

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(DATA REQUEST ORA-60)**

**Date Requested: January 11, 2017
Date Responded: January 26, 2017**

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: Exploring Otay Mesa alternatives to achieve resiliency

The definition of the North Baja path (Ehrenberg – Otay Mesa) pipeline system is the North Baja system in southeast California, the Gasoducto Rosarito system across North Baja just south of the Mexican border, and then into the TGN system that delivers gas to the Gas System at Otay Mesa.

QUESTION 1:

The testimony of Gwen Marelli dated March 21, 2016 in page 6 states, “In order to deliver gas to Otay Mesa from ECA, SDG&E customers or their suppliers would have to enter into purchase agreements with the current holders of this gas supply: Shell Mexico Gas Natural, Gazprom Trading Mexico, or Sempra LNG”.

- a. In the case of an unplanned outage on Line 3010 and/or the Moreno compressor station being not operational, how long would it take to procure gas from Shell Mexico Gas Natural, Gazprom Trading Mexico, or Sempra LNG or otherwise procure gas supplies to be delivered through Otay Mesa? Please provide the answer in hours and explain.
- b. If there are other alternative gas sources not identified in this question and your answer, please list those, provide the hours it will take to procure the gas through each gas source, and explain. If not, please state that there are no other options to procure gas supplies.

RESPONSE 1:

- a. Applicants object that this Question calls for speculation. Without waiving its objection, Applicants respond as follows: Gas supply to be delivered at the Otay Mesa receipt point could be purchased as soon as the subsequent trading cycle, if gas supply was available for sale. However, Applicants have no knowledge or information as to whether gas supply would be available for sale at the time of an unplanned outage on Line 3010 or the Moreno Compressor Station, or the quantity or price of any gas that might be available for sale at such a time.
- b. Applicants object that this Question is vague and ambiguous in referring to “other alternative gas sources,” and calls for speculation. Without waiving its objection, Applicants respond as follows: Applicants interpret this Question as asking about alternative sources of gas to be delivered at the Otay Mesa receipt point. The most likely source of gas supply to be delivered at the Otay Mesa receipt point would be gas purchased from El Paso Natural Gas South Mainline shippers which would then be transported to Otay Mesa through the North Baja pipeline system, which is comprised of three pipelines: North Baja Pipeline, Gasoducto Rosarito and Transportadora de Gas

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Natural de Baja California (TGN). However, Applicants have no knowledge or information as to whether gas supply would be available for sale at the time of an unplanned outage on Line 3010 or the Moreno Compressor Station, or the quantity or price of any gas that might be available for sale at such a time.

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QUESTION 2:

The Cost-Effectiveness Analysis (CEA),¹ page 35, table 10 provides the scores for the benefit criteria "Gas storage thru Line Pack".

- a. Please provide the definition of "Line Pack" as used in the CEA.
- b. Please state if there are other definition(s) of "Line Pack". If there are, please provide the alternative definitions.
- c. Please provide the applicable equation or equations underlying each benefits criteria provided in Table 10 on page 35 of the CEA. Please be sure to identify all factors in the equation or equations, and define each factor.
- d. Please explain how the formula provided in response to question 2c, if at all, incorporates the definition of Line Pack. If the formula does not account for the definition of Line Pack, please say so.

RESPONSE 2:

- a. The definition of line pack as used in the CEA is provided on page 54. Please also refer to the Prepared Direct Testimony of David M. Bisi in A.15-09-013, page 10, footnote 16.
- b. SDG&E and SoCalGas (Applicants) object to this request for "other definition(s) of 'Line Pack'" on the grounds that it is vague and ambiguous, apparently unlimited by author or use in this proceeding, and thus both unreasonably burdensome and seeking information that is publicly available or otherwise equally available to ORA. Subject to and without waiving this objection, Applicants respond as follows.

After a reasonably diligent review of the record in this proceeding, Applicants have not found or provided other definitions of "Line Pack" other than what is provided in response to Question 2(a) above. Other potential alternative definitions of "Line Pack" may be available to ORA on the Internet.

- c. The excel files supporting Table 10 are attached.
- d. There is no formula provided for Line Pack.

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QUESTION 3:

For each definition(s) given in response of question 2,

- a. Please provide the maximum amount of gas in mmcf that can be stored by line pack for the proposed project and each of the eighteen alternatives.
- b. Please provide the maximum amount of gas in mmcf that can be stored by packing the Ehrenberg – Otay Mesa pipeline system if in any way different than alternative “F” of the CEA.

RESPONSE 3:

- a. Applicants object that this Question calls for information not in Applicants’ possession, custody or control, and thus calls for speculation. Without waiving their objections, Applicants respond as follows: Applicants have not calculated the “maximum amount of gas in mmcf that can be stored by line pack” for the eighteen alternatives specified in Table 10 of the Cost-Effectiveness Analysis (CEA). Additionally, some of the alternatives listed, such as “Alt Energy – Grid Scale” and “Alt Energy – Smaller Scale” are not volumetric solutions and are incompatible with the concept of line pack.

Even so, the “maximum amount of gas in mmcf that can be stored by line pack” is not the relevant measure for operational flexibility. All transmission pipelines require a minimum level of line pack (and associated minimum operating pressure) be maintained for system integrity. The amount of line pack available for operational purposes, the “usable line pack”, is the difference between the maximum and minimum levels as described in the Prepared Direct Testimony of David M. Bisi in A.15-09-013 in footnote 16.

On the SDG&E system, as currently operating, the amount of usable line pack is approximately 30 – 40 million cubic feet (MMCF). The Proposed Project will increase the usable line pack by approximately 22 MMCF. Of the alternatives presented in Table 10 of the CEA, those with an alternate pipeline diameter smaller than 16-inch will reduce the current level of SDG&E line pack, assuming Line 1600 is derated as proposed. Those with an alternate diameter greater than 16-inch but less than 36-inch will have a lesser contribution to line pack than the Proposed Project. And those with an alternate diameter greater than 36-inch will have a somewhat greater contribution than the Proposed Project.

Note that the operational benefit of the increased line pack is reflected in the 200 MMcfd SDG&E system capacity increase provided by the Proposed Project. Footnote 16 in the Prepared Direct Testimony of David M. Bisi in A.15-09-013 states: “The benefit of this

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increased linepack has already been included in the increase to the SDG&E system capacity to serve customer demand since the new 36-inch diameter pipeline will operate as part of the integrated SDG&E gas network, and the capacity of the network is calculated based upon operating between its overall MAOP and MinOP.”

- b. Applicants object that this Question calls for information not in Applicants’ possession, custody or control, and thus calls for speculation. Without waiving their objections, Applicants respond as follows: The “Ehrenberg – Otay Mesa pipeline system” referenced in this question is Alternative F of the CEA, and is not operated by Applicants. Applicants are not able to calculate the ability of the respective pipeline operators to pack and draft their systems.

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QUESTION 4:

The testimony of Gwen Marelli dated March 21, 2016 at page 5 states, "It is unknown at this time whether approximately 400 mmcf/d of firm capacity on the North Baja path could be secured at all on all three pipelines on a long-term basis (*i.e.*, for a multi-year term) starting at some future, yetto- be specified date".

- a. Have SoCalGas/SDG&E assessed whether 400 mmcf/d is available on a short term (*i.e. seasonal basis*)? Please explain.
- b. Since the testimony was provided, have SoCalGas/SDG&E learned any more about availability of capacity on North Baja path? If so, please provide that information.
- c. Have SoCalGas/SDG&E examined how much capacity is utilized on North Baja path? If so, please provide the results of this examination, and all supporting documentation.

RESPONSE 4:

- a. No.
- b. Yes. North Baja Pipeline, LLC has recently filed an application with the Federal Energy Regulatory Commission to abandon compressor facilities that will reduce current unsubscribed capacity from 117,000 Dth/day down to approximately 98,500 Dth/d.
- c. Please see the response to Sierra Club DR 5 Q5 provided in response to ORA DR 19 for a graphic display of daily utilization on the North Baja system.

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**Date Requested: January 11, 2017
Date Responded: January 26, 2017
Amended Response Submitted: February 24, 2017**

AMENDED

The response to Question 5.a has been amended, changes are noted in **red bold and underline**.

QUESTION 5:

The testimony of Gwen Marelli dated March 21, 2016 at page 6 states, “Currently one of the three pipelines is nearly fully subscribed, with only 25 mmcf available”.

- a. Please state which line is nearly fully subscribed, with only 25 mmcf available.
- b. Please provide the full capacities and the unsubscribed capacity of each line of the North Baja path by year from 2017 through 2030.

RESPONSE 5:

- a. In early 2016, Gasoducto Rosarito indicated that approximately **20** MMcf of firm service was currently available at the time.
- b. Applicants object that this Question calls for information not in Applicants’ possession, custody or control, and thus calls for speculation. Applicants are not the owners or operators of any of the pipelines in the North Baja pipeline system, and are limited by the Commission’s affiliate transaction rules in obtaining relevant information. Without waiving their objections, Applicants respond as follows:

Pipeline	Capacity	Additional Information
Gasoducto Rosarito	500 MMcf/day	See SCGC DR-06, Response 6.1.2 for details: https://www.socalgas.com/regulatory/documents/a-15-09-013/SCGC-06.pdf
TGN	940 MMcf/day	See SCGC DR-06, Response 6.2.4 for details: https://www.socalgas.com/regulatory/documents/a-15-09-013/SCGC-06.pdf
North Baja	500 MMcf/day, southbound	See http://www.tcplus.com/North%20Baja for details

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AMENDED

On January 24, 2017 the North Baja Pipeline posted that 117,000 MMBtu of unsubscribed firm capacity was available on the Ehrenberg to Otay Mesa path which is attached. No posting of unsubscribed capacity is available on either the Gasoducto Rosarito or TGN websites.

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QUESTION 6:

ORA understands that there is a coastal gas pipeline extending south from the Los Angeles Basin that can be utilized to provide some quantity of gas to San Diego. Please confirm if this is true and if so, provide its name, number, capacity, actual operating pressure, maximum allowable operating pressure, and diameter.

RESPONSE 6:

This response contains confidential information (shaded in gray) and is provided pursuant to General Order 66-C and Public Utilities Code §583 and D.16-08-024. Accordingly, a confidentiality declaration is included with this submission.

SoCalGas' 12-inch diameter pipeline 1026 extends from the SoCalGas system in Dana Point to the Torrey Pines area in San Diego. Line 1026 operates between a MinOP of [REDACTED] psig and an MAOP of [REDACTED] psig since 2011. Line 1026 does not contribute to the throughput or capacity of the SDG&E system.

Per the Prepared Direct Testimony of David M. Bisi in A.15-09-013, footnote 2:

“This pipeline operates as part of the coastal distribution system, provides natural gas to the local area, and does not transport gas within the larger San Diego region.”

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QUESTION 7:

The testimony of Jani Kikuts dated March 21, 2016 at page 5, figure 2 states that the Core Demand is 350 mmcf/d.

- a. Assuming that Line 3010 is out of service and that ALL alternative gas supplies are available, please state ALL of the existing alternative gas supplies, their capacities and the amount of time they would be expected to be available.
- b. What is the current plan for SoCalGas/SDG&E in case of an extended and planned outage for Line 3010? Please provide the documentation showing the plan and explain.

RESPONSE 7:

Applicants object to this question on the ground that it misstates Mr. Kikuts' testimony, which simply posited a scenario under which Core Demand is 350 MMcf/d.

- a. Applicants object to this question on the grounds that it is vague and ambiguous, calls for speculation, and constitutes an incomplete hypothetical as it fails to identify the "alternative gas supplies" that it asks Applicants to assume are available, including the point of purchase, quantity, and availability of pipeline capacity. Subject to and without waiving these objections, Applicants respond as follows. Available gas supplies are dynamic and would need to be evaluated at the time of the outage.
- b. Applicants object that this Question calls for information not in Applicants' possession, custody or control. Without waiving their objection, Applicants respond as follows. Applicants would develop a plan at the time they became aware of the need for a planned extended outage for Line 3010, and before such an outage was taken.

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QUESTION 8:

If SoCalGas/SDG&E does not own pipeline infrastructure within its service area, and the infrastructure ends up being unneeded, who bears the cost responsibility of paying for that pipeline infrastructure? If there is more than one instance of this, and certain instances have different circumstances from others, please identify and explain each one.

RESPONSE 8:

This question states that the hypothetical pipeline infrastructure is not owned by Applicants. Therefore, , Applicants would have no cost responsibility and cannot speculate who would have cost responsibility in this hypothetical scenario.

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**Date Requested: January 11, 2017
Date Responded: January 26, 2017**

Subject: Cost estimates regarding Otay Mesa alternatives (Alternative E/F)

QUESTION 9:

The testimony of Gwen Marelli dated March 21, 2016 at page 7 states, "The Utilities estimate that the low end cost would be approximately \$45 million per year based on current rates. The high end cost is based on more recent published pipeline costs for projects proposed or awarded for construction in Arizona and Northern Mexico. The high end cost assumes the North Baja system and Gasoducto Rosarito system would need to be looped from Ehrenberg to TGN. The estimated high end cost is approximately \$997 million (in 2012 dollars).

- a. What assumptions about pipeline diameter, length, operating pressure and capacity is the SoCalGas/SDG&E estimate based upon?
- b. What is the expected project cost (rather than the minimum and maximum)?

RESPONSE 9:

- a. Please see the response to Question 1 of ORA DR 41 for how the costs for Alternatives E and F were prepared and the methodology that was used. The high cost Alternative assumes the North Baja Pipeline System (86 miles of 30") and Gasoducto Rosarito System (140 miles of 30") are looped with 30" pipe from Ehrenberg to TGN. No corresponding expansion of TGN is assumed to be required because TGN's existing delivery capacity to Otay Mesa is already 800 MMcf. Applicants do not have sufficient knowledge of the North Baja pipeline system's design and operation to determine or speculate on operating pressure.
- b. Applicants object that this Question calls for information not in Applicants' possession, custody or control, and calls for speculation. Without waiving their objection, Applicants respond as follows. In order to respond to this question, Applicants require information to be provided by either: 1) existing pipeline shippers willing to release their firm capacity rights on the North Baja pipeline system (comprised of three pipelines, North Baja Pipeline, Gasoducto Rosarito and TGN) for the quantity specified, or 2) a request to North Baja Pipeline, Gasoducto Rosarito and TGN for the cost of expansion capacity in excess of the quantities available to meet the specified amounts. Applicants do not have sufficient knowledge of the North Baja pipeline system's design and operation to better determine what improvements may be required to expand capacity and prepare precise cost estimates for those improvements and associated transportation rates.

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QUESTION 10:

ORA understands that in order to prepare cost estimates for alternatives E and F, SDG&E/SoCalGas did not request offers from Shell Mexico Gas Natural or Gazprom Trading Mexico or Sempra LNG. If ORA's understanding is correct please provide how the costs for alternatives E and F were prepared and explain the methodology that was used. If SDG&E/SoCalGas did request offers, please explain and provide the request and offers received.

RESPONSE 10:

Please see the response Question 9 above. Also, as described in the CEA at page 25:

The low end cost is based on existing rates for the pipelines and rates for facilities in service since 2002. (See Prepared Direct Testimony of Gwen Marelli (March 21, 2016), page 7). The high end cost is based on recently published pipeline costs for projects proposed or awarded for construction in Arizona and Northern Mexico. The high end cost assumes the North Baja Pipeline System and Gasoducto Rosarito System are looped from Ehrenberg to TGN.

**BEFORE THE PUBLIC UTILITIES
COMMISSION OF THE STATE OF CALIFORNIA**

**DECLARATION OF DOUGLAS M. SCHNEIDER
REGARDING CONFIDENTIALITY OF CERTAIN DATA/DOCUMENTS
PURSUANT TO D.16-08-024**

I, Douglas M. Schneider, do declare as follows:

1. I am the Vice President of System Integrity and Asset Management for San Diego Gas & Electric Company (“SDG&E”) and Southern California Gas Company (“SoCalGas”). I have reviewed the following documents: ORA DR 60.pdf, submitted concurrently herewith. I am personally familiar with the facts and representations in this Declaration and, if called upon to testify, I could and would testify to the following based upon my personal knowledge and/or belief.

2. I hereby provide this Declaration in accordance with Decision (“D.”) 16-08-024 to demonstrate that the confidential information (“Protected Information”) provided in document is within the scope of data protected as confidential under applicable law, including, but not limited to, Public Utilities (“PUC”) Code § 583, General Order (“GO”) 66-C, and other legal authority specifically described in Attachment A.

3. In accordance with the legal authority described herein, the Protected Information should be protected from public disclosure.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed this 25th day of January, 2017, at Los Angeles, California.


Douglas M. Schneider
Vice President, System Integrity &
Asset Management
San Diego Gas & Electric and
Southern California Gas Company

ATTACHMENT A

SDG&E and SoCalGas Request for Confidentiality On the following Protected Information

Location of Data	Description of Data	Applicable Confidentiality Provisions	Basis for Confidentiality
ORA DR 6.pdf Q6	<p>Maximum Allowable Operating Pressure</p> <p>Minimum Operating Pressure (Min Op)</p>	<ul style="list-style-type: none"> • Sensitive Security Information (“SSI”) under 49 CFR §1520.5(a)(3), that, if revealed would be detrimental to transportation security. The Pipeline and Hazardous Materials Safety Administration’s (“PHMSA”) guidelines in the Federal Register, Vol 81, pg. 40764, published on 6/22/2016 and U.S. Department of Homeland Security Transportation Security Administration (“TSA”) guidelines consider the data to be restricted pipeline information. The SSI regulation requires that only “covered persons with a need to know” may have access to SSI. The CPUC’s access to this information must be necessary for the performance of its official duties and is restricted to CPUC Staff, Air Resources Board (“ARB”) Staff under the CARB/CPUC Interagency Information Sharing Agreement, and the Office of Ratepayer Advocates (“ORA”) only 	<p>Operating "pressure" is a specific engineering design value as well as an operating parameter depicting an attribute of an existing critical infrastructure. This operating parameter could be used to determine the criticality of a gas pipe or facility and identify vulnerabilities of the gas delivery network. The release of this operating parameter is detrimental to public safety as it can be used as a means to identify the volume of gas present and potential energy that could be released in an area in order to identify the potential consequences of an intentional act of sabotage. Because of the critical nature of the parameter, it has been identified by PHMSA to be restricted pipeline information as well being an SSI element in the Federal Register Vol 81, pg. 40764 published on 6/22/2016. Pressure information is also exempt from public disclosure per the CEII and CII regulations for the same security reasons</p> <p>Pressure information is also exempt from public disclosure per Cal. Gov’t Code § 6254(e) as it is a type of production data relating to utility systems similar to plant production data.</p>