

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(DATA REQUEST ORA-76)**

**Date Requested: March 14, 2017
Date Responded: March 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: Line 1600 Features Map

QUESTION 1:

The first portion of this data request is a map sketch, shown on the next page, which has above the legend the title “ORA DR-76 Q1 Line 1600 Features Map”. This sketch is intentionally not drawn to scale. With this in mind.

- a. Please confirm that the location of the elements in ORA DR-76 Q1 Line 1600 Features Map are accurate in spatial relation to one another.
- b. If any element identified in the ORA DR-76 Q1 Line 1600 Features Map are misplaced, please identify each such element, and where in relation to Line 1600 and the other elements in the ORA DR-76 Q1 Line 1600 Features Map they belong.
- c. If any of the elements identified in the ORA DR-76 Q1 Line 1600 Features Map do not exist, please identify each such element.
- d. If there are any elements that exist that are not shown in the ORA DR-76 Q1 Line 1600 Features Map, please list them and identify where they belong on the ORA DR-76 Q1 Line 1600 Features Map in relation to the other elements. Such elements that should be identified should include: 1) Transmission Lines that connect with Line 1600; 2) Distribution Centers that receive gas from Line 1600; 3) Large Volume Customers that receive gas from Line 1600; and 4) Parts of Line 1600.
- e. If the ORA DR-76 Q1 Line 1600 Features Map is accurate, is there any reason why it must be kept confidential? If so, please provide each requirement that requires confidentiality, as well as an explicit and detailed explanation as to why each requirement cited would require confidentiality.
- f. If the ORA DR-76 Q1 Line 1600 Features Map must be modified based upon the answers to questions 1b, 1c, and 1d, is there any reason why it must be kept confidential? If so, please provide each requirement that requires confidentiality, as well as an explicit and detailed explanation as to why each requirement cited would require confidentiality.

RESPONSE 1:

SDG&E and SoCalGas (Applicants) object to Question 1 on the grounds that it is vague, ambiguous, unduly burdensome, calls for speculation and beyond the scope of permissible

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discovery. In essence, rather than use one of the numerous maps provided by Applicants in this proceeding, ORA has created its own map, admittedly “not to scale,” and asked Applicants to verify that the features contained therein “are accurate in spatial relation to one another” or to correct such “spatial relation.” Applicants do not know for what purpose the map will be used and as such, cannot comment on the significance of missing features, whether intentional or not. Subject to and without waiving their objections, Applicants respond as follows.

- a. Applicants are unable to verify the accuracy of ORA DR 76 Q1 Line 1600 Features Map (ORA Map) as it was not prepared by the Applicants or under their direction and control. Please refer to the map provided by Applicants in response to ORA DR 64 Q1 for an accurate representation of comparable features. In addition, please also refer to the body of information provided as part of this Application as well as information previously provided to ORA in response to data requests ORA 1 through ORA 75. Notwithstanding the above, the naming of the transmission lines and the general location of the transmission lines, the city gate stations and interconnects appear to depict a reasonably accurate spatial relationship of the subject matter.
- b. The “distribution centers” appear as point locations when in reality they are communities better depicted by showing a geographic area served by the gas system. Please refer to the map provided by Applicants in response to ORA DR 64 Q1 for an accurate representation of comparable features.
- c. Please refer to the map provided by Applicants in response to ORA DR 64 Q1 for an accurate and more complete representation of comparable features.
- d. Please refer to the map provided by Applicants in response to ORA DR 64 Q1 for an accurate and more complete representation of comparable features. Comparing the ORA Map to the map provided by Applicants in response to ORA DR 64 Q1, ORA’s Map is missing some features, of particular note are the Line 1600 pressure regulators and the medium pressure distribution pipelines, which more accurately and completely convey information related to areas directly served by Line 1600.
- e. Yes, the ORA Map must be kept confidential for the following reasons. The ORA Map details major stations feeding the San Diego Gas System by name, as well as depicts large volume customers, interconnections and provides information on city gates that are in current operation. This information could be used to identify vulnerabilities of the gas delivery network and is considered confidential because it falls within the definition of Critical Energy Infrastructure Information (CEII) under 18 CFR § 388.113(c) and 6 U.S.C. § 131(3). FERC regulations exempt CEII from mandatory disclosure under the Freedom of Information Act (5 U.S.C. § 552.8). Furthermore, the ORA Map identifies both Moreno Station, a compressor station, and Rainbow Station, a metering station. The Pipeline and

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Hazardous Materials Safety Administration (PHMSA) has identified these facilities as being a Sensitive Security Information Element under 49 CFR § 15.5 in Federal Register Vol 81, pg. 40764 (June 22, 2016). Finally, locations of stations, interconnects, city gates and distribution centers often have regulator stations and meter that are above ground or in accessible vaults, that could allow access to the gas transportation system. Acts of sabotage at these critical points could interrupt on-going gas delivery as well as impacting the environment and public safety and are deemed confidential. Protecting this information is consistent with guidance issued by PHMSA in its Advisory Bulletin on December 9, 2016: ABD-2016-0137; Pipeline Safety: Safeguarding and Securing Pipelines from Unauthorized Access.

Further, it appears that ORA created the ORA Map based on confidential information provided by Applicants pursuant to California Public Utilities Code § 583, G.O. 66-C and D.16-08-024. Please refer to the confidentiality declaration which accompanied the ORA DR 64 Q1 Map.

- f. Please see the response to Question 1(e) above.

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QUESTION 2:

Also based the ORA DR-76 Q1 Line 1600 Features Map, ORA has created the following description of Line 1600 (Line 1600 Project Description).

- From Moreno Compressor Station, Transmission Lines 6900, 1028, and 1027 run southward. These three transmission lines connect to Rainbow Metering Station, which connects to Lines 3010 and 1600.
 - At the approximate border of Riverside and San Diego Counties, Line 1600 exits the Rainbow Compressor Station and continues south as a transmission line for approximately 50 miles.
 - South of the Rainbow Compressor Station, Line 1600 connects with five transmission lines. In order from north to south, Line 1600 connects first with transmission line 3010, then with Transmission Line 1032, then with Transmission Line 1601, and then with Transmission Lines 3011 and 2010 at approximately the same point. After connecting with Line 1600, Transmission Line 3010 continues in a westward direction; while Transmission Line 2010 continues in an eastward direction.
 - Along Line 1600 between Rainbow Compressor Station and the Transmission Line 3010 connection point, there are two distribution centers receiving gas from Line 1600.
 - Along Line 1600 between the connection points with Transmission Lines 1032 and 1601, there are four distribution centers receiving gas from Line 1600.
 - Along Line 1600 between the connection point with Transmission Line 1601 and the connection point where Transmission Lines 3011 and 2010, there are eight distribution centers receiving gas from Line 1600.
 - Along Line 1600 south of the connection point with Transmission Lines 3011 and 2010, there are three distribution centers receiving gas from Line 1600.
 - Along Line 1600 south of the connection point with Transmission Lines 3011 and 2010, there is one Large Volume Customer receiving gas from Line 1600.
- a. Please confirm whether the “Line 1600 Project Description”, provided in question 2 is accurately written.
- b. If there are any inaccuracies with the Line 1600 Project Description, please correct them. Please use tracked changes to show the corrections.

RESPONSE 2:

Applicants object to Question 2 as unduly burdensome and beyond the scope of permissible discovery. In essence, ORA is asking Applicants to not only proof read its project description,

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but also to re-write its project description to correct errors. Without waiving and subject to their objection, Applicants respond as follows:

Responses are provided in bullet form corresponding to the order of each bullet above:

- Generally, this is correct.
 - Generally, this is correct.
 - This is incorrect. Line 1600 does not directly interconnect with Line 3010 south of the Rainbow Compressor Station. Also, it is Line 3011 that continues in a westward direction, not Line 3010; while Transmission Line 2010 continues in an eastward direction.
 - This is an incomplete and oversimplified representation. Please refer to the map provided by Applicants in response to ORA DR 64 Q1 for an accurate and more complete representation of comparable features.
 - This is an incomplete and oversimplified representation. Please refer to the map provided by Applicants in response to ORA DR 64 Q1 for an accurate and more complete representation of comparable features.
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 - This is an incomplete and oversimplified representation. Please refer to the map provided by Applicants in response to ORA DR 64 Q1 for an accurate and more complete representation of comparable features.
- a. Applicants are unable to confirm the accuracy of ORA's Line 1600 Project description as Applicants believe it is an incomplete and oversimplified representation with inaccuracies.
- b. See the responses to Questions 1 and 2(a) above.