APPLICATION FOR AUTHORITY TO REVISE THEIR CURTAILMENT PROCEDURES

(A.15-06-020)

(5TH DATA REQUEST FROM THE INDICATED SHIPPERS)

QUESTION 05-01:

Please provide the Sempra Utilities definitions of:

- (a) Planned Maintenance;
- (b) Unplanned Maintenance; and
- (c) Emergency Events.

RESPONSE 05-01:

- (a) Planned outages are those whose impact will take place beyond a seven day time horizon. Examples of this would be a pipeline tie-in scheduled well in advance, or a compressor unit maintenance activity.
- (b) Unplanned outages are those whose impact will take place within a seven day time horizon. Examples of this would be a main unit that needs repair, however it can wait until Monday, or a pipeline pressure reduction that can be scheduled for when system conditions allow.
- (c) Outages whose impact are immediate, unplanned and require immediate shutdown or repair due to a mechanical or pipeline condition related to maintaining system integrity. These events also include events that are a result of elements of nature, like earthquakes, floods, landslides, as well as those caused by criminal human behavior, such as acts of terrorism, sabotage, and riots. Examples of this would be a Safety Related Condition (SRC) on a pipeline that requires an immediate pressure reduction, or a main unit failure at a storage field or compressor station.

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QUESTION 05-02:

Please describe and identify the possible triggers and/or causes for each type of event that will necessitate a Sempra Utilities curtailment, including:

- (a) Planned Safety Enhancement Program (PSEP) Maintenance;
- (b) Planned Pipeline Integrity (PI) maintenance;
- (c) Unplanned Maintenance;
- (d) Emergencies; and
- (e) Any other event(s) necessitating curtailment.

RESPONSE 05-02:

- (a) Planned Pipeline Safety Enhancement Program (PSEP) Maintenance: Examples of work completed are valve repairs or replacements, sections of pipe replaced, and hydrotests performed.
- (b) Planned Pipeline Integrity (PI) maintenance: Examples are in line inspections performed and anomalies found from such inspections performed.
- (c) Unplanned Maintenance: See response 05-01.
- (d) Emergencies: See response 05-01.
- (e) Other events: See response 05-01.

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QUESTION 05-03:

- (a) For each of the planned type of event enumerated in Question 05-01 above, please describe the typical process the Sempra Utilities employ to plan and schedule the system element out of service, including but not limited to the amount of time between establishing the need for the maintenance and the date that that maintenance is to be performed.
- (b) For each of the planned type of event enumerated in Question 05-01 above, how far in advance do the Sempra Utilities initially schedule the required maintenance?
- (c) For each of the unplanned type of event enumerated in Question 05-01 above, please describe the typical process the Sempra Utilities employ to plan and schedule the system element out of service, including but not limited to the amount of time between establishing the need for the maintenance and the date that that maintenance is to be performed.
- (d) Are there circumstances in which unplanned maintenance can be rescheduled? If so, please specify the circumstances and describe the procedure for rescheduling and whether potential curtailments are a consideration.

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RESPONSE 05-03:

- (a) For planned maintenance, SoCalGas determines the work necessary to meet compliance or required maintenance. The requested work is scheduled with the outage coordinator and fit into the overall maintenance schedule. When the project date is confirmed, impacted customers are identified. SoCalGas account representatives work with customers when possible to determine a mutually convenient time for the curtailment.
- (b) Planned maintenance schedules may be from seven days to two years in advance, but may change depending on the overall coordination of all projects.
- (c) Unplanned maintenance and emergency situations necessitating curtailments are dealt with immediately. If it is not clear whether a curtailment is required, the System Operator may elect to issue a "curtailment watch" to alert customers that a curtailment may be pending. A curtailment watch may last one day to a few days, depending on the situation. If a curtailment is inevitable, then an assessment of all the impacted customers is made. A comparison is made of how much reduction is required versus how much contracted volume is available in the affected area. Depending on the contracted volume available and current consumption information, a partial interruptible, full interruptible, or curtailment of firm customers may be called. The System Operator may elect to issue an emergency curtailment if it appears that there is not enough time to go through the normal curtailment process and still safely protect the system. Customers are noticed as timely as possible of a curtailment event, but if it is an emergency curtailment it could be an immediate notice.
- (d) Yes. See response 05-02.

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QUESTION 05-04:

- (a) In performing its planned maintenance, how often do the Sempra Utilities formulate a projected maintenance plan (e.g., an annual maintenance plan updated on a monthly basis during the maintenance year or 5-year maintenance plan updated on annual basis).
- (b) If the answer to Question 05-04 (a) is yes, is the planned maintenance schedule available to their customers a year or more in advance of the maintenance scheduled? If so, where is the schedule located? If not, why is it not available?
- (c) How far in advance of a calendar year do Sempra Utilities develop the maintenance schedule for the maintenance projects to be performed in the subject calendar year?
- (d) Please provide a copy of the most recent planned maintenance schedule(s) showing the planned maintenance to be performed in 2016 and beyond. Please include in the response the date the planned maintenance schedule was originally formulated and the date of each update to the original maintenance schedule(s).
- (e) Please provide a detailed description of the Sempra Utilities procedures (whether formal or informal) to communicate and coordinate planned maintenance with customers that may be impacted by that planned maintenance, including, but not limited to, the amount of advance notice to the customer from the date the planned maintenance is scheduled to occur.

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RESPONSE 05-04:

- (a) All projects that impact the Gas Transmission pipeline and Storage system are coordinated through the Gas Control Department's Outage Coordination Group. They meet with all internal departments at least monthly to discuss and update project plans; however, the schedule is dynamic and may change daily.
- (b) The posted schedule is available on SoCalGas' Electronic Bulletin Board, Envoy. Impacted customers are noticed soon after they are added on the list, which is well ahead of the scheduled work date and at least ten days before the actual curtailment.
- (c) The maintenance schedule for some projects can be set as far as one year in advance, however schedules change continuously due to current system impacts.
- (d) Please refer to SoCalGas' Envoy website for both current and historical posted maintenance schedules.
- (e) For planned maintenance projects, once customers are identified, they are given project specifics and an estimated work date. After finalizing the date, SoCalGas analyzes the capacity available, compares it to expected demand, and determines the curtailment requirements for affected customers. Curtailment orders are given to each customer to let them know the volume they may use without incurring penalties. This communication is given to customers as early as possible, but not less than ten days before the curtailment event. Official notice is made on Envoy describing work to be done and the date and time it will occur. An advice letter is filed and a copy is sent to each affected customer. If any changes occur during any time, customers are notified by Account Representatives as soon as possible.