

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(DATA REQUEST ORA-77)**

**Date Requested: March 16, 2017
Date Responded: March 30, 2017**

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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QUESTION 1:

Is it possible for Line 1600 to provide throughput from Rainbow Compressor Station to the southernmost point along the line?

RESPONSE 1:

SDG&E and SoCalGas (Applicants) object to this question as vague, ambiguous and calling for speculation. Subject to and without waiving their objections, Applicants respond as follows:

The Rainbow Compressor Station was decommissioned in October 2016. Line 1600 transports gas from Rainbow Metering Station, is connected to cross-ties as well as distribution systems, and the flow of gas varies with customer demand. At transmission level pressures, it is possible for Line 1600 to provide throughput on the SDG&E transmission system of some supply delivered at the Rainbow Metering Station. At the distribution level pressure proposed by the Applicants, Line 1600 provides no transmission function.

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QUESTION 2:

If the answer to question 1 is yes, how would the cross-ties connecting with Line 1600 need to be configured to allow for this?

RESPONSE 2:

Applicants object to this question as vague, ambiguous and calling for speculation. Subject to and without waiving this objection, Applicants respond as follow:

When operating the existing gas transmission pipeline network with Line 1600 at the current transmission level pressure, the interconnects require no modification from the status quo.

When operating Line 1600 at distribution level pressure in conjunction with the construction of Line 3602 as proposed, the interconnect of Line 1600 to Line 1601 will be valved off (closed). A new interconnection between Line 3602 and Line 1601 would be constructed as would a new pressure limiting station at Lake Hodges to provide regulated supply to Line 1600. The interconnect at Kearny Villa Station already has overpressure protection installed and simply needs to be reset to the lower operating pressure of Line 1600.

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QUESTION 3:

Also if the answer to question 1 is yes, please explain what the operational limitations and impacts would be.

RESPONSE 3:

Applicants object to this question as vague, ambiguous and calling for speculation, and incorporate their objections to the referenced Question 1. Subject to and without waiving their objections, Applicants respond as follows:

Applicants' Proposed Project mitigates any operational impact from operating Line 1600 at distribution level pressures and improves the reliability, safety, and operational flexibility of the SDG&E system.

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QUESTION 4:

If the answer to question 1 is no, please explain why not.

RESPONSE 4:

Please refer to the response to Question 1 above.

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QUESTION 5:

If Line 1600 is tested to validate a Maximum Allowable Operating Pressure of 340 psig in compliance with applicable federal and state requirements, is the line unsafe operating at 340 psig? Please answer yes or no first before giving an explanation.

RESPONSE 5:

Applicants object to Question 5 as vague, ambiguous, poses an incomplete hypothetical, and unduly burdensome. ORA is asking numerous hypothetical questions with slightly varying MAOPs, but has not articulated any level of safety, system capacity, or reliability ORA hopes to achieve. Therefore, the burden of answering such questions is disproportionate to any evidentiary value of such responses. Without waiving and subject to such objections, Applicants respond as follows: See SDG&E-12 Supplemental Testimony at 64-67, 71-77, 123-32, 140-43 & Attachment C; See also SDGE-2 Prepared Direct Testimony of Travis Sera.

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QUESTION 6:

If the answer to question 5 is yes, please explain why.

RESPONSE 6:

Applicants object to Question 6 as vague, ambiguous, poses an incomplete hypothetical, and unduly burdensome. ORA is asking numerous hypothetical questions with slightly varying MAOPs, but has not articulated any level of safety, system capacity, or reliability ORA hopes to achieve. Therefore, the burden of answering such questions is disproportionate to any evidentiary value of such responses. Without waiving and subject to such objections, Applicants respond as follows: See the response to Question 5 above.

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QUESTION 7:

If Line 1600 is tested to validate an MAOP of 340 psig in compliance with applicable federal and state requirements, is there a regulatory or legal concern with operating at 340 psig?

RESPONSE 7:

Applicants object to Question 7 as vague, ambiguous, poses an incomplete hypothetical, and unduly burdensome. ORA is asking numerous hypothetical questions with slightly varying MAOPs, but has not articulated any level of safety, system capacity, or reliability ORA hopes to achieve. Therefore, the burden of answering such questions is disproportionate to any evidentiary value of such responses. Without waiving and subject to such objections, Applicants respond as follows: See the response to Question 5 above.

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QUESTION 8:

Please explain each safety difference between operating Line 1600 at 320 psig and 340 psig. As part of this explanation, please quantify the difference in likelihood of a rupture at 340 psig versus 320 psig.

RESPONSE 8:

Applicants object to Question 8 as vague, ambiguous, poses an incomplete hypothetical, and unduly burdensome. ORA is asking numerous hypothetical questions with slightly varying MAOPs, but has not articulated any level of safety, system capacity, or reliability ORA hopes to achieve. Therefore, the burden of answering such questions is disproportionate to any evidentiary value of such responses. Without waiving and subject to such objections, Applicants respond as follows: See the response to Question 5 above.