

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(DATA REQUEST ORA DR 11)
Date Requested: April 28, 2016
Date Responded: May 13, 2016**

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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Subject: Prepared Testimony of J. Kikuts

QUESTION 1:

Regarding page 1 of the Prepared Direct Testimony of J. Kikuts:

- a. What is the diameter of the Miramar to Santee pipeline?
- b. What is the diameter of the Santee to Otay Mesa pipeline?
- c. Define the S.R.L. acronym.
- d. How large are the S.R.L. pipelines interconnecting to Otay Mesa?

RESPONSE 1:

Please note that some of the information provided (e.g., pipe diameter) contains **confidential information provided pursuant to G.O. 66-C and Cal. Pub. Util. Code § 583.**

- a. The SDG&E transmission pipeline between Miramar and Santee is a ■-inch diameter pipeline.
- b. The SDG&E transmission pipelines between Santee and Otay Mesa are ■-inch and ■-inch diameter pipeline.
- c. S.R.L., shortened from S. de R.L. de C.V., stands for Sociedad de Responsabilidad Limitada de Capital Variable. Translated to English, it means Limited Liability Company Capital Variable.
- d. The pipeline supplying the Otay Mesa receipt point is a single ■-inch diameter pipeline.

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QUESTION 2:

What other outage scenarios were considered for Section IV of the Prepared Direct Testimony of J. Kikuts?

RESPONSE 2:

Section IV of the Prepared Direct Testimony of J. Kikuts focused strictly on a single plausible scenario involving a supply disruption to a key SDG&E natural gas transmission pipeline. No other scenarios beyond the scenario depicted in the testimony were considered.

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QUESTION 3:

Provide the independent and combined probabilities of each of the events and the specific scenario occurring.

RESPONSE 3:

The purpose of the Prepared Direct Testimony of J. Kikuts is to describe how a specific supply disruption on an existing SDG&E gas transmission line would impact SDG&E's and SoCalGas' system and resulting ability to provide gas service to customers. As the testimony was focused on the impacts a specific supply disruption scenario on an existing pipeline and not the statistical probability of it occurring, no corresponding probability data was calculated.

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QUESTION 4:

What are the bases for the assumptions used in Section IV of the Prepared Direct Testimony of J. Kikuts?

RESPONSE 4:

The basis for the assumptions used in Section IV of the Prepared Direct Testimony of J. Kikuts are as provided as follows:

- The outage scenario occurrence time of 10 am was selected to demonstrate the impact of a specific supply disruption on an existing SDG&E gas transmission line shortly following the morning peak gas demand period. An estimated isolation time of 15 minutes was selected after reviewing the main line valve auto-closure settings and operational activities required to confirm the supply line outage prior to isolation. The isolated line segment length of 6.5 miles was based on the distance between the two valves selected for the scenario at the northern end of Line 3010.
- The outage period of a 24 hour minimum was based on the assumption that a full rupture of a gas transmission line due to an unknown cause would not be repaired in less than 24 hours. Reasonable time beyond 24 hours is required for incident investigation, repair planning, materials delivery, and physical construction of a new pipeline segment.
- The SDG&E 1-in10 system design criteria is the basis for selecting a 1-in-10 year gas demand day for this scenario. SDG&E designs the gas system to adequately serve all customers, including core, non-core, and electric generation (EG) during a 1-in 10 demand day.
- The basis of the assumption that gas supplies at Otay Mesa are not available in the short term is that immediate supply of gas from Otay Mesa receipt point is not guaranteed as discussed in the Prepared Direct Testimony of Gwen Marelli.
- The purpose of the Prepared Direct Testimony of J. Kikuts is to describe how a specific supply disruption on an existing SDG&E gas transmission line would impact the Utilities' system and resulting ability to provide gas service to customers. This is the basis for the assumption that the remaining SDG&E gas transmission system, including Moreno, remains fully functional with the outage limited to a northern segment of Line 3010.

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QUESTION 5:

What electric generators are included in the 165 MMcfd of demand in Figure 2 on page 5 of the Prepared Direct Testimony of J. Kikuts? How many MW does 165 MMcfd represent?

RESPONSE 5:

The electric generators include: Cabrillo Power 1, SDG&E Generation Palomar and Otay Mesa Energy Center, representing 1,530 MW.

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QUESTION 6:

What weather day are the capacity numbers in Figure 2 on page 5 of the Prepared Direct Testimony of J. Kikuts based upon?

RESPONSE 6:

The capacity line item in Figure 2 on page 5 of the Prepared Direct Testimony of J. Kikuts summarizes capacity of the SDG&E system without Line 3010 and only Line 1600 remaining available as discussed in the Prepared Direct Testimony of D. Bisi. This system capacity is 150 MMcfd and is not weather dependent.

The subsequently listed Core, Electric Generation (EG), and Non-Core demand values are based on a 1-in-10 year gas demand day, which on average have a 10% probability of occurring each year during the winter season.

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QUESTION 7:

Has SoCalGas/SDG&E ever experienced a situation similar to the scenario described in Section IV of the Prepared Direct Testimony of J. Kikuts? If so, please identify each such scenario and explain.

RESPONSE 7:

SDG&E has not experienced an event similar to the outage scenario on a 1-in-10 design day condition resulting in core customer outages. SDG&E has experienced an event on Line 3010 driving EG curtailment demonstrating the plausibility of the outage scenario described in the Prepared Direct Testimony of J. Kikuts.

- On October 11, 1985 SDG&E sustained third party damage on the northern end of Line 3010. The contractor was installing a 16" inch liquid fuel line in the SDG&E right of way when Line 3010 was struck. The damage, while not a rupture, was 15 feet in length and required isolation and pressure reduction of the affected pipeline segment in order to make necessary repairs. This event required the curtailment of gas service to local electric generation including Miramar turbine, South Bay power plant, and Encina power plant. At the time of this incident, these power plants had alternate fuel capability.

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QUESTION 8:

Over the past five years, how often are have no flowing supplies been available at Otay Mesa?

RESPONSE 8:

Supply delivered to Otay Mesa has only occurred when the System Operator purchases supply at that location or compels customers to deliver supply at Otay Mesa in lieu of curtailment. Over the past five years, the vast majority of the time has seen no flowing supply delivered at Otay Mesa.

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QUESTION 9:

Does SoCalGas/SDG&E have any agreements or contracts in place that provide for making additional gas supplies available via other systems in the advent of an emergency or force majeure? If so, please identify and provide all such agreements, and explain.

RESPONSE 9:

SDG&E and SoCalGas do have one agreement that could possibly provide for additional gas supplies via another system in the case of an emergency or force majeure. SoCalGas and Pacific Gas and Electric Company entered into an agreement dated 1988 which provided that either utility could request of the other gas volumes in any amount sufficient to make up the deficiency in its own gas supplies for its P-1/P-2A customers' requirements.

However, such provision of gas supplies was conditioned on several conditions as follows:

Prior to requesting service thereunder the requesting party was required to do all of the following:

- Purchase all available gas supplies, provided that the Requesting Party is not required to purchase gas at a price in excess of 300 percent of the Supplying Party's noncore procurement portfolio price; and
- Subject to Requesting Party's ability to meet its design day and/or other operating requirements, withdrawal of gas from its storage facilities will be maximized; and
- Curtail all sales to its own noncore procurement portfolio customers except where such curtailment would endanger the customer's health or property; and
- Curtail all sales to its core-elect procurement portfolio customers except where such curtailment would endanger the customer's health or property; and
- Request a Commission acknowledgment of a state of emergency resulting from the gas supply situation, and notify the Supplying Party of such request when made; and
- Divert all available storage, transport and exchange gas from the Requesting Party's system; and
- Seek to have its customers conform to its tariffs filed with the Commission regarding prohibitions, conservation, and curtailment of gas use and to urge its customers to limit their gas usages.

Also, the Party receiving such request for gas to satisfy a part or the Requesting Party's P-1/P-2A requirements shall use its best efforts to deliver in accordance with good operating procedure, the gas volumes requested to the extent it is able to do so from all supply sources

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available to it, including gas which can be made available by curtailment of its own customers in priorities lower than P-2A, and by purchase or production of gas from whatever other qualified gas source(s) of supply that are available; provide, however, that neither party shall be required to deliver gas to the other, if as a consequence it has a reasonable belief it might be unable, at the time of such request or within the current planning year, to meet the design day or planning year requirements of its own P-1/P-2A customers, as to which the Supplying Party shall be the sole judge.

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QUESTION 10:

Page 6 of the Prepared Direct Testimony of J. Kikuts states that “not all noncore customers will comply with the curtailment order in a timely manner”. Define “timely manner”.

RESPONSE 10:

The term “timely manner” refers to a noncore customer complying with the curtailment order within the requested curtailment timeframe.

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QUESTION 11:

Page 7 of the Prepared Direct Testimony of J. Kikuts states that “immediate supply of gas from Otay Mesa... is not guaranteed.” Define “immediate supply”.

RESPONSE 11:

By “immediate supply”, SDG&E and SoCalGas refer to supply that is procured, scheduled, and delivered across three pipeline companies in sufficient time to avoid a noncore curtailment on the SDG&E system.