

**SOUTHERN CALIFORNIA GAS COMPANY
SAN DIEGO GAS & ELECTRIC COMPANY**

**APPLICATION TO RECOVER COSTS RECORDED IN THE
PIPELINE SAFETY AND RELIABILITY MEMORANDUM ACCOUNTS,
THE SAFETY ENHANCEMENT EXPENSE BALANCING ACCOUNTS, AND
THE SAFETY ENHANCEMENT CAPITAL COST BALANCING ACCOUNTS
(A.16-09-005)**

(DATA REQUEST ORA-09)

**Date Requested: October 5, 2017
Date Responded: October 19, 2017**

QUESTION 9.01:

In regard to project Line 235 West Sawtooth Canyon, SCG/SDG&E state on page WP-III-A162 in their workpapers “In 2013, however, portions of Line 235W Sawtooth Canyon were identified as being in HCAs due to the identification of a nearby campground” (hereafter referred to as “Sawtooth Canyon campground”).

- a. How did SCG/SDG&E become aware of the Sawtooth Canyon campground?
- b. Please provide the date in 2013 when SCG/SDG&E became aware of the Sawtooth Canyon campground.
- c. Please provide all records forming or relating to the 2013 Class Location Study that takes into account the Sawtooth Canyon Campground.
- d. Please provide the Class Location Studies 2 years before and 2 years after the 2013 Class Location Study identified in Question 9.01(c) above.
- e. Is any point along the Line 235W Sawtooth Canyon project within 100 yards of the Sawtooth Canyon campground? Please include geographic files that show the distance of these two things from one another in response to Question 9.05.
- f. In any 12-month period, has the Sawtooth Canyon campground been occupied by 20 or more persons at least 5 days a week for 10 weeks? Please include non-consecutive days and weeks in this count.

RESPONSE 9.01:

- a. SoCalGas identified the site during a routine scheduled pipeline patrol.
- b. July 11, 2012.
- c. **The attached supporting documents include Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024.** Attached are the available supporting documents.

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- d. There were no class location changes in the 2 years prior or 2 years after 2013 in this area that could generate the conditions that would require a class location study.
 - e. **The attached supporting documents include Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024.** Yes. See map attached.
 - f. Information on the occupancy of the campground is not available to SoCalGas, so it employed a conservative approach that assumes the campground is an outdoor gathering area occupied by 20 or more persons.

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QUESTION 9.02:

- a. Is SCG/SDG&E aware of the opening year of the Sawtooth Canyon Campground? If so, please provide.
- b. Does SoCalGas/SDG&E retain permits from agencies relating to the construction and inception of the Sawtooth Canyon Campground? If so, please provide them.

RESPONSE 9.02:

- a. No.
- b. No, but in response to this question SoCalGas and SDG&E were able to obtain a copy of the Bureau of Land Management record. See attached.

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QUESTION 9.03:

- a. Please provide the permit (or equivalent document) issued by the Bureau of Land Management (BLM) for the Line 235W Sawtooth Canyon project, along with any supporting documentation.
- b. Was environmental review performed under the California Environmental Quality Act (CEQA) for the Line 235W Sawtooth Canyon project? If so, please provide a copy of the environmental document.

RESPONSE 9.03:

- a. **The attached supporting documents include Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024.** See attached notice to proceed for the Line 235 replacement project.
- b. No – the project was categorically exempt from CEQA pursuant to section 15301(b).

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QUESTION 9.04:

It is ORA's understanding that, on the L235W Sawtooth Canyon replacement project, the pipe between the two sections replaced was not itself replaced (see Figures 1 and 2 on page WP-III A155 of Applicant workpapers). Is this understanding correct? If not, please explain.

RESPONSE 9.04:

No, the portion of pipe between the two sections was replaced as part of a non-PSEP replacement project, as described at WP-III-A156.

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QUESTION 9.05:

Please provide all the GIS or digital map files used to create Figures 1 and 2 on page WP-III A155. The files should be readable in Google Earth Pro, ArcGIS 10.3, or both and should include all data layers and underlying metadata.

RESPONSE 9.05:

The attached supporting documents include Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024. See attached files.

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QUESTION 9.06:

Please provide a map showing the Potential Impact Radius (PIR) before the 2013 Class Location Change Study and a map showing the PIR after the 2013 Class Location Change Study.

RESPONSE 9.06:

The attached supporting documents include Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024. The potential impact radius would not change due a class location change. The attached map denotes the PIR length before and after the class location change in 2013.

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QUESTION 9.07:

On page WP-III-A162, SCG/SDG&E state “Thus, SoCalGas has sufficient record of a pressure test from 1957, but must still address Line 235W Sawtooth Canyon as part of PSEP Phase 1A because of recent developments in the area.”

Please describe the “recent developments in the area” referred to in the passage above.

RESPONSE 9.07:

The phrase “recent developments in the area” refers to the identification of the Sawtooth Canyon campground as an outdoor gathering area for class location purposes.

**BEFORE THE PUBLIC UTILITIES
COMMISSION OF THE STATE OF CALIFORNIA**

**DECLARATION OF HUGO MEJIA
REGARDING CONFIDENTIALITY OF CERTAIN DATA/DOCUMENTS
PURSUANT TO D.16-08-024**

I, Hugo Mejia, do declare as follows:

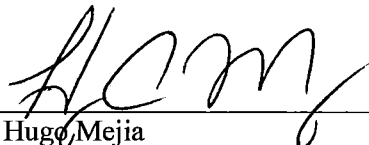
1. I am a Project and Execution Manager in the Major Projects, Regulatory Compliance and Controls group for San Diego Gas & Electric Company (“SDG&E”) and Southern California Gas Company (“SoCalGas”). I have been delegated authority to sign this declaration by Jimmie Cho, Senior Vice President, Gas Engineering and Distribution Operations for SDG&E and SoCalGas. I have reviewed the Response of SoCalGas and SDG&E for the Ninth Data Request of the Office of Ratepayer Advocates (ORA) of the California Public Utilities Commission (CPUC) in the Pipeline Safety and Enhancement Plan (PSEP) 2016 Reasonableness Review A.16-09-005 proceeding, submitted concurrently herewith. I personally am familiar with the facts and representations in this Declaration, except where stated as based upon my information and belief. If called upon to testify, I could and would testify to the following based upon my personal knowledge and/or information and belief.

2. I hereby provide this Declaration in accordance with Decision (D.) 16-08-024 to demonstrate that the confidential information (Protected Information) provided in response to ORA’s Data Request is within the scope of data protected as confidential under applicable law and pursuant to Public Utilities Code (PUC) section 583 and General Order (GO) 66-C, as further described in Attachment A.

3. In accordance with the legal authority described herein, the Protected Information should be protected from public disclosure.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed this 19th day of October, 2017, at Los Angeles, California.



Hugo Mejia
Project and Execution Manager

ATTACHMENT A

TYPE OF DATA / INFORMATION	JUSTIFICATION FOR CONFIDENTIALITY	LOCATION OF THE DATA
<p>Pipeline attribute (i.e., diameter, pressure, location)</p>	<p>This data constitutes sensitive critical energy infrastructure information that is not currently published by the PHMSA and, if made publicly available, could present a risk to the security of the SoCalGas and SDG&E pipeline system and California’s critical energy infrastructure. SoCalGas’ and SDG&E’s assessment of the risks associated with critical energy infrastructure data will continue to evolve as the sophistication, frequency and volume of security threats increase. In light of certain events, such as the attack on Pacific Gas & Electric Company’s Metcalf Substation in 2013, pipeline diameter data must be treated as confidential. SoCalGas and SDG&E designate this pipeline diameter data as confidential pursuant to several laws, regulations, and guides that seek to protect critical infrastructure information and sensitive security information from public disclosure for national security reasons. These include, but are not limited to: The yellow highlighted portions on the pages identified in the table below fall within the category of sensitive critical energy infrastructure. See 18 CFR § 388.113(c); FERC Orders 630, 643, 649, 662, 683, and 702 (defining CEII); 6 U.S.C. §§ 131(3), 133(a)(1)(E); 6 CFR §§ 29.2(b), 29.8 (defining CII and restricting its disclosure); and Cal. Gov’t Code § 6254(e) (“Geological and geophysical data, plant production data, and similar information relating to utility systems development, or market or crop reports, that are obtained in confidence from any person.”) See also Transportation Security Administration (TSA) Pipeline Security Guidelines; and August 27, 2015 Federal Register Notice (Volume 80, Number 166) concerning PHMSA/OPS’ proposed changes to the National Pipeline Mapping System (NPMS) data collection and the protection of pipeline information such as MAOP and pipe diameter.</p>	<p>Yellow highlighted text in the following attachments: Q09.01c CONFIDENTIAL 2013_Class Location Study Support Documents.pdf: pp.1; Q09.01e CONFIDENTIAL SawtoothCanyonCampground.pdf: pp.1; Q09.05 CONFIDENTIAL Layers.zip: pp.1; and Q09.06 CONFIDENTIAL SawtoothCanyonCampground_PIR.pdf: pp.1.</p>
<p>Vendor (i.e., name, bids, pricing)</p>	<p>This is commercially sensitive proprietary information of third parties. Public disclosure of this information could lead place vendors at a competitive disadvantage and lead to potential loss of market share for those vendors. Disclosure could also place SoCalGas and SDG&E at a competitively disadvantage by inhibiting vendors from contracting with SoCalGas and SDG&E to avoid public disclosure of their proprietary information. See D.11-01-36, 2011 WL 660568 (2011); GO 66-C Sections 2.2(b), 2.8; Cal. Gov’t Code § 6254.15 (disclosure not required for “corporate financial records, corporate proprietary information including trade secrets, and information relating to siting within the state furnished to a government agency by a private company for the purpose of permitting the agency to work with the company in retaining, locating, or expanding a facility within California”); Cal. Gov’t Code § 6254.7(d) (trade secrets); Cal. Gov’t Code § 6254(k); Cal. Evid. Code § 1060; and Cal. Civil Code § 3426.</p>	<p>Yellow highlighted text in the following attachments: Q09.01c CONFIDENTIAL 2013_Class Location Study Support Documents.pdf: pp.1 and Q09.03a CONFIDENTIAL Line 235 West Sawtooth_Approved Permits 100814.pdf: pp.18-20</p>
<p>Employee (i.e., name, signature, contact information)</p>	<p>Disclosure of staff-level employee names, signatures or other contact information would constitute an unwarranted invasion of personal privacy. Public disclosure of this information could put employees, at greater risk for identity theft, personal harm,</p>	<p>Yellow highlighted text in the following attachments: Q09.01c CONFIDENTIAL 2013_Class Location Study Support Documents.pdf: pp.1,3 and Q09.03a</p>

	<p>harassment or other negative outcomes. In addition, public disclosure may increase cyber-security risks for SoCalGas, SDG&E or third-party vendors. See Cal. Gov't Code § 6254(c); Cal. Gov't Code 6255; Cal. Civil Code §§ 1798.3, 1798.24 (the California Information Practices Act); Cal. Const., Art. I, § 1 (California constitutional right to privacy).</p>	<p>CONFIDENTIAL Line 235 West Sawtooth Approved Permits 100814.pdf: pp.1-2, 18.</p>
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