

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(DATA REQUEST ORA DR 13)
Date Requested: May 10, 2016
Date Responded: May 24, 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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QUESTION 1:

Provide the “recent deficiency letter” from Energy Division discussed in the May 5, 2016 SoCalGas/SDG&E Ex Parte meeting with Rachel Peterson.

RESPONSE 1:

SDG&E and SoCalGas object to this request insofar as it calls for the production of documents which are publicly available or otherwise equally accessible to ORA. Subject to and without waiving this objection, SDG&E and SoCalGas respond as follows.

The “recent deficiency letter” may be obtained from the Energy Division’s Project Website. Please see “Deficiency Letter #3”: <http://www.cpuc.ca.gov/Environment/info/ene/sandiego/sandiego.html>

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QUESTION 2:

Provide any data requests, deficiency letters, presentations, or other materials requested by any Commission staff, not limited to Energy Division, Safety and Enforcement Division, or Commissioners and/or their advisors.

RESPONSE 2:

SDG&E and SoCalGas object to this request on the grounds that it is overbroad and unduly burdensome. It seeks an expansive amount of information, most of which was previously provided and/or calls for the production of documents which are publicly available or otherwise equally accessible to ORA. Subject to and without waiving these objections, SDG&E and SoCalGas respond as follows.

Data Requests

Energy Division propounded 1 data request, which was provided to ORA via email dated April 26, 2016 (email subject: ORA DR-05 in A.15-09-013).

Safety and Enforcement Division propounded 1 data request, which was provided to ORA in response to ORA Data Request 5 on April 25, 2016.

Deficiency Letters

All deficiency letters from Energy Division to SDG&E/SoCalGas may be obtained from the Energy Division's Project Website: <http://www.cpuc.ca.gov/Environment/info/ene/sandiego/sandiego.html>

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QUESTION 3:

Provide any data responses, responses to deficiency letters, presentations, or other materials provided to any Commission staff, not limited to Energy Division, Safety and Enforcement Division, or Commissioners and/or their advisors. To the extent identical information is provided in response to Question 2, do not include it in response to this question.

RESPONSE 3:

SDG&E and SoCalGas object to this request on the grounds that it is overbroad and unduly burdensome. It seeks an expansive amount of information, most of which was previously provided and/or calls for the production of documents which are publicly available or otherwise equally accessible to ORA. Subject to and without waiving these objections, SDG&E and SoCalGas respond as follows.

Data Requests

Please refer to the response to Question 2 above.

Responses to Deficiency Letters

SDG&E's and SoCalGas' responses to deficiency letters from Energy Division may be obtained from the Energy Division's Project

Website: <http://www.cpuc.ca.gov/Environment/info/ene/sandiego/sandiego.html>

Presentations

SDG&E and SoCalGas provided presentations during the following meetings. Please note that the information contained in these presentations may change over time as the proposed project is more fully developed:

- August 20, 2015 – Meeting with CPUC Energy Division, CEQA, SED and Gas Planning
- September 2, 2015 – Meeting with CPUC CEQA and E&E
- April 6, 2016 – Meeting with CPUC CEQA, SED, Gas Planning and E&E

Due to size, the presentations will be sent via Electronic Data Transfer. Please note that some of the information provided is **confidential information provided pursuant to G.O. 66-C and Cal. Pub. Util. Code § 583**.