

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(8th DATA REQUEST FROM THE SIERRA CLUB)**

**Date Requested: April 3, 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 Sierra Club from Sierra Club's own files, from documents or information in Sierra Club's possession, or from documents or information that SDG&E and SoCalGas previously released to the public or produced to Sierra Club. 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 Sierra Club 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 Sierra Club'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 1:

Response to Sierra Club Data Request 7, Q.1(c) states that in Table 2 of SDGE-4-R, “the generation value refers to the generation that could be online at IV, East County, and Ocotillo.” Please clarify the meaning of “could be online” as used in the response to this question. For example, does “could be online” mean that the generation has a valid, active, in-service interconnection agreement and thus “could” be on line? Does “could be online” mean that the generation must be on-line and available for redispatch as spinning reserve? Does “could be online” mean that it must be available to be started post contingency and serve as operating reserve?

RESPONSE 1:

“Could be online” as used in the response to Sierra Club DR 7, Q1(c) means that the generation is on and producing Megawatts pre-contingency.

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QUESTION 2:

Response to Sierra Club Data Request 7, Q.1(i) states that “[p]rojects not approved or currently in-service were excluded from the studies.” To make this phrase consistent with the other response to Question 1, it appears that the word “not” is missing between the words “currently” and “in service.” Please confirm that the correct response to Q.1(i) should state “projects not approved or currently not in service.” If the response to Q.1(i) is correctly stated in its current form, please explain how this response is consistent with responses to Q.1(f) and (j).

RESPONSE 2:

In the original response, the word “not” applies to both “approved” and “currently in service.” Sierra Club’s formulation is also correct.

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QUESTION 3:

Response to Sierra Club Data Request 7, Q.1(l) states Kumeyaay and Borrego are “electrically distant from the area where the instability is observed.” Please define the area where the voltage instability is observed.

RESPONSE 3:

The voltage instability is observed in the northern part of San Diego Gas & Electric’s system and the southern part of Southern California Edison’s system around the San Onofre substation vicinity.

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QUESTION 4:

Please provide the date (year, month if known) when the nomogram shown in Table 2 of SDGE 4-R was created?

RESPONSE 4:

The nomogram shown in Table 2 of SDGE-4-R was created approximately mid-2015 while developing SDGE-4 Prepared Direct Testimony of S. Ali Yari served on March 21, 2016.

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QUESTION 5:

Page 8 of the Updated Prepared Direct Testimony of David M. Bisi states that “The chance of losing all compression at Moreno is relatively small, although such a situation nearly did occur at least once due to a malfunction in the Energy Shut Down system at the station.” Response to Sierra Club Data Request 7, Q.6(c), lists a number of instances where “Moreno experienced an unplanned loss of all compression.” Please explain how the Testimony of David M. Bisi, which uses the phrase “nearly did occur” with respect to the loss of all compression at Moreno, suggesting loss of full compression has not actually occurred, is consistent with the response to Q.6(c), which identifies instances where Moreno did in fact experience “an unplanned loss of all compression.”

RESPONSE 5:

The cited reference to Mr. Bisi’s Updated Prepared Direct Testimony was made regarding a complete loss of all compression at the Moreno Compressor station which would have impacted the capacity of the SDG&E system sufficient to result in a loss of service to customers, as discussed at page 7:

“Similarly, practically all gas supplies destined for use on the SDG&E system pass through the Moreno Compressor Station, which boosts pressures for delivery to the SDG&E system at Rainbow Station. With a loss of some compression at Moreno, delivered pressure at Rainbow Station may be insufficient to maintain service to all SDG&E customers; the loss of compression capability at Moreno (i.e., “free flowing” supplies from the SoCalGas system, as if bypassing Moreno Compressor Station) will only support an SDG&E demand of 340 MMcfd, approximately equal to only the SDG&E daily average demand of 343 MMcfd.”