

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(DATA REQUEST ORA-80)**

Date Requested: March 23, 2017

Date Responded: May 23, 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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Subject: Line 3010 outage events

In response to ORA Data Request DR-58, question 3, SDG&E/SoCalGas provided a Table which suggests that in the event of a Line 3010 complete outage, the number of days the Line 3010 Event existed between and in 2006-2015 were 30 days.

In DR 71, question 2, ORA quoted the response to “DR 58 question 3” provided immediately above. In response to ORA Data Request DR-71 question 2, SDG&E/SoCalGas provided a Table that comprises of 12 Line 3010 Events, and stated that “After a reasonably diligent search, Applicants are unaware of curtailment events in 2006 through January 2011.”

In response to Data Request DR-07 question 5, SDG&E/SoCalGas provided a table showing 12 Line 3010 Events beginning in January 2011, and prefaced the table by stating, “Reliable service was maintained to core customers in all instances.”

QUESTION 1:

- A. Based upon SCG/SDG&E’s responses to ORA DR-07, Question 5, ORA DR 58, question 3, and ORA DR-71 question 2, ORA understands that SCG/SDG&E can only provide evidence of 12 Line 3010 Events (as provided in the definitions section of this data request) that occurred including and between 2006 and 2015. Is this understanding accurate? If this understanding is inaccurate, please provide documents showing all other Line 3010 Events during this time period.
- B. Also, please reference the statement in SCG/SDG&E’s response to ORA Data Request 71 question 2 that states, “After a reasonably diligent search, Applicants are unaware of curtailment events in 2006 through January 2011.” Does this quoted statement mean that SCG/SDG&E cannot provide evidence of Line 3010 Events (as provided in the definitions section of this data request) including and between 2006 through January 2011? If Applicants have evidence of additional Line 3010 Events during this time period, please provide all evidence of such Line 3010 Events.

RESPONSE 1:

- A. SDG&E and SoCalGas (Applicants) object to this question on the grounds that it is unduly burdensome to seek supporting documentation for the data provided in the attachment to this response. Subject to and without waiving this objection, Applicants respond as follows:

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No. Please refer to the table below which lists all **notices** of Line 3010 outages including those that led to curtailment events. Applicants cannot confirm with certainty whether these are or are not the only events that took place during the 2006 and January 2011 period.

Line 3010 Outage Dates	Description of job	Led to Curtailment Event
10/1/2011	Replace main line valve	Yes
10/8/2011	Retrofit main line valve	Yes
10/15/2011	Replace main line valve	Yes
10/22/2011	Retrofit main line valve	Yes
10/28/11 – 10/30/11	MSA Retrofit at Rainbow	Yes
11/5/11, 11/12/11, 11/19/11	Tie in main line valve	Yes
2/22/12, 2/23/12, 3/22/12	Replace main line valve	
3/27/12 – 4/6/12	Install main line valve	
4/1/2012	Side tap 6" tie in	
4/5/2012	Install main line valve	
4/17/2012	Install tap	
4/27/12 - 5/1/12	New spool piece	
5/1/12 - 5/2/12	New spool piece	
5/8/2012	New spool piece	
5/14/2012, 7/15-16/2012	Install main line valve	
10/27/12 – 10/28/12	Pigging L3010	
11/8/12 – 11/9/12	Main line valve	
3/22/13 – 3/24/13	Remove spherical tees	
5/16/13 – 7/1/13	Replace main line valve	
7/24/13 – 7/25/13	Removed wrinkle bend	
8/27/13 – 8/30/13	Removed siphon drip	

- B. See the response to Question 1.a above for Line 3010 outage notices through 2013; however, Applicants cannot confirm with certainty whether there were other outages or not during the 2006 and January 2011 period.

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QUESTION 2:

- A. Based upon SCG/SDG&E's response to ORA DR-07, Question 5, do SCG/SDG&E agree that the 12 events identified in this response total 22 days of outage on Line 3010?
- B. If the answer to question 2A is no, how many days of complete outage on Line 3010 do SCG/SDG&E assert resulted from these 12 events?
- C. If the answer to question 3A is no, provide the number of days associated with each event when line 3010 was at a complete outage?
- D. If the answer to question 2A is yes, then is it correct to say that SCG/SDG&E are assuming in their response to ORA DR 58 Question 3 that there are eight additional days of outage on Line 3010 beyond the 22 days identified in response to ORA DR 07, Question 5.

RESPONSE 2:

- A. No. The table provided in the response to ORA DR-07, Question 5 (and included below for reference) only described curtailment events on the SDG&E system since January 2011. Of the 12 curtailment events listed, there were only 8 curtailment events triggered by planned maintenance and related to Line 3010 outages.

Start Date and Time	End Date and Time	Duration	Trigger	Affected Utility
Feb 3, 2011 3 PM	Feb 4, 2011 12 Noon	21 hours	Lack of Supply	SCG/SDGE [†]
Oct 1, 2011 6 AM	Oct 1, 2011 9 PM	13 hours	Planned Maintenance	SDGE
Oct 8, 2011 6 AM	Oct 8, 2011 11PM	17 hours	Planned Maintenance	SDGE
Oct 15, 2011 6 AM	Oct 15, 2011 11 PM	17 hours	Planned Maintenance	SDGE
Oct 22, 2011 6 AM	Oct 22, 2011 9 PM	15 hours	Planned Maintenance	SDGE
Oct 29, 2011 6 AM	Oct 30, 2011 4 AM	22 hours	Planned Maintenance	SDGE
Nov 5, 2011 6 AM	Nov 5, 2011 1 PM	7 hours	Planned Maintenance	SDGE

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Nov 12, 2011 6 AM	Nov 12, 2011 10 PM	16 hours	Planned Maintenance	SDGE
Nov 19, 2011 6 AM	Nov 19, 2011 8 PM	14 hours	Planned Maintenance	SDGE
Dec 6, 2013 12 AM	Dec 11, 2013 11:59 PM	6 days	Lack of Supply	SCG/SDGE [†]
Feb 6, 2014 8 AM	Feb 10, 2014 11:59 PM	4 days 16 hours	Lack of Supply	SCG/SDGE [†]
Feb 6, 2014 6:45 AM	Feb 7, 2014 12 AM	17 hours 15 minutes	Emergency	SCG/SDGE [†]

[†] Curtailment event was not related to a Line 3010 outage.

- B. Of the curtailments listed in the response to ORA DR-07, Question 5, 8 curtailments that were triggered by planned maintenance were Line 3010 outages and affected 9 days of operation.
- C. See the response to Question 2.b above.
- D. N/A

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QUESTION 3:

Referring to the table provided in response to DR-7 question 5 and updated in DR-71 question 2, why are the two events that occurred from Feb 6, 2014 at 8 AM to Feb 10, 2014 at 11:59 PM and from Feb 6, 2014 at 6:45 AM to Feb 7, 2014 at 12 AM considered to be two events rather than one event that occurred from Feb 6, 2014 at 6:45 AM to Feb 10, 2014 at 11:59 PM?

RESPONSE 3:

Neither of these events are related to Line 3010 outages. One event was the curtailment of Standby Service and the other was a curtailment of Noncore Intrastate Transportation Service. These are treated as two separate curtailments.