

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(DATA REQUEST ORA-27)**

**Date Requested: August 4, 2016
Date Responded: August 12, 2016**

PRELIMINARY STATEMENT

1. These responses and objections are made without prejudice to, and are not a waiver of, SDG&E 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 does 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. SDG&E and SoCalGas possession, custody, or control does not include any constructive possession that may be conferred by SDG&E or 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 objects to the production of documents or information protected by the attorney-client communication privilege or the attorney work product doctrine.
6. SDG&E and SoCalGas expressly reserve 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).
7. 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. SDG&E and SoCalGas will Bates-number such documents only if SDG&E and SoCalGas deem it necessary to ensure proper identification of the source of such documents.
8. Publicly available information and documents including, but not limited to, newspaper clippings, court papers, and materials available on the Internet, will not be produced.

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9. SDG&E and SoCalGas object to any assertion that the data requests are continuing in nature and will respond only upon the information and documents available after a reasonably diligent search on the date of its responses. However, SDG&E and SoCalGas will supplement its answers to include information acquired after serving its responses to the Data Requests if it obtains information upon the basis of which it learns that its response was incorrect or incomplete when made.
10. In accordance with the CPUC's Discovery: Custom And Practice Guidelines, SDG&E and SoCalGas will endeavor to respond to ORA's data requests by the identified response date or within 10 business days. If it cannot do so, it will so inform ORA.
11. SDG&E and SoCalGas object to any ORA contact of SDG&E and SoCalGas officers or employees, who are represented by counsel. ORA may seek to contact such persons only through counsel.
12. SDG&E and SoCalGas objects to ORA's instruction to send copies of responses to entities other than ORA.

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Subject: Cost Effectiveness Analysis for the Pipeline Safety & Reliability Project by PWC and Neil Navin Prepared Testimony Attachment A & B PSRP Report

QUESTION 1:

In Workpapers for Volume III in A.15-09-013, SoCalGas and SDG&E provides several excel workpapers on the avoided cost model, net cost and benefits score, pipeline incidents rate calculation, and scenario analysis, all relating to the Cost Effectiveness Analysis (CEA). In addition, SoCalGas has workpapers on the PSRP Alternatives which provides the capital workpapers for each alternative to the Proposed Project. ORA would like to request for a walkthrough of the aforementioned workpapers with SoCalGas. Specifically, ORA requests for a one on one meeting with SoCalGas' witness, either by phone or in-person (no preference) where ORA staff can walk through the spreadsheets with the appropriate SoCalGas witness in front of computers. ORA staff assigned on the CEA requests to work with SoCalGas on scheduling the walk-through of the workpapers as soon as possible.

RESPONSE 1:

SDG&E and SoCalGas will reach out directly to Pearlie Sabino of ORA to schedule a meeting to walk-through the workpapers related to the CEA.

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QUESTION 2:

In Workpapers on the PSRP Rates, SoCalGas provides Mr. Bonnett's workpapers in an excel spreadsheet. ORA requests for a one on one meeting with SoCalGas witness Mr. Bonnett, either by phone or in-person (no preference) where both ORA staff and SoCalGas witness can walk through the spreadsheets in front of computers. ORA staff assigned on the rates requests to work with SoCalGas on scheduling the walk-through of the workpapers as soon as possible.

RESPONSE 2:

SDG&E and SoCalGas will reach out directly to Pearlie Sabino of ORA to schedule a meeting to walk-through Mr. Bonnett's workpapers.

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QUESTION 3:

In Workpapers on the PSRP Revenue Requirements, SoCalGas provides Mr. Woodruff's workpapers in an excel spreadsheet. ORA requests for a one on one meeting with SoCalGas witness Mr. Woodruff, either by phone or in-person (no preference) where both ORA staff and SoCalGas witness can walk through the spreadsheets in front of computers. ORA staff assigned on the revenue requirements requests to work with SoCalGas on scheduling the walk-through of the workpapers as soon as possible.

RESPONSE 3:

SDG&E and SoCalGas will reach out directly to Pearlie Sabino of ORA to schedule a meeting to walk-through Mr. Woodruff's workpapers.