

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(DATA REQUEST ORA-56)**

**Date Requested: November 23, 2016
Date Responded: December 15, 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

QUESTION 1:

Has SoCalGas/SDG&E ever used natural gas, air, or inert gas as a test medium? Please explain.

RESPONSE 1:

SDG&E and SoCalGas (Applicants) object to this question on the grounds that it is overbroad and vague in asking if Applicants have “ever” used natural gas, air or an inert gas. Applicants do not typically use natural gas, air, or other inert gas as a test medium for pipelines that operate over 60 PSIG. After a reasonably diligent search, Applicants are aware of one instance in 2010 where nitrogen was used as a test medium in a Class 1 location. See the response to Question 2 below for further information.

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QUESTION 2:

What, if any, operational concerns would occur if SoCalGas/SDG&E were to test Line 1600 with natural gas in support of an MAOP of up to 30% SMYS? Please explain.

RESPONSE 2:

Testing with natural gas significantly increases the exposure to rupture risk for stress levels above 20% SMYS (and especially above 30% SMYS) where development of a propagating fracture is more likely (see the Prepared Direct Testimony of Travis Sera, page 13, line 18 through page 14 line 2). Additionally, detection of test leaks – particularly small ones – becomes an issue that must be addressed during testing with natural gas. In light of these risks, Applicants, as prudent and knowledgeable operators of their integrated natural gas system, would not recommend pressure testing Line 1600 with natural gas, particularly in populated/congested areas or areas where the public could be exposed.

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QUESTION 3:

How long would pressure testing using natural gas in support of an MAOP of up to 30% SMYS take SoCalGas/SDG&E to undertake?

RESPONSE 3:

Applicants object to this question on the grounds that it is vague and ambiguous, poses an incomplete hypothetical and calls for speculation. The question does not provide what is hypothetically being pressure tested (i.e., an entire pipeline, a segment of a pipeline). Subject to and without waiving their objection, the Applicants respond as follows.

Applicants interpret this question as asking how long it would take to pressure test the entire length of Line 1600 with natural gas as the testing medium. The majority of Line 1600 is in class 3. Per 49 CFR § 192.503 and 49 CFR § 192.619(a)(2), for a class 3 location, it is not possible to conduct a pressure test of a pipeline using natural gas as the test medium to establish an MAOP of more than 20% SMYS.

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QUESTION 4:

Please confirm the following information. If any value is incorrect, please state the correct value and provide reference to the appropriate calculation and data source.

- a. After the portion of Line 1600 between engineering stations 17-131 is replaced, the lowest MAOP of design for a class 3 location would be 812 psig.
- b. That the MAOP, if the line is tested using gas, would be 487 psig (30% SMYS), which would necessitate testing Line 1600 up to 730 psig (a 1.5 testing factor).
- c. That the MAOP, if the line is tested using gas to support the Applicants' proposed 320 psig MAOP, would be 480 psig.
- d. That the historical operating pressure of Line 1600 in 1968 was 800 psig, on the basis of the SDG&E report to the CPUC in 1968 (provided in response to ORA DR-14 Q2).
- e. Please confirm that SoCalGas/SDG&E have not retained actual pressure logs that verify the historical operating pressure of Line 1600 from between 1965 and 1970.
- f. Please confirm that SoCalGas/SDG&E have not retained affidavits from between 1965 and 1970 that verify the historical operating pressure of Line 1600 from between 1965 and 1970.
- g. If the answer to questions 4e or 4f is anything other than an unqualified confirmation, please explain and provide the pressure logs or affidavits.

RESPONSE 4:

- a. That statement can only be confirmed for pipe property combinations that would yield a stress level equal to or less than 50% SMYS such as 16", 0.250" wall thickness and 52,000 grade at 812 psig MAOP.
- b. Applicants, as prudent and knowledgeable operators of their integrated natural gas system would not be in favor pressure testing Line 1600 with natural gas, due to the risks identified in the response to Question 2 above. Further, see response to Question 3 above.
- c. Please see the response to Question 4(b) above.
- d. Confirmed.

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- e. Confirmed, 49 CFR § 192.619(c) does not require nor does it specify the documents needed to validate the grandfathering pressure.
 - f. Based on the information currently known by Applicants, confirmed.
 - g. This is correct based on information currently known by Applicants.

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QUESTION 5:

What is the pressure that SoCalGas/SDG&E as the operator of Line 1600, has determined to be the maximum safe pressure considering the history of the segment, records of the pipeline, and, particularly, known corrosion and the operating pressure?

RESPONSE 5:

Please refer to the Prepared Direct Testimony of Travis Sera, page 8 line 12 through page 10 line 2.