

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

**Date Requested: March 9, 2017  
Date Responded: March 23, 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 TURN from TURN's own files, from documents or information in TURN's possession, or from documents or information that SDG&E and SoCalGas previously released to the public or produced to TURN. 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 TURN 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 TURN'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:**

Please provide for the past 5 years (2012-2016 if available):

- a. The total number of customers, total annual load, and peak day load (in MMcfd) served from line 1600;
- b. The total annual and peak day load for the five largest customers served from Line 1600 (in MMcfd);
- c. Please provide the service pressure for all customers and the service pressure for the 5 largest customers.

**RESPONSE 1:**

SDG&E and SoCalGas (Applicants) object to this question as vague and ambiguous and unduly burdensome. As part of the SDG&E gas transmission system, Line 1600 serves more customers than just those directly connected to the pipeline (if that was the intent of TURN's vague and ambiguous question). Furthermore, the vast majority of those customers are distribution-level and residential. Some of these distribution systems are interconnected to supplies from transmission lines in addition to Line 1600 and thus render it indistinguishable to determine how much gas was supplied from Line 1600 and how much from other transmission lines. Thus, much of the data requested herein by TURN is unavailable. Subject to and without waiving this objection, Applicants respond as follows:

- a. Please refer to SDGE-8-R Updated Prepared Direct Testimony of Norm G. Kohls at page 28, lines 7 – 8. Load information is unavailable for the reasons mentioned above.
- b. Applicants further object that the information requested is not admissible evidence and not likely to lead to the discovery of admissible evidence as Line 1600 does not serve only its 5 largest customers and, in any event, it would be unduly burdensome to attempt to determine the five customers obtaining the most gas from Line 1600 alone over the course of each year from 2012 to 2016 and on the peak day during that time period. Further, the sample size requested – “five largest customers served from Line 1600” – is not large enough to provide customer confidentiality assurances.
- c. Please refer to the response to Question 1(b) above. Customers can have a variety of serving pressures. Service pressures for customers served directly from Line 1600 or from distribution systems directly supplied by Line 1600 range from 7-inches water column to the MAOP of the pipeline (currently 512 psig). Some customers have “line

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---

pressure” service which means that the serving pressure will float with the varying pressure in the pipeline.

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---

**QUESTION 2:**

Please indicate how the customers in Q. 1 could be served if line 1600 were to be shut down permanently and provide an estimate of the number of laterals, miles of laterals needed and size in inches for each lateral from proposed Line 3010 or existing Line 3002 that would be needed to serve the current load served from Line 1600 and the cost of those laterals.

**RESPONSE 2:**

Applicants object to this question as it is unduly burdensome and seeks information not in Applicants' possession, custody, or control. Subject to and without waiving their objection, Applicants respond as follows: Abandoning Line 1600 is outside of the scope of this Application and as such, Applicants have not conducted any study, analysis, or determination as to how customers would be served from a pipeline other than Line 1600 if Line 1600 was removed from service rather than de-rated to distribution service.

However, in an attempt to be responsive, Applicants offer the following:

As explained in SDGE-8-R Updated Prepared Direct Testimony of Norm G. Kohls at page 28, lines 7 – 8, Line 1600 supplies approximately 152,000 distribution customers, including core/non-core and electric generation via 50 connections/regulator/meter stations. For many of these connections, Line 1600 is the only supply source in the area. So, if Line 1600 is abandoned (no longer in service as a gas pipeline), new pipelines would need to be built to connect to an alternate supply source such as Line 3010 if gas service is to be maintained.

Though a detailed study has not been completed, based on a cursory review using engineering judgment, the effort and expense to do so would be extensive. Communities such as Pala, Valley Center, southern Escondido, Rancho Bernardo and north Poway have no other gas supply source within several miles. It is likely that an extensive new supply pipeline network will need to be constructed if gas service is to be maintained to these communities. In summary, and as described above, abandoning Line 1600 did not seem to be a reasonable or feasible alternative, and therefore no study has been performed and no detailed information regarding cost implications are available.

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---

**QUESTION 3:**

Please provide the cost of de-commissioning Line 1600 permanently.

**RESPONSE 3:**

See response to Question 2 above.

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---

**QUESTION 4:**

Please indicate if a replacement 16" pipeline could be built parallel to the existing 16" Pipeline 1600 in the same right-of-way and provide information if the five largest customers currently served from Line 1600 could be served with acceptable disruption of service when the new 16" pipeline becomes operational.

**RESPONSE 4:**

Applicants object to this question on the grounds that it is vague, ambiguous and calls for speculation. The phrase "acceptable disruption of service" is undefined, as is the "information" requested for the five largest customers served from Line 1600. Further, the sample size specified is insufficient to assure customer confidentiality. Subject to and without waiving their objections, Applicants respond as follows:

Applicants have determined that it is not feasible, prudent or reasonable to build a new parallel pipeline in the existing Line 1600 right-of-way, which is why the Proposed Project does not follow this route. For greater detail, please see the Applicants' Proponent's Environmental Assessment (PEA) at Chapter 5, page 5-8 through 5-12 regarding "Line 1600 In-Kind Replacement Alternative" and "Installation of a New 16-Inch Pipeline Parallel to Line 1600 Alternative," where the Applicants considered: 1) removing and replacing the existing Line 1600 with a new 16-inch diameter pipeline within the same right-of-way (ROW), and 2) installing a new 16-inch diameter pipeline parallel to the existing Line 1600 and leave the existing Line 1600 in place.

Among other issues, Applicants' PEA at 5-8 (footnotes omitted) notes:

Adequate space for new construction does not exist along the Line 1600 centerline because the area surrounding the existing approximately 20-foot-wide ROW has been heavily developed in many locations since the line was originally constructed in 1949. Approximately 500 parcels would be affected in order to obtain the minimum amount of temporary workspace required during construction, including public, private, commercial, and residential properties. Of the parcels anticipated to be affected, approximately 125 homes and other structures would be permanently displaced or acquired due to impacts to primary structures. Further, acquiring the additional ROW would affect 11 public and governmental agencies, including local municipal agencies, municipalities, and state agencies. Approximately 24 commercial buildings, seven apartment buildings, and possibly two commercial pools

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---

may require total acquisitions for the additional ROW needed. Ranch and ranchette properties along the existing route would also be affected.

The total severance damage is estimated to run as high as \$87 million and total costs for ROW acquisition are estimated to range from \$92 million to \$93 million. However, the actual costs associated with acquiring the additional ROW would be even higher, as this estimate does not include costs such as those associated with the interruption of business activities or acquisitions through eminent domain, which could result in substantial legal fees. Furthermore, because the estimate is based on the minimum ROW width, additional businesses and residences would likely be displaced when site-specific workspace needs are determined during the design phase.

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---

**QUESTION 5:**

Please provide the estimated cost of replacing the current 16" Pipeline 1600 with a new 18" pipeline.

**RESPONSE 5:**

Applicants object to this question on the grounds that it seeks information not in Applicants' possession, custody or control, is vague and ambiguous as to the alignment of the hypothetical new 18" pipeline, is and is unduly burdensome. Without waiving and subject to their objections, Applicants respond as follows:

Applicants have not studied replacing Line 1600 with an 18" diameter pipeline and do not possess the requested cost estimate information. To the extent that this Question hypothesizes replacing Line 1600 with an 18" pipeline in the current Line 1600 alignment, it is considered infeasible for the reasons set forth in response to Question 4 above. Furthermore, Applicants would not install an 18" pipeline as it is not a standard size pipeline used in the industry which would likely lead to complications related to material availability and tooling required to construct and maintain the line. Common diameter sizes utilized in the industry include 16", 20", 24", 30", 36" and 42".

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---

**QUESTION 6:**

Please certify that if Line 1600 is de-rated to distribution level service at 20% to 30% SMYS that the de-rated pipeline will meet all state and Federal pipeline safety standards and that the de-rated pipeline can be certified with gas testing instead of hydrostatic testing. Please provide the name of the individual expert or pipeline safety certification organization that Sempra has contracted with to provide that certification.

**RESPONSE 6:**

Applicants object that Question 6 is vague and ambiguous, and appears to misunderstand the applicable state and federal gas pipeline regulations. Without waiving and subject to their objections, Applicants respond as follows:

As stated in SDGE-12 Supplemental Testimony of SDG&E and SoCalGas at page 100, sponsored by Applicants' witness Deanna Haines:

If the pressure of Line 1600 is reduced to a MAOP of 320 psig, Line 1600 would no longer serve as a transmission pipeline. The requirements of P.U. Code § 958, PSEP, and other federal and state law and regulation applicable to transmission lines would no longer apply. The Commission recognizes this fact in the Scoping Memo, stating that Line 1600 at 320 psig "reflects 20% SMYS (Specified Minimum Yield Strength), which makes [Line 1600] a distribution line and out of the scope of the 'test-or-replace' mandate in Pub. Util. Code § 958. [citing Scoping Memo at 17, n.27]

The de-rated Line 1600, however, would be subject to other federal, state, and Commission requirements, and the [Applicants] would operate the de-rated Line 1600 in accordance with such requirements. Similarly, other required work, including modifications to the system to avoid over-pressurization, would be implemented and operated in accordance with applicable federal, state and Commission requirements.

If Line 1600 were to be operated at a MAOP that corresponds to a hoop stress of 20% SMYS or greater, the line would be define as a transmission line per 49 CFR Part 192.3 and thus could not be classified as a distribution line. Contrary to Question 6, "distribution level service" is not "20% to 30% SMYS."

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---

Finally, whether to pressure test using water or gas is irrelevant because there is no requirement for pressure testing Line 1600 once de-rated to a distribution pipeline. However, if Line 1600 remained a transmission line, pressure testing with gas rather than water would not be prudent and would be constrained by regulation on the amount of hoop stress allowed as a percent of the SMYS.

Applicants do not typically use natural gas, air or other inert gas as a test medium for pipelines that operate over 60 psig. Testing with gas significantly increases the exposure to rupture risk for stress levels above 20% SMYS (and especially above 30% SMYS) where development of a propagating fracture is more likely (see SDGE-2 Prepared Direct Testimony of Travis Sera, page 13, line 18 through page 14 line 2). Additionally, detection of test leaks – particularly small ones – becomes an issue that must be addressed during testing. In light of these risks, Applicants, as prudent and knowledgeable operators of their integrated natural gas system, would not recommend pressure testing Line 1600 with gas, particularly in populated/congested areas or areas where the public could be exposed.

Further, federal regulations constrain the amount of hoop stress allowed when testing with gas. For example, the majority of Line 1600 is in class 3 location. Per 49 CFR § 192.503 and 49 CFR § 192.619(a)(2), for a class 3 location, it is not possible to conduct a pressure test of a pipeline using natural gas as the test medium to establish an MAOP of more than 20% SMYS without violating the regulations.

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**QUESTION 7:**

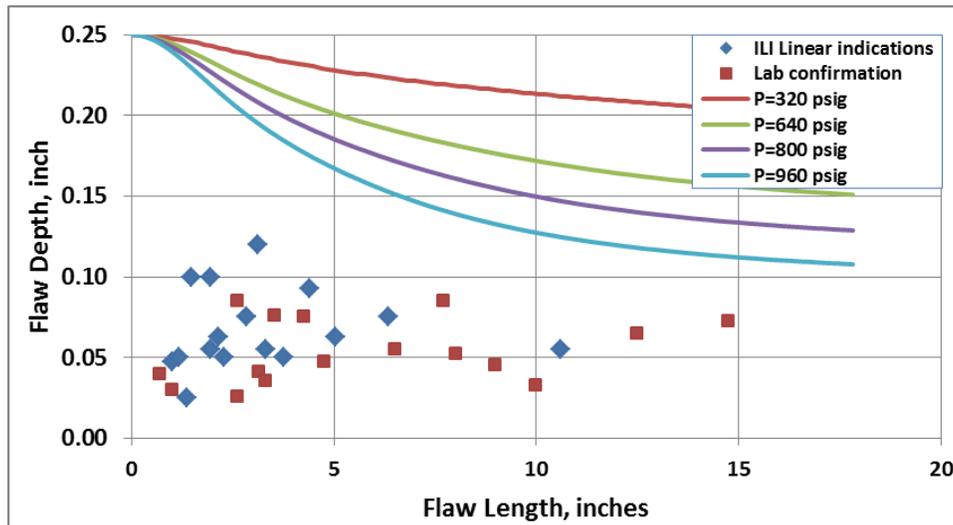
Re. Supplemental Testimony Attach C:

Please provide a copy of Fig. 11, 12 or 13 with a failure curve at 320 psig.

**RESPONSE 7:**

Figures 11, 12 and 13 from Attachment C to SDGE-12 Supplemental Testimony of SDG&E and SoCalGas shown below, have a failure curve at 320 psig added for purposes of this data request response.

Figure 11 at 320 psig failure curve:



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Figure 12 at 320 psig failure curve:

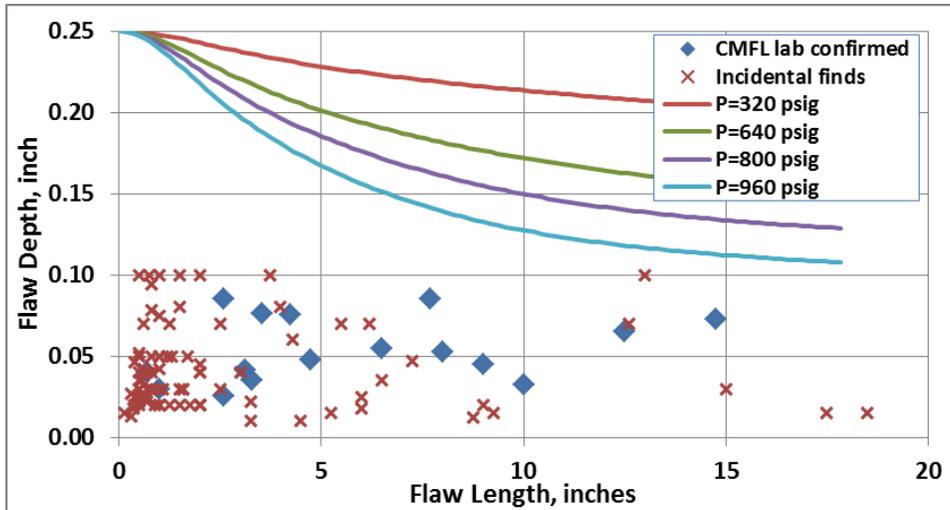


Figure 13 at 320 psig failure curve:

