

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**

**CERTIFICATE OF PUBLIC CONVENIENCE & NECESSITY FOR THE
PIPELINE SAFETY & RELIABILITY PROJECT - CPCN**

(A.15-09-013)

(DATA REQUEST ORA-02)

Date Requested: December 3, 2015

Date Responded: December 16, 2015

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.

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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.
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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QUESTION 1:

Please provide copies of all data requests by the Commission's CEQA team to SCG/SDG&E, and all SCG/SDG&E responses to such requests. Please treat this data request as an ongoing request for all data requests by the Commission's CEQA team and responses to such requests throughout the proceeding.

RESPONSE 1:

SDG&E and SoCalGas provided the attached responses to Energy Division regarding their application completeness determination on October 30, 2015, which included a cover letter, response table, and list of minor corrections to the Proponent's Environmental Assessment filed on September 30, 2015. The Exhibits referenced in the response table provide supporting documentation or specific data that was requested by the CPUC. The enclosed email response provides login information to the Project's FTP site to access the Exhibits. Some of the exhibits contain **confidential information provided pursuant to G.O. 66-C and Cal. Pub. Util. Code § 583**. Further, a CD providing copies of the Confidential shape files for Lines 3010 and 1600 were sent via mail to ORA's project coordinator.



PEA Corrections
(11-30-15S).pdf



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Responses Cover



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Responses (11-30-15S)