

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(DATA REQUEST ORA DR 14)**

**Date Requested: May 27, 2016
Date Responded: June 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.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(DATA REQUEST ORA DR 14)**

Date Requested: May 27, 2016

Date Responded: June 13, 2016

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.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(DATA REQUEST ORA DR 14)**

**Date Requested: May 27, 2016
Date Responded: June 13, 2016**

QUESTION 1:

In response to ORA-DR 6, Question 9, SCG/SDG&E responded:

Pressure tests for newly constructed segments (for example, cylindrical replacements) have been conducted in accordance with applicable code requirements on Line 1600.

- a. How many miles of Line 1600 have been pressure tested? If less than 1 mile, provide the response in feet.
- b. As a percentage of the length of Line 1600, what percentage of the Line has been pressure tested?

RESPONSE 1:

- a. Approximately 4.3 miles of Line 1600 have been pressure tested.
- b. Approximately 8.5% of Line 1600 has been pressure tested.

Please note: There are some additional segments that were pressure tested and are in process of being entered into the database. These projects are expected to be 2,000 feet or less and were performed for valve replacements to allow for inline inspection or cylindrical repairs post inline inspection. Once these projects are added to the database, we will update our response accordingly.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(DATA REQUEST ORA DR 14)**

**Date Requested: May 27, 2016
Date Responded: June 13, 2016**

QUESTION 2:

In response to ORA-DR 6, Question 9:

Which subsection of 49 CFR § 192.619 applies to determine Maximum Allowable Operating Pressure of Line 1600?

SCG/SDG&E responded:
49 CFR § 192.619(c).

In ORA-DR 12, Question 12, ORA asked:

What is the maximum in service pressure experienced by Line 1600? Provide the record showing this.

SCG/SDG&E responded:

The maximum in service pressure experienced by Line 1600 is 785 psig, since February 1, 2008. The record is attached.

- a. Please provide a copy of the pressure log used to establish the Maximum Allowable Operating Pressure of Line 1600.
- b. What was the maximum in service pressure experienced by Line 1600 between 1965 and 1970?

RESPONSE 2:

- a. The final record for establishing the grandfathering pressure varies. The review completed during this time period was transcribed into summary sheets and pressure logs were not preserved. Attached is a filing made at the CPUC in 1968 that summarizes the review completed and documents the highest operating pressure to be 812 psig each winter.

The requirements on pressure restrictions in 49 CFR § 192.619(c) do not apply in the following instance. An operator may operate a segment of pipeline found to be in satisfactory condition, considering its operating and maintenance history, at the highest actual operating pressure to which the segment was subjected during the 5 years preceding the applicable date in the second column of the table in 49 CFR § 192.619(a)(3). An operator must still comply with 49 CFR § 192.611.

- b. 812 psig