

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(DATA REQUEST ORA-64)**

**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:

Question 1: Please provide a map that models the system planned in SDG&E's service territory with Line 3602 built, as well as SDG&E's service territory demarcated in its entirety. Please provide each of the following attributes on this map. Please ensure that each attribute requested below is provided in a different color and marked so that one attribute can be discerned from each of the others.

- a. All gathering lines that would connect to Lines 3602 and/or 1600.
- b. All distribution centers that would be on or near Lines 3602 and/or 1600. Please include all distribution lines that would connect with or are within 1 mile of Lines 3602 and/or 1600.
- c. All storage facilities that would connect to or be within 1000 feet of Lines 3602 and/or 1600.
- d. All large volume customers (exclusive of gas fired electric power plants) that could receive service from Lines 3602 and/or 1600, or would be connected to Lines 3602 and/or 1600.
- e. All gas fired electric power plants that could receive service from Lines 3602 and/or 1600, or are connected to Lines 3602 and/or 1600.
- f. All transmission lines to which Lines 3602 and/or 1600 would connect. Please be sure to properly label each transmission line number.
- g. The location of valves, service regulators, or other pressure limiting devices in series that would meet the requirements of 49 Code of Federal Regulations § 192 Subpart D if Line 1600 could be called a high-pressure distribution line in compliance with 49 CFR Section 192.
- h. The location of mainline valves, blowdown valves, and other devices that would meet the requirements of 49 Code of Federal Regulations § 192 Subpart D if Line 1600 were to be derated and could be called a high-pressure distribution line in compliance with 49 CFR Section 192.
- i. The location of overhead electric lines that would be within 300 feet of Line 3602.
- j. The class locations that would be along Line 3602.

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k. Any transmission lines currently connected to Line 1600, or that would be proposed to be connected to Line 3602, that SoCalGas/SDG&E would also propose to derating from transmission to distribution in compliance with 49 CFR Section 192.

The response to Question 1 has been amended, changes are noted in **red, bold and underline**.

RESPONSE 1:

Please refer to the attached map, which is **confidential (e.g. customer specific information cannot be released publicly unless the customer consents to the release in writing per D.01-07-032) and is provided pursuant to Cal. Pub. Util. Code § 583, General Order 66-C, D.16-08-024 and the accompanying declaration**. The attached map shows the large volume customers as defined by SDG&E's and SoCalGas' (Applicants') gas standards and show locations of specific types of customers (electric generation). The map also shows the location of critical pipeline infrastructure including interconnection points, isolation valves and pressure control equipment.

As utilized in this response, "distribution centers by community name" are intended to provide context to the map by identifying the location of notable community names that are served by Line 1600. On this map, "distribution centers by community name" is not the same as the formal use of "distribution center" as defined in SoCalGas Standard 223.0415 and SDG&E Gas Standard G8116. See attached documents. As previously discussed in Applicants' response to ORA DR-19, Q3, the formal definition is: A distribution center is the transition point at which gas supplies from an Intrastate, Interstate or International pipeline, a California Producer, or a company gas storage field, are transferred into a transmission or distribution pipeline system. The point of transfer from supply to delivery is demarcated by a designated block valve(s). In this context, for SDG&E's system, these points are established as the Otay Mesa Metering Station receipt point, the Rainbow Metering Station receipt point and the San Onofre Metering Station receipt point.

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QUESTION 2:

Question 2: If the map provided in response to Question 1 is identified as confidential by SoCalGas/SDG&E, provide a schematic version of items 1b, 1c, 1d, 1e, 1f, 1g, 1i, and 1k that is public.

RESPONSE 2:

Applicants are not able to provide the requested schematic version of the map for public use due to the confidential nature of the information. As discussed in the response to Question 1 above, the map schematic would show the large volume customers as defined by Applicants' gas standards and show locational relationships of specific types of customers (electric generation). The map schematic would also show the operational relationship of critical pipeline infrastructure including interconnection points, isolation valves and pressure control equipment. A map schematic providing line names, transmission interconnects, main line isolation valves, downstream distribution systems, regulator stations and large volume customers is considered confidential because the schematic map could be used to rank the criticality of a facility or identify vulnerable points within the gas delivery network. This information is critical in nature as acts of sabotage at these critical points could interrupt on-going gas delivery of the transmission system as well as impacting the environment and public safety.