

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(DATA REQUEST ORA-63)**

**Date Requested: January 13, 2017
Date Responded: January 31, 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: CEA Approach and Methodology (starting p. 34 and continued on p. 35)

QUESTION 1:

For each of the elements used in the CEA, please provide a list of whether:

- a. The Applicant, PwC, or both defined the benefit;
- b. The Applicant, PwC, or both defined the “desirable outcomes”;
- c. The Applicant, PwC, or both defined the “quantifiable characteristics”;
- d. The Applicant, PwC, or both created the “benefits evaluation model”;
- e. The Applicant, PwC, or both defined the “quantifiable scoring criteria”;
- f. The Applicant, PwC, or both determined that 16 benefits were the appropriate number;
- g. The Applicant, PwC, or both determined that a 1 to 5 point scale was appropriate;
- h. The Applicant, PwC, or both determined the weighting of the 7 benefit categories identified in Table 10 of page 35;
- i. The Applicant, PwC, or both determined that the “scoring scale was defined to allow for an objective evaluation of the Proposed Project and the Alternatives”;

RESPONSE 1:

- a. The Assigned Commissioner (AC) and Assigned Administrative Law Judge (ALJ) in their January 22, 2016 Ruling (January 22 Ruling), SDG&E and SoCalGas (Applicants) and Pricewaterhouse Coopers (PwC) defined the benefit.
- b. The AC/ALJ January 22 Ruling, Applicants and PwC defined the “desirable outcomes.”
- c. Applicants and PwC defined the “quantifiable characteristics.”
- d. PwC created the “benefits evaluation model.”
- e. Applicants and PwC defined the “quantifiable scoring criteria.”
- f. Applicants and PwC determined that 16 benefits were the appropriate number.
- g. Applicants and PwC determined that a 1 to 5 point scale was appropriate.
- h. There is no weighting of the 7 benefit categories identified in the Cost-Effectiveness Analysis (CEA) at 35, Table 10.

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- i. PwC determined that the “scoring scale was defined to allow for an objective evaluation of the Proposed Project and the Alternatives.”

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QUESTION 2:

For each of the quantifiable scoring criteria, please provide the basis for each of the 5 elements.

RESPONSE 2:

The basis for the quantifiable scoring criteria for the elements used to score the benefits was the engineering judgment and experience of the Applicants' engineers and system operators, along with subject matter experts who operate and maintain the SDG&E gas and electric systems. For additional detail on each benefit and corresponding scoring criteria, please refer to the CEA (pages 34-69).

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QUESTION 3:

Provide the basis that demonstrates each of the 16 benefits are objective (CEA, p. 35). For each of the 16 benefits, please identify and explain what other criteria were considered, and why they were rejected.

RESPONSE 3:

The scoring of each of the 16 benefits is objective because each is based on fact (e.g., reduction in number of incidents per high consequence area (HCA) mile; normalized curtailment impacts as a percent of the maximum; percent change in system capacity) and not personal judgment. The criteria for scoring the benefits in the CEA was developed by PwC and Applicants and is based on the engineering judgment and experience of the Applicants' engineers and system operators, along with subject matter experts who operate and maintain the SDG&E gas and electric systems. No alternative set of criteria for scoring the benefits was considered.