

**SAN DIEGO GAS & ELECTRIC COMPANY  
SOUTHERN CALIFORNIA GAS COMPANY**

**PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)**

**(A.15-09-013)**

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

**Date Requested: March 24, 2017**

**Date Responded: March 29, 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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The following questions are directed at the Aliso Canyon Winter Risk Assessment Technical Report, which was issued August 22, 2016:

**QUESTION 17.1:**

Please derive the Receipt Points (Flowing Supplies) figure of 3565 MMcf/d shown in columns 1-3 in Table 1 and 3325 MMcf/d shown in column 4 in Table 1 using the capacity of the individual receipt points listed in SoCalGas Schedule G-TBS.

**RESPONSE 17.1:**

SDG&E and SoCalGas object to this data request on the grounds that it is unduly burdensome and seeks information beyond the scope of this proceeding, and as such, seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible information. This request makes no reference to Line 1600 or proposed Line 3602, and is beyond the scope of evidence relevant to the Proposed Project.

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**QUESTION 17.2:**

What is the maximum operating pressure for Line 225?

**RESPONSE 17.2:**

SDG&E and SoCalGas object to this data request on the grounds that it is unduly burdensome and seeks information beyond the scope of this proceeding, and as such, seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible information. This request makes no reference to Line 1600 or proposed Line 3602, and is beyond the scope of evidence relevant to the Proposed Project.

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**QUESTION 17.3:**

What is the maximum throughput capacity of Line 225 during 1-in10 peak day conditions? Please provide the response in terms of maximum hourly capacity as well as average hourly capacity over a 24 hour period.

**RESPONSE 17.3:**

SDG&E and SoCalGas object to this data request on the grounds that it is unduly burdensome and seeks information beyond the scope of this proceeding, and as such, seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible information. This request makes no reference to Line 1600 or proposed Line 3602, and is beyond the scope of evidence relevant to the Proposed Project.

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**QUESTION 17.4:**

Please explain in detail the circumstances under which there is “150 MMcfd of stranded gas at Honor Rancho” as stated on page 20.

**RESPONSE 17.4:**

SDG&E and SoCalGas object to this data request on the grounds that it is unduly burdensome and seeks information beyond the scope of this proceeding, and as such, seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible information. This request makes no reference to Line 1600 or proposed Line 3602, and is beyond the scope of evidence relevant to the Proposed Project.

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**QUESTION 17.5:**

With respect to the statement made on page 20: “Demand on the system exceeds supply during the morning and evening peak periods. All available supply is fully utilized during these periods. After the peak demand periods, Honor Rancho supplies must be reduced from full withdrawal rate to avoid an over-pressure condition, limiting the daily volume to 835 million cubic feet. Both Honor Rancho and the Wheeler Ridge Zone are on the same pipeline, forcing both supply points to compete for limited pipeline capacity. When the Wheeler Ridge Zone is operating at 100 percent utilization, Honor Rancho is limited to a maximum withdrawal of 835 MMcfd in the 5.2 Bcfd scenario.”

- 17.5.1. Please identify all of the locations on the SoCalGas system where would the “over-pressure condition” occur if the Honor Rancho supplies were not “reduced from full withdrawal rate.”
- 17.5.2. Please identify the hourly rate of withdrawal from Honor Rancho that corresponds to the statement: “All available supply is fully utilized during these periods.”
- 17.5.3. Please identify the hourly rate of withdrawal from Honor Rancho that corresponds to the statement: “After the peak demand periods, Honor Rancho supplies must be reduced from full withdrawal rate to avoid an over-pressure condition...”
- 17.5.4. Please provide an hour by hour breakdown of the rates of withdrawal from Honor Rancho that corresponds to the statement: “limiting the daily volume to 835 million cubic feet.”
- 17.5.5. Is the hourly profile described in response to Q.17.5.3 correct assuming that the Wheeler Ridge Zone is operating at 100 percent utilization?
- 17.5.6. If the answer to the previous question is “no,” please provide an hour by hour breakdown of the rates of withdrawal from Honor Rancho that would be possible assuming that the Wheeler Ridge Zone is operating at 100 percent utilization.

**RESPONSE 17.5:**

SDG&E and SoCalGas object to this data request on the grounds that it is unduly burdensome and seeks information beyond the scope of this proceeding, and as such, seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible information. This request makes no reference to Line 1600 or proposed Line 3602, and is beyond the scope of evidence relevant to the Proposed Project.

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**QUESTION 17.6:**

With respect to the statement on pages 24-25: “Figure 9 illustrates the supply and demand profiles for the 4.7 Bcfd simulation. Supply from all storage fields (without Aliso Canyon) is maximized during the morning peak, and then is reduced throughout the day to prevent an over-pressure situation. This process allows the system operator flexibility to meet the peak demand times on the system, which prevents minimum operating pressure situations. This is also why Honor Rancho supplies are listed at 403 MMcfd in Table 1, even though the field is capable of 1,000 MMcfd. While that maximum rate was available at the storage field and was used at times, more than 403 MMcf of supply was not required out of Honor Rancho over the course of the day to meet the reduced level of demand that could be supported.”

- 17.6.1 Please provide an hour by hour breakdown of the rates of withdrawal from Honor Rancho that corresponds to the figure 403 MMcf/d in Table 1, Column 2.
- 17.6.2 Please provide an hour by hour breakdown of the rates of withdrawal from Honor Rancho that corresponds to the figure 426 MMcf/d in Table 1, Column 3.
- 17.6.3 Please provide an hour by hour breakdown of the rates of withdrawal from Honor Rancho that corresponds to the figure 541 MMcf/d in Table 1, Column 4.

**RESPONSE 17.6:**

SDG&E and SoCalGas object to this data request on the grounds that it is unduly burdensome and seeks information beyond the scope of this proceeding, and as such, seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible information. This request makes no reference to Line 1600 or proposed Line 3602, and is beyond the scope of evidence relevant to the Proposed Project.