

**SAN DIEGO GAS & ELECTRIC COMPANY  
SOUTHERN CALIFORNIA GAS COMPANY**  
**PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)**  
**(A.15-09-013)**  
**(3<sup>rd</sup> DATA REQUEST FROM SIERRA CLUB)**

**Date Requested: April 26, 2016**

**Date Responded: May 10, 2016**

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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 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:**

The Direct Testimony of David Bisi p. 11:203 states: "We have recorded historical usage of a maximum SDG&E demand of 674 MMcfd in the winter operating season."

- a) What year was the 674 MMcfd demand recorded?
- b) Please identify the witness responsible for this answer.

**RESPONSE 1:**

- a) 2013
- b) David M. Bisi

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**QUESTION 2:**

What percentage of SDG&E customers reside within the City of San Diego? Please identify the witness responsible for this answer.

**RESPONSE 2:**

SDG&E and SoCalGas object to this request on the grounds that the term “SDG&E customers reside” is vague, ambiguous and subject to speculation in interpretation. Further, depending on one’s interpretation of the term, the investigation required by the question is unduly burdensome and unnecessarily time-consuming, and not reasonably calculated to lead to the discovery of relevant evidence. Subject to and without waiving these objections, SDG&E and SoCalGas respond as follows.

SDG&E and SoCalGas interpret the term “SDG&E customers reside” to mean the percentage of the overall active gas customer service meters which are located within the city limits of San Diego. As such, 46 percent of the active gas customer service meters within SDG&E’s service territory are located within the City of San Diego. SDG&E and SoCalGas have not identified a witness for this answer.

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**QUESTION 3:**

Please refer to the Cost-Effectiveness Analysis (Volume 3 of the Amended Application) on page 22, which states, "The estimated costs for the Proposed Project and the Alternatives include contingency."

- a) For each project alternative listed in Table 6 on page 22, please state the dollar amount of the total Fixed Cost that represents contingency.
- b) For each project alternative listed in Table 6 on page 22, please state the dollar amount of the total Annual Operating Cost that represents contingency.
- c) Please describe the methodology that was used to calculate contingency costs.
- d) Please identify the witness responsible for this answer.

**RESPONSE 3:**

- a) For each project alternative listed in Table 6 on page 22, the dollar amount of the total Fixed Cost that represents contingency is identified in PSRP Alternatives Workpapers of Neil Navin, page ALT WP-2. The workpapers are available here: <http://www.sdge.com/regulatory-filing/15786/pipeline-safety-reliability-project>
- b) There is no contingency in the total Annual Operating Costs.
- c) SDG&E/SoCalGas methodologies for calculating contingency for the alternatives:

Alternative A: Proposed Project contingency methodology is discussed in Neil Navin's Direct Testimony on pages 22 through 25. A detailed discussion of contingency is also provided in Neil Navin's direct testimony, Attachment A: Pipeline Safety & Reliability Report pages 27-30.

Alternative B contingency methodology applied the contingency at the project level instead of the project component level and is consistent with the methodology used for Alternative A. The contingency methodology is discussed Neil Navin's Direct Testimony on pages 22 through 25 with a detailed discussion of contingency provided in Neil Navin's direct testimony, Attachment A: Pipeline Safety & Reliability Report pages 27-30.

Alternatives C1-C7 contingency was calculated at the project component level, following the methodology used for Alternative A and is discussed Neil Navin's Direct Testimony on pages 22 through 25 with a detailed discussion of contingency provided in Neil Navin's direct testimony, Attachment A: Pipeline Safety & Reliability Report pages 27-30.

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Alternative D, E/F, G, H, I, J1-J3, and K contingencies were determined based on level of project definition, availability of applicable cost data, complexity of the projects and expert judgement. Contingencies were calculated at the project level for Alternatives D, E/F, G, H, I, J1-J3 and K.

- d) Witness Neil Navin is responsible for the cost estimates associated with project alternatives as stated in testimony of Neil Navin, page 31.

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**QUESTION 4:**

Please refer to page 25 of the Cost-Effectiveness Analysis, which discusses Alternative D, replacing Line 1600 in place. The document states that “Right-of-way acquisition costs for this Alternative are significantly greater than those for the Proposed Project.” Footnote 61 on page 25 states that the basis for this statement is a “feasibility study [that] was conducted to evaluate the feasibility of acquiring the necessary Right of Ways.”

- a) Please produce the feasibility study that evaluated the costs of acquiring the necessary Right of Ways.
- b) Please identify the witness responsible for this answer.

**RESPONSE 4:**

- a) Attached is the Line 1600 Gas Pipeline Feasibility Report for Acquisition of Right of Way. **This report contains confidential information that is submitted pursuant to the Nondisclosure and Protection Agreement between Sierra Club and SDG&E/SoCalGas.**



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- b) Neil Navin is the identified witness responsible for information related to costs and feasibility of project alternatives.

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**QUESTION 5:**

Page 20 of the Cost-Effectiveness Analysis states that “Under the Hydrotest Alternative, it is anticipated that Line 1600 will be replaced within approximately 20 years.” Was the cost of replacing Line 1600 included in the total calculated cost for the Hydrotest Alternative?

**RESPONSE 5:**

No, the cost of replacing Line 1600 is not included in the estimated cost for the Hydrotest Alternative. However, the cost for replacing Line 1600 is included in the avoided cost analysis that is applied to the Proposed Project and the Alternative projects.

Line 1600 Hydrotest cost information is presented in the testimony of Neil Navin in Table 8 on page 29.



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**QUESTION 6:**

What percentage of gas demand in SDG&E service territory is served by Lines 1600 and 3010?  
Please identify the witness responsible for this answer.

**RESPONSE 6:**

SoCalGas and SDG&E object to this question as vague and ambiguous. The “percentage of gas demand in SDG&E service territory served by Lines 1600 and 3010” can be interpreted in a number of ways, such as demand directly connected to the pipelines or demand that is served by supply originally delivered into either pipeline at the Rainbow Meter Station. Without waiving this objection, SoCalGas and SDG&E respond as follows:

Based upon recorded deliveries into Line 3010 and Line 1600 at the Rainbow Meter Station and depending upon the distribution of sendout on the SDG&E system, approximately 80-90% of the SDG&E demand is supplied by Line 3010, with approximately 10-20% supplied by Line 1600.

David M. Bisi is the witness responsible for this answer.

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**QUESTION 7:**

Please see Response 3 to Sierra Club-SDG&E-02, which states, “Line 1600 has two other unmetered interconnects with rest of the SDG&E system south of the Rainbow Meter Station which impact its transported volumes.”

- a) What are the locations of these two unmetered interconnects?
- b) Please identify the name and capacity of the two pipelines that interconnect with Line 1600 south of the Rainbow Meter Station.
- c) Please identify the witness responsible for this answer.

**RESPONSE 7:**

- a) The unmetered interconnects are located at Escondido and Kearny Villa.
- b) Line 1601 interconnects with Line 1600 at Escondido, and has a theoretical capacity of 150 MMcfd. Lines 3011 and 2010 interconnect with Line 1600 at Kearny Villa, and have theoretical capacities of 500 MMcfd and 400 MMcfd, respectively.
- c) David M. Bisi

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**QUESTION 8:**

Please see Response 3 to Sierra Club-SDG&E-02, which states that the data provided in Appendix E to the Amended Application “represents only volumes delivered into Line 1600 at the Rainbow Meter Station” since May 2011.

- a) Please provide the daily volumes delivered into Line 3010, as measured at the Rainbow Meter Station, since May 2011.
- b) Please identify the witness responsible for this answer

**RESPONSE 8:**

- a) Please refer to the attached data.



Sierra Club DR3  
Q8a.xlsx

- b) David M. Bisi

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**QUESTION 9:**

In response to Question 8 to Sierra Club-SDG&E-02, SDG&E provided a map of its existing “backbone transmission lines.”

- a) Please explain the distinction, if any, between a backbone transmission line and a non-backbone transmission line.
- b) To the extent the SDG&E gas system contains non-backbone transmission lines, please identify the name, location, and size of each line.
- c) Please identify the witness responsible for this answer.

**RESPONSE 9:**

SoCalGas and SDG&E object to this question as vague and ambiguous. The term “non-backbone transmission line” can refer to any of number of pipelines on the SoCalGas and SDG&E gas system, including local transmission, distribution, storage, and service lines. Without waiving this objection, SoCalGas and SDG&E respond as follows:

- a) SoCalGas and SDG&E characterize their transmission plant pipeline assets as “backbone” or “local” based on the primary function of the pipeline. The function of backbone transmission pipelines is to transport supply received from interstate pipelines and local California producers to SoCalGas’ storage fields for injection or to local transmission pipelines. The function of local transmission pipelines is to transport supplies from SoCalGas’ storage fields and backbone pipelines to distribution systems and end-use customers.
- b) All transmission plant pipelines on the SDG&E gas system are classified as backbone.
- c) David M. Bisi

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**QUESTION 10:**

In response to Sierra Club-SDG&E-02, Question 6, SDG&E provided Sierra Club with copy of the full slide presentation for the Sempra Energy 2015 Analyst Conference. Please provide a copy of the full slide presentation for the Sempra Energy 2016 Analyst Conference, if it has occurred.

**RESPONSE 10:**

Sempra Energy's 2016 Analyst Conference is anticipated to take place in Q3 2016.