

**SAN DIEGO GAS AND ELECTRIC COMPANY  
SOUTHERN CALIFORNIA GAS COMPANY  
2013 TRIENNIAL COST ALLOCATION PROCEEDING (A.11-11-002)  
(FIRST SET OF DATA REQUESTS FROM SOUTHERN CALIFORNIA EDISON)**

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**QUESTION 1:**

According to Sim-Cheng Fung's testimony page 13 lines 5-8:

**Pipelines are classified as backbone transmission if they receive gas from receipt points and transport it to SoCalGas' storage fields and local transmission system. Local transmission pipelines transport gas from backbone pipelines and storage fields to the distribution system.**

To clarify, would it be correct to say that:

- a) In order to be classified as a backbone transmission pipeline, the pipe must be connected to either a receipt point or to a storage field.
- b) Any transmission pipeline which is not a backbone transmission pipe, as described in a) is a local transmission pipeline

If not, please provide a definition of backbone transportation pipelines which does not rely on knowing which pipes are local transmission pipeline or a definition of local transmission pipelines which does not rely on knowing which pipes are backbone pipelines.

**RESPONSE 1:**

- a) No, that is incorrect. A backbone transmission pipeline need not connect directly to a receipt point or storage field. All backbone transmission pipelines do, however, connect to other backbone transmission pipelines which ultimately connect to receipt points and storage fields.
- b) Generally that is correct, although there are some pipelines that have both backbone and local transmission portions.

SoCalGas/SDG&E have no other definitions for backbone or local transmission pipeline than those already provided in the testimony, which do not require knowledge of which pipelines are classified as backbone or local transmission.

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**QUESTION 2:**

Please provide a definition of transmission pipelines which does not rely on knowing which pipelines are distribution pipelines or a definition of distribution pipelines which does not rely on knowing which pipelines are transmission pipelines.

**RESPONSE 2:**

SoCalGas/SDG&E use the definitions for transmission and distribution pipelines specified in 49 CFR PART 192.3 when addressing the requirements specified in 49 CFR Part 192 and CPUC General Order 112-E. 49 CFR Part 192.3, which can be found online at <http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=824c46c92bac1bd6bc786b35b5b5c3e7&rgn=div8&view=text&node=49:3.1.1.1.8.1.9.2&idno=49>, states:

...

Distribution line means a pipeline other than a gathering or transmission line.

...

Gathering line means a pipeline that transports gas from a current production facility to a transmission line or main.

...

Transmission line means a pipeline, other than a gathering line, that: (1) Transports gas from a gathering line or storage facility to a distribution center, storage facility, or large volume customer that is not down-stream from a distribution center; (2) operates at a hoop stress of 20 percent or more of SMYS; or (3) transports gas within a storage field.

Note: A large volume customer may receive similar volumes of gas as a distribution center, and includes factories, power plants, and institutional users of gas.

Transportation of gas means the gathering, transmission, or distribution of gas by pipeline or the storage of gas, in or affecting interstate or foreign commerce.