

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

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(18th DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION)

Date Requested: March 28, 2017

Date Responded: April 12, 2017

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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QUESTION 18.1:

Travis Sera states, at page 25, lines 4-5, of his testimony that “the Utilities advocate a permanent reduction in pressure on Line 1600 to 320 psig.”

18.1.1 What would be the maximum capability of Line 1600 to deliver gas if it were operated at 320 psig, assuming sufficient load to receive the gas that was delivered?

RESPONSE 18.1:

SDG&E and SoCalGas (Applicants) object to this question on the grounds that it is vague and ambiguous, calls for speculation and poses an incomplete hypothetical. The demand that Line 1600 could support (“the maximum capability of Line 1600 to deliver gas”) if it were operated at 320 psig is dependent upon the location of demand on Line 1600. Subject to and without waiving this objection, Applicants respond as follows:

Applicants have not performed the requested analysis.

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QUESTION 18.2:

With respect to Table 2 on page 16 of S. Ali Yari's testimony:

18.2.1 Does Table 2 reflect any import capacity from SCE or CFE?

18.2.1.1 If not, please explain why not.

18.2.1.2 If so, please identify the import capacity from SCE and the import capacity from CFE.

RESPONSE 18.2:

18.2.1 Table 2 illustrates the SDG&E simultaneous import capability that takes into account Southern California Edison (SCE) and Comision Federal de Electricidad (CFE).

18.2.1.1 Please see response to Question 18.2.1.2 below.

18.2.1.2 The capability of the path from San Onofre (SCE's interconnection point) into the SDG&E system is about 2,500 MW. The capability of the path from CFE into the SDG&E system is 800 MW. Without internal gas-fired generation, the maximum simultaneous import capability limit into SDG&E is 2,500 MW.

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QUESTION 18.3:

Does SDG&E agree that imports into SDG&E from either SCE or CFE are west of the “cut plane” at Imperial Valley?

18.3.1 If SDG&E does not agree, please explain in detail why.

RESPONSE 18.3:

No, imports from SCE and CFE flow into the SDG&E Import cut-plane. The SDG&E cut-plane includes imports from SCE, CFE, Imperial Valley, and Arizona.

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QUESTION 18.4:

Please specify if imports from SCE are limited by voltage stability requirements.

18.4.1 If there are such limits, please specify what the MW import limit is.

RESPONSE 18.4:

There are no imports from SCE that are limited by voltage stability requirements.

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QUESTION 18.5:

Please specify if imports from CFE (Presidente Juárez) are limited by voltage stability requirements.

18.5.1 If there are such limits, please specify what the MW import limitation is.

RESPONSE 18.5:

There are no imports from CFE (Presidente Juárez) that are limited by voltage stability requirements.

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QUESTION 18.6:

Please specify if imports from SCE are limited by frequency stability requirements.

18.6.1 If there are such limits, please specify what the MW import limitation is.

RESPONSE 18.6:

Imports from SCE are not limited by frequency stability requirements.

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QUESTION 18.7:

Please specify if imports from CFE (Presidente Juárez) are limited by frequency stability requirements.

18.7.1 If there are such limits, please specify what the MW import limitation is.

RESPONSE 18.7:

Imports from CFE (Presidente Juárez) are not limited by frequency stability requirements.

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QUESTION 18.8:

If the limits due to frequency stability requirements are different from the limits due to voltage stability requirements for imports from SCE, please explain why there is a difference.

RESPONSE 18.8:

Imports from SCE are not limited by frequency stability requirements or voltage stability requirements.

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QUESTION 18.9:

Please provide the complete operating procedure/nomogram that defines the SDG&E import limitations reflected in Table 2 or any other operating procedures that may restrict the import of power into SDG&E from all points of interconnection including interconnections with SCE and CFE as well as interconnections through the Imperial Valley substation.

RESPONSE 18.9:

SDG&E currently has no procedure with the nomogram provided in Table 2 of SDGE-4-R Updated Direct Testimony of S. Ali Yari. The specified nomogram was developed for a scenario with no internal gas-fired generation. Currently SDG&E relies on gas-fired generation when developing its procedures and operating plans.

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QUESTION 18.10:

What line(s) outages were assumed in developing the Table 2 limitations? For example, what outage defines the S-line limitation and what outage is resulting in stability limit at 2,500 MW import level?

RESPONSE 18.10:

For the S-line thermal limitation shown in Table 2 of SDGE-4-R, the limiting contingency is TL50002 (500 kV line from North Gila to Imperial Valley).

For the 2,500 MW voltage stability limit shown in Table 2, the limiting contingency is the simultaneous outage of TL50001 (500 kV line from East County to Miguel) and TL50003 (500 kV line from Ocotillo to Suncrest).

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QUESTION 18.11:

The Applicants' response to SCGC-06, Q.6.5 indicates that 1,872 MW of generation is needed locally within SDG&E area to support maximum import conditions of 3,500 MW.

- 18.11.1 In determining this limitation, was any consideration given to resources in CFE (specifically Presidente Juárez Generation) that are capable of providing frequency and voltage support during contingencies via typical governor response?
- 18.11.2 If the answer to the previous question is "no," please state each reason in detail why no consideration was given to resources in CFE.

RESPONSE 18.11:

- 18.11.1 There is no need for frequency support. Voltage support is needed in the northern part of the system. The Presidente Juárez generation units are electrically distant from the area where the voltage stability concerns take place.
- 18.11.2 Loss of the 500 kV lines into SDG&E triggers a CFE remedial action scheme (RAS) that opens the interconnection to SDG&E to protect CFE's internal lines from overloading.