

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(DATA REQUEST ORA-83)**

Date Requested: March 30, 2017

Date Responded: April 17, 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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As context for this data request, ORA understands that pressure limiting devices are configured as follows:

- A pressure limiting valve, which limits the pressure of gas coming into a line.
- A monitoring valve which is a back-up device in case the pressure limiting valve fails.
- The pressure limiting and monitoring valves are designed to restrict the pressure entering into a line.
- The last item may be a relief valve, which would vent gas if the set point on the valve is exceeded by pressure into the line.

Subject: Valves and Line 1600

QUESTION 1:

Regarding each transmission line that connects to Line 1600, identify:

- a. The name, diameter, and MAOP.
- b. If there is a pressure regulator currently installed where it connects to Line 1600, or if SoCalGas/SDG&E have proposed installing a pressure regulator.
- c. If there is a monitoring valve currently installed where it connects to Line 1600, or if SoCalGas/SDG&E have proposed installing a pressure regulator.
- d. If there is a pressure relief valve currently installed where it connects to Line 1600, or if SoCalGas/SDG&E have proposed installing a pressure regulator.
- e. The feasibility of installing a second monitoring valve between the first monitoring valve and the pressure relief valve (if there is currently or proposed to have a monitoring valve and a pressure relief valve).

RESPONSE 1:

This response contains confidential information (shaded in gray) and is provided pursuant to Cal. Pub. Util. Code § 583, G.O. 66-C, D.16-08-024 and the accompanying declaration.

SDG&E and SoCalGas (Applicants) object to this question on the grounds that is overbroad, unduly burdensome and seeks information that is not reasonably calculated to lead to the

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discovery of admissible information. 49 CFR § 192.195 and § 192.197 do not require more than two forms of over pressure protection for high pressure pipelines. A pressure limiting valve and an over pressure protection valve, as described in this question, already provides the necessary two forms of overpressure protection. Subject to and without waiving this objection, Applicants respond as follows:

Upstream of the SDG&E system, SoCalGas' [REDACTED]-inch diameter Line 1027 and [REDACTED]-inch diameter Line 1028, both operating at an MAOP of [REDACTED] psig, and [REDACTED]- and [REDACTED]-inch diameter Line 6900, operating at an MAOP of [REDACTED] psig, connect to Line 1600. There are both a service and monitor pressure regulator at the common connection between the three pipelines.

Line 1601 is a [REDACTED]-inch diameter pipeline that operates in common with Line 1600 at an MAOP of 640 psig, and therefore lacks pressure limiting devices between the two pipelines. As part of the Applicant's Proposed Project, a main line valve on Line 1601 will be kept closed to isolate Line 1601 from Line 1600.

[REDACTED]-inch diameter Line 3011 and [REDACTED]-inch diameter Line 2010 operate at an MAOP of [REDACTED] psig. There are both a service and monitor pressure regulator between the three pipelines at the interconnection with Line 1600.

[REDACTED]-inch diameter Line 1032 is supplied by Line 1600 and operates in common with that pipeline at an MAOP of 640 psig without regulation.

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QUESTION 2:

For each valve identified in the response to Question 1, provide the proposed set points.

RESPONSE 2:

The actual set points of the service and monitor regulators supplying Line 1600 are currently 500 psig and 512 psig, respectively.

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QUESTION 3:

Please provide a sketch for each transmission line and the valves connected to Line 1600 provided in response to Question 1.

RESPONSE 3:

Please see the attachment to this response. **This attachment contains confidential information and is provided pursuant to Cal. Pub. Util. Code § 583, G.O. 66-C, D.16-08-024 and the accompanying declaration.**

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QUESTION 4:

Please identify what the set points for each of the valves identified in Question 1 would be if Line 1600 was operated with a MAOP of 325 psi.

RESPONSE 4:

The pressure limiting valve and the over pressure protection valve would be set to 315 and 325 psig, respectively.

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QUESTION 5:

Please provide the cost of installing a second monitoring valve on each of the transmission lines that connect with Line 1600.

RESPONSE 5:

Applicants object to this question on the grounds that is overbroad, unduly burdensome and seeks information that is not reasonably calculated to lead to the discovery of admissible information. 49 CFR § 192.195 and § 192.197 do not require more than two forms of over pressure protection for high pressure pipelines. Subject to and without waiving this objection, Applicants respond as follows:

Applicants have not researched the requested cost scenario.

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QUESTION 6:

Please provide a reference to testimony where any of these changes are discussed., except for the Rainbow PLS and Line 1600 PLS: ORA reviewed the Updated Testimony of Kohls, in particular Attachment XI, and found no reference to how pressure limiting and safe guards would be configured on Line 1600, except the Rainbow Pressure Limiting Station (Kohls, Attachment A, p. 5) and the Line 1600 Cross Tie (Kohls, Attachment A, p.8).

RESPONSE 6:

Line 1600 is proposed to be de-rated and protected from over-pressurization through a combination of constructing new facilities, changing set points on existing pressure limiting facilities and closing certain existing valves. New transmission pressure limiting stations that will control the gas pressure feeding into Line 1600 are discussed in SDGE-8-R Updated Prepared Direct Testimony of Norm G. Kohls, Attachment A at page 8 for the Rainbow Pressure Limiting Station and at page 9 for the Line 1600 interconnect to the proposed Line 3602. Other construction activities that will prevent over-pressurization of a de-rated Line 1600 are discussed within Attachment XI of SDGE-8-R. This includes the regulator station, check valves and pipeline work outlined on pages 2 through 6 and shown on the maps attached in Appendix A of that study. In addition, other steps to be taken include changes to operational aspects of existing equipment such as closing valves at the interconnection between Line 1600 and Line 1601 and changing set points at the existing Kearny Villa Pressure Limiting Station. These changes to the operational aspects of this existing equipment were not discussed in the Application as no construction and no environmental impacts are necessary to implement.

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QUESTION 7:

To the extent that valves will be closed to isolate Line 1600 from any other cross-ties except from where Line 1600 has its pressure limited coming out of Rainbow Station and the proposed Line 1600 cross-tie with Line 3602, explain:

- a. What occurs if the valve isolating Line 1600 from any other source of gas at a pressure greater than 325 psi fails.
- b. The probability of any of the valves failing that isolate Line 1600 from other higher pressure sources of gas.
- c. The age of each valve and maintenance history, that would be used to isolate Line 1600 from the source of higher pressure gas.

RESPONSE 7:

- a. As stated in the response to Question 1 above, as part of the Applicant's Proposed Project a main line valve will be kept closed to isolate Line 1601 from Line 1600. Once it is closed, the main line valve is not capable of a fail-open.
- b. See the response to Question 7.a.
- c. The main line valve that currently connects Line 1601 to Line 1600 was installed in 2012 and has been maintained per 49 CFR Part 192.745.

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Subject: % SMYS

SoCalGas/SDG&E have generally described that the majority of Line 1600 would operate below 20% SMYS at a 320 psi MAOP.

QUESTION 8:

Would the majority of Line 1600 would have a 20% SMYS if operated at 325 psi?

RESPONSE 8:

Yes, for the segments of Line 1600 associated with the 1949 installation. Those segments would be classified as transmission. Line 1600 would need to operate at 320 psig to be classified as distribution.

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QUESTION 9:

Please explain why SoCalGas/SDG&E propose a 960 psi pressure test in the testimony of Kohls, rather than a test to 1200 psi.

RESPONSE 9:

As stated in SDGE-8-R Updated Prepared Direct Testimony of Norm G. Kohls, Attachment B at page 4, the Hydrotest Study was based on a target MAOP of 640 psi post-test. The minimum test pressure required to comply with 49 CFR 192.505 and 192.619 is 1.5 times the MAOP of 640 psi, or 960 psi.

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QUESTION 10:

Since filing the original application in September 2015:

- a. Did SoCalGas/SDG&E become aware of reasons why Line 1600 would experience problems with a pressure test to 1200 psi?
- b. If the answer to question 10a is yes, please provide each date when SoCalGas/SDG&E learned of each reason.
- c. If the answer to question 10a is yes, please provide each reason that made SoCalGas/SDG&E aware that Line 1600 would experience problems with a pressure test to 1200 psi.
- d. Please ensure that each reason provided in response to question 10c is matched with each date provided in response to question 10b.

RESPONSE 10:

- a. No. Since September 2015, SoCalGas/SDGE have not become aware of reasons beyond those identified previous to September 2015 regarding why Line 1600 would experience problems with a pressure test.
- b. N/A
- c. N/A
- d. N/A

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

**DECLARATION OF MARIA MARTINEZ
REGARDING CONFIDENTIALITY OF CERTAIN DATA/DOCUMENTS
PURSUANT TO D.16-08-024**

I, Maria Martinez, do declare as follows:

1. I am the Director of Pipeline Integrity for San Diego Gas & Electric Company (“SDG&E”) and Southern California Gas Company (“SoCalGas”) I have been delegated authority to sign this declaration by Douglas M. Schneider, Vice President of System Integrity and Asset Management for SDG&E and SoCalGas. I have reviewed ORA DR 83, Question 1 and the attachment in the response to Question 3, submitted concurrently herewith (“ORA-83_Confidential.pdf and ORA-83 Q3_Attachment_Confidential.pdf”) in response to the Office of Ratepayer Advocates (“ORA”) data request ORA-66 Question 1 and Question 3. 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 the Refined Non-Miramar Alternative GIS files are within the scope of data protected as confidential under applicable law, and pursuant to California Public Utilities Code (“P.U. Code”) § 583 and General Order (“GO”) 66-C, as described in Attachment A hereto.

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 13th day of April, 2017, at Los Angeles, California.

**Maria
Martinez**

Digitally signed by Maria Martinez
DN: cn=Maria Martinez, o, ou=Pipeline
Integrity,
email=mariamartinez@semprautilities.com,
c=US
Date: 2017.04.13 19:51:33 -0700'

Maria Martinez
Director of Pipeline Integrity
San Diego Gas & Electric and
Southern California Gas Company

ATTACHMENT A

SDG&E and SoCalGas Request for Confidentiality on the following Protected Information in its response to ORA 83 Question 1 and 3

Location of Data	Description of Data	Applicable Confidentiality Provisions	Basis for Confidentiality
<p>ORA-83_Confidential.pdf, Response 1</p> <p>ORA-83_Q3_Attachment_Confidential.pdf</p>	<p>Pressure and diameter information shaded in gray.</p> <p>Mapping product depicting transmission and distribution pipelines, interconnects, valves, regulators, service and monitor pressure regulator facilities, and valves. The Location, repair/replacement type, and long seam are confidential.</p>	<p>The Pipeline and Hazardous Materials Safety Administration ("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.</p> <p>Critical Energy Infrastructure Information ("CEII") under 18 CFR § 388.113(c); Federal Energy Regulatory Commission ("FERC") Orders 630, 643, 649, 662,683, and 702 (defining CEII).</p> <p>Critical Infrastructure Information ("CII") under 6 U.S.C. §§ 131(3), 133(a)(1)(E); 6 CFR §§ 29.2(b), 29.8 (defining CII and restricting its disclosure).</p> <p>Cal. Gov't Code § 6254(e) exempts from mandatory disclosure, plant production data, and similar information relating to utility systems. Pressure information is also exempt from public disclosure per Cal. Gov't Code § 6254(e).</p>	<p>A map providing transmission assets and interconnects may be used to identify vulnerabilities of the gas delivery network, which is considered CEII under 18 CFR § 388.113(c); FERC Orders 630, 643, 649, 662, 683, and 702 (defining CEII). Additionally, PHMSA issued an advisory bulletin on December 9, 2016: ABD-2016-0137; <i>Pipeline Safety: Safeguarding and Securing Pipelines from Unauthorized Access</i>, detailing the need for operators to protect points of access to their pipeline system.</p>