

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**
**CERTIFICATE OF PUBLIC CONVENIENCE & NECESSITY FOR THE
PIPELINE SAFETY & RELIABILITY PROJECT - CPCN**
(A.15-09-013)

(DATA REQUEST ORA-DR-03)

Date Requested: March 23, 2016

Date Responded: April 6, 2016

QUESTION 1:

If SoCalGas and SDG&E have an updated workpapers associated with their amended / supplemented application please provide them in active Excel spreadsheets. Excel spreadsheets should not contain hard-coded numbers but instead should have the formulas that were used to arrive at the calculations shown in the workpapers in support of the testimonies that will enable ORA to replicate the numbers.

RESPONSE 1:

Please refer to the attached workpapers in support of the amended application, specifically workpapers supporting the Cost Effectiveness Analysis (Volume III) and Prepared Direct Testimonies of Neil Navin, Michael Woodruff, and Jason Bonnett. Please note that some of the workpapers supporting Neil Navin's direct testimony contains **confidential information provided pursuant to G.O. 66-C and Cal. Pub. Util. Code § 583.**

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QUESTION 2:

From ORA's review of the SoCalGas website it does not appear that SoCalGas / SDG&E have updated testimony alongside the updated application. Does SoCalGas/SDG&E have any updated testimony as a result of the updated application? If so, please provide. If not, please explain why not.

RESPONSE 2:

SDG&E and SoCalGas did not serve direct testimony with the original application on September 30, 2015. SDG&E and SoCalGas provided direct testimony with the amended application on March 21, 2016. Therefore, the testimony found on our company websites is the most current.

Website:

SDG&E: <http://www.sdge.com/regulatory-filing/15786/pipeline-safety-reliability-project>

SCG: <https://socalgas.com/regulatory/A15-09-013.shtml>