

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(88th DATA REQUEST FROM ORA)**

**Date Requested: May 25, 2017
Date Responded: May 25, 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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ORA is in receipt of two updates to SoCalGas/SDG&E's response to ORA data request 06, Question 12. The first update was provided in April 2017, and the second in May 2017. These updates were provided after ORA submitted its opening testimony in this proceeding. With these facts in mind:

QUESTION 1:

Please identify all portions of ORA testimony that SoCalGas/SDG&E asserts is affected by the two updated data responses.

RESPONSE 1:

SDG&E and SoCalGas' (Applicants) April 27 and May 22, 2017 updates to Applicants' original May 12, 2016 response to ORA DR-06, Q.12 corrected that response to match the updated information previously provided to ORA in (1) Applicants' July 15, 2016 response to ORA DR 19 (which provided a copy of Applicants' original response to SED DR 3, Q2 and Attachment thereto), (2) Applicants' August 4, 2016 email to ORA attaching a copy of Applicants' August 2, 2016 amended response to SED DR 3, Q2 and Attachment thereto, and (3) Applicants' August 12, 2016 response to ORA DR 25, Question 1. The original May 12, 2016 data was taken from Applicants' High Pressure Database, which at the time had not been fully updated to reflect information learned from research of historical records and to reflect recent construction activity, and which subsequently was updated. In addition, Applicants' April 27 and May 22, 2017 updates included the October 26, 2016 replacement of the Line 1600 segment for Engineering Station 17-131 pursuant to Resolution SED-1, of which ORA was informed in Applicants' November 30, 2016 response to ORA DR 51, Question 3.

Applicants first learned of ORA's reliance on the Line 1600 segment data in the original May 12, 2016 response to ORA DR-06, Q.12, rather than the updated information, upon receipt of the ORA prepared testimony marked as ORA-2 on April 17, 2017. Applicants then promptly updated the original May 12, 2016 response to ORA DR-06, Q.12 with the updated information. On May 3, 2017, Applicants emailed ORA, inquiring: "Given that Applicants' failure to correct that response earlier may have contributed to ORA's testimony being inaccurate, would ORA like the opportunity to amend certain affected portions of ORA-2?" Applicants' counsel noted: "I believe the affected portions of ORA-2 are found in Section II (recommended Step 1), Section III (Step 1), Section IV.B (pp 15-16), Section IV.D, and Section V.C. We also would need ORA's corrected testimony in time to complete our rebuttal testimony. If ORA has an interest in amending its testimony, we can discuss when we would need the amended testimony. Please let me know if ORA would like to pursue this option." Later on May 3, ORA responded: "We appreciate your offer regarding amended testimony, and are considering our

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procedural options. We will communicate with you regarding this matter when we are ready.” Applicants’ rebuttal testimony is now due in less than three weeks.

Nonetheless, Applicants remain hopeful that ORA will withdraw its testimony based on inaccurate information regarding the Line 1600 segment data, and thus avoid unnecessary factual disputes. Although Applicants do not assume responsibility for identifying each impacted area of ORA’s testimony, Applicants note the following impacted portions:

- ORA-2 at 2. Summary of Recommendations. Step One — “Replace the weakest segments of Line 1600.” These segments are not “weak” as ORA relied upon the inaccurate information in reaching that conclusion. If ORA’s plan becomes a “3 step” plan, conforming changes would be needed throughout.
- ORA-2 at 3, lines 20-23. The “discrepancies” identified by ORA relate to the differences between the original May 12, 2016 response to ORA DR-06, Q12 and the three later updated responses. ORA’s “discrepancies” may also refer to certain differences in segment information arising because the ORA DR-06, Q.12 response used CUM Stationing while the other responses used ENG Stationing. When common units are used, that “discrepancy” does not exist, as shown in Applicants’ response to ORA DR-84.
- ORA-2 at 4, lines 7-8, 11-20, footnote 21. If ORA wishes to continue to argue for four over-pressurization devices, it may do so, but federal law only requires two devices, and ORA has performed no study of the need or cost of installing such devices, particularly if doing so on Line 1600 were deemed precedent setting.
- ORA-2 at 15, line 10 through 16, line 12, and associated footnotes. This testimony relies upon inaccurate information.
- ORA-2 at 21, line 23 through 23, line 9, and associated footnotes. The testimony regarding the design pressure of Line 1600 is based upon inaccurate information. Applicants note that, once the proper design pressure is recognized, there is no question that Line 1600, de-rated to 320 psig, meets 49 C.F.R. 192.621. ORA may wish to consider the remainder of its testimony from ORA-2 at 17, line 10 through 23, line 9.
- ORA-2 at 25, lines 13-14, and at 29, lines 3-16, claiming “discrepancies” in data provided to ORA and SED.
- The Confidential Workpapers of Mina Botros, Exhibit ORA-02-C.

Applicants note that, following recognition that all of Line 1600 would be below 20% SMYS at 320 psig, ORA’s claim that Line 1600 would be a federally-defined “transmission line” rests upon ORA’s assertion that Rainbow Metering Station is not a “distribution center.” ORA’s assertion is contrary to Applicants’ longstanding definition of “distribution center,” used and recognized in SED audits of Applicants’ gas system since 2007. Applicants are Local Distribution Companies, and the gas entering SoCalGas and SDG&E’s system is primarily used to deliver gas to customers who purchase it for consumption. This is entirely consistent with the PHMSA interpretation of “distribution center.” If ORA wishes to withdraw its testimony contending that

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Line 1600 de-rated to a 320 psig MAOP would be a “transmission line” because it purportedly is not downstream of a “distribution center,” Applicants have no objection.

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QUESTION 2:

With the two updated data responses, has SoCalGas/SDG&E completed its updates to data request 06, Question 12?

RESPONSE 2:

Yes, to the best of Applicants' current knowledge

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QUESTION 3:

Do the two updates mentioned update any of SoCalGas/SDG&E other data responses to ORA in this proceeding that have not already been updated by SoCalGas/SDG&E?

RESPONSE 3:

As of today, SDG&E and SoCalGas (Applicants) are not aware of any other data request responses to ORA that require updating as a result of the two updates mentioned. Since filing their Application in September 2015, Applicants have received approximately 150 data request sets, comprised of thousands of questions (including subparts), from various parties to this proceeding. Applicants have responded to all data requests with the best of their knowledge at the time of each response. When Applicants discover information, either on their own or identified by a third party, that would require amendments to previous data request responses, Applicants work to provide such updates in a timely manner. Should ORA have any questions or seek further explanation of Applicants' prior data request responses, Applicants welcome and would appreciate the opportunity to provide such clarification.

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QUESTION 4:

If the answer to question three is yes, please identify all other updated data responses.

RESPONSE 4:

Please refer to the response to Question 3 above.