

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(DATA REQUEST ORA-53)**

**Date Requested: November 23, 2016
Date Responded: December 14, 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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**Date Requested: November 23, 2016
Date Responded: December 14, 2016**

Subject: Line 1600

QUESTION 1:

At any point between Rainbow Station and the ultimate consumers of gas from Line 1600, do the gas supplies:

- a. Remain under the ownership of SoCalGas/SDG&E?
- b. Change ownership from SoCalGas/SDG&E to another party?
- c. Pass through a City Gate?
- d. Pass through a Gate Station?

RESPONSE 1:

- a. Only gas transported by SDG&E's Electric & Fuel Procurement Department.
- b. Gas supply transported by the Gas Acquisition Department changes ownership to core customers when it passes through the customer's meter.
- c. The Citygate described in SoCalGas' and SDG&E's respective gas tariffs does not have a physical location on the SoCalGas/SDG&E system.
- d. Gate Station is not a term used by SoCalGas/SDG&E to describe its system. It is also not defined in either SoCalGas Rule 1 or SDG&E Gas Rule 1.

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QUESTION 2:

If Line 1600 has the pressure lowered to below 320 psig or less, at any point between Rainbow Station and the ultimate consumers of gas from Line 1600, would the gas supplies:

- a. Remain under the ownership of SoCalGas/SDG&E?
- b. Change ownership from SoCalGas/SDG&E to another party?
- c. Pass through a City Gate?
- d. Pass through a Gate Station?

RESPONSE 2:

Please refer to the responses to Questions 1(a) through (d) above. Converting Line 1600 to a distribution supply line does not change any of the responses to Questions 1(a) through (d).

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QUESTION 3:

If Line 1600 was derated, would any other connecting transmission lines also be derated? If so, which ones? What would the new maximum allowable operating pressures on those lines be?

RESPONSE 3:

No other transmission pipelines would need to be derated per SDG&E/SoCalGas' proposal set forth in A.15-09-013.

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Date Requested: November 23, 2016
Date Responded: December 28, 2016**

Subject: Location of Anomalies on Line 1600

QUESTION 4:

Please provide a map identifying where hook-like cracking has been identified on Line 1600.

RESPONSE 4:

The map contains confidential information provided pursuant to Cal. Pub. Util. Code §583, General Order 66-C and D.16-08-024 and the accompanying declaration. Applicants are providing via email, a secure web viewer for ORA to view the requested map information.

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QUESTION 5:

Please provide a chart that identifies per 1000 feet of Line 1600 (starting at Rainbow Station):

- a. The number of hook-like cracks.
- b. The longest/deepest hook-like crack identified.
- c. The average length/depth of hook-like cracking identified.
- d. The number of bondline flaws.
- e. The longest/deepest bondline flaw identified.
- f. The average length/depth of bondline flaws identified.
- g. The number of other anomalies.

RESPONSE 5:

Applicants object to the question as it is unduly burdensome and seeks information that was previously provided to ORA. Subject to and notwithstanding their objection, Applicants respond as follows.

Applicants do not maintain the requested data in the format requested. Applicants have previously provided the data requested in response to previous data requests in this proceeding. Specifically, the response to ORA DR 5 Q1, Applicants provided copies of their response to SED DR 1 Q11, which contain documentation pertaining to Line 1600 pigging data (anomaly information). Please refer to Question 6 of ORA DR 52 for locating reported dimensions for confirmed hook cracking anomalies. Within the ILI data, the distance (in feet) for each anomaly relative to detected features can be determined using the values listed in the column labeled "OdometerFt".