

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(SIERRA CLUB Data Request 04)
Date Requested: May 12, 2016
Date Responded: May 26, 2016**

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.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(SIERRA CLUB Data Request 04)
Date Requested: May 12, 2016
Date Responded: May 26, 2016**

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.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(SIERRA CLUB Data Request 04)
Date Requested: May 12, 2016
Date Responded: May 26, 2016**

QUESTION 1:

On page 14 of its Protest to the Amended Application, ORA provided the following excerpt from page 32-33 of the SDG&E/SoCalGas Reply Brief in A.13-12-013:

SoCalGas and SDG&E have no illusions that Sempra will view our transmission systems as a viable path for the large-scale shipment of domestic supplies to ECA for shipment overseas. But if Sempra does ever wish to ship gas on the SoCalGas and SDG&E system, such shipments should be encouraged, not discouraged. As Mr. Bisi noted in his rebuttal testimony, “[i]f Line 3602 is constructed, and SDG&E reinstalls the necessary equipment to serve Mexican customers at Otay Mesa, it would benefit SoCalGas and SDG&E ratepayers to fully utilize assets and increase throughput on the system.” (citing Exh. SCG-18 (Bisi) at 8.)

- a) Please provide Exh. SCG-18 (Bisi Testimony) from A.13-12-013.
- b) Please explain the basis for Mr. Bisi’s statement that increased throughput through Line 3602 into Mexico “would benefit SoCal Gas and SDG&E ratepayers.”

Please provide the witness responsible for this answer.

RESPONSE 1:

- a) SDG&E and SoCalGas object to this request insofar as it calls for the production of documents which are publicly available or otherwise equally accessible to Sierra Club. Subject to and without waiving this objection, SDG&E and SoCalGas respond as follows.

A.13-12-013, Exh. SCG-18 (Rebuttal Testimony of David M. Bisi, June 12, 2015) may be obtained here: <https://www.socalgas.com/regulatory/A1312013.shtml>

- b) In general, as throughput increases on the SoCalGas and SDG&E system, the unit cost of service decreases and all customers benefit through lower rates.

Jason Bonnett is the SDG&E and SoCalGas rate design witness in this proceeding.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(SIERRA CLUB Data Request 04)
Date Requested: May 12, 2016
Date Responded: May 26, 2016
Amended Response Submitted: June 1, 2017**

The response to Question 2 has been amended, this amendment replaces the response to Question 2 in its entirety.

QUESTION 2:

Question 14 of TURN's 2nd data request asked in part for the date and duration of any partial or full shutdown of Line 3010. In response, SDG&E provide 8 instances of planned shutdown from October 2011 through November 2012.

- a) According to SDG&E's records, are these 8 instances are the only partial or full shutdowns, both planned or unplanned, that have occurred on Line 3010 since it has been in service?
- b) If other shutdowns in addition to these 8 instances have occurred, please list the date and duration, and indicate whether the shutdown was planned or unplanned. If the shutdown was unplanned, please state the cause of the shutdown.
- c) Has there ever been an event that caused an unplanned partial or full shutdown of a backbone transmission pipeline in SDG&E's system? If yes, for each shutdown please list the date, duration, cause, and line number.
- d) Please identify the witness responsible for this answer.

RESPONSE 2:

- a. No.
- b. Due to the limited information available that spans over the operating history of Line 3010, SDG&E and SoCalGas (Applicants) cannot confirm with certainty whether the incidents in the table below are the only shutdowns of Line 3010 that have occurred.

Applicants have located documentation of one unplanned outage, which occurred in 1985 and it is reflected in the table below. Applicants have also located a memo, attached hereto, which reflects two other events affecting Line 3010, but have not located any other documentation of such events and cannot confirm whether either resulted in a shutdown. Applicants cannot confirm whether other outages occurred prior to 2010.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)**

(A.15-09-013)

(SIERRA CLUB Data Request 04)

Date Requested: May 12, 2016

Date Responded: May 26, 2016

Amended Response Submitted: June 1, 2017

Date	Event	Shutdown Planning	Approximate Duration
10/11/85	L-3010 hit by contractor during installation of a liquid fuel line	Unplanned	1 day
10/1/11	Replace main line valve	Planned	1 day
10/8/11	Retrofit main line valve	Planned	1 day
10/15/11	Replace main line valve	Planned	1 day
10/22/11	Retrofit main line valve	Planned	1 day
10/28/11 – 10/30/11	MSA Retrofit at Rainbow	Planned	1 day
11/5/11	Tie-in main line valve	Planned	1/2 day
11/12/11	Tie-in main line valve	Planned	1 day
11/19/11	Tie-in main line valve	Planned	1 day
2/22/12	Replace main line valve	Planned	1 day
2/23/12	Replace main line valve	Planned	1 day
3/22/12	Replace main line valve	Planned	1 day
3/27/12 – 4/6/12	Install main line valve	Planned	Unknown
4/1/2012	Side tap tie-in	Planned	1 day
4/5/2012	Install main line valve	Planned	1 day
4/27/12 - 5/1/12	New spool piece	Planned	5 days
5/1/12 - 5/2/12	New spool piece	Planned	2 days
5/8/12	New spool piece	Planned	1 day
5/14/2012, 7/15- 16/2012	Install main line valve	Planned	3 days
10/27/12 – 10/28/12	Pigging Line 3010	Planned	2 days
11/8/12 – 11/9/12	Main line valve	Planned	2 days
3/22/13 – 3/24/13	Remove spherical tees	Planned	3 days
5/16/13 – 7/1/13	Replace main line valve	Planned	1 day
7/24/13 – 7/25/13	Removed wrinkle bend	Planned	2 days
8/27/13 –	Removed siphon drip	Planned	1/2 day

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)**

(A.15-09-013)

(SIERRA CLUB Data Request 04)

Date Requested: May 12, 2016

Date Responded: May 26, 2016

Amended Response Submitted: June 1, 2017

8/30/13			
---------	--	--	--

c. With respect to Line 3010, please see the response to Question 2.b above. As indicated in the table above, Applicants are aware of one unplanned outage on Line 3010 on October 11, 1985 for 1 day resulting from damage caused by a third party contractor. Applicants cannot confirm whether other unplanned outages on Line 3010 occurred prior to 2010.

Applicants are aware of two unplanned outage events on Line 1600. On March 28, 1995, a contractor gathering geotechnical information bored into the ground striking the side of Line 1600 and damaging the pipeline. The duration of this work was approximately 1 day. This event was documented in the attached pipeline inspection report.

According to the 1985 memo attached hereto, on June 24, 1965, Line 1600 was “ripped open” and “valves were closed to isolate the section.” The attached 1985 memo references numerous additional events of third party damage to Line 1600, but Applicants cannot confirm that Line 1600 was shut down to facilitate the repair based upon what is stated in the memo.

Applicant has not tracked all full or partial shutdowns on its backbone transmission system since 1949. Due to the limited information available that spans over the operating history of the system, SDG&E cannot confirm with certainty whether these are or are not the only events that took place prior to 2010.

d. The witness that can speak to the response provided to Question 2.a and 2.b is David Bisi. Norm Kohls can speak to the response provided to Question 2.c.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(SIERRA CLUB Data Request 04)
Date Requested: May 12, 2016
Date Responded: May 26, 2016**

QUESTION 3:

In response to UCAN Data Request 2, Question 2(B), SDG&E stated:

Should the SDG&E system experience an outage that renders system capacity insufficient to meet the current level of demand, the System Operator will first attempt to procure supply at Otay Mesa, and failing that, implement customer curtailment per SDG&E Gas Rule No. 14.

- a) Please list the dates and duration of each instance where an outage rendered system capacity insufficient to meet the current level of demand.
- b) For each instance listed in response to part (a), please indicate whether the System Operator was able to procure supply at Otay Mesa.
- c) For each instance listed in response to part (a), please indicate whether the System Operator implemented customer curtailment per SDG&E Gas Rule No. 14.
- d) Please identify the witness responsible for this answer.

RESPONSE 3:

- a) Each outage listed below rendered system capacity insufficient to meet expected system demand.
 - October 1-2, 2011
 - October 8-9, 2011
 - October 15-16, 2011
 - October 22-23, 2011
 - October 29-30, 2011
 - November 5-6, 2011
 - November 12-13, 2011
 - November 19-20, 2011
- b) For each instance listed in response to part (a), the System Operator did not procure supply at Otay Mesa.
- c) Yes.
- d) Gwen Marelli.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(SIERRA CLUB Data Request 04)
Date Requested: May 12, 2016
Date Responded: May 26, 2016**

QUESTION 4:

Please provide Sierra Club with the gas transmission map requested by UCAN in Question 14 of its 1st Data Request showing “all high pressure gas pipelines in SDG&E’s service territory as well as any in Mexico known to SDG&E for which SDG&E may have access to.” Sierra Club has executed an NDA.

RESPONSE 4:

Please refer to the attached map, which contains **confidential information that is submitted pursuant to the Nondisclosure and Protection Agreement between Sierra Club and SDG&E/SoCalGas.**



Confidential 151230
SDGE Data Request M:

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(SIERRA CLUB Data Request 04)
Date Requested: May 12, 2016
Date Responded: May 26, 2016**

QUESTION 5:

In Appendix E to the Amended Application, SDG&E provided data on the “volumes delivered into Line 1600 at the Rainbow Meter Station” from May 1, 2011 to December 31, 2014. However, in response to Question 8 to Sierra Club’s 3rd Data Request, which asked about volumes measured at the Rainbow Meter Station for Line 3010, SDG&E provided data through the end of 2015.

Please provide the volumes delivered into Line 1600, as measured at Rainbow Meter Station, from January 1, 2015 until December 31, 2015.

RESPONSE 5:

Please refer to the attached data.



Response 5

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(SIERRA CLUB Data Request 04)
Date Requested: May 12, 2016
Date Responded: May 26, 2016**

QUESTION 6:

Do any natural gas storage facilities exist along the routes of Line 3010 or Line 1600, or within the city limits of San Diego? If yes, please provide the location and capacity of these storage facilities.

RESPONSE 6:

No.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(SIERRA CLUB Data Request 04)
Date Requested: May 12, 2016
Date Responded: May 26, 2016**

QUESTION 7:

In the Direct Testimony of David Bisi at p. 11:203, he states: “We have recorded historical usage of a maximum SDG&E demand of 674 MMcfd in the winter operating season.” In response to Sierra Club’s 3rd Data Request, Question 1, Mr. Bisi states that this maximum demand was recorded in 2014.

By adding the daily throughput in 2014 on Line 1600 (provided in Appendix E to the Amended Application) and the daily throughput on Line 3010 (provided in response to Question 8 to Sierra Club’s 3rd Data Request), Sierra Club determined that the maximum daily throughput in 2014 on both lines was 582 MMcfd (on December 31, 2014).

- a) Please explain how SDG&E was able to fully serve 2014 maximum demand of 674 MMcfd, if the maximum amount of natural gas passing through Rainbow Meter Station on a single day in 2014 was 582 MMcfd. (For example, was additional natural gas supplied through Otay Mesa or through a smaller pipeline not shown on SDG&E’s gas system map? Was demand met through operational practices, such as preemptively increasing line pack?)
- b) Please identify the witness responsible for this answer.

RESPONSE 7:

- a) The response provided to Question 1 of Sierra Club’s 3rd data request in this proceeding inadvertently stated 2014. The SDG&E system experienced a sendout of 674 MMcfd on January 14, 2013. This sendout was served with 530 MMcfd and 128 MMcfd of supply delivered into Lines 3010 and 1600, respectively, at Rainbow Meter Station. In addition, 1 MMcfd was supplied by Line 1026 and the system was drafted by 15 MMcf. No supply was received at Otay Mesa.
- b) David Bisi

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(SIERRA CLUB Data Request 04)
Date Requested: May 12, 2016
Date Responded: May 26, 2016**

QUESTION 8:

Sierra Club appreciates that SDG&E has posted data request responses from other parties to this proceeding on its website for the PSRP (<http://www.sdge.com/regulatory-filing/15786/pipeline-safety-reliability-project>). However, the PDF format in which the responses are provided does not allow embedded files included within the data request responses to be downloaded. Please provide Sierra Club a copy of all attachment files embedded within the data request responses. In the alternative, please post attachments to past data request responses on the PSRP website as individual files so that these files can be downloaded.

RESPONSE 8:

SDG&E and SoCalGas object to this question on the grounds that it is unreasonably burdensome. Without waiving this objection, and subject thereto, SDG&E and SoCalGas respond as follows: Due to file size, the following parties' data requests with associated attachments will be sent via Electronic Data Transfer. Please note that some of the files **contain confidential information provided pursuant to the Non-Disclosure Agreement (NDA) between SDG&E/SoCalGas and Sierra Club.**

- TURN DR 1-4
- UCAN DR 1-2
- ORA DR 3, 6-10, 12

Note: For deficiency letters and responses referenced in ORA DR 2, please refer to the CPUC website: <http://www.cpuc.ca.gov/Environment/info/ene/sandiego/sandiego.html> . For public workpapers referenced in ORA DR 3, please refer to SDG&E's website: <http://www.sdge.com/regulatory-filing/15786/pipeline-safety-reliability-project>