

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(DATA REQUEST ORA-20)
Date Requested: July 21, 2016
Date Responded: August 5, 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:

Does Sempra's adopted Pipeline Safety Enhancement Plan decision tree contain information or decision points based on flash welded seams? Please provide specific references to which step of the decision tree contains this information.

RESPONSE 1:

The Pipeline Safety Enhancement Plan (PSEP) Decision Tree approved by the Commission in Decision (D.) 14-06-007 includes a PSEP Sub-Prioritization Methodology, which considers multiple factors including long seam type (see D.14-06-007 at Attachment I). Additionally, analysis of other engineering factors may include consideration of long seam type depending on the situation of each unique pipeline segment (see Application (A.) 11-11-002, Exhibit SCG-20 at 10-11).

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QUESTION 2:

Has the CPUC or its staff ordered any pressure reductions or other remedial actions on any parts of the following lines which Sempra has indicated are also electric resistance welded (ERW)? If so, please provide a copy of the letter, and all data requests and data responses on those lines.

- a) Line 1027
- b) Line 85 North
- c) Line 85 South
- d) Line 1004
- e) Line 404
- f) Line 49-18

RESPONSE 2:

No.

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QUESTION 3:

The Prepared Testimony of T. Sera at page 11 discusses Line 1003. Under what mechanism was Line 1003 reduced to distribution pressures? Did this reduction require any permission from the CPUC?

RESPONSE 3:

SDG&E and SoCalGas operate an integrated natural gas transmission system and have the authority to operate their lines consistent with applicable laws, rules and regulations. In an effort to enhance system safety and as knowledgeable operators of their system, SDG&E and SoCalGas converted Line 1003 from transmission service to distribution service by reducing the maximum allowable operating pressure (MAOP) to produce a stress level less than 20% specified minimum yield strength (SMYS). This reduction in pressure did not require permission from the Commission.

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QUESTION 4:

For each of the following lines, did SoCalGas or SDG&E's TIMP assessments indicate a need for replacement, down rating, or further study? If so please provide the relevant assessments.

- a) Line 1027
- b) Line 85 North
- c) Line 85 South
- d) Line 1004
- e) Line 404
- f) Line 49-18

RESPONSE 4:

TIMP assessments of the high consequence area portions of the pipelines listed above did not indicate a need for replacement, down rating, or further study – however, this does not preclude the possibility of future actions or studies on these pipelines.

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QUESTION 5:

The July 8, 2016 Executive Director's letter to the CEO of SDG&E entitled "RE: Reducing Pressure on Line 1600" (July 8th letter) orders replacement of the segment of Line 1600 from Engineering Stations 17-131 on Line 1600.

- a. Please provide the basis for the ordered replacement.
- b. Provide all communications, including but not limited to discovery, from the CPUC and its staff relating to the July 8th letter, and SoCalGas and/or SDG&E's responses to those communications. If there were verbal communications relating to the July 8th letter, please identify the dates and persons present for those communications.
- c. What size and materials are SoCalGas or SDG&E intending to use to replace this segment?
- d. Does SoCalGas and SDG&E intend to recover the costs of this replacement from ratepayers? If so, how much do SoCalGas and SDG&E anticipate this replacement costing?
- e. Is Engineering Stations 17-131 the only segment of Line 1600 where SoCalGas/SDG&E was making engineering assumptions about pipeline features? Please explain.
- f. What percentage SMYS is Line 1600 at the current pressure of 512 psig?
- g. When did SoCalGas/SDG&E first begin discussions with Commission staff relating to the July 8th letter?
- h. Did SoCalGas/SDG&E identify communications relating to the July 8th letter in either its initial or amended application in proceeding number A.15-09-013? If so, please provide all page numbers that identify such communications. If not, why not?
- i. Did SoCalGas/SDG&E have any communications with Commission decision makers relating to the July 8th letter?
- j. Does SoCalGas/SDG&E understand that any of its communications with staff relating to the July 8th letter were shared with decision makers at the Commission? If the answer is anything other than no, please explain. If the answer is yes, please explain why SoCalGas/SDG&E has such an understanding.

RESPONSE 5:

- a. SDG&E and SoCalGas object to this data request on the ground that it calls for speculation. SDG&E and SoCalGas do not know the Commission's basis for the ordered replacement other than what was stated in the Executive Director's July 8, 2016 letter (July 8 Letter) directive and Draft Resolution No. SED-1 issued on July 19, 2016, and cannot speak for the Commission.

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- b. Other than the communications described in the response to (g) below, SDG&E and SoCalGas did not have communications specifically relating to the July 8 Letter; however, as part of discovery for this Application (A.15-09-013), the Safety Energy Division (SED) and Energy Division issued a number of data requests (copies of which were provided to ORA in SDG&E's and SoCalGas' responses to ORA DR 5 and DR 19). In addition, a meeting was held at SDG&E's Miramar office with the SED staff.
- Meeting on 6/22/2016
 - Review of records related to work orders on Line 1600
 - Location: SDG&E's Miramar Office
 - Attendees: Andy Chow (CPUC), Durga Shrestha (CPUC), Dave Reistetter (SDG&E), Steve Diuco (SDG&E), Jaime Garcia (SoCalGas), Fay Chen (SoCalGas), Jeff Koskie (SoCalGas)
- c. 16" diameter, 0.375" wall thickness, X52 grade pipe.
- d. Yes, the preliminary estimate is approximately \$900,000, since the initial planning has not been completed.
- e. Yes, pipe segment 17-131 is the only location on Line 1600 where SDG&E and SoCalGas do not have complete records; however SDG&E and SoCalGas have records of their purchasing practices and direct examinations that support the conservative engineering values used on Line 1600.
- f. Line 1600 is operating at 32% SMYS based on the primary properties of the original 1949 construction installation.
- g. SDG&E and SoCalGas sent an email to the Commission's Executive Director on July 8, 2016, which confirmed receipt of the July 8 Letter. On July 14, 2016, consistent with the instructions in the July 8 Letter, SDG&E and SoCalGas sent a written response to the Commission's Executive Director providing an update on the steps taken to implement each of the four directives set forth in the July 8 Letter.
- h. No. The original Application and Amended Application were filed on September 30, 2015 and March 21, 2016, respectively. The Commission's directive to reduce the pressure on Line 1600 was received on July 8, 2016.
- i. No.

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- j. SDG&E and SoCalGas object to this request on the grounds that it is vague and ambiguous and calls for speculation. Subject to and without waiving their objections, SDG&E and SoCalGas respond as follows.

SDG&E and SoCalGas interpret this question as asking if they have knowledge of staff sharing SDG&E's and SoCalGas' communications related the July 8 Letter with decision makers at the Commission. SDG&E's and SoCalGas' communications regarding the July 8 Letter are described in the response above and were provided to the Commission's Executive Director. SDG&E and SoCalGas do not know whether these communications were shared with decision makers at the Commission.

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QUESTION 6:

What is the longest seam flaw from hook cracking that SoCalGas/SDG&E has identified on Line 1600? On any other line in the SoCalGas/SDG&E system?

RESPONSE 6:

The longest seam individual flaw related to hook cracking on Line 1600 that SoCalGas and SDG&E has identified was approximately 8 inches long.

SoCalGas/SDG&E object to the question regarding “any other line” on the grounds that it is overbroad and unduly burdensome.

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QUESTION 7:

Provide any engineering studies of the time to failure, or similar measure, for the following lines where there are flash welded seams:

- a) Line 1027
- b) Line 85 North
- c) Line 85 South
- d) Line 1004
- e) Line 404
- f) Line 49-18

RESPONSE 7:

No time to failure studies have been conducted for the pipelines listed above.

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QUESTION 8:

Are there any other lines with higher risk scores than those identified in Table 3 of the Prepared Direct Testimony of T. Sera? Please provide a table and brief explanation of why their risk scores are higher.

RESPONSE 8:

The risk scores identified in Table 3 of the Prepared Direct Testimony of T. Sera were generated in support of this filing, and include all pipelines with flash welded seams. As a result there are no other flash welded pipe scores available for comparison.

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QUESTION 9:

Prior to the mitigations and repairs that occurred after the ILI of Line 1600, what was the risk score?

RESPONSE 9:

Risk scores were not generated to reflect the period of time after the ILI and prior to repair.

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QUESTION 10:

When did SDG&E first identify hook cracking on Line 1600? When did SDG&E first report hook cracking on Line 1600 to the CPUC?

RESPONSE 10:

Hook cracking was confirmed on July 23rd, 2013. The hook cracking observed did not trigger any CPUC reporting requirements at the time of inspection, and no hook crack specific reports were submitted. The CPUC was first informed of the presence of manufacturing flaws in a safety related condition status update on December 29, 2014.

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QUESTION 11:

What is SoCalGas/SDG&E's understanding of the underlying facts and rationales that serve as the basis for the July 8th letter to instruct each of the following:

- a. "Reduce pressure on Line 1600 to 512 psig, which represents a 20% reduction from design-based maximum allowable operating pressure (MAOP)".
- b. "Perform In Line Inspections (ILI) of Line 1600 using identical technologies as in your previous ILI run and compare the results with the 2012-2015 ILI data".
- c. "Replace segment from Engineering Stations "17-131" on Line 1600".
- d. "Perform Quarterly Instrumented Leak Surveys on the entire transmission Line 1600".

RESPONSE 11:

SDG&E and SoCalGas object to this data request on the grounds that it calls for speculation. SDG&E and SoCalGas do not know the Commission's basis or rationale for the directive other than what was stated in the July 8 Letter and Draft Resolution No. SED-1 issued on July 19, 2016, and cannot speak for the Commission.

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QUESTION 12:

Did SoCalGas/SDG&E request any of the instructions identified in the July 8th letter? If so, which ones? If so, please explain why SoCalGas/SDG&E made such a request.

RESPONSE 12:

No.