

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(9th DATA REQUEST FROM TURN)**

Date Requested: March 29, 2017

Date Responded: April 13, 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 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 copies of all confidential responses provided in response to data requests from ORA, Energy Division, SCGC and UCAN.

RESPONSE 1:

The attachments contain **confidential information and/or protected materials provided pursuant to the Non-Disclosure Agreement between SDG&E/SoCalGas and TURN**. Please refer to the attached confidential responses. Not included in this submittal are customer specific information or proprietary revenue requirement models (detailed workpapers are included). Customer specific information cannot be released publicly unless the customer consents to the release in writing per D.01-07-032.

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QUESTION 2:

The daily flow data for Line 1600 (for example, Supplemental Testimony, Attachment D), shows almost zero flows for a prolonged period from about April through August 2013.

- a. Please explain the reason(s) for this decreased flow through Line 1600.
- b. Please explain in detail how the approximately 152,000 customers served directly by Line 1600 were served during this time period. Please identify all means of delivering natural gas that were used and the quantities that were provided by different means.
- c. Please provide any reports or documents submitted to the CPUC concerning this reduced flow on Line 1600.
- d. Please provide any internal reports or studies concerning the decreased flow through Line 1600 in 2013.
- e. Please provide a copy of any data responses to other parties addressing the reduced flow through Line 1600 during this period of time.

RESPONSE 2:

- a. As provided in response to ORA Data Request 19, Question 4, "During 2013 and 2014, Line 1600 was shut in or operating at reduced pressure for extended periods of time for pipeline maintenance purposes."
- b. The daily flow data for Line 1600 provided in Attachment D of SDGE-12 Supplemental Testimony of SDG&E and SoCalGas is through Rainbow Metering Station. Line 1600 has two other unmetered connecting points that can supply gas to Line 1600.
- c. Please see the attachments to this question, some of which contain **confidential information and/or protected materials provided pursuant to the Non-Disclosure Agreement between SDG&E/SoCalGas and TURN**. After a reasonably diligent search, please refer to the attached submittals to the CPUC concerning the reduced flow on Line 1600 during the period from approximately April 2013 through August 2013.
- d. After a reasonably diligent search, Applicants are unaware of any internal reports or studies that were prepared concerning the decreased flow on Line 1600 in 2013.
- e. After a reasonably diligent search, please see the responses to ORA DR 19, Q4 and SCGC DR 4, Q5, copies of which may be obtained here:
<http://www.sdge.com/regulatory-filing/15786/pipeline-safety-reliability-project>

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QUESTION 3:

Please describe the transmission system from Moreno to Rainbow, including at a minimum the number of pipelines, size of each pipe, capacity of each pipe, and date of installation of each pipe.

RESPONSE 3:

The highlighted diameter information below contains **confidential information and/or protected materials provided pursuant to the Non-Disclosure Agreement between SDG&E/SoCalGas and TURN**. SoCalGas' transmission system between the Moreno Compressor Station and Rainbow Metering Station consists of three pipelines: a [REDACTED]-inch diameter pipeline put into service in 1949, a [REDACTED]-inch diameter pipeline put into service in 1958, and a [REDACTED]-inch diameter pipeline put into service in phases between 1989 and 2001, with nominal capacities of 100, 300, and 600 MMcfd, respectively.