

**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-04)**

**Date Requested: April 5, 2016  
Date Responded: April 19, 2016**

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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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**QUESTION 1:**

Please provide the following data:

- i. Leak history for Line 1600 for the last 10 years.
- ii. What is the average leak rate for Line 1600? (Please go back as far as you have data available to show this)

**RESPONSE 1:**

- i. SDG&E and SoCalGas object to this data request insofar as it is over-broad, burdensome, vague, and ambiguous to the extent that it relies on the terms “leak history” and “leak rate”, which are not defined. As such, the discovery request is impossible to respond to and/or seeks information that is neither relevant nor reasonably calculated to lead to discovery of admissible information. SDG&E and SoCalGas will treat this request as if it called for a gas leak detection that required repair. Without waiving these objections, SDG&E and SoCalGas respond that in the last 10 years one leak has been reported on Line 1600 due to a leaking tap valve.
- ii. SDG&E and SoCalGas object to this data request insofar as it is over-broad, burdensome, vague, and ambiguous to the extent that it relies on the terms “leak history” and “leak rate”, which are not defined. As such, the discovery request is impossible to respond to and/or seeks information that is neither relevant nor reasonably calculated to lead to discovery of admissible information. SDG&E and SoCalGas will treat this request as if it called for a gas leak detection that required repair. The average leak rate for Line 1600 for the last 10 years is 0.1 leaks/year.