

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(84th DATA REQUEST FROM ORA)
Date Requested: May 5, 2017
Date Responded: May 22, 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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For Questions 1 through 19, ORA has noted inconsistent data sets regarding certain attributes along Line 1600. The primary questions use the shortest engineering station segments on Line 1600, taken from the original and updated responses to ORA DR-06, Q12, in an attempt to clarify these discrepancies.

QUESTION 1:

For engineering stations [REDACTED] to [REDACTED]:

- a. Provide all supporting information for the original May 2016 response to ORA DR-06, Q12 that supported a wall thickness of [REDACTED] inches for engineering stations [REDACTED] to [REDACTED].
- b. Provide all supporting information for the April 2017 updated response to ORA DR-06, Q12 that supports a wall thickness of [REDACTED] inches for engineering stations [REDACTED] to [REDACTED].
- c. Confirm that the April 2017 update to ORA DR-25, Q1 identifies engineering stations [REDACTED] to [REDACTED] as having a wall thickness of [REDACTED] inches.
- d. Confirm that the April 2017 update to ORA DR-25, Q1 identifies engineering stations [REDACTED] to [REDACTED] as having a wall thickness of [REDACTED] inches.
- e. Provide all supporting information for the April 2017 update to ORA DR-25, Q1 supporting the wall thicknesses of [REDACTED] and [REDACTED] inches.
- f. Explain why SoCalGas/SDG&E has provided inconsistent responses within ORA DR-25, Q1 as to the wall thickness of Line 1600 between engineering stations [REDACTED] and [REDACTED].
- g. Please explain why SoCalGas/SDG&E provided inconsistent responses between ORA DR-06, Q12 and ORA DR-25, Q1 for engineering stations [REDACTED] to [REDACTED].

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RESPONSE 1:

Cumulative Stationing vs. Engineering Stationing

The question and response (and accompanying attachments) 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. Question 1 refers to “engineering stations [REDACTED] to [REDACTED]” in questions regarding both Applicants’ response to ORA DR-06, Q12 and Applicants’ response to ORA DR-25, Q1. Applicants clarify that the attachment to Applicants’ response to ORA DR-06, Q12, including Applicants’ April 27, 2017 Corrected and Updated Confidential Attachment to Applicants’ Response to ORA DR 6, Question 12 1600 Pipe Segment Data, refers to “cumulative stations,” not “engineering stations.” By contrast, the attachment to Applicants’ response to ORA DR-25, Q1, including Applicants’ April 27, 2017 Corrected and Updated Confidential Attachment to Applicants’ Response to ORA DR-25, Q1, refers to “engineering stations,” not “cumulative stations.”

Although the stationing values are in close proximity to each other, the minor differences create an incorrect comparison of pipeline segments. Cumulative stationing is a direct measurement down the centerline of the pipeline and is re-calculated each time the pipeline is modified; therefore, each reiteration of the pipe will have a new cumulative stationing value. In contrast, “engineering station” values are memorialized on the pipeline and do not change even though the geometry of the pipeline changes. The benefit of “engineering stationing” is that attribute information can easily be associated to legacy drawings. One downside of using engineering stationing values is that the true length of the pipeline is not easily calculated due to the introduction of station equations. When a section of pipeline is modified, a station equation is added to represent a location where the stationing and design has changed. The equation is represented with an “Ahead” and “Back” engineering station value that compensates for the modified pipeline length and allows the engineering stationing to be preserved upstream and downstream of the tie-in point. An explanation of how Applicants use a “stationing equation” is attached here to as *StationEquationExample_Attachment.pdf*.

Each time modifications are made to Applicants High Pressure Database to reflect work on a pipeline, such as relocations or removals, the Cumulative Stationing may change. For purposes of this Data Request, which is asking about Cumulative Stationing of Line 1600 segments that existed in the High Pressure Database in May 2016, Applicants have responded regarding the segments represented by the Cumulative Stationing for those segments as it existed at that time. As the High Pressure Database is updated, the Cumulative Stationing of those segments may change, though the Engineering Stationing will not. If requested, Applicants are willing to provide an updated table of Line 1600 segment data reflecting Cumulative Stationing, but will not otherwise update Cumulative Stationing information. Given that ORA is seeking

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documentation of the pipeline values, Line 1600 segment data based on Engineering Stationing would appear more useful.

With respect to the pipeline segment that is the focus of Question 1, the “cumulative station” (“CUM Station”) [REDACTED] to [REDACTED] (reflected in the response to ORA-DR06, Q12) is the same as “engineering station” (“ENG Station”) [REDACTED] to [REDACTED] (reflected in the response to ORA-DR25, Q1). Applicants provide similar comparison information for the Line 1600 segments that are the subject of Questions 2 through 6.

In preparing Applicants’ April 27, 2017 Corrected and Updated Confidential Attachment to Applicants’ Response to ORA DR 6, Question 12 1600 Pipe Segment Data, Applicants confused the CUM Stationing used in the response to ORA-DR06, Q12 for the ENG Stationing used in the response to ORA-DR25, Q1. This resulted in errors with respect to the wall thickness for two segments (the actual wall thicknesses are greater than shown). These errors are corrected in Applicants’ May 22, 2017 Corrected and Updated Confidential Attachment to Applicants’ Response to ORA DR 6, Question 12 1600 Pipe Segment Data.

- A. In May 2016, when the original response to ORA DR-06, Q12 was provided, Applicants’ High Pressure database had not been updated with documented wall thickness information and therefore the wall thickness defaulted to unknown for the CUM Station [REDACTED] to [REDACTED]. When a wall thickness value is unknown in the database, it is conservatively assigned a wall thickness value that provides a margin of safety. The conservative value assigned based on the diameter and year of installation, and which was reflected in the database at the time the May 12, 2016 response to ORA DR-06, Q12 was prepared, was [REDACTED] wall thickness for CUM Station [REDACTED] to [REDACTED].
- B. As noted above, the response to ORA DR-06 Q12, refers to CUM Station [REDACTED] to [REDACTED] which is ENG Station [REDACTED] to [REDACTED]. As reflected in Applicants’ response to ORA DR-25, Q1, the correct wall thickness for this segment is [REDACTED] inch for pipe installed in 2004. Applicants’ May 22, 2017 Corrected and Updated Confidential Attachment to Applicants’ Response to ORA DR 6, Question 12 1600 Pipe Segment Data reflects the [REDACTED] inch wall thickness. Documents establishing this value are attached as *ORA 84_Q1_Attachments.pdf*.
- C. Confirmed. See also response to Subpart F below.
- D. Confirmed. See also response to Subpart F below.
- E. The attached pipe specification supports the [REDACTED]” wall thickness. See also response to Subpart F below.

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F. Stationing in question is not a valid station range. Applicants infer that ORA meant [REDACTED] not [REDACTED] and provides the following response. The two segments from question parts C through E are two separate segments of pipe. The stationing provided was in “Engineering Stationing,” which may appear to have overlaps. However, this issue is commonly associated with preserving the memorialized engineering station values. The stationing is in fact for two different segments of pipe. This is shown through what we title “Cumulative Stationing” which is the direct count down the line of the pipeline which shows that these two segments are indeed following each other. See table below for engineering and cumulative stationing for these two segments.

Line Number	Engineering Station Start	Engineering Station End	Cumulative Station Start	Cumulative Station End
1600	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
1600	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

*Output reports only display one station value of a station equation

G. As discussed above, Applicants’ response to ORA DR-06, Q12, including Applicants’ April 27, 2017 Corrected and Updated Confidential Attachment to Applicants’ Response to ORA DR 6, Question 12 1600 Pipe Segment Data, refers to “cumulative stations,” not “engineering stations.” With respect to the updated value for this pipe segment, see responses to Question 1(a)-(b) and Question 11.

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QUESTION 2:

For engineering stations [REDACTED] to [REDACTED]:

- a. Provide all supporting information for the original May 2016 response to ORA DR-06, Q12 that supported a wall thickness of [REDACTED] inches.
- b. Provide all supporting information for the April 2017 updated response to ORA DR-06, Q12 that supports a wall thickness of [REDACTED] inches.
- c. Please provide all supporting information for the April 2017 updated response to ORA DR-25, Q1 that supports a wall thickness of [REDACTED] inches.
- d. Provide all supporting information for the April 2017 update to ORA DR-25, Q1 supporting the wall thickness of [REDACTED] inches.
- e. Please explain why SoCalGas/SDG&E provided inconsistent responses between the original ORA DR-06, Q12 and ORA DR-25, Q1 for engineering stations [REDACTED] to [REDACTED].

RESPONSE 2:

The question and response (and associated attachments) 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.

- A. With respect to the pipeline segment that is the focus of Question 2, the “cumulative station” (“CUM Station”) [REDACTED] to [REDACTED] (reflected in the response to ORA-DR06, Q12) is the same as “engineering station” (“ENG Station”) [REDACTED] to [REDACTED] 3 (reflected in the response to ORA-DR25, Q1). At the time the original response to ORA DR-06, Q12 was prepared, the High Pressure database was defaulted to unknown for the segment noted. When a wall thickness or grade value is unknown in the database, it is conservatively assigned a wall thickness and grade value that provides a margin of safety. The conservative value assigned based on the diameter and year of installation, and which was reflected in the database at the time the May 12, 2016 response to ORA DR-06, Q12 was prepared, was [REDACTED] wall thickness for CUM Station [REDACTED] to [REDACTED].
- B. As noted above, the information provided in the response to ORA-DR-06 Q12, refers to CUM Station [REDACTED] to [REDACTED] is the same as ENG Station [REDACTED] to [REDACTED] (reflected in the response to ORA-DR25, Q1). As reflected in Applicants’ response to ORA DR-25, Q1, the correct wall thickness for this segment is [REDACTED] inch for pipe installed in 1999. Applicants’ May 22, 2017 Corrected and Updated Confidential

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Attachment to Applicants' Response to ORA DR 6, Question 12 L1600 Pipe Segment Data reflects the [REDACTED] inch wall thickness. Documents establishing this value are attached as *ORA 84_Q2_Attachments.pdf*.

- C. The document supporting the [REDACTED] inch wall thickness for ENG Station [REDACTED] to [REDACTED] is attached *ORA 84_Q2_Attachments.pdf*.
- D. See response to Question 2(c)
- E. Please see response to Question 2(a)(b) and Question 11.

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QUESTION 3:

For engineering stations [REDACTED] to [REDACTED]:

- a. Provide all supporting information for the original May 2016 response to ORA DR-06, Q12 that supported a wall thickness of [REDACTED] inches.
- b. Provide all supporting information for the April 2017 updated response to ORA DR-06, Q12 that supports a wall thickness of [REDACTED] inches.
- c. Please provide all supporting information for the April 2017 updated response to ORA DR-25, Q1 that supports a wall thickness of [REDACTED] inches.
- d. Please explain why SoCalGas/SDG&E provided inconsistent responses between the original ORA DR-06, Q12 and ORA DR-25, Q1 for engineering stations [REDACTED] to [REDACTED].

RESPONSE 3:

The question and response (and accompanying attachments) 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.

- A. With respect to the pipeline segment that is the focus of Question 3, the “cumulative station” (“CUM Station”) [REDACTED] to [REDACTED] (reflected in the response to ORA-DR06, Q12) is the same as “engineering station” (“ENG Station”) [REDACTED] to [REDACTED] (reflected in the response to ORA-DR25, Q1). At the time the original response to ORA DR-06, Q12 was prepared, the High Pressure Database did not reflect the documented wall thickness information and was defaulted to unknown for the segment noted. When a wall thickness value is unknown in the database, it is conservatively assigned a wall thickness value that provides a margin of safety. The conservative value assigned based on the diameter and year of installation, and which was reflected in the database at the time the May 12, 2016 response to ORA DR-06, Q12 was prepared, was [REDACTED] wall thickness for CUM Station [REDACTED] to [REDACTED].
- B. As noted above, the information provided in the response to ORA -DR-06 Q12 refers to CUM Station [REDACTED] to [REDACTED] which is the same as ENG Station [REDACTED] to [REDACTED] (reflected in the response to ORA-DR25, Q1). As reflected in Applicants’ response to ORA DR-25, Q1, the correct wall thickness for this segment is [REDACTED] inch

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for pipe installed in 2006.¹ Applicants' May 22, 2017 Corrected and Updated Confidential Attachment to Applicants' Response to ORA DR 6, Question 12 1600 Pipe Segment Data, as well as Applicants' April 27, 2017 Corrected and Updated Confidential Attachment to Applicants' Response to ORA DR 6, Question 12 L1600 Pipe Segment Data, reflects the [REDACTED] inch wall thickness. Documents establishing this value are attached as *ORA 84_Q3_Attachment.pdf*.

- C. The documents attached as *ORA 84_Q3_Attachment.pdf* supports the information provided as part ORA DR-25 Q1 for ("ENG Station") [REDACTED] to [REDACTED].
- D. Please see the responses to Question 3(a)-(b) and Question 11.

¹ In the accompanying backup documentation, there are two wall thicknesses shown (e.g. [REDACTED] and [REDACTED]). The conservative figure was selected for use in the Applicants' High Pressure Database.

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QUESTION 4:

For engineering stations [REDACTED] to [REDACTED] 0:

- a. Provide all supporting information for the original May 2016 response to ORA DR-06, Q12 that supported a yield strength of [REDACTED].
- b. Provide all supporting information for the April 2017 updated response to ORA DR-06, Q12 that supports a yield strength of [REDACTED].
- c. Provide all supporting information for the April 2017 updated response to ORA DR-25, Q1 that supports a yield strength of [REDACTED].
- d. Please explain why SoCalGas/SDG&E provided inconsistent responses between the original ORA DR-06, Q12 and ORA DR-25, Q1 for engineering stations [REDACTED] to [REDACTED].

RESPONSE 4:

The question and response (and accompanying attachment) 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.

- A. With respect to the pipeline segment that is the focus of Question 4, the “cumulative station” (“CUM Station”) [REDACTED] to [REDACTED] (reflected in the response to ORA-DR06, Q12) is the same as “engineering station” (“ENG Station”) [REDACTED] to [REDACTED] (reflected in the response to ORA-DR25, Q1). At the time the original response to ORA DR-06, Q12 was prepared, the High Pressure Database did not reflect the documented grade information and was defaulted to unknown for the segment noted. When a grade value is unknown in the database, it is conservatively assigned a grade value that provides a margin of safety. The conservative yield strength value assigned, and which was reflected in the database at the time the May 12, 2016 response to ORA DR-06, Q12 was prepared, was [REDACTED].
- B. As noted above, the information provided in the response to ORA -DR-06 Q12 refers to CUM Station [REDACTED] to [REDACTED], which is the same as ENG Station [REDACTED] to [REDACTED] (reflected in the response to ORA-DR25, Q1). As reflected in Applicants’ response to ORA DR-25, Q.1, the correct yield strength value for this segment is [REDACTED] for pipe installed in 1961. Applicants’ May 22, 2017 Corrected and Updated Confidential Attachment to Applicants’ Response to ORA DR 6, Question 12 L1600 Pipe Segment Data, as well as Applicants’ April 27, 2017 Corrected and Updated

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Confidential Attachment to Applicants' Response to ORA DR 6, Question 12 L1600 Pipe Segment Data, reflects the [REDACTED] yield strength value. Documents establishing this value are attached as *Attachments ORA 84_Q4_Attachment.pdf*.

- C. Documents attached as Attachment ORA 84_Q4_Attachment.pdf support the yield strength of [REDACTED] for "ENG Station" [REDACTED] to [REDACTED].
- D. See responses to Question 4(a)-(b) and Question 11

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QUESTION 5:

For engineering stations [REDACTED] to [REDACTED]

- a. Provide all supporting information for the original May 2016 response to ORA DR-06, Q12 that supported a yield strength of [REDACTED].
- b. Provide all supporting information for the April 2017 updated response to ORA DR-06, Q12 that supported a yield strength of [REDACTED].
- c. Provide all supporting information for the April 2017 updated response to ORA DR-25, Q1 that supports a yield strength of [REDACTED].
- d. Please explain why SoCalGas/SDG&E provided inconsistent responses between the original ORA DR-06, Q12 and ORA DR-25, Q1 for engineering stations [REDACTED] to [REDACTED].

RESPONSE 5:

The question and response (and accompanying attachment) 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.

- A. With respect to the pipeline segment that is the focus of Question 5, the “cumulative station” (“CUM Station”) [REDACTED] to [REDACTED] (reflected in the response to ORA-DR06, Q12) is the same as “engineering station” (“ENG Station”) [REDACTED] to [REDACTED] (reflected in the response to ORA-DR25, Q1). At the time the original response to ORA DR-06, Q12 was prepared, the High Pressure Database did not reflect the documented grade information and was defaulted to unknown for the segment noted. When a grade value is unknown in the database, it is conservatively assigned a grade value that provides a margin of safety. The conservative yield strength value assigned, and which was reflected in the database at the time the May 12, 2016 response to ORA DR-06, Q12 was prepared, was [REDACTED]0.
- B. As noted above, the information provided in the response to ORA -DR-06 Q12 refers to CUM Station [REDACTED] to [REDACTED], which is the same as ENG Station [REDACTED] to [REDACTED] (reflected in the response to ORA-DR25, Q1). As reflected in Applicants’ response to ORA DR-25, Q1, the correct yield strength value for this segment is [REDACTED] for pipe installed in 1961. Applicants’ May 22, 2017 Corrected and Updated Confidential Attachment to Applicants’ Response to ORA DR 6, Question 12 L1600 Pipe Segment Data, as well as Applicants’ April 27, 2017 Corrected and Updated Confidential Attachment to Applicants’ Response to ORA DR 6, Question 12 L1600

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Pipe Segment Data, reflects the [REDACTED] yield strength value. Documents establishing this value are attached as *ORA 84_Q5_Attachments.pdf*.

- C. The documents attached as Attachment ORA 84_Q5_Attachments.pdf support the yield strength of [REDACTED] for “ENG Station” [REDACTED] to [REDACTED].
- D. Please see the responses to Question 5(a)-(b) and Question 11.

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QUESTION 6:

For engineering stations [REDACTED] to [REDACTED]:

- a. Provide all supporting information for the original May 2016 response to ORA DR-06, Q12 that supported a yield strength of [REDACTED].
- b. Provide all supporting information for the April 2017 updated response to ORA DR-06, Q12 that supports a yield strength of [REDACTED].
- c. Provide all supporting information for the April 2017 updated response to ORA DR-25, Q1 that supports a yield strength of [REDACTED].
- d. Please explain why SoCalGas/SDG&E provided inconsistent responses between the original ORA DR-06, Q12 and ORA DR-25, Q1 for engineering stations [REDACTED] to [REDACTED].

RESPONSE 6:

The question and response (and accompanying attachment) 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.

- A. With respect to the pipeline segment that is the focus of Question 6, the “cumulative station” (“CUM Station”) [REDACTED] to [REDACTED] reflected in the response to ORA-DR06, Q12) is the same as “engineering station” (“ENG Station”) [REDACTED] to [REDACTED] (reflected in the response to ORA-DR25, Q1). At the time the original response to ORA DR-06, Q12 was prepared, the High Pressure Database did not reflect the documented grade information and was defaulted to unknown for the segment noted. When a grade value is unknown in the database, it is conservatively assigned a grade value that provides a margin of safety. The conservative yield strength value assigned, and which was reflected in the database at the time the May 12, 2016 response to ORA DR-06, Q12 was prepared, was [REDACTED].
- B. As noted above, the information provided in the response to ORA -DR-06 Q12 refers to CUM Station [REDACTED] to [REDACTED], which is the same as ENG Station [REDACTED] to [REDACTED] (reflected in the response to ORA-DR25, Q1). As reflected in Applicants’ response to ORA DR-25, Q1, the correct yield strength value for this segment is

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██████ for pipe installed in 1962.² Applicants' May 22, 2017 Corrected and Updated Confidential Attachment to Applicants' Response to ORA DR 6, Question 12 L1600 Pipe Segment Data, as well as Applicants' April 27, 2017 Corrected and Updated Confidential Attachment to Applicants' Response to ORA DR 6, Question 12 L1600 Pipe Segment Data, reflects the ██████ yield strength value. Documents establishing this value are attached as *ORA 84_Q6_Attachments.pdf*.

- C. The document attached as Attachment *ORA 84_Q6_Attachments.pdf* supports the yield strength of ██████ for "ENG Station" ██████ to ██████
- D. Please see the responses to Question 6(a)-(b) and Question 11.

² Since the May 2016 response to ORA DR-06, Q12, the High Pressure Database has been updated to reflect work on this Line 1600 segment. A small portion has been replaced with pipe that has a wall thickness of ██████ inches and a yield strength of ██████ psi. As a result of this work, the Cumulative Stationing for this line segment has changed, though not the Engineering Stationing. To maintain the comparability of the responses to ORA DR-06, Q12 and ORA DR-25, Q1, Applicants have not changed the reference to this line segment in the Applicants' May 22, 2017 Corrected and Updated Confidential Attachment to Applicants' Response to ORA DR 6, Question 12 L1600 Pipe Segment Data.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(84th DATA REQUEST FROM ORA)
Date Requested: May 5, 2017
Date Responded: May 22, 2017**

QUESTION 7:

Please confirm that to identify the same areas of pipeline along Line 1600, two SoCalGas/SDG&E's Data Responses use different engineering stations. Specifically, confirm that the updated response to ORA DR- 25, Q1 uses engineering stations [REDACTED] to [REDACTED] to identify a specific area of Line 1600 pipeline, while the response to ORA DR-06, Q12 uses engineering stations [REDACTED] [REDACTED] to cover that same area of pipeline?

RESPONSE 7:

The question above contains confidential information (shaded in gray) pursuant to Cal. Pub. Util. Code § 583, G.O. 66-C, D.16-08-024.

As set forth in response to Question 1, *Cumulative Stationing vs. Engineering Stationing*, the attachment to Applicants' response to ORA DR-06, Q12, including Applicants' April 27, 2017 Corrected and Updated Confidential Attachment to Applicants' Response to ORA DR 6, Question 12 1600 Pipe Segment Data (now further updated in Applicants' May 22, 2017 Corrected and Updated Confidential Attachment to Applicants' Response to ORA DR 6, Question 12 L1600 Pipe Segment Data), refers to "cumulative stations," not "engineering stations." By contrast, the attachment to Applicants' response to ORA DR-25, Q1, including Applicants' April 27, 2017 Corrected and Updated Confidential Attachment to Applicants' Response to ORA DR-25, Q1, refers to "engineering stations," not "cumulative stations."

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(84th DATA REQUEST FROM ORA)
Date Requested: May 5, 2017
Date Responded: May 22, 2017**

QUESTION 8:

If SoCalGas/SDG&E confirm question 7, please explain why SoCalGas/SDG&E have provided ORA with inconsistent Data Responses that show different engineering stations along Line 1600 to identify the same exact area of pipe.

RESPONSE 8:

As set forth in response to Question 1, *Cumulative Stationing vs. Engineering Stationing*, the attachment to Applicants' response to ORA DR-06, Q12, including Applicants' April 27, 2017 Corrected and Updated Confidential Attachment to Applicants' Response to ORA DR 6, Question 12 1600 Pipe Segment Data (now further updated in Applicants' May 22, 2017 Corrected and Updated Confidential Attachment to Applicants' Response to ORA DR 6, Question 12 L1600 Pipe Segment Data), refers to "cumulative stations," not "engineering stations." By contrast, the attachment to Applicants' response to ORA DR-25, Q1, including Applicants' April 27, 2017 Corrected and Updated Confidential Attachment to Applicants' Response to ORA DR-25, Q1, refers to "engineering stations," not "cumulative stations."

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(84th DATA REQUEST FROM ORA)
Date Requested: May 5, 2017
Date Responded: May 22, 2017**

QUESTION 9:

Please confirm that to identify the same areas of pipeline along Line 1600, certain SoCalGas/SDG&E Data Responses use different engineering stations. Specifically, confirm that the updated April 2017 response to ORA DR-25, Q1 uses engineering stations [REDACTED] to [REDACTED] to identify a specific area of Line 1600 pipeline, while the original May 2016 and updated April 2017 response to ORA DR-06, Q1 uses engineering stations [REDACTED] to cover that same area of pipeline. Explain the difference between the two data responses.

RESPONSE 9:

The question above contains confidential information (shaded in gray) pursuant to Cal. Pub. Util. Code § 583, G.O. 66-C, D.16-08-024.

As set forth in response to Question 1, *Cumulative Stationing vs. Engineering Stationing*, the attachment to Applicants' response to ORA DR-06, Q12, including Applicants' April 27, 2017 Corrected and Updated Confidential Attachment to Applicants' Response to ORA DR 6, Question 12 1600 Pipe Segment Data (now further updated in Applicants' May 22, 2017 Corrected and Updated Confidential Attachment to Applicants' Response to ORA DR 6, Question 12 L1600 Pipe Segment Data), refers to "cumulative stations," not "engineering stations." By contrast, the attachment to Applicants' response to ORA DR-25, Q1, including Applicants' April 27, 2017 Corrected and Updated Confidential Attachment to Applicants' Response to ORA DR-25, Q1, refers to "engineering stations," not "cumulative stations."

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
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(A.15-09-013)
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Date Requested: May 5, 2017
Date Responded: May 22, 2017**

QUESTION 10:

Explain why the response to ORA DR-06, Q12 contains different engineering stations than the response to ORA DR-25, Q1. If the responses come from different databases or other systems, please explain the underlying documentation and what part of the SCG/SDG&E organization(s) bears responsibility for their maintenance and accuracy.

RESPONSE 10:

As set forth in response to Question 1, *Cumulative Stationing vs. Engineering Stationing*, the attachment to Applicants' response to ORA DR-06, Q12, including Applicants' April 27, 2017 Corrected and Updated Confidential Attachment to Applicants' Response to ORA DR 6, Question 12 1600 Pipe Segment Data (now further updated in Applicants' May 22, 2017 Corrected and Updated Confidential Attachment to Applicants' Response to ORA DR 6, Question 12 L1600 Pipe Segment Data), refers to "cumulative stations," not "engineering stations." By contrast, the attachment to Applicants' response to ORA DR-25, Q1, including Applicants' April 27, 2017 Corrected and Updated Confidential Attachment to Applicants' Response to ORA DR-25, Q1, refers to "engineering stations," not "cumulative stations."

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
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(A.15-09-013)
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Date Requested: May 5, 2017
Date Responded: May 22, 2017**

QUESTION 11:

Do SCG/SDG&E's updates to its responses to ORA DR-06 Q12 identified in this data request mean that SCG/SDG&E claims it provided inaccurate information to ORA in the instances where that information have been updated? If not, please explain.

RESPONSE 11:

To the extent that ORA is referring to differences in stationing, as set forth in response to Question 1, *Cumulative Stationing vs. Engineering Stationing*, the attachment to Applicants' response to ORA DR-06, Q12, including Applicants' April 27, 2017 Corrected and Updated Confidential Attachment to Applicants' Response to ORA DR 6, Question 12 1600 Pipe Segment Data (now further updated in Applicants' May 22, 2017 Corrected and Updated Confidential Attachment to Applicants' Response to ORA DR 6, Question 12 L1600 Pipe Segment Data), refers to "cumulative stations," not "engineering stations." By contrast, the attachment to Applicants' response to ORA DR-25, Q1, including Applicants' April 27, 2017 Corrected and Updated Confidential Attachment to Applicants' Response to ORA DR-25, Q1, refers to "engineering stations," not "cumulative stations."

With respect to the values attributed to the specific pipeline segments corrected in Applicants' April 27, 2017 Corrected and Updated Confidential Attachment to Applicants' Response to ORA DR 6, Question 12 1600 Pipe Segment Data (and now further updated in Applicants' May 22, 2017 Corrected and Updated Confidential Attachment to Applicants' Response to ORA DR 6, Question 12 1600 Pipe Segment Data), Applicants provided the information for the relevant segments that was in Applicants' High Pressure Database at the time of the original and updated responses. As discussed above, the High Pressure Database was updated from conservative default values for certain segments to actual values for those segments between the May 12, 2016 response to ORA DR-06, Q12 and the June 13, 2016 response to SED DR 3, Q2, a copy of which was provided to ORA in Applicants' July 15, 2016 response to ORA DR 19 and subsequently resubmitted to ORA on August 4, 2016 following an August 2, 2016 amended response to SED DR 3 Q2.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
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Date Requested: May 5, 2017
Date Responded: May 22, 2017**

QUESTION 12:

Please explain why allegedly inaccurate information was originally provided in response to ORA DR-06, Q12. SoCalGas/SDG&E stated in the Amended Response to ORA DR-19, Q7: “The April 27, 2017 Amended Response to ORA DR-06, Question 12 (and the Corrected and Updated Attachment thereto) reflects the pipeline segment data previously provided to ORA in: [ORA DR-25, Q1; amending ORA DR- 19, which amended SED DR-03, Q2].”

RESPONSE 12:

Please see the response to Question 11.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(84th DATA REQUEST FROM ORA)
Date Requested: May 5, 2017
Date Responded: May 22, 2017**

QUESTION 13:

Please provide the change log or other similar information that tracks changes to the database or information used to provide the response to ORA DR-06, Q12. If no such log is available, explain:

- a. How SCG/SDG&E tracks and maintains attribute information of its natural gas pipelines to ensure compliance with state and federal natural gas pipeline safety requirements.
- b. How SCG/SDG&E tracks changes and updates to attribute information of its natural gas pipelines to ensure compliance with state and federal natural gas pipeline safety requirements.

RESPONSE 13:

The Attachments identified in response to Questions 1-6 include documentation of the changes to the High Pressure Database. See documents entitled *FORM 2112 PIPELINE DATABASE UPDATE*.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
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Date Requested: May 5, 2017
Date Responded: May 22, 2017**

QUESTION 14:

How many different sources of information did SCG/SDG&E use to determine the pipeline attributes of Line 1600 it provided ORA in the response to ORA DR-06, Q12? Please list all such sources.

RESPONSE 14:

Applicants have consistently responded to all data requests from the same data source, the High-Pressure Data Base, and documents referenced therein.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
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Date Requested: May 5, 2017
Date Responded: May 22, 2017**

QUESTION 15:

How many different sources of information did SCG/SDG&E use to determine the pipeline attributes of Line 1600 it provided ORA in the April 2017 updated response to ORA DR-06, Q12? Please list all such sources.

RESPONSE 15:

Applicants have consistently responded to all data request from the same data source, the High-Pressure Data Base, and the documents referenced therein. As discussed in response to Question 11, the High Pressure database was updated from conservative default values for certain segments to actual documented values for those segments between the May 12, 2016 response to ORA DR-06, Q12 and the June 13, 2016 response to SED DR 3, Q2, a copy of which was provided to ORA in Applicants' July 15, 2016 response to ORA DR 19, and has been further updated and resubmitted to ORA thereafter.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
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(A.15-09-013)
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Date Requested: May 5, 2017
Date Responded: May 22, 2017**

QUESTION 16:

How many different sources of information did SCG/SDG&E use to determine the pipeline attributes of Line 1600 it provided ORA in the response to ORA DR-25, Q1. Please list all such sources.

RESPONSE 16:

Applicants have consistently responded to all data request from the same data source, the High-Pressure Data Base, and the documents referenced therein. As discussed in response to Question 11, the High Pressure Database was updated from conservative default values for certain segments to actual documented values for those segments between the May 12, 2016 response to ORA DR-06, Q12 and the June 13, 2016 response to SED DR 3, Q2, a copy of which was provided to ORA in Applicants' July 15, 2016 response to ORA DR 19, and has been further updated and resubmitted to ORA thereafter.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
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(A.15-09-013)
(84th DATA REQUEST FROM ORA)
Date Requested: May 5, 2017
Date Responded: May 22, 2017**

QUESTION 17:

How many different sources of information did SCG/SDG&E use to determine the pipeline attributes of Line 1600 it provided ORA in the April 2017 updated response to ORA DR-25, Q1. Please list all such sources.

RESPONSE 17:

Applicants have consistently responded to all data request from the same data source, the High-Pressure Data Base, and the documents referenced therein. As discussed in response to Question 11, the High Pressure Database was updated from conservative default values for certain segments to actual documented values for those segments between the May 12, 2016 response to ORA DR-06, Q.12 and the June 13, 2016 response to SED DR 3, Q2, a copy of which was provided to ORA in Applicants' July 15, 2016 response to ORA DR 19, and has been further updated and resubmitted to ORA thereafter.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)**

(A.15-09-013)

(84th DATA REQUEST FROM ORA)

Date Requested: May 5, 2017

Date Responded: May 22, 2017

QUESTION 18:

When answering questions 14, 15, 16, and 17, if SCG/SDG&E used a data source in one response it did not use in another response, please explain why.

RESPONSE 18:

NA. All data sources were the same.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(84th DATA REQUEST FROM ORA)
Date Requested: May 5, 2017
Date Responded: May 22, 2017**

QUESTION 19:

When answering questions 14, 15, 16, and 17 if SCG/SDG&E did not use a data source in one response that it used in another response, please explain why.

RESPONSE 19:

NA. All data sources were the same.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(84th DATA REQUEST FROM ORA)
Date Requested: May 5, 2017
Date Responded: May 22, 2017**

QUESTION 20:

Provide the name(s), title(s), and part of the SoCalGas/SDG&E organization for who:

- a. Prepared the original response to ORA DR-06, Q12.
- b. Prepared the April 2017 updated response to ORA DR-06, Q12.
- c. Prepared the original response to SED DR-03, Q2 (and thus ORA DR-25, Q1).
- d. Prepared the April 2017 updated response to SED DR-03, Q2 (and thus ORA DR-25, Q1).
- e. Prepared the original response to ORA DR-19, Q7.
- f. Prepared the April 2017 updated response to ORA DR-19, Q7.

RESPONSE 20:

SDG&E and SoCalGas (Applicants) object to the term “prepared” as vague and ambiguous, and thus potentially overbroad and unduly burdensome if deemed to include every employee who contributed data to the High Pressure Database. Subject to and without waiving their objections, Applicants respond as follows: These responses were prepared by various personnel in the pipeline integrity department under the direction of Maria Martinez (Director - Pipeline Integrity).

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(84th DATA REQUEST FROM ORA)
Date Requested: May 5, 2017
Date Responded: May 22, 2017**

Update to ORA DR-19, Q7

QUESTION 21:

Please confirm that at no point in the response to ORA DR-25 Q1 has SCG/SDG&E stated that the information contained therein was an update or revision to the response contained in ORA DR-06, Q12.

RESPONSE 21:

ORA DR-25 Q1 specifically requested “Please provide an updated version of the table provided in response to SED DR-3, Q2 and Q3, that includes the following columns appended to the end”. Applicants provided the updated information requested by ORA DR-25 Q1.

ORA clearly was aware of the later data provided to SED, and received the updated data it requested through ORA DR-25 Q1. Although SCG/SDG&E did not state in the response to ORA DR-25, Q1 that it superseded the earlier response to ORA DR-06, Q12, SCG/SDG&E assumed that ORA was aware that it was receiving “updated” data as ORA DR-25, Q1 specifically requested it. ORA also received updated data through its receipt of SCG/SDG&E’s responses to SED DR-3, Q2 and Q3.

At no time before receiving ORA’s testimony on April 17, 2017 was SCG/SDG&E aware that ORA was relying on the un-updated data provided in response to ORA DR-06, Q12, rather than the updated data provided to ORA in response to ORA DR-19 and ORA DR-25, Q1. Despite serving thousands of data request questions on SCG/SDG&E, ORA never asked about the differences in Line 1600 segment data between the early response to ORA DR-06, Q12 and the later responses to ORA DR-19 and ORA DR-25, Q1, despite being aware of the discrepancies as set forth in ORA’s April 17, 2017 testimony. SCG/SDG&E regrets that ORA relied upon the earlier response rather than the later responses with the updated data.

**SAN DIEGO GAS & ELECTRIC COMPANY
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(A.15-09-013)
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Date Requested: May 5, 2017
Date Responded: May 22, 2017**

QUESTION 22:

Please confirm that at no point in the response to ORA DR-19 Q7, prior to the April 2017 update, has SCG/SDG&E stated that the information contained therein was an update or revision to the response contained in ORA DR-06, Q12.

RESPONSE 22:

Please see the response to Question 21 above.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(84th DATA REQUEST FROM ORA)
Date Requested: May 5, 2017
Date Responded: May 22, 2017**

QUESTION 23:

Please confirm that ORA DR-19, Q7 specifically asked for the differences between the response to ORA DR-06, Q12 and the 1968 SDG&E report provided in response to ORA DR-14, Q2, which asked:

- a. Please provide a copy of the pressure log used to establish the Maximum Allowable Operating Pressure of Line 1600.
- b. What was the maximum in service pressure experienced by Line 1600 between 1965 and 1970?

RESPONSE 23:

ORA DR-19, Q7 states: "Please explain the discrepancies in pipeline records between SDG&E's 1968 report on Line 1600 (provided in response to ORA DR-14 Q2) and the L1600 pipe segment data (provided in response to ORA DR-06 Q12)."

ORA DR-14, Q2 states, in part: "a. Please provide a copy of the pressure log used to establish the Maximum Allowable Operating Pressure of Line 1600. b. What was the maximum in service pressure experienced by Line 1600 between 1965 and 1970?"

- a. Please see response to ORA DR14 Q2. In addition, 49 CFR § 192.619(c) does not specify actual copies of written pressure records to be preserved.
- b. Please see response to ORA DR14 Q2.

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SOUTHERN CALIFORNIA GAS COMPANY
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Date Requested: May 5, 2017
Date Responded: May 22, 2017**

QUESTION 24:

Please confirm that the response to ORA DR-19, Q7 explicitly included the explanatory factors of “changes to the pipelines due to various reasons, such as replacement or relocations”, but omitted the information provided in the April 2017 updated response to ORA DR 19, Q7.

RESPONSE 24:

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.

Applicants’ July 15, 2016 response to ORA DR-19, Q7 states: “The pipeline record provided in ORA DR-14 Q2 was developed in 1968, and the pipeline record provided in ORA DR-06 Q12 is the current status of Line 1600, which accounts for changes to the pipelines due to various reasons, such as replacement or relocations. The primary segment is still the 16” Diameter, [REDACTED]” Wall Thickness and [REDACTED] SMYS in the current report (see DR 14).”

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(84th DATA REQUEST FROM ORA)
Date Requested: May 5, 2017
Date Responded: May 22, 2017**

QUESTION 25:

Please confirm that the response to SED DR-3, Q2 was based on “the Maximum Allowable Operating Pressure (MAOP) validation process”.

RESPONSE 25:

As stated in SoCalGas/SDG&E response to SED DR-3 Q2: “As part of the Maximum Allowable Operating Pressure (MAOP) validation process each segment was analyzed to determine the appropriate MAOP based on year of installation, pipe properties, class location, test records and historical operating pressures.”

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SOUTHERN CALIFORNIA GAS COMPANY
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(84th DATA REQUEST FROM ORA)
Date Requested: May 5, 2017
Date Responded: May 22, 2017**

QUESTION 26:

Regarding Line 1600, has SCG/SDG&E ever found errors in the data during the MAOP validation process? Please explain and indicate if the information was more conservative (i.e. the data SCG/SDG&E had been using resulted in lower MAOPs than the data discovered during the MAOP validation process) or was less conservative (i.e. the data SCG/SDG&E had been using resulted in higher operating pressure than the data discovered during the MAOP validation process).

RESPONSE 26:

Applicants object that “ever found errors in the data during the MAOP validation process” is vague and ambiguous, and thus could be overbroad, unduly burdensome and beyond the scope of this proceeding. Assuming that ORA is asking about whether errors were introduced into Applicants’ High Pressure Database, Applicants respond as follows: No, until a reliable source document is found conservative numbers are used, which provide a margin of safety. Basing the analysis on conservative values sets the maximum allowable operating pressure (MAOP) as determined by Section 192.619(a)(1) at lower setting.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(84th DATA REQUEST FROM ORA)
Date Requested: May 5, 2017
Date Responded: May 22, 2017**

QUESTION 27:

If any of the data discovered in the MAOP validation process resulted in lowering the MAOP of Line 1600, please identify all such data, including the initial data that was used, and the updated data. Please be sure to include in spreadsheet format all necessary factors to identify this change, including:

- a. Engineering stations;
- b. Date of the discovery of the new data;
- c. All attributes needed to calculate design based MAOP under 49 CFR Section 192.105 that changed due to discovery of the new data. Please be sure to itemize each attribute provided in response to question 27c.

RESPONSE 27:

No data resulted in the change of the MAOP of Line 1600.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(84th DATA REQUEST FROM ORA)
Date Requested: May 5, 2017
Date Responded: May 22, 2017**

QUESTION 28:

Please confirm that the 1968 report to the Commission, provided in response to ORA DR-14, Q2, erroneously states that the 14” segments of Line 1600 under Lake Hodges had not been tested.

RESPONSE 28:

The 1968 report to the Commission provided reflected information available at the time. As part of the MAOP validation process, Applicants located the testing documents for the 14” section of pipeline.

**SAN DIEGO GAS & ELECTRIC COMPANY
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(A.15-09-013)
(84th DATA REQUEST FROM ORA)
Date Requested: May 5, 2017
Date Responded: May 22, 2017**

QUESTION 29:

Are there any other errors of which SoCalGas/SDG&E is now aware of in the 1968 report to the Commission, provided in response to ORA DR-14, Q2?

RESPONSE 29:

Applicants object that this Question is vague and ambiguous, and thus may be overbroad, unduly burdensome and beyond the scope of this proceeding. To the extent that the Question is limited to errors regarding Line 1600 wall thickness and yield strength, and without waiving their objections, Applicants respond as follows: No.

**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 the Response to ORA DR 84, Question 1 – 28 and the corresponding attachments, submitted concurrently herewith (“ORA 84_Q1_ Attachment.pdf” and “ORA 84_Q2_ Attachment.pdf”, “ORA 84_Q3_ Attachment.pdf”, “ORA 84_Q4_ Attachment.pdf”, “ORA 84_Q5_ Attachment.pdf”, “ORA 84_Q6_ Attachment.pdf”) in response to the Office of Ratepayer Advocates (“ORA”) data request ORA DR 84. 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 response to the data request ORA DR 84, Question 1-6 & 24 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 19th day of May 2017, at Los Angeles, California.



Maria Martinez
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 DR 84, Question 1-6 and 24

Location of Data	Description of Data	Applicable Confidentiality Provisions	Basis for Confidentiality
<p>ORA DR 84 Q1_Attachment</p>	<p>Q1 Page 1:, Completed/Approved By (Personnel Names), Stationing (Location), Wall Thickness and Pipe Grade Q1 Page 2: Test Chart, Wall Thickness, Grade Q1 Page 3: Diameter, Wall Thickness, Test Pressure Parameters, Grade Q1 Page 4: Test Chart, Wall Thickness, Grade Q1 Page 5: Job Description, Location, Class Location, Design Factor, Grade, Wall Thickness, Specification (SMC), Yield Pressure, Design Pressure, Test Parameters (Medium, Duration, Pressure). Q1 Page 6: Job Description, Location, Class Location, Design Factor.</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>"Wall Thickness" and "Yield Strength" are specific engineering design information about an existing critical infrastructure that could be used to determine the criticality of a gas facility and identify vulnerabilities of the gas delivery network. The values can be used to calculate stress levels of a pipe. Because of the critical nature of these attributes, they have been identified by PHMSA to be restricted attributes available only to government officials in the Federal Register Vol. 81, pg. 40764 published in 6/22/2016.</p> <p>"Pipe Diameter" is a specific engineering design value depicting an attribute of a proposed or existing critical infrastructure that could be used to determine the criticality of a gas facility and identify vulnerabilities of the gas delivery network. The value can be used to identify the volume of gas present in an area and ascertain the relative potential consequences of intentional acts against the gas transportation and distribution network. Because of the critical nature of the attribute, it has been identified by PHMSA to be a restricted pipeline attribute in the</p>
<p>ORA DR 84 Q2_Attachment</p>	<p>Q2 Page 1: Completed By, Grade, Stationing, and Approved By Q2 Page 2-5: Wall, Pressure Test Parameters, Personnel Information and Specific Location.</p>	<p>Personnel Information - Gov't Code §6254(c) ("disclosure of which would constitute an unwarranted invasion of personal privacy").</p>	

<p>ORA DR 84 Q3_Attachment</p>	<p>Q3 Page 1: Completed/Approved By (Personnel Names), Stationing (Location), and Pipe Grade Q3 Page 2: Job Description, Location, Class Location, Design Factor, Length, Design Level, Yield Pressure, Pressure, Grade, Wall Thickness, Specification (SMC), Yield Pressure, Design Pressure, Test Parameters (Medium, Duration, Pressure), and Personnel Information Q3 Page 3: Job Description, Location, Class Location, Design Factor, Test Parameters (Medium, duration, pressure, and length) and Personnel Information Q3 Page 4: Job Description/Scope and Personnel Information</p>		<p>Federal Register Vol 81, pg. 40764 published on 6/22/2016. Diameter is also exempt from public disclosure per the CEII and CII regulations for the same security reasons.</p> <p>Operating "pressure" (i.e., MAOP) is a specific engineering design value as well as an operating parameter depicting an attribute of an existing critical infrastructure. This operating parameter could be used to determine the criticality of a gas pipe or facility and identify vulnerabilities of the gas delivery network. The release of this operating parameter is detrimental to public safety as it can be used as a means to identify the volume of gas present and potential energy that could be released in an area in order to identify the potential consequences of an intentional act of sabotage. Because of the critical nature of the parameter, it has been identified by PHMSA to be restricted pipeline information as well being an SSI element in the Federal Register Vol 81, pg. 40764 published on 6/22/2016. Pressure information is also exempt from public disclosure per the CEII and CII regulations for the same security reasons.</p>
<p>ORA DR 84 Q4_Attachment</p>	<p>Q4 Page1: Completed/Approved By (Personnel Names), Stationing (Location), Wall Thickness and Grade Q4 Page2: Stationing (Location), Wall Thickness, Grade, and Approved by Q4 Page3-5: Specific Location, Personnel Information, Wall Thickness</p>		<p>Personnel Information - Gov't Code §6254(c) ("disclosure of which would constitute an unwarranted invasion of personal privacy").</p>
<p>ORA DR84 Q5_Attachment</p>			

<p>ORA DR 84 Q6_Attachment</p> <p>ORA-84.doc</p>	<p>Q5 Page1: Completed/Approved By (Personnel Names), Stationing (Location), Wall Thickness and Grade Q5 Page2: Stationing (Location), Wall Thickness, Grade, and Approved by Q5 Page3-5: Specific Location, Personnel Information, Wall Thickness</p> <p>Q6 Page 1: Completed/Approved By (Personnel Names), Stationing (Location), Wall Thickness and Grade Q6 Page 2: Diameter, Wall Thickness, Grade, and Personnel Information</p> <p>Q24, Page 5-17, 35: Stationing (Location), Wall Thickness and Grade</p>		
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