

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(DATA REQUEST ORA-54)**

**Date Requested: November 23, 2016
Date Responded: December 14, 2016**

PRELIMINARY STATEMENT

1. These responses and objections are made without prejudice to, and are not a waiver of, SDG&E 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 does 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. SDG&E and SoCalGas possession, custody, or control does not include any constructive possession that may be conferred by SDG&E or 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 objects to the production of documents or information protected by the attorney-client communication privilege or the attorney work product doctrine.
6. SDG&E and SoCalGas expressly reserve 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).
7. 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. SDG&E and SoCalGas will Bates-number such documents only if SDG&E and SoCalGas deem it necessary to ensure proper identification of the source of such documents.
8. Publicly available information and documents including, but not limited to, newspaper clippings, court papers, and materials available on the Internet, will not be produced.

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9. SDG&E and SoCalGas object to any assertion that the data requests are continuing in nature and will respond only upon the information and documents available after a reasonably diligent search on the date of its responses. However, SDG&E and SoCalGas will supplement its answers to include information acquired after serving its responses to the Data Requests if it obtains information upon the basis of which it learns that its response was incorrect or incomplete when made.
10. In accordance with the CPUC's Discovery: Custom And Practice Guidelines, SDG&E and SoCalGas will endeavor to respond to ORA's data requests by the identified response date or within 10 business days. If it cannot do so, it will so inform ORA.
11. SDG&E and SoCalGas object to any ORA contact of SDG&E and SoCalGas officers or employees, who are represented by counsel. ORA may seek to contact such persons only through counsel.
12. SDG&E and SoCalGas objects to ORA's instruction to send copies of responses to entities other than ORA.

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Subject: Line 1600 - Pressure

QUESTION 1:

What is the minimum pressure at which Line 1600 can operate in conjunction with Line 3010 and still meet the Commission-mandated planning standards?

RESPONSE 1:

Per the demand forecast presented in the SDG&E Gas Capacity Planning and Demand Forecast Semi-Annual Report submitted to the Commission on October 31, 2016, the highest level of SDG&E demand forecast for the plan period is 590 MMcfd. Using the data provided in response to Energy Division DR 4, Question 2, a copy of which was provided in response to ORA DR 19, and noting that the nominal capacity of the SDG&E system with Line 1600 operating at 640 psig is 630 MMcfd, 590 MMcfd of SDG&E demand can be supported with Line 1600 operating at 480 psig. Taking into account 10-15 psig required for overpressure protection yields that Line 1600 must be capable of operating at a pressure of at least 490-495 psig to support this level of demand.

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QUESTION 2:

If Line 1600 is derated to 320 psig, has there been a demonstrated need for more distribution pipelines along the Rainbow corridor? If so, please provide all documentation in support of such demonstrated need.

RESPONSE 2:

The Rainbow Corridor is part of the SoCalGas system upstream of the SDG&E system, and the distribution system there is not impacted by the operating pressure of Line 1600.

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QUESTION 3:

If Line 1600 is derated to lower than 320 psig, has SoCalGas or SDG&E conducted any studies to determine at what point further distribution pipelines would need to be added to the system? Please explain and provide all such studies.

RESPONSE 3:

SDG&E/SoCalGas have not conducted any studies to determine at what point further distribution pipelines would need to be added to the SDG&E system for a scenario where Line 1600 is derated to an MAOP of lower than 320 psig.

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QUESTION 4:

On June 13, 2016, SoCalGas/SDG&E responded to ORA DR-14, Question 1, and indicated that an updated response would be provided. Has SoCalGas/SDG&E completed the entry into their database? If so, please provide the updated response. If not, when does SoCalGas/SDG&E expect to have the database updated?

RESPONSE 4:

The attachment contains **confidential information provided pursuant to Cal. Pub. Util. Code § 583, General Order 66-C and D.16-08-024 and the accompanying declaration.**

Attached is an amended confidential map from ORA DR-14 Question 1 with the updated information to date that has been entered into the HPPD database. Note: The recent replacement of segment 17-131 is not yet reflected in the database.