

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(DATA REQUEST ORA-25)
Date Requested: July 29, 2016
Date Responded: August 12, 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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BACKGROUND INFORMATION:

In DR ORA-6, Q18 ORA asked and SDG&E answered as follows:

QUESTION 18:

Has Line 1600 undergone any class location changes after installation? If so, please provide at the segment level, the date of class location change, the old class location, the new class location, and the percentage of Specified Minimum Yield Strength of the pipe before and after the class location change.

RESPONSE 18:

Yes, the pipeline has undergone class location changes since installation. The entire pipeline operates at a stress level that is less than 50% of SMYS and would be commensurate for class 1, 2 and 3 areas. As such, there would be no need for a change in the percentage of SMYS from a change in class location between class 1, 2 and 3 for Line1600.

Please note that some of the information provided contains confidential information provided pursuant to G.O. 66-C and Cal. Pub. Util. Code §583. The attached document identifies the segments that increased in class location since 2008 with the associated percentage of SMYS.

ORA followed up in ORA-19, Q9 with two further questions, and SDG&E answered those. The questions and answers are shown as follows:

- a. Please provide a listing of the segments that increased in class location prior to 2008.
- b. For all segments that experienced a change in change location, provide the stress level (as a percentage of SMYS) before and after the class location change.

RESPONSE 9:

The term “class location” was not in existence at the time of construction of Line 1600. While some early industry guidelines did introduce the concept of class location in relation to the design of new pipelines, monitoring for changes in class location on existing pipelines was introduced into federal regulation in 1970.

Based upon the pipe record provided as part of ORA DR-14 Q2, the design calculation to qualify the pipe assumed that all segments of Line 1600 operated in a class 3 location with a safety factor of 0.5 which allowed for an MAOP of 812 psig.

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In an attempt to be responsive to this question, Table 1 was constructed to compare the reported class location with records from 2008 in the same mile post ranges listed in the 1968 document. The table shows that class location segment determinations have mostly reduced when evaluating on a milepost segment level established in 1968. This is reflective of improved technology and less conservatism in the class location determination.

**Table 1: Comparison
of Class Location**

	<u>1968</u>	<u>2008</u>
Records (1968 vs 2008) Segment		
MP 0 to 29.1	Class 1,2,3	Class 1,2,3
MP 29.1 to MP 29.6	Class 2	Class 1
MP 29.6 to MP 49.6	Class 2,3	Class 1,2,3

As denoted in Table 1, there were no increases in class between the periods of 1968 and 2008 at the granularity of the mile post ranges that was used in the 1968 document.

It is important to note that prior to 2008, class location was managed at the milepost segment level and there are no historical records that provide class location determination at a pipe segment detail as is being requested. Reporting of class information by pipe segment is a modern practice that became possible once a class location database was introduced.

Lastly, in response to SED DR-3, Q2 and Q3, SoCalGas/SDG&E provided a table. With this background in mind, please answer the following:

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A supplemental response to the amended response dated April 27, 2017 is provided herein.

QUESTION 1:

Please provide an updated version of the table provided in response to SED DR-3, Q2 and Q3, that includes the following columns appended to the end:

- a. Longitudinal Joint Factor
- b. If the Joint is Known (K) or Unknown (U)
- c. The year of each class location change (blank if no class location change)
- d. The class location prior to each change
- e. The class location after each change

Provide the response as an active Excel spreadsheet. If an entry has more than one class location change, append an additional set of items c-e to the end of the entry. Please highlight each column that contains information that SoCalGas/SDG&E claims to be confidential.

RESPONSE 1:

Some of the information provided in the attachment contains confidential information provided pursuant to G.O 66-C and Cal. Pub. Util. Code § 583 and D.16-08-024. Accordingly, a confidentiality declaration is included with the attachment.

The attached excel file appends the requested additional columns. Please note that the attachment also reflects the updates provided to ORA on August 4, 2016.

The updates to the table in the Corrected and Updated Attachment are noted in red and reflect the replacement of a segment in October 2016 per Resolution SED-1.

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SUPPLEMENTAL RESPONSE 1:

This response contains confidential information (shaded in gray) and the attachment also contains confidential information and are provided pursuant to G.O. 66-C/D, Cal. Pub. Util. Code § 583, D.16-08-024, and the accompanying declaration.

In ORA DR-25, Q1, ORA instructed the Applicants to add certain information to a table of Line 1600 segment data provided to SED on June 13, 2016 in response to SED DR-3, Q2 (the June 2016 Table), and which was provided to ORA in response to ORA DR-19, Q6. This June 2016 Table reflected the information contained in the Applicants' High Pressure Pipeline Database (HPPD) when it was created in June 2016. The June 2016 Table was amended on August 2, 2016 (First Amended June 2016 Table) to update the MAOP calculation due an error in the output script as stated to ORA and SED at the time, and in more detail in Applicants' response to ORA DR-92, Q1. The First Amended June 2016 Table was provided to SED on August 2, 2016 and to ORA on August 4, 2016 (the August 2016 Table). In response to ORA DR-25, Q1, the First Amended June 2016 Table was amended to add requested information and provided to ORA on August 12, 2016 (Second Amended June 2016 Table).

The Second Amended June 2016 Table was amended again on April 27, 2017 to reflect the replacement of the segment mandated by Resolution SED-1, and provided to ORA in an Amended Response to ORA DR-25, Q1. Applicants also amended the First Amended June 2016 Table to reflect the replacement of the segment mandated by Resolution SED-1, and provided it to SED in a Second Amended Response to SED DR-3, Q2.

These past amendments to the original June 2016 Table, however, have not reflected later updates to the information contained in the HPPD for Line 1600. Applicants update pipeline information in the HPPD on an ongoing basis to reflect normal operational activities, including but not limited to, class location updates and incorporation of construction activities submitted into the GIS department, as well as updates from continual record reviews. Each update is documented by a Form 2112.

ORA noted that the information in the June 2016 Table and later amendments for certain Line 1600 segments under Lake Hodges (the Lake Hodges segments) is not consistent with the information contained in a 1968 filing with the Commission. Following ORA's observation, Applicants have reviewed the current information in the HPPD. Since the June 2016 Table was produced, there have been some updates to the information for Line 1600 in the HPPD, including the information for the Lake Hodges segments.

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The Line 1600 pipeline attributes related to calculating the %SMYS (i.e. diameter, wall, SMYS), MAOP and previous pressure testing provided to ORA and SED by the April 27, 2017 amended responses to ORA DR-25, Q1 and SED DR-3, Q2 have changed minimally as a result of construction projects. These construction-related changes have no impact on Line 1600's MAOP determination or its ability to operate below 20% SMYS at 320 psig as the new pipe is of equal or greater strength than the original 1949 A.O. Smith pipe constituting a majority of the pipeline.

Non-construction related changes to the information in the HPPD for Line 1600 include:

An update of the MAOP for Line 1600 from 640 psig to [REDACTED] psig as directed by SED. A Form 2112 was submitted on 9/1/2017 and was reflected in the HPPD on 9/11/2017 (PDMS ID [REDACTED]). As a result, the %SMYS and A1 results on all Line 1600 segments in the June 2016 Table (as amended) would change as the MAOP at that time was 640 psig.

The 14 inch pipe segments under Lake Hodges were revised to [REDACTED] inch wall thickness and SMYS of [REDACTED] on a Form 2112 submitted on 7/28/2016 and updated in the HPPD on 7/29/2016 (PDMS ID [REDACTED]). This update was based upon a January 10, 1949 memo. As noted in the Form 2112, the "Reference document (PDMS [REDACTED]) indicates 'tensile strength' of [REDACTED] psi. Per historical pipe specifications, a tensile strength of [REDACTED] psi is equivalent to [REDACTED] psi grade." This Form 2112 and the reference document are attached hereto as Attachment 1. In addition, the test pressure for the [REDACTED] inch segments was changed from [REDACTED] to [REDACTED] psig on a Form 2112 submitted on 9/11/2017 and was reflected in the HPPD on 10/17/2017 (PDMS ID [REDACTED]).

In seeking to determine why the HPPD reflected inaccurate values for the Lake Hodges segments in June 2016, the Utilities have determined the following. During the initial data collection efforts, the [REDACTED] pipe was originally identified as having [REDACTED] inch wall thickness and SMYS of [REDACTED] as reflected in the 1949 record noted above. In 2013, two Form 2112s were submitted to change these pipe properties to [REDACTED] inch wall thickness and SMYS of [REDACTED] (PDMS ID [REDACTED] & [REDACTED]). The two Form 2112s that were submitted and entered in 2014, initiated changes based on a 2006 pipe examination (PDMS ID [REDACTED]) that reported the inspected pipe properties to be [REDACTED] inch wall thickness. Due to miss-alignment with the stationing values, the 2006 inspection report mistakenly was applied to the 14" pipe segments under Lake Hodges, and the Lake Hodges segments were incorrectly updated. The Utilities have reviewed a 2015 bellhole inspection for a Lake Hodges segment that confirms the [REDACTED] wall and [REDACTED] pipe described in the January 1949 letter, and which is attached as Attachment 2.

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These changes to the information for the Lake Hodges segments (as well as the erroneous data in the HPPD from 2014 to 2016) had no impact on the MAOP determination for those segments as they are grandfathered under 49 CFR 192.619(c). The changes also have no impact on those segments' ability to operate below 20% SMYS at 320 psig. Based upon the information in the HPPD reflected in the June 2016 Table (as amended), where the Lake Hodges segments were reported to have [REDACTED] wall thickness and 52,000 psi SMYS, the segments would have operated at a hoop stress of [REDACTED] % SMYS at 320 psig. With the updated documented values currently in the HPPD, the Lake Hodges segments, with 14.0" diameter, [REDACTED] wall thickness, and [REDACTED] psi SMYS, would operate at a hoop stress of [REDACTED] % SMYS at 320 psig.

A [REDACTED] installation test record on another segment changed from [REDACTED] to [REDACTED] psig. This change was submitted on a Form 2112 on 9/21/2017 and was reflected in the HPPD on 10/17/2017 (PDMS ID [REDACTED]).

A [REDACTED] installation test record on another segment changed from [REDACTED] to [REDACTED] psig. This change was submitted on a Form 2112 on 9/12/2017 and was reflected in the HPPD on 10/17/2017 (PDMS ID [REDACTED]).

SED specifically reviewed Line 1600 records at SDG&E's Miramar Base from August 9-11, 2017, including the records used to validate its MAOP. The Applicants provided SED with a table of Line 1600 segment data reflecting the information contained in the HPPD at that time (August 2017). The comprehensive review included segment level analysis of the underlying records that support the pipeline attributes (including joint factor and SMYS), pressure test records, material purchase records, bill of materials and invoices, design data sheets, material test reports, direct examination records, construction drawings, and various other documents. SED's review included the supporting information for the above changes as well as new installations that have been integrated into the HPPD since the June 2016 Table was produced. After the review, SED did not report any concerns to Applicants regarding inadequate record keeping.

If ORA would like a copy of the August 2017 Line 1600 segment table provided for the SED review, or a table generated as of the current date, please let Applicants know. However, such a table will not be directly comparable to the June 2016 Table (or amendments) as the segmentation changes as a result of construction projects, changes in class and other miscellaneous updates (as explained in response to ORA DR-95).

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QUESTION 2:

- a. Does Table 1 cover increases in class on Line 1600 between the periods of 1968 and 2008 at all levels of granularity?
- b. Please identify all class location increases on Line 1600 that are not identified by Table 1.
- c. For all class location increases identified on Line 1600 in response to question 2b, please provide:
 - a. The year of the class location change.
 - b. The approximate mile posts of the line covered by the class location change.
 - c. The old and new class location.

RESPONSE 2:

- a. The available level of granularity has been provided in Table 1.
- b. The class location changes since 2008 have been provided in Table 1.
- c. N/A

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QUESTION 3:

Please confirm if any parts of Line 1600 have a longitudinal joint factor of less than 1.0. If there are parts of Line 1600 that have a longitudinal joint factor of less than 1.0, please identify all such parts, including beginning and ending mileposts. Please explain.

RESPONSE 3:

No parts of Line 1600 have a longitudinal joint factor of less than 1.0.

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QUESTION 4:

For any class location change while Line 1600 had a maximum allowable operating pressure at or above 800 psig, please provide the class location study, including the study results, and the action SoCalGas/SDG&E took to confirm or revise the maximum allowable operating pressure.

RESPONSE 4:

As provided in the attachment for Question 1 above, Line 1600 only contains Class 1, Class 2 and Class 3 allowing the line to operate up to 50% specified minimum yield strength (SMYS) and commensurate with the class location, which is validated per the class location process. Results from the class location study are not retained unless the process indicates the pipeline is not commensurate with the hoop stress.

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QUESTION 5:

CONTAINS DATA IDENTIFIED AS CONFIDENTIAL BY SCG/SDG&E

On line 5 of the table provided to SED DR-3, Q2 and Q3, SoCalGas/SDG&E give a series of values. Please explain why the 192619(A1) value is 650, given the response to ORA DR-6, Q12, where SoCalGas/SDG&E stated the longitudinal joint factor is 1.0.

RESPONSE 5:

Please see response to Question 1 above.

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QUESTION 6:

CONTAINS DATA IDENTIFIED AS CONFIDENTIAL BY SCG/SDG&E

When did SoCalGas/SDG&E become aware that the design factor (192.619 (A1)) of the pipe was 650 psig, not the 800 psig the pipeline was operated at under the grandfather clause (192.619(c)).

RESPONSE 6:

Please see response for Question 1 above.

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QUESTION 7:

- a. Did any part on Line 1600 experience a class location change while it operated at more than 40 percent of SMYS?
- b. If the answer to question 7a is yes, please identify the dates of all such occurrences.
- c. Did Line 1600 operate at more than 40 percent SMYS after any part of it experienced a class location change?
- d. If the answer to question 7c is yes, please provide the first date that Line 1600 operated at more than 40 percent SMYS following a class location change.
- e. Did any segment of Line 1600 ever experience a hoop stress corresponding to the established maximum allowable operating pressure that was not commensurate with the present class location?
- f. If the answer to question 7e is yes, please identify all such parts of Line 1600 that had such an experience, and also provide the date that each part of Line 1600 had such an experience.
- g. Please provide all of the class location studies, including the study results, and the action SoCalGas/SDG&E took to confirm or revise the maximum allowable operating pressure.

RESPONSE 7:

Q7(a) – Q7(c) Please see attachment provided in response to Question 1 above.

Q7(d) – Please see attachment provided in response to Question 1 above. Segments with a class location change that occurred pre-2011 when the Line 1600 pressure reduction took place from 800 psig to 640 psig would have been operating over 40% SMYS.

Q7(e) – No, as previously stated, segments operating at or below 50% SMYS are commensurate with Class 1, Class 2 and Class 3.

Q7(f) – N/A

Q7(g) – As previously stated segments operating at or below 50% SMYS are commensurate with Class 1, Class 2 and Class 3 and require no action to confirm or revise the MAOP.

**BEFORE THE PUBLIC UTILITIES
COMMISSION OF THE STATE OF CALIFORNIA**

**DECLARATION OF MARIA MARTINEZ
REGARDING CONFIDENTIALITY OF CERTAIN DATA/DOCUMENTS
PURSUANT TO D.16-08-024**

I, Maria Martinez, do declare as follows:

1. I am the Director of Pipeline Integrity for San Diego Gas & Electric Company (“SDG&E”) and Southern California Gas Company (“SoCalGas”). I have been delegated authority to sign this declaration by Douglas M. Schneider, Vice President of Enterprise Asset Management for SDG&E and SoCalGas. I have reviewed the supplemental response to the Office of Ratepayer Advocates (ORA) Data Request 5, Question 1 dated December 14, 2017 submitted concurrently herewith (“*ORA 25_Q1_Supplemental_Confidential_12.14.17.pdf*”) and the attachments referenced thereto. I am personally familiar with the facts and representations in this Declaration and, if called upon to testify, I could and would testify to the following based upon my personal knowledge and/or belief.

2. I hereby provide this Declaration in accordance with Decision (“D.”) 16-08-024 to demonstrate that the confidential information (“Protected Information”) provided in response to the above data request is within the scope of data protected as confidential under applicable law.

3. In accordance with the legal citations and narrative justification described in Attachment A hereto, the Protected Information should be protected from public disclosure.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed this 14th day of December 2017, at Los Angeles, California.



Maria Martinez
Director of Pipeline Integrity
San Diego Gas & Electric and
Southern California Gas Company

ATTACHMENT A

SDG&E and SoCalGas Request for Confidentiality on the following Protected Information in its response to ORA Data Request 25

Location of Protected Information	Legal Citations	Narrative Justification
<p><i>ORA 25_Q1_Supplemental Confidential_12.14.17.pdf</i></p>	<p>CPRA Exemption, Gov't Code § 6254(k) ("Records, the disclosure of which is exempted or prohibited pursuant to federal or state law")</p>	<p>Attached is a direct inspection report which includes data collected during the examination- along with specific location. The inspection template details the data collection required by Company internal processes (i.e., standard operating procedures). Inspection Results (including specific location), Inspection Dates, Environmental Conditions (e.g., backfill properties), Pipe Coating, Pipe Segment Characteristics, Wall Thickness, and Cathodic Protection Information are considered CEII.</p>
<p><i>ORA 25_Q1_Supplemental Attachment 1_Confidential.pdf</i></p>	<p>Critical Energy Infrastructure Information ("CEII") under 18 CFR § 388.113(c); Federal Energy Regulatory Commission ("FERC") Orders 630, 643, 649, 662,683, and 702 (defining CEII).</p>	<p>The Pipeline and Hazardous Materials Safety Administration ("PHMSA") guidelines in the Federal Register, Vol 81, pg. 40764, published on 6/22/2016 and U.S. Department of Homeland Security Transportation Security Administration ("TSA") guidelines consider the data to be restricted pipeline information.</p>
<p><i>ORA 25_Q1_Supplemental Attachment 2_Confidential.pdf</i></p>	<p>Critical Infrastructure Information ("CII") under 6 U.S.C. §§ 131(3), 133(a)(1)(E); 6 CFR §§ 29.2(b), 29.8(g) (defining CII and restricting its disclosure).</p>	<p>6 U.S.C. §131(3) defines "critical infrastructure information" as: [I]nformation not customarily in the public domain and related to the security of critical infrastructure or protected systems - (A) actual, potential, or threatened interference with, attack on, compromise of, or incapacitation of critical infrastructure or protected systems by either physical or computer-based attack or other similar conduct (including the misuse of or unauthorized access to all types of communications and data transmission systems) that violates Federal, State, or local law, harms interstate commerce of the United States, or threatens public health or safety; (B) the ability of any critical infrastructure or protected system to resist such interference, compromise, or incapacitation, including any planned or past assessment, projection, or estimate of the vulnerability of critical infrastructure or a protected system, including security testing, risk evaluation thereto, risk management planning, or risk audit; or (C) any planned or past operational problem or solution regarding critical infrastructure or protected systems, including repair, recovery, reconstruction,</p>
	<p>Sensitive Security Information ("SSI") under 49 CFR §1520.5(a)(3), that, if revealed would be detrimental to transportation security.</p>	
	<p>Gov't Code §6254(c) ("disclosure of which would constitute an unwarranted invasion of personal privacy")</p>	
	<p>CA Const. art. 1, § 1.</p>	

Location of Protected Information	Legal Citations	Narrative Justification
		insurance, or continuity, to the extent it is related to such interference, compromise, or incapacitation. Disclosure of confidential Personnel information would constitute an unwarranted invasion of personal privacy.