

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(85th DATA REQUEST FROM ORA)**

**Date Requested: May 18, 2017
Date Responded: June 2, 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.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(85th DATA REQUEST FROM ORA)**

Date Requested: May 18, 2017

Date Responded: June 2, 2017

-
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.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(85th DATA REQUEST FROM ORA)**

**Date Requested: May 18, 2017
Date Responded: June 2, 2017**

QUESTION 1:

Subject: Attachment C to SoCalGas/SDG&E Supplemental Testimony

This data request contains information identified as confidential by SoCalGas/SDG&E

Page 3 of Attachment C to SoCalGas/SDG&E's Supplemental Testimony states "Small segments of the line consist of pipe grades having higher or lower strengths than [REDACTED]."

SoCalGas/SDG&E's response to ORA DR-6, Q 12 (original and updated) identifies segments [REDACTED]; [REDACTED]; and [REDACTED] as having a yield strength of [REDACTED].

SoCalGas/SDG&E's response to ORA DR-25, Q 1 (original and updated) identifies segments [REDACTED]; [REDACTED]; and [REDACTED] as having a yield strength of [REDACTED].

With these statements in mind:

- a. When Mr. Rosenfeld refers to "lower strengths than [REDACTED]", are there any segments other than those identified in ORA DR-6, Q12 and ORA DR-25, Q1 identified above, that Mr. Rosenfeld is referring to?
- b. When Mr. Rosenfeld referred to "lower strengths than [REDACTED]", explain and provide the underlying data source that was utilized in making this statement.
- c. Are the segments identified in ORA DR-6 Q12 and ORA DR-25 Q1 identifying the exact same pieces of Line 1600? If the answer is anything but an unequivocal "Yes", please explain and provide all supporting documentation related to the explanation.

RESPONSE 1:

The question and response contain 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. Yes. In preparing his testimony, Mr. Rosenfeld reviewed the original data used in response to ORA DR-6, Q12, which, in addition to the segments having a yield strength of [REDACTED], also included the following segments with a material strength of [REDACTED]:
 - [REDACTED] to [REDACTED]
 - [REDACTED] to [REDACTED]

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

(A.15-09-013)

(85th DATA REQUEST FROM ORA)

Date Requested: May 18, 2017

Date Responded: June 2, 2017

-
- [REDACTED] to [REDACTED]
 - [REDACTED] to [REDACTED]

b. Mr. Rosenfeld was identifying pipe segments listed in the original May 12, 2016 response to ORA DR-6, Q12 with a yield strength lower than [REDACTED], which includes [REDACTED] psi and [REDACTED] psi SMYS material for Line 1600. The original data source was provided to ORA in response to DR-06, Q12 on May 12, 2016

c. Yes

**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:

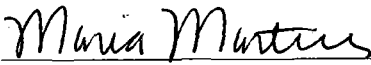
1. I am the Director of Pipeline Integrity for San Diego Gas & Electric Company (“SDG&E”) and Southern California Gas Company (“SoCalGas”). I have been delegated authority to sign this declaration by Douglas M. Schneider, Vice President of System Integrity and Asset Management for SDG&E and SoCalGas. I have reviewed the information provided in SDG&E’s and SoCalGas’ response to ORA Data Request 85 (“ORA DR 85”), submitted concurrently herewith. 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 ORA DR 85, is 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 2nd day of June, 2017, at Los Angeles, California.



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 ORA DR 85

Location of Data	Description of Data	Applicable Confidentiality Provisions	Basis for Confidentiality
<p><i>ORA-85_Confidential.pdf</i></p> <p>Pages 3-4</p>	<p>Pipeline Attributes:</p> <p>Yield Strength /Grade</p> <p>Positional Line Name</p> <p>Location</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.</p>	<p>Documents listing yield strength (grade) with line name and location is considered confidential because it is specific engineering value and is considered detailed design information on a critical energy infrastructure (see Critical 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>The engineering design value (yield strength and/or grade) of an existing critical infrastructure 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 the attribute, it has been identified by PHMSA to be a restricted pipeline attributes in the Federal Register Vol 81, pg. 40764 published on 6/22/2016.</p> <p>Line name and location with design information is also considered confidential because it may be used as a key to identifying the location of critical facilities named in other publically available documents.</p>