 10.12 and ORA Data Request 50, Question 5.

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QUESTION 2:

If line 1600 is de-rated to distribution service prior to any new pipeline coming on-line, will the ratepayers of SDG&E, or any specific customer of SDG&E likely have gas supplies curtailed?

RESPONSE 2:

See SDGE-12 Supplemental Testimony of SDG&E and SoCalGas at 108-113 (regarding Scoping Memo Issue 16), SDGE-13 Rebuttal Testimony of SDG&E and SoCalGas at 63-71, and the response to ORA Data Request 50, Question 5.

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QUESTION 3:

Please explain the impact to SDG&E's customers, in terms of reliability, of de-rating line 1600 to distribution service prior to any new transmission pipeline coming on-line.

RESPONSE 3:

See SDGE-12 Supplemental Testimony of SDG&E and SoCalGas at 108-113 (regarding Scoping Memo Issue 16); SDGE-13 Rebuttal Testimony of SDG&E and SoCalGas at 63-71 and 100-119. See also SDGE-5 Prepared Direct Testimony of Jani Kikuts, SDGE-4-R Updated Prepared Direct Testimony of S. Ali Yari, and the response to ORA Data Request 50, Question 5.

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QUESTION 4:

When line 1600 is de-rated, if at all, are there infrastructure modifications that must be made immediately to ensure continued service to existing customers that require a higher pressure than the level proposed for the de-rated line 1600?

- If yes, is SDG&E obligated to make those modifications?
- If yes, specify the modifications required
- Assuming SDG&E was required to de-rate Line 1600 as soon as possible, how long will it take for those modifications to be made before line 1600 can be operated at the de-rated pressure?
- What is the total estimated cost of making those modifications as soon as possible?

RESPONSE 4:

See the attached **confidential** response to Energy Division Data Request 2, Question 4, which **contains confidential information provided pursuant to the Non-disclosure and Protection Agreement between SDG&E/SoCalGas and UCAN**. In the hypothetical scenario outlined in this question, SDG&E and SoCalGas (Applicants) would not be obligated to make infrastructure modifications to mitigate drops in serving pressure to existing customers that require a higher serving pressure than the level proposed for the de-rated Line 1600 unless the Commission determined it necessary and ordered Applicants to do so. Since no detailed study has been completed for this scenario, Applicants are unable to provide reliable schedule or cost estimates.