

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(87th DATA REQUEST FROM ORA)**

**Date Requested: May 23, 2017
Date Responded: June 5, 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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This data request contains material identified by SoCalGas/SDG&E as confidential (shaded in gray).

QUESTION 1:

In Confidential Attachment 2 to ORA Data Request 84, SoCalGas/SDG&E provided documentation regarding MAIN_ID 6716, Work Order 1581522-99. The work was on engineering stations [REDACTED] to [REDACTED] in July 1999.

In the notes for pages 2, 3 and 5, is the statement: "Test new 16" main @ 1200 psi for 4 hours hydrostatically".

- a. Please provide the pressure log and pressure test records for this pressure test.
- b. A pressure test at 1200 psi would be a 1.5 times test for a MAOP of 800 psi. With the identified 16" diameter, 0.5" wall thickness, and 52,000 psi yield, this segment would have operated at approximately 24% SMYS at 800 psi. If this is incorrect, please explain and provide the correct values.
- c. Please explain the basis for a 4 hour pressure test on this segment of Line 1600, rather than any other duration such as 1 hour or 8 hours.

RESPONSE 1:

The question contains confidential information (shaded in gray) which has been previously provided to ORA pursuant to Cal. Pub. Util. Code § 583, G.O. 66-C, D.16-08-024 with an accompanying declaration.

- a. Please see the attachment to this response.
- b. Correct.
- c. The pipeline segment in question is a short section of pipe. 49 Code of Federal Regulations (CFR) § 192.505(d) states: "For fabricated units and short sections of pipe, for which a post installation test is impractical, a pre-installation strength test must be conducted by maintaining the pressure at or above the test pressure for at least 4 hours."

Accordingly, the pressure test on the segment in question was for 4 hours.

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QUESTION 2:

In response to ORA DR-84, Q11, SoCalGas/SDG&E stated:

“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...”

- a. Please explain in detail what prompted SoCalGas/SDG&E to update their High Pressure Database between May 12, 2016 and June 13, 2016.
- b. For how long had the High Pressure Database had incorrect information entered for the segments identified in ORA DR-84 Questions 1 to 6?
- c. For Line 1600, when did SoCalGas/SDG&E complete MAOP validation? If there has been more than one period when MAOP validation has been considered complete, please provide each date, and an explanation of what occurred that prompted a new examination of MAOP validation.
- d. What is the High Pressure Database used for?
- e. What purposes, including but not limited to integrity management, are the cumulative stations (as described in the response to ORA DR-84 Q1) in the High Pressure Database used for?
- f. What purposes, including but not limited to integrity management, are the engineering stations (as described in the response to ORA DR-84 Q1) in the High Pressure Database used for?

RESPONSE 2:

- a. SDG&E and SoCalGas (Applicants) continually evaluate the High Pressure Database to identify additional updates and/or review its records. Further, the data requests received regarding Line 1600 afforded an opportunity to review the High Pressure Database and input additional updates between May and June 2016.
- b. The High Pressure Database works as intended. The Applicants’ use of conservative values should not be characterized as “incorrect information” as the process for establishing conservative values was developed to align with guidance provided by ASME B31.8S Section 4, Gathering, Reviewing and Integrating Data when the data available is not completely substantiated. As stated in Applicants’ response to ORA DR-84, at the time the original response to ORA DR-06, Q12 was prepared, the High

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Pressure Database was assigned conservative values for the segments noted in ORA DR-84 Questions 1 to 6. When a wall thickness or grade value is not completely substantiated through installation records in the High Pressure Database, it is conservatively assigned a wall thickness and grade value that provides a margin of safety. The conservative value was assigned based on the diameter and year of installation, and was appropriately reflected in the High Pressure Database at the time the May 12, 2016 response to ORA DR-06, Q12 was prepared and submitted.

- c. Applicants completed the MAOP validation process as outlined by the Pipeline and Hazardous Materials Safety Administration (PHMSA) in June 2013. The segments involved in the ORA DR-84 data request did not impact the validated MAOP determination of Line 1600. The segments from ORA DR-84 Questions 1-3 using conservative wall thickness and grade values validated the MAOP of 640 psig and the segments from ORA DR-84 Questions 4-6 are qualified to be grandfathered.
- d. The primary purpose of the High Pressure Database is to support the Applicants' integrity management program. It is used to represent the pipeline attributes for high pressure pipelines with geospatial references based on the source documentation within the installation package.
- e. Cumulative stationing is a measurement down the centerline of the pipeline and is recalculated each time the pipeline is modified; therefore, each reiteration of the pipe will have a new cumulative stationing value. The cumulative stationing facilitates calculating accurate lengths of the pipeline.
- f. Engineering station values are memorialized on the pipeline and are intended to stay consistent over time with small modifications to account for realignments and reroutes. The benefit of "engineering stationing" is that attribute information can easily be associated to legacy drawings.