

**SAN DIEGO GAS & ELECTRIC COMPANY  
SOUTHERN CALIFORNIA GAS COMPANY  
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)  
(A.15-09-013)  
(DATA REQUEST ORA-98)**

**Date Requested: September 20, 2017  
Date Responded: September 25, 2017**

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**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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Please refer to the following excerpts from the Response of San Diego Gas & Electric Company and Southern California Gas Company in Opposition to Office of Ratepayer Advocates Motion to Amend and Supplement Testimony and for Additional Hearings (Response), filed September 19, 2017.

In particular, the Response notes:

“Moreover, the Commission’s Safety and Enforcement Division (SED) reviewed Applicants’ Line 1600 records in August 2017, and raised no safety concern.” (Response,p.5.)

The Response also states:

“On August 9-11, 2017, this documentation was made available to SED as part of a complete records review of Line 1600 to assess the inventory of documentation that is available to support the pipe properties, pressure testing of certain segments and the MAOP validation, and no unsatisfactory findings were noted.”

“As an initial matter, Applicants have never “inform[ed] the Commission and parties of their lack of documentation” on the appropriate LJF value because Applicants have documentation. (footnote omitted) Moreover, the Commission’s Safety and Enforcement Division (SED) reviewed Applicants’ Line 1600 records in August 2017, and raised no safety concern.” (Response, p. 13.)

With these excerpts in mind, please answer the following.

**QUESTION 1:**

As a result of the August 2017 Safety and Enforcement Division (SED) review mentioned in the above excerpts, did SoCalGas/SDG&E receive any communications from SED that there were “no safety concerns” with Line 1600?

**RESPONSE 1:**

Over the course of the review of Line 1600 records conducted by the Safety and Enforcement Division (SED) on August 9-11, 2017, there were verbal communications between SDG&E and SoCalGas (Applicants) and SED. Based on these verbal communications, it is the

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Applicants' understanding that SED was satisfied with Applicants' Line 1600 records and SED raised no immediate safety concerns as part of the records review.

Further, Applicants note that via Resolution SED-1, SED previously required Applicants take steps to enhance the operating safety of Line 1600 by reducing the maximum operating pressure to 512 psig from its previous level of 640 psig. Applicants have complied with this requirement by reducing the Maximum Operating Pressure (MOP) and the Maximum Allowable Operating Pressure (MAOP) to 512 psig for the entire length of Line 1600, including the southern 4.7 miles which are outside the scope of the Application (A.)15-09-013. Since the issuance of Resolution SED-1 and the review of Line 1600 records, SED has not indicated that further action is needed to ensure safety.

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**QUESTION 2:**

If the answer to question 1 is yes, please provide all such communications.

Please include documentation showing those communications.

**RESPONSE 2:**

N/A. As indicated in the response to Question 1 above, the communications that transpired during the August 9-11, 2017 review of records were verbal communications.

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**QUESTION 3:**

As a result of the August 2017 SED review mentioned in the above excerpts, did SoCalGas/SDG&E receive any communications from SoCalGas/SDG&E that stated or suggested its pipeline safety records were safe?

**RESPONSE 3:**

No. As a result of the August 2017 SED review mentioned in the above excerpts, SoCalGas/SDG&E did not “receive any communications from SoCalGas/SDG&E that stated or suggested its pipeline safety records were safe.”

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**QUESTION 4:**

If the answer to question 4 is yes, please provide all such communications.

Please include documentation showing those communications.

**RESPONSE 4:**

N/A. Please refer to the response to Question 3 above.

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**QUESTION 5:**

Did SoCalGas/SDG&E receive authorization from SED to represent the results of SED's August 2017 review described above? If so, please provide documentation showing that authorization.

**RESPONSE 5:**

The subject statements included in the Response are the Applicants' statements and are based on Applicants' understanding of the verbal communications that transpired during the August 9-11, 2017 review of Line 1600 records.