

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(DATA REQUEST ORA-62)**

**Date Requested: January 17, 2017
Date Responded: February 1, 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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QUESTION 1:

For each of the large volume customers connected to Line 1600, what is their distance in feet from the next nearest transmission or distribution line to which they could be connected, and which could serve them in replacement of Line 1600? For each customer, indicate the name, volume of gas used (annual average), and the name of the line they would connect to.

RESPONSE 1:

SDG&E and SoCalGas (Applicants) object to this question as it is vague, ambiguous, burdensome, and seeks information not in Applicants' possession, custody, or control. Without waiving this objection, and subject thereto, Applicants respond as follows: Applicants have not made any study, analysis, or determination as to whether customers need to be served from a pipeline other than Line 1600, and what pipeline that would be.

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QUESTION 2:

If the Commission were to order Line 1600 removed from service, how would core customers currently connected to Line 1600 receive gas? Please provide a response for each gas distribution center on Line 1600.

RESPONSE 2:

Applicants object to this question as it is burdensome and seeks information not in Applicants' possession, custody, or control. Without waiving this objection, and subject thereto, Applicants respond as follows: Abandoning Line 1600 is outside of the scope of this application; therefore, A have not made any study, analysis, or determination as to how customers would be served from a pipeline other than Line 1600 if Line 1600 was removed from service. Please refer to the response to Question 1(a) and 1(e) of ORA DR 42 regarding abandoning Line 1600.

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QUESTION 3:

If the Commission were to order Line 1600 removed from service, how would non-core customers currently connected to Line 1600 receive gas? Please provide a response for each gas distribution center on Line 1600.

RESPONSE 3:

Please refer to the response to Question 2 above.

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QUESTION 4:

Are there currently any transmission lines that receive gas solely through Line 1600? Please list them.

RESPONSE 4:

Yes, Line 1032 is only tied into Line 1600, and is within the scope of the Proposed Project.

Additionally, Line 1206 and Line 401 are served from the southern portion of Line 1600, which is outside of the scope of this Application.

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QUESTION 5:

If the response to Question 4 is anything other than an unequivocal “no”, please state how the transmission line(s) would receive gas with specific reference to the transmission or distribution line that would provide gas, the maximum allowable operating pressure of the line that would provide gas, and if any changes to the system would be necessitated that have not been described in SoCalGas/SDG&E testimony.

RESPONSE 5:

Line 1032, Line 1206, and Line 401 serve large noncore customers. Please refer to the response to Question 1(f) of ORA DR 26 regarding the requirements for continued service to large noncore customers under the Proposed Project.