

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

**(14<sup>th</sup> DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION)**

**Date Requested: March 9, 2017  
Date Responded: March 23, 2017**

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**PRELIMINARY STATEMENT**

1. These responses and objections are made without prejudice to, and are not a waiver of, SDG&E's 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 do 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, as set forth in the California Public Utilities Commission ("Commission or CPUC") Rules of Practice and Procedure. SDG&E and SoCalGas possession, custody, or control does not include any constructive possession that may be conferred by SDG&E's and 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 expressly reserves 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).
6. 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.
7. Publicly available information and documents including, but not limited to, documents that are part of the proceeding record, newspaper clippings, court papers, and materials available on the Internet, will not be produced.

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**GENERAL OBJECTIONS**

1. SDG&E and SoCalGas object to each instruction, definition, and request to the extent that it purports to impose any requirement or discovery obligation greater than or different from those under the CPUC Rules of Practice and Procedure, Statutes, and the applicable Orders of the Commission.
2. SDG&E and SoCalGas object to each request that is overly broad, unduly burdensome, or not reasonably calculated to lead to the discovery of admissible evidence.
3. SDG&E and SoCalGas object to each instruction, definition and data request to the extent that it seeks information protected from disclosure by the attorney-client privilege, deliberative process privilege, attorney work product doctrine, or any other applicable privilege. Should any such disclosure by SDG&E and SoCalGas occur, it is inadvertent and shall not constitute a waiver of any privilege.
4. SDG&E and SoCalGas object to each instruction, definition and data request as overbroad and unduly burdensome to the extent it seeks documents or information that are readily or more accessible to Southern California Generation Coalition (SCGC) from SCGC's own files, from documents or information in SCGC's possession, or from documents or information that SDG&E and SoCalGas previously released to the public or produced to SCGC. Responding to such requests would be oppressive, unduly burdensome, and unnecessarily expensive, and the burden of responding to such requests is substantially the same or less for SCGC as for SDG&E and SoCalGas.
5. SDG&E and SoCalGas object to each instruction, definition and data request to the extent that it seeks the production of documents and information that were produced to SDG&E and SoCalGas by other entities and that may contain confidential, proprietary, or trade secret information.
6. To the extent any of SCGC's data requests seek documents or answers that include expert material, including but not limited to analysis or survey materials, SDG&E and SoCalGas object to any such requests as premature and expressly reserves the right to supplement, clarify, revise, or correct any or all responses to such requests, and to assert additional objections or privileges, in one or more subsequent supplemental response(s) in accordance with the time period for exchanging expert reports set by the Commission.
7. SDG&E and SoCalGas incorporate by reference every general objection set forth above into each specific response set forth below. A specific response may repeat a general objection for emphasis or some other reason. The failure to include any general objection in any specific response does not waive any general objection to that request. Moreover, SDG&E and SoCalGas do not waive their right to amend any responses.

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**Supplemental Testimony Chapter 1, Introduction and Background (Q.14.1 - Q14.4)**

**QUESTION 14.1:**

In Mr. Schneider's testimony at page 5, line 18, through page 6, line 3, Mr. Schneider identifies Sempra Energy "operating units." Please provide a schematic diagram showing the complete chains of subsidiaries of Sempra Energy that include the subsidiaries identified by Mr. Schneider.

**RESPONSE 14.1:**

Please refer to Sempra Energy's annual report (Form 10-K) filed with the United States Securities and Exchange Commission on February 28, 2017 for a description of Sempra Energy's business units. Specifically, see Item 1 – Description of Business.

For your convenience, the annual report may be found on Sempra Energy's website:  
<http://investor.shareholder.com/sre/sec.cfm>

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**QUESTION 14.2:**

In Mr. Schneider’s testimony at page 11, lines 8-11, Mr. Schneider says: “A second customer meter is located at San Onofre on the Orange County/San Diego border, where a minimal amount of gas flows into the SDG&E system to support the local distribution system along the San Diego coast.”

- 14.2.1. Is the pipeline into which gas is delivered at San Onofre identified as “SoCalGas pipeline” on the SDG&E system map on page 12?
- 14.2.2. Is that “SoCalGas pipeline” SoCalGas Line 1026?
- 14.2.3. When was the pipeline constructed?
- 14.2.4. When was the pipeline derated to distribution service?
- 14.2.5. Why was the pipeline derated to distribution service?
- 14.2.6. Does the pipeline interconnect with SDG&E Line 1601?
- 14.2.7. If so, is the pipeline capable of delivering gas into Line 1601?
- 14.2.8. If the pipeline is not capable of delivering gas into Line 1601, why not?
- 14.2.9. Is the pipeline capable of delivering gas to the Encina power plant?
- 14.2.10. If the pipeline is not capable of delivering gas to the Encina power plant, why not?
- 14.2.11. Please provide the historic daily volumes delivered at the Customer Meter located at San Onofre on the Orange County/San Diego border for the same period reported in Attachment D to the Supplemental Testimony for historic daily volumes delivered through Line 1600.

**RESPONSE 14.2:**

- 14.2.1. Yes
- 14.2.2. Please refer to the response to SCGC DR 13 Question 2.

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- 14.2.3. The earliest pipe installation year is 1929.
  - 14.2.4. December 2011
  - 14.2.5. Line 1026 was derated to lower potential risks, which correlates to increased public safety.
  - 14.2.6. No.
  - 14.2.7. N/A
  - 14.2.8. Please refer to the response to Question 14.2.6 above.
  - 14.2.9. No.
  - 14.2.10. The pipeline does not operate at a sufficient pressure and lacks capacity to deliver gas to the Cabrillo I (*i.e.*, Encina) power plant.
  - 14.2.11. Please refer to the attached file.

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**QUESTION 14.3:**

In Mr. Schneider’s testimony at page 16, line 7, Mr. Schneider refers to a “meter at Rainbow,” implying there is just one meter.

- 14.3.1. Is there a meter where SoCalGas delivers gas into Line 1600 and a second meter where the SoCalGas delivers gas into Line 3010?
- 14.3.2. If there are not two meters at Rainbow, one for flows into Line 3010 and another for flows into Line 1600, how does SoCalGas determine the total amount of gas it delivers to SDG&E at Rainbow?

**RESPONSE 14.3:**

- 14.3.1. As of May 2011, yes.
- 14.3.2. N/A

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**QUESTION 14.4:**

Mr. Schneider says at page 16, line 13: "Natural gas moves slowly through a pipeline network." What is the speed or range of speeds at which natural gas moves through the SoCalGas/SDG&E backbone transmission system?

**RESPONSE 14.4:**

Typically 20-30 miles per hour.

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**Supplemental Testimony Chapter 2, Scoping Memo Issue 1.**

**QUESTION 14.5:**

At page 21, line 3, Mr. Schneider says that Line 1600 “must be tested or replaced and removed from transmission service.” (emphasis added) Does Mr. Schneider mean, instead, that Line 1600 must be tested or replaced or removed from transmission service?

**RESPONSE 14.5:**

No, California Public Utilities Code § 958 and Commission Decision (D.) 11-06-017 require transmission pipelines that have not been pressure tested, like Line 1600, to be tested or replaced as soon as practicable. As stated in SDGE-12 Supplemental Testimony of SDG&E and SoCalGas at Chapter 17, Applicants do not believe it is reasonable, cost-effective or prudent to simply pressure test Line 1600 and return it to transmission service without any changes to the SDG&E gas system. Further, if Line 1600 were removed from transmission service without replacing its transmission capacity, SDG&E’s gas system would be degraded by a reduction in capacity and reliability, and would not have sufficient capacity to comply with the Commission’s design criteria. (see SDGE-12 at 100, lines 18-20)



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**Supplemental Testimony Chapter 4, Scoping Memo Issue 3. (Q14.6 – Q14.19)**

**QUESTION 14.6:**

Regarding Mr. Borkovich's testimony at page 41, please provide:

- 14.6.1. The nominal capacity of Line 1600 operating at 800 psig without Line 3010 in service.
- 14.6.2. The capacity of Line 1600 operating at 800 psig with Line 3010 in service.

**RESPONSE 14.6:**

- 14.6.1. Please refer to the response to SCGC DR 4, Question 8 in this proceeding.
- 14.6.2. Please refer to the response to SCGC DR 4, Question 7 in this proceeding.

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**QUESTION 14.7:**

Regarding Mr. Borkovich’s testimony at page 42, line 5, please provide the capacity of each of the pipelines in what Mr. Borkovich calls the “North Baja Pipeline System.”

**RESPONSE 14.7:**

See table below for capacity of each pipeline in the North Baja California Pipeline System, webpages are included as part of the attachments.

<b>Pipeline</b>	<b>Capacity</b>	<b>Info Source</b>
North Baja Pipeline	500 MMcfd (Southbound)	<a href="http://www.tcplus.com/North%20Baja">http://www.tcplus.com/North%20Baja</a>
Gasoducto Rosarito	500 MMcfd (Westbound) 534 MMcfd* (Westbound)	<a href="http://www.gasoductorosarito.com/english/about-us.html">http://www.gasoductorosarito.com/english/about-us.html</a> (English version) <a href="http://www.gasoductorosarito.com/quienes-somos.html">http://www.gasoductorosarito.com/quienes-somos.html</a> (Spanish version)
TGN	800 MMcfd (Westbound) 940 MMcfd* (Westbound)	<a href="http://www.tgndebajacalifornia.com/english/index.html">http://www.tgndebajacalifornia.com/english/index.html</a> (English version) <a href="http://www.tgndebajacalifornia.com">http://www.tgndebajacalifornia.com</a> (Spanish version)

\*SoCalGas/SDG&E confirmed with IEnova that the correct capacities are listed in the Spanish (not English version).

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**QUESTION 14.8:**

Regarding Mr. Borkovich's testimony at page 43, please provide the IEnova Annual Report, Sempra Energy Annual Report, and the Sempra Mexico Annual Report for 2016 and Form 10-Ks for 2016.

14.8.1. For any of these annual reports and Form 10-Ks that are not yet available, please provide the date by which each is expected to be available, and please provide them when they become available to *npedersen@hanmor.com* and *cathy@barkovichandyap.com*.

**RESPONSE 14.8:**

Applicants object to this question insofar as it calls for the production of documents which are publicly available or otherwise equally accessible to SCGC. Further, this question calls for information about the future availability of documents that are not within Applicants' possession, custody or control, and thus calls for speculation. Subject to and without waiving this objection, Applicants respond as follows.

Applicants are not the authors of the Sempra Energy Annual Report or the Sempra Mexico Annual Report/IEnova Annual Report, or the Form 10-Ks for such entities. Please refer to Sempra Energy's website for their Form 10-K for 2016 and future financial reports: <http://investor.shareholder.com/sre/sec.cfm> For the current and future financial reports for IEnova, please refer to their website: <http://phx.corporate-ir.net/phoenix.zhtml?c=251832&p=quarterlyearnings>

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**QUESTION 14.9:**

In Mr. Borkovich's testimony at page 44, lines 3-4, Mr. Borkovich refers to the "added cost" of "transporting gas from the El Paso Natural Gas South Mainline system through the North Baja pipeline, Gasoducto Rosarito, and TGN systems." Please provide the "added cost" to which Mr. Borkovich refers and break down the "added cost" among the three pipelines.

**RESPONSE 14.9:**

"Added cost" is the total cost incurred by SoCalGas and SDG&E to transport gas from the EPNG South Mainline to the Otay Mesa system receipt point. See the attached table for a breakdown of these costs charged by each pipeline system for days when the Operational Hub transported gas through the North Baja pipeline, Gasoducto Rosarito and TGN systems.

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**QUESTION 14.10:**

In Mr. Borkovich’s testimony at page 44, lines 5-6, Mr. Borkovich refers to the “added cost” of “purchasing LNG-based supply from ECA for receipt at Otay Mesa plus any applicable import fees and value added tax for supply delivered to Otay Mesa from Mexico.” Please provide the “added cost” to which Mr. Borkovich refers.

**RESPONSE 14.10:**

“Added cost” in this instance is the difference between the price of ECA-based supply at Otay Mesa and the average SoCal Border price. ECA-based purchases by the Operational Hub providing limited examples of these added costs are shown in the table below.

<b>Flow Date</b>	<b>Otay Mesa Delivered Price (Dollars per Dth)</b>	<b>SoCal Avg Border Price (Dollars per Dth)</b>	<b>Added Cost (Dollars per Dth)</b>
2/2/2011	8.50	4.5377	3.9623
2/2/2011	15.00	4.5377	10.4623
2/3/2011	12.75	5.5641	7.1859
2/4/2011	10.00	6.0126	3.9874

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**QUESTION 14.11:**

In Mr. Borkovich's testimony at page 44, line 17, Mr. Borkovich refers to the "Energy Hub." Please describe the functions of and operator of the "Energy Hub."

**RESPONSE 14.11:**

The Energy Hub is the Operational Hub described in SoCalGas Rule 41.

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**QUESTION 14.12:**

In Mr. Borkovich's testimony at page 44, lines 19-21, Mr. Borkovich says that the Utilities could be required to negotiate either a long term capacity or supply agreement with IEnova LNG.

- 14.12.1. Please identify the assets owned by IEnova LNG.
- 14.12.2. Please identify the products or services that the Utilities would obtain from IEnova LNG.
- 14.12.3. Please identify the string of Sempra Energy subsidiaries between Sempra Energy and IEnova LNG and identify any subsidiaries of IEnova LNG.
- 14.12.4. Please provide the full corporate name of IEnova LNG.

**RESPONSE 14.12:**

- 14.12.1. Applicants object to this question insofar as it calls for information which is publicly available or otherwise equally accessible to SCGC. Subject to and notwithstanding their objection, Applicants respond as follows. Please see IEnova's website for a list of their assets: <http://www.ienova.com.mx/english/map.html>
- 14.12.2. Per Rule No. 41, Section 12, any contract with a Request for Offers (RFO) respondent is subject to the following protocol:

Any contract with an RFO respondent will be conditioned on the Utility obtaining the prior approval of the California Public Utilities Commission (CPUC) acceptable to the Utility. Respondent offers will be considered non-binding until a definitive agreement is reached between the respondent and the Utility, and the CPUC issues an order approving the definitive agreement memorializing the terms and conditions of the transaction between the respondent and the Utility.

If feasibility/applicability and requisite approvals were obtained and IEnova was willing to provide the service under potentially volatile conditions subsequent to Commission approval, Applicants could potentially purchase some volume of gas supply at some price from IEnova LNG at Otay Mesa under a long-term natural gas supply contract. Whether the Commission would approve any such contract, particularly given the price differential noted in response to Question 14.10 above, is speculation.

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14.12.3. Please see the response to Question 14.1 above. See also <http://phx.corporate-ir.net/phoenix.zhtml?c=251832&p=irol-IRHome>

14.12.4. IEnova LNG, S. de R.L. de C.V.



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**QUESTION 14.13:**

In Mr. Borkovich's testimony at 45, line 17, Mr. Borkovich discusses "delivery of small quantities of gas for a short period of time at Otay Mesa."

- 14.13.1. What is the range of quantities that Mr. Borkovich has in mind when he refers to "small quantities of gas?"
- 14.13.2. What is amount of time that Mr. Borkovich considers to be a "short period of time"?

**RESPONSE 14.13:**

- 14.13.1. The complete sentence for Mr. Borkovich's referenced testimony is: "If the Commission concludes that accepting greater risk is reasonable and prudent, and that delivery of small quantities of gas for a short period of time at Otay Mesa is reasonable from a cost, security and reliability perspective, it might be possible to estimate the cost of delivery of small quantities of gas based upon publicly available information." (Emphasis added). Mr. Borkovich's testimony discusses the fact that the known firm capacity available on the North BC Pipeline System is approximately 20 MMcfd, which "would not be sufficient to cover even the lost capacity of Line 1600, much less provide redundancy for a Line 3010 or Moreno Compressor Station outage." SDGE-12 Supplemental Testimony at 50. Absent a firm contract for capacity on the Ehrenberg to Otay Mesa path, the amount of capacity available is limited to 1) the amount of supply available on the El Paso Natural Gas (EPNG) South Mainline at Ehrenberg; and 2) the amount of operationally available capacity (OAC) common across the respective North Baja California (BC) pipeline systems. OAC is equal to the capacity of each pipeline system minus the firm capacity scheduled for use by the firm transportation rights holders. SoCalGas and SDG&E OAC can also be pro-rated with other shippers making interruptible nominations for transportation service along this path. The SoCalGas Operational Hub has purchased small quantities of gas for interruptible delivery at Otay Mesa at limited times in the past. See the response to Question 14.9 above. System reliability purchases requiring deliveries at Otay Mesa to date have ranged from 14.3 to 180 MDth/day.
- 14.13.2. The complete sentence for Mr. Borkovich's referenced testimony is: "If the Commission concludes that accepting greater risk is reasonable and prudent, and that delivery of small quantities of gas for a short period of time at Otay Mesa is reasonable from a cost, security and reliability perspective, it might be possible to estimate the cost of

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delivery of small quantities of gas based upon publicly available information.” (Emphasis added). Mr. Borkovich’s testimony discusses the fact that the known firm capacity available on the North BC Pipeline System is approximately 20 MMcfd, which “would not be sufficient to cover even the lost capacity of Line 1600, much less provide redundancy for a Line 3010 or Moreno Compressor Station outage.” SDGE-12 Supplemental Testimony at 50. Absent a firm contract for capacity on the Ehrenberg to Otay Mesa path, the amount of capacity available is limited to 1) the amount of supply available on the El Paso Natural Gas (EPNG) South Mainline at Ehrenberg; and 2) the amount of operationally available capacity (OAC) common across the respective North Baja California (BC) pipeline systems. OAC is equal to the capacity of each pipeline system minus the firm capacity scheduled for use by the firm transportation rights holders. SoCalGas and SDG&E OAC can also be pro-rated with other shippers making interruptible nominations for transportation service along this path. The SoCalGas Operational Hub has purchased small quantities of gas for interruptible delivery at Otay Mesa at limited times in the past. See the response to Question 14.9 above. System reliability purchases requiring deliveries at Otay Mesa to date have never been required for more than three consecutive days at a time.

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**QUESTION 14.14:**

In Mr. Borkovich's testimony at page 46, Mr. Borkovich says that the "Proposed Project is expected to provide resiliency and operational flexibility for at least 100 years."

- 14.14.1. Would 100 years be the period over which the capital investment in the "Proposed Project" would be depreciated?
- 14.14.2. If not, why not?
- 14.14.3. Please provide an explanation including workpapers for Mr. Borkovich's suggestion that the "Proposed Project" would provide service for "at least 100 years."

**RESPONSE 14.14:**

- 14.14.1. No, 100 years is the useful life of the asset, as presented in the Cost-Effectiveness Analysis, which is not the same as the book life used for purposes of depreciation used to calculate the Proposed Project's revenue requirement. For purposes of depreciation, Applicants follow the Federal Energy Regulatory Commission Uniform System of Accounts. The book life for a transmission pipeline asset is 45 years.
- 14.14.2. See response to Question 14.14.1 above.
- 14.14.3. The Role of Pipeline Age in Pipeline Safety, Kiefner and Rosenfield states that "...a well-maintained and periodically assessed pipeline can safely transport natural gas indefinitely." A 100 year lifetime period has been assumed for calculation purposes in the Cost Effectiveness Analysis.

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**QUESTION 14.15:**

In Mr. Borkovich’s testimony at page 46, Mr. Borkovich discusses available capacity of the “existing North BC Pipeline System.”

- 14.15.1. Is the “existing North BC Pipeline System” the same as what Mr. Borkovich calls the “North Baja Pipeline System” in his testimony on page 42, line 5?
- 14.15.2. If the answer to the previous question is “no,” please identify the pipeline(s) that constitute the “existing North BC Pipeline System.”
- 14.15.3. Please provide the “available capacity” for each component of the “existing North BC Pipeline System” for flows from Ehrenberg to Otay Mesa.

**RESPONSE 14.15:**

- 14.15.1. Yes.
- 14.15.2. N/A
- 14.15.3. See table below for available firm capacity based upon information known to Applicants.

<b>Pipeline</b>	<b>Available Firm Capacity</b>
North Baja Pipeline	117 MDth/day
Gasoducto Rosarito	20 MMcfd
TGN	0

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

**(14<sup>th</sup> DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION)**

**Date Requested: March 9, 2017  
Date Responded: March 23, 2017**

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**QUESTION 14.16:**

In Mr. Borkovich's testimony at page 47, lines 5-7, Mr. Borkovich states: "The estimated direct cost of expanding the Otay Mesa receipt point to receive up to 570 MMcfd is approximately \$100 million." In footnote 78, Mr. Borkovich explains: "The Utilities estimated this cost based upon a per mile unit costs...."

- 14.16.1. Please explain how a "per mile unit cost" can be used to estimate the cost of expanding a receipt point which, as a receipt point, does not have mileage associated with it.
- 14.16.2. Please provide Mr. Borkovich's workpaper showing his derivation of the \$100 million cost estimate.

**RESPONSE 14.16:**

- 14.16.1. The expansion of a receipt point may require more infrastructure improvements than just those physically located at the receipt point in order to transport the expanded level of supply to the system's demand centers. In the case of Otay Mesa, an expansion beyond the 400 MMcfd of existing firm receipt capacity requires the installation of new pipeline on the SDG&E system, hence the "per mile unit cost" provided in the cited testimony.
- 14.16.2. No detailed study or formal workpapers were created for the \$100 million cost estimate referenced in this question. The premise of the estimate is that system improvements would be required to receive 570 MMcfd of supply at Otay Mesa (the individual capacity of Line 3010) assuming an outage of Line 3010 at Rainbow and the de-rating of Line 1600 to 320 psig. In order to transport this supply across the SDG&E system under this scenario, it was determined that approximately 11 miles of new 36-inch diameter pipeline must be installed from Line 3600 in Santee to Line 3010 in Miramar, looping Lines 2010 and 3011.

The high level cost estimate was created via a simple calculation using cost data from this Application. Using pipeline cost data from this Application for proposed Line 3602, the estimated cost for this new 11 mile pipeline is about \$100 million direct which is simply derived as follows: 11 miles of new 36-inch pipeline multiplied by the average cost per mile for proposed Line 3602 equals \$100 million. ( $\$426.8/47 * 11 = \$100$ )

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**Date Requested: March 9, 2017  
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**QUESTION 14.17:**

In Mr. Borkovich's testimony at page 49, lines 21-23, Mr. Borkovich says: "The quantity of gas from Ehrenberg that can be delivered to the Otay Mesa receipt point via the North BC Pipeline System is a maximum of 500 MMcfd, which is the maximum capacity of the smallest pipeline in that system." Please identify the pipeline that is "the smallest pipeline in that system."

**RESPONSE 14.17:**

Note that Mr. Borkovich further testified: "However, as noted above and shown on the public websites of the relevant pipeline owners, much of that capacity is already held by others." SDG&E-12 Supplemental Testimony at 50. See the response to Question 14.7 above.

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**QUESTION 14.18:**

In Mr. Borkovich's testimony at 49, lines 25-26, Mr. Borkovich says that the maximum capacity of TGN is 800 MMcf/d. However, the 2015 IEnova Annual Report (at 12) says that TGN pipeline is: "a system comprised of approximately 45 km of 30-inch diameter pipeline with a capacity of 940 MMcf/d (9.8 MMthd) and an 8,000 horsepower compressor station." Is the capacity of the TGN pipeline 940 MMcf/d or 800 MMcf/d?

**RESPONSE 14.18:**

Please see response to Question 14.17 above.

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**QUESTION 14.19:**

Regarding Mr. Borkovich’s testimony at 50, lines 1-2, Mr. Borkovich says that as “shown on the public websites of the relevant pipeline owners, much of that capacity is already held by others.” Please provide hyperlinks to the pages on the “public websites” for Gasoducto Rosarito and TGN that Mr. Borkovich used to determine that “much” of the capacity that “is already held by others.”

**RESPONSE 14.19:**

Applicants object to this question insofar as it calls for the production of information that is publicly available or otherwise equally accessible to SCGC. Subject to and without waiving this objection, Applicants respond as follows.

Gasoducto Rosarito –

[http://www.gasoductorosarito.com/docs/Suscribed%20capacity%20GRO\\_February%202017.pdf](http://www.gasoductorosarito.com/docs/Suscribed%20capacity%20GRO_February%202017.pdf)

TGN -

[http://www.tgndebajacalifornia.com/docs/Suscribed%20Capacity%20TGN\\_February%202017.pdf](http://www.tgndebajacalifornia.com/docs/Suscribed%20Capacity%20TGN_February%202017.pdf)

Additional information on existing capacity subscription can also be found in the IEnova Annual Report. Please see the response to Question 14.8.