

**SAN DIEGO GAS & ELECTRIC COMPANY  
SOUTHERN CALIFORNIA GAS COMPANY  
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)  
(A.15-09-013)  
(DATA REQUEST ORA-52)**

**Date Requested: November 23, 2016  
Date Responded: December 13, 2016**

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**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: Line 1600 - Class Location Change**

**QUESTION 1:**

In response to ORA DR-6, Question 18, SDG&E/SoCalGas provided a list (in a file marked CONFIDENTIAL named "PSRP\_ORA6\_Question18.pdf"). The fourth row of this list states that the date of a class location change was 8/29/2011 when the line was operating at 49% Specified Minimum Yield Strength (SMYS). Please update the response to ORA DR-6, Question 18, and provide the specific segment and beginning and ending engineering stations that have had the class location change and the results of the associated study as per the federal regulation 49 CFR § 192.609.

**RESPONSE 1:**

The following attachment contains confidential information and is provided pursuant to Cal. Pub. Util. Code § 583, General Order 66-C, D.16-08-024 and the accompanying declaration.

The attachment provides an amendment to ORA DR 6, Question 18. The modification includes the requested beginning and ending engineering stationing as requested. The file also corrects a typo on the original submittal for the %SMYS in row 4. Of the pipe segments that operated above 40% SMYS that had a class location increase in 2009, all were found to be commensurate with the new class location upon internal review as prescribed in 49 CFR § 192.609.

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**QUESTION 2:**

In response to DR-25 question 1, SDG&E/SOCaGas provided a list (in a file marked CONFIDENTIAL named "Confidential\_ORA\_DR\_25\_Q1.xls").

- a. There are ten segments on Line 1600 increased from class 1 to class 3. Is this correct?
- b. Can SoCalGas/SDG&E confirm that none of these segments experienced a class location increase from class 1 to class 2, rather than straight from 1 to 3?
- c. Please update Column "Y" to include the class location change date (month/day/year). For each of the segments that experienced a class location change from 1 to 3 at one point in time, in column "Z" provide the number of additional structures within the class location area were added at this point in time.

**RESPONSE 2:**

The attachment contains **confidential information provided pursuant to P.U. Code § 583, General Order 66-C, D.16-08-024 and the accompanying declaration.**

- a. Yes.
- b. Our records indicate two segments experienced a class location increase from 1 to 2 prior to becoming Class 3.
- c. The attached spreadsheet, with the format prescribed by ORA, has been updated to reflect the format requested in column "Y" for date. Column "Z" to was updated to reflect the number of additional structures for each of the segments that experienced a class location change from 1 to 3.

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**QUESTION 3:**

- a. If SoCalGas/SDG&E's responds to Question 2 that certain segments that experienced a class location increase from class 1 to class 3, first experienced a class location increase from class 1 to class 2, input (yes) in column "AA". (If no change, leave the cell blank).
- b. In Column "AB", please add information identifying which segments experienced a class location increase from class 1 to class 2. (If no change, leave the cell blank).
- c. In Column "AC", please add the date a class location changed from 1 to 2 (not only year, but day and month). (If no change, leave the cell blank).
- d. In column "AD", please provide the date the class location study was completed when a segment of Line 1600 experienced a class location change and that either: 1) had SMYS not commensurate with the existing class location; or 2) was more than 40% SMYS, pursuant to 49 CFR § 192.609. If no study was completed, input (no). If the answer to both questions is no, input (neither).

**RESPONSE 3:**

- a. Column "AA" in the confidential spreadsheet provided for Question 2 (c) above was updated to 'yes' to flag the segments that experienced a class location increase from class 1 to class 3, but first experienced a class location increase from class 1 to class 2.
- b. The spreadsheet was modified in column "AB" to reflect the engineering station of the segments (partial or complete) that experienced a class location increase from 1 to 2 in the confidential spreadsheet provided in response to Question 2 (c) above.
- c. The spreadsheet was modified in column "AC" to reflect the date format requested of the segments that experienced a class location increase from 1 to 2 in the confidential spreadsheet provided in response to Question 2 (c) above.
- d. In the spreadsheet provided in response to ORA DR 52, Question 1 (re-attached to this amended response for your convenience), no segments were found to be not commensurate upon review of the class location change. Of the three segments operating over 40% SMYS, a class location study was completed and the results of the study found that the segments were commensurate and all other operating parameters were found satisfactory. The review dates for the segments were not retained so column "AD" was left blank. No other documentation from the class location study are available except the result which was that the pipeline was found to be commensurate, there is no regulatory requirement to retain the class location study.

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**QUESTION 4:**

In response to DR-6 question 18, SDG&E/SoCalGas provided a list (in a file marked CONFIDENTIAL named "PSRP\_ORA6\_Question18.pdf"), the list comprises 20 class location changes. However, in response to DR-25 question 1, SDG&E/SOCaGas provided a list (in a file marked CONFIDENTIAL named "Confidential\_ORA\_DR\_25\_Q1.xls") the list comprises 17 class location changes. Please provide the reason for this discrepancy in the body of the response to the data request, and not in the Excel Spreadsheet. Please fill column "AE" to indicate which entry in the table responding to DR 6 question 18 corresponds to each entry showing a class location change in the attached Table.

**RESPONSE 4:**

The reason for the difference in class changes between DR6\_Question 18 and DR25\_Question 1 is due to a difference in the way segmentation was established between the two data requests. As demonstrated in the attached confidential spreadsheet, segments from DR 25 established in columns "C" and "D" encompass more than one class location record that is listed in DR 6 as evident in columns "AB" and "AE".

Note: two class location records from DR 6, Question 18 were partially incomplete as listed in ORA DR 25. This was corrected in the attached spreadsheet in column AE, row 20 and 35.

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**QUESTION 5:**

In Data Request 25, Questions 7a through 7d, ORA asked:

- a. Did any part on Line 1600 experience a class location change while it operated at more than 40 percent of SMYS?
- b. If the answer to question 7a is yes, please identify the dates of all such occurrences.
- c. Did Line 1600 operate at more than 40 percent SMYS after any part of it experienced a class location change?
- d. If the answer to question 7c is yes, please provide the first date that Line 1600 operated at more than 40 percent SMYS following a class location change.

SoCalGas/SDG&E responded:

Q7(a) – Q7(c) Please see attachment provided in response to Question 1 above.

Q7(d) – Please see attachment provided in response to Question 1 above. Segments with a class location change that occurred pre-2011 when the Line 1600 pressure reduction took place from 800 psig to 640 psig would have been operating over 40% SMYS.

Rather than referencing to the response to Question 1, please provide direct answers to Questions in ORA DR 25, Questions 7a through 7d.

**RESPONSE 5:**

- a. Yes.
- b. The date of the class location increase was on 5/20/2009. See the attached confidential spreadsheet for Q1, rows 1 thru 3 for additional details.
- c. Yes.
- d. The pipeline segments operated at 49% of SMYS on the day that the class location increased on 5/20/2009 until the pipeline was derated in July of 2011.

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3. The depth and length are listed in the columns labeled "DepthPercent" and "LengthInches", respectively.

Phase 2 (Refer to file named "*1600\_ILI\_Phase2\_AMFL&CMFL\_Tally.pdf*").

1. Confirmed hook cracks are listed as "Metal Loss" in the column labeled "Vendor Feature" and "Crack Like; at Long Seam" listed in the column labeled "Circ. Comments".
2. Potential hook cracking anomalies are listed as either:
  - a. "Long Seam Indication" in the column labeled "VendorFeature, or
  - b. "Metal Loss" in the column labeled "VendorFeature" and "Manufacturing related seam flaw" in the column labeled "Circ. Comments".
3. The depth and length are listed in the columns labeled "Circ. DepthPercent" and "Circ. LengthInches", respectively.



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**QUESTION 7:**

If a hook-like crack or bondline flaw was long/deep enough that a rupture was likely to occur at the former 800 psig maximum allowable operating pressure of Line 1600, please provide the depth/length of the flaw, and please explain why the pipe would not have ruptured.

**RESPONSE 7:**

Table 4 on page 19 of the Prepared Direct Testimony of Travis Sera provides the dimensions of a critical flaw for a pipeline of 16-inch diameter, 0.250 inch wall, 52ksi specified minimum yield strength, in both a flash welded and ERW seam pipe operating pressure at a pressure of 800 psig. Please refer to ORA DR 50 Response 9 for information regarding rupture relative to flaw size.

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**QUESTION 8:**

In column "AJ", identify the number of In-Line Inspection anomalies, exclusive of hook cracking and bond line flaws from the In-Line Inspection run(s) on Line 1600 referenced in the Application and Testimony. In column "AK", identify each of these In-Line inspection anomalies on Line 1600 from the In-Line Inspection run(s) ordered in Resolution SED-01. In column "AL", please identify the maximum length and depth (in inches) of each such anomaly found. In column "AM", please identify the pressure at which SoCalGas/SDG&E believes those anomalies would rupture rather than leak.

**RESPONSE 8:**

Applicants reaffirm their objections to the question as it is unduly burdensome and not available in the requested format. The data requested has been made available through previous data requests. In response to ORA DR 5 Q1, Applicants provided copies of their response to SED DR 1 Q11, which contain documentation pertaining to Line 1600 pigging data. Anomalies will be categorized as listed in Table 2 of the Prepared Direct Testimony of Travis Sera in the column labeled "VendorFeature". The depth and length are listed in the columns labeled "DepthPercent" and "LengthInches", respectively. The predicted failure pressure for metal loss anomalies are listed in the column labeled "EffectAreaBurstPressurePsi".

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**Subject: Line 1600 - In Line Inspection**

**QUESTION 9:**

Please provide all documentation showing data pertaining to the in-line inspections (ILI) performed on Line 1600 to date.

**RESPONSE 9:**

In response to ORA DR 5 Q1, Applicants provided copies of their responses to SED DR 1 Q10 and Q11 and TURN DR 2 Q8, which contain documentation pertaining to Line 1600 in-line inspections.

Data processing by the ILI vendor related to in-line inspection runs completed this year are in-progress and are not available at this time.

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**QUESTION 10:**

In reference to ILI, please provide results and recommendations, including whether there is any change in the inspection frequency in the 7 years maximum reassessment interval for Transmission Integrity Management Program (TIMP) that SoCalGas/SDG&E is currently using for Line 1600.

**RESPONSE 10:**

Based upon the results of the assessment of Line 1600 for the inspections conducted from 2012 through 2015, the recommended reassessment interval is 7 years.

The ILI results were provided to ORA in response to ORA DR 5, Q1. Please refer to Applicants' responses to SED DR 1 (Q10 and Q11) and TURN DR 2, Q8, which were provided to ORA in ORA DR 5, Q1.