

**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-11)

**Date Requested: October 27, 2017
Date Responded: November 10, 2017**

QUESTION 11.01:

In response to ORA data request 9.01, SCG/SDG&E stated that they became aware of the HCA status of the area around the Sawtooth Canyon Campground on July 11, 2012 as part of a “routine scheduled pipeline patrol.”

Why were SCG/SDG&E not aware of the HCA status of the section of Line 235 West prior to the July 2012 discovery?

RESPONSE 11.01:

SoCalGas objects to this question on the basis that it mischaracterizes SoCalGas and SDG&E’s response to ORA data request 9.01. ORA data request 9.01 does not include a question asking SoCalGas and SDG&E when “they became aware of the HCA status of the area around Sawtooth Canyon.” ORA data request 9.01 does include the following question:

“Please provide the date in 2013 when SCG/SDG&E became aware of the Sawtooth Canyon Campground.”

SoCalGas and SDG&E provided the date July 11, 2012 in response to that question.

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QUESTION 11.02:

What is the earliest possible date the HCA status change of the pipeline could have been (i.e. when did SCG/SDG&E last verify the previous class location and HCA status of the section of Line 235 West)? Please provide all supporting information.

RESPONSE 11.02:

SoCalGas and SDG&E object to this question on the basis it calls for speculation. SoCalGas and SDG&E cannot speculate as to the “earliest possible date the HCA status change of the pipeline could have been [sic].” SoCalGas and SDG&E actively monitor the rights of way of transmission pipelines for changes that may affect Class and HCA status per federal and state regulations. In 2012, SoCalGas and SDG&E became aware of the recently built campsite and made a conservative determination that the campsite could meet the occupancy requirements to change the class and HCA determination. Prior to that date, monitoring activities did not identify the presence of a newly-constructed campsite. The pipeline patrol that pre-dated the discovery of the class location change was completed in February 2012. The field class location survey prior to the discovery of the class location change was completed in July 2011. See attached supporting documents. **The attached supporting documents include Confidential and Protected Information Pursuant to PUC Section 583, GO 66-C, and D.16-08-024.**

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QUESTION 11.03:

Please provide all Class Location Studies required on L235 West to comply with 49 CFR §192.609 within 0.5 miles of the Sawtooth Canyon Campground since 1970.

If no such studies are available, please show why no study was done at the opening of the Campground.

RESPONSE 11.03:

Under state and federal regulations, a class location study is required when a class location change occurs on a transmission segment operating at over 40% SMYS. Since the time SoCalGas converted its class location records to electronic format, there has been one class location change for the area, and this warranted a class location study. This occurred when the Sawtooth Campsite was identified by SoCalGas personnel.

Prior to identifying the Sawtooth Campsite, the Company classified this section of Line 235 West as operating in a Class 1 location, which is the lowest class location rating. Other than this campsite, the site remains largely undeveloped. Therefore, it is highly unlikely there are any paper records going back to 1970 that would indicate a class location change at this site. As such, to the extent ORA requests SoCalGas retrieve and index the Company's historic class location field records from non-electronic archives, SoCalGas objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that the burden and intrusiveness of the request outweighs the likelihood of discovering admissible evidence in this proceeding. Furthermore, the historical records are not expected to be kept at the granularity level of today's standards, thus making reconciliation difficult, if not impossible.

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QUESTION 11.04:

Of the Class Location Studies identified in response to Question 11.03, please identify which ones were required by 49 CFR Section 192.609 to be completed because of the creation of the Sawtooth Canyon Campground.

RESPONSE 11.04:

Not applicable.

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

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

I, Jeffery Salazar, do declare as follows:

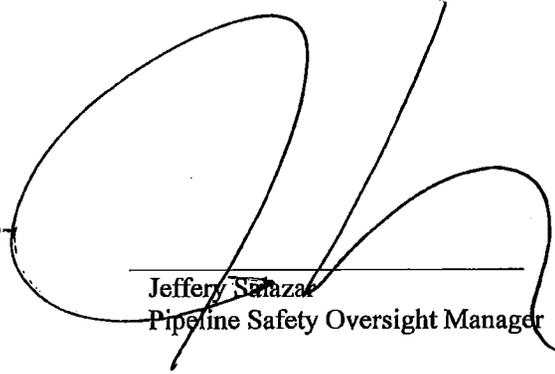
1. I am a Pipeline Safety Oversight Manager in the Pipeline Safety and Compliance group for San Diego Gas & Electric Company (SDG&E) and Southern California Gas Company (SoCalGas). I have been delegated authority to sign this declaration by Jimmie Cho, Senior Vice President, Gas Engineering and Distribution Operations for SDG&E and SoCalGas. I have reviewed the Response of SoCalGas and SDG&E for the Eleventh 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 10th day of November, 2017, at Los Angeles, California.



Jeffrey S. Sazak
Pipeline Safety Oversight 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: Q11.02 CONFIDENTIAL L235 Class Location Survey Inspection 2011-2012, pp 1, 2 and 3</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, 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>Yellow highlighted text in the following attachments: Q11.02 CONFIDENTIAL L235 Class Location Survey Inspection 2011-2012, pp 1 and 2</p> <p>Q11.01 CONFIDENTIAL L235 Patrol_Leak Survey Insoections 2010-2011 pp.1,3,5 and 7</p>