

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(DATA REQUEST ORA-93)**

**Date Requested: July 21, 2017
Date Responded: August 17, 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:

For each segment of Line 1600 in the attached spreadsheet, which uses engineering stations, provide the following information. In row 2, please identify if SoCalGas/SDG&E is asserting the information is confidential.

- a. Fill out column D, which is the alphanumeric value from the longitudinal long seam field in the High Pressure Pipeline Database.
- b. Fill out column E, with the joint type specification. By joint type, ORA means the specification from 49 Code of Federal Regulations 192.113, such as “ASTM A53/A53M” or “API 5L” or “Other”.
- c. Fill out column F, with the pipe class. By pipe class, ORA means the pipe class from 49 Code of Federal Regulations 192.113, such as “Seamless”, “Electric Resistance Welded”, “Pipe over 4 inches (102 millimeters)”.
- d. Fill out column G with the Longitudinal Joint Factor value based on SoCalGas/SDG&E’s MAOP Calculator.
- e. Fill out column H with the Longitudinal Joint Factor from 49 Code of Federal Regulations 192.113 based on the “Joint Type Specification from 49 CFR 192.113” and the “Joint Type (Pipe Class) from 49 CFR 192.113) columns.
- f. Fill out column I with the Longitudinal Joint Factor provided in columns G and H is taken from “paper and other records” not incorporated in the High Pressure Pipeline Database. If the answer is yes, please identify the source of paper or other records. For example, if the paper or other records is from Miramar, please indicate this.
- g. Fill out column J with the most recent date that the longitudinal long seam field changed in the High Pressure Pipeline Database.
- h. Fill out column K with each date that the longitudinal long seam field for each segment changed in the High Pressure Pipeline Database since SoCalGas/SDG&E filed their application in A.15-09-013.
- i. Fill out column L with clarification as to whether the alphanumeric value from the longitudinal long seam field in the High Pressure Pipeline Database provided in column D uses a conservative default value, or uses a record that shows Longitudinal Joint Factor.

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RESPONSE 1:

The attached spreadsheet provided by ORA as part of the data request contains confidential information which has been previously provided to ORA in SoCalGas' amended response to ORA-25, Question 1 dated April 27, 2017 and was provided to ORA pursuant to Cal. Pub. Util. Code § 583, G.O. 66-C, and D.16-08-024 with an accompanying declaration.

Please note that the spreadsheet provided by ORA reflects historic station segment extents that, in some cases, have been superseded with updated data in the High Pressure Pipeline Database (HPPD). SDG&E and SoCalGas (Applicants) have updated the spreadsheet to reflect the current pipe segment data in the HPPD.

- a. See Column D – Alphanumeric Value (Longitudinal Long Seam field) of the attached spreadsheet for the long seam attribute listed in the HPPD.
- b. The joint type specification is not captured in the HPPD, but Applicants have provided the specification based upon the construction and purchasing records available. This information is listed in Column E – Joint Type Specification from 49 CFR 192.113. It should be noted that 49 CFR § 192.113 became a regulation in 1970, and appears in subpart C, which is not considered a retroactive section of the code. Regardless, Applicants have used the table listed in 49 CFR § 192.113 to establish joint factors for all installations post-1970 as well as applying comparable joint factors on pipelines installed prior to 1970.

In the case of Line 1600, the majority of the pipe in operation for this line consists of the initial installation order from 1949. The initial 16" installation is electric flash welded pipe from A.O. Smith and the Applicants have applied a comparable joint factor of 1.0 based upon the chart in 49 CFR § 192.113, which list "API 5L electric flash welded pipe" as having a joint factor of 1.0. Applicants believe the application of a joint factor of 1.0 is consistent with industry norm. Supplemental industry literature from page 5-2 of the indicates that A.O. Smith made pipe according to API standards or better during this manufacturing period. (See J.F. Kiefner and E.B. Clark, History of Line Pipe Manufacturing in North America, American Society of Mechanical Engineers (ASME) CRTD-Vol. 43 (1996) at page 5-2 (Kiefner 1996 Report)). Furthermore, Applicants assigned flash welded pipe from this time-period a joint factor of 1.0 in alignment with the Kiefner industry recommendation (See attachment "ORA-93_Q1_Attachment_Kiefner Joint Efficiency Factors for AO Smith Line Pipe.pdf").

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Please note, however, that the Pipeline and Hazardous Material Safety Administration (PHMSA) has stated that “hoop stress’ is the actual stress produced by a given internal gas or liquid pressure in a pipeline and would be calculated using ‘Barlows’ formula. This calculation would not involve the use of the de-rating factors specified in §192.105 Design formula for steel pipe.” (See attachment “ORA-93_Q1_Attachment_PI79035.pdf”).¹ Thus, the joint efficiency factor is not required to be used to determine whether a pipeline “operates at a hoop stress of 20 percent or more of SMYS” under 49 CFR Section 192.3.

The Applicants also note that Line 1600 contains pipe manufactured per API 5LX which was recognized by the original 49 CFR § 192 regulations but has since been removed as a referenced specification when it was combined with API 5L (amendment 192-51 in April 1986).

- c. Applicants built the HPPD to capture the type of long seam found in its paper records and does not maintain a joint type (pipe class) per 49 CFR § 192.113 in its database. However, for the purposes of this data request, Applicants have filled out Column F – Joint Type (Pipe Class) from 49 CFR 192.113 based upon information available in its database and supplemental construction and purchasing documents. In certain instances, Applicants have reliable records that indicate the purchase of pipe to either API 5L or API 5LX, which allows for a joint factor application of 1.0 but does not have records to indicate the exact joint type (pipe class). Where this occurred, the values have either been left blank or reference the possible joint types purchased. Decision Tree (DT) values were not used for these records since the pipe can be reliably traced back to the purchase of either API 5L or API 5LX specifications and the Applicants were able to eliminate the potential for the pipe long-seam to be furnace butt welded, which would have denoted a joint factor of less than 1.0. The elimination of furnace butt welded pipe was possible because the Applicants were able to confirm that this manufacturing process was not used to fabricate 16” diameter pipe per Table C-1 of the Kiefner 1996 Report).
- d. The longitudinal joint factor value based on the Applicants’ Maximum Allowable Operating Pressure (MAOP) Calculator has been added in the attachment under Column G – Longitudinal Joint Factor per SoCalGas/SDG&E MAOP Calculator.
- e. The data in Column H – Longitudinal Joint Factor per 49 CFR 192.113 has been filled out using information in Column G – Longitudinal Joint Factor per SoCalGas/SDG&E MAOP

¹ Also available at <https://www.phmsa.dot.gov/staticfiles/PHMSA/DownloadableFiles/Files/Interpretation%20Files/Pipeline/1979/PI79035.pdf>

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Calculator, which uses the long seam information from the HPPD (listed in in Column D). The numerical value determined by the MAOP calculator assigns joint factors based upon pipe class per § 192.113 for construction that occurred in and after 1970 and comparable joint factors for pre-1970 pipe segments as applicable, using industry standards discussed above.

- f. Applicants object that Question 1(f) is vague and ambiguous as it appears to be missing words. Subject to and without waiving their objection, Applicants respond as follows. Applicants interpret this question as asking whether the documents supporting the assigned longitudinal joint factor are “incorporated” in the HPPD. HPPD relies on scanned construction records, purchasing records, and other historical documents to obtain source data, which is then summarized and entered into the HPPD.
- g. Applicants object that Question 1(g) seeks information not relevant to any issue within the scope of this proceeding because it is the actual longitudinal seam type, and the appropriate longitudinal joint factor, that is relevant under 49 CFR Part 192, not when Applicants incorporated such information into a voluntary electronic database. To the extent that such information has any limited relevance, it is unduly burdensome for Applicants to review past changes to each Line 1600 segment in the HPPD to determine when changes to the longitudinal seam type were made. Please note that replaced segments of Line 1600 would reflect the longitudinal seam type of the replacement pipe.
- h. Applicants object that Question 1(h) seeks information not relevant to any issue within the scope of this proceeding because it is the actual longitudinal seam type, and the appropriate longitudinal joint factor, that is relevant under 49 CFR Part 192, not when Applicants incorporated such information into a voluntary electronic database. To the extent that such information has any limited relevance, it is unduly burdensome for Applicants to review past changes to each Line 1600 segment in the HPPD to determine when changes to the longitudinal seam type were made. Please note that replaced segments of Line 1600 would reflect the longitudinal seam type of the replacement pipe.
- i. Applicants have reliable records to substantiate the longitudinal joint factors assigned to Line 1600 segments. As such, no flags were denoted in Column L. It is noted that in some records the long seam attribute in the HPPD (Column D) denotes “JF=1,” which is an indicator of partially substantiated long seam information. In these cases, the Applicants can confirm through reliable records that the pipe installed was purchased to an API 5L/5LX specification, but the exact long seam pipe class was indeterminate. Because the furnace butt pipe fabrication method for 16” diameter pipe can be eliminated, these records can be substantiated sufficiently to assign a joint factor based upon specification only. Thus, a decision tree value was not applied nor indicated in this Column L.

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QUESTION 2:

Please provide the index, or lookup values, that translate the alphanumeric code for the longitudinal seam in the High Pressure Database into any and all other uses, such as longitudinal joint factor, long seam type, etc.

RESPONSE 2:

Applicants object that this question is vague and ambiguous, and potentially not relevant to any issue within the scope of this proceeding. Subject to and without waiving their objection, Applicants respond as follows. To the extent that Applicants understand the question, please see the response to Question 1 above.

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**Date Requested: July 21, 2017
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For the following questions, in response to ORA data request 85, Question 1a, SoCalGas/SDG&E identified several segments of Line 1600 with [REDACTED] yield strength. For each of the segments identified below provide the following information, and identify if any of the values are not known. If the segment has been replaced, provide the date of replacement, the supporting documentation of the material specifications, and the cost of the replacement.

- a. If the segment is still in service.
- b. The wall thickness.
- c. The outside diameter.
- d. The long seam type.
- e. The specification to which it was manufactured.
- f. The longitudinal joint factor.
- g. Length (in feet).
- h. The temperature derating factor.
- i. The calculation of percentage SMYS at 320 psig based on the values above.
- j. Explain where these segments with [REDACTED] yield strength are identified in the responses to: ORA Data Request 6, Question 12 (original, April 2017 update, or May 2017 update); or in the responses to SED Data Request 3, Question 2 (June 2016 or August 2016 update); the responses to ORA Data Request 25, Question 1 (original or April 2017 update); or any other data response than ORA Data Request 85 in this proceeding. If they are not identified, please explain why.
- k. If assumptions or decision tree values were used on these segments, please identify them in the response to ORA Data Request 91, or if they are not in the response, please explain why.

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QUESTION 3:

Engineering stations [REDACTED]

RESPONSE 3:

The question contains confidential information (shaded in gray) which has been previously provided to ORA pursuant to Cal. Pub. Util. Code § 583, G.O. 66-C, D.16-08-024 with an accompanying declaration. Additionally, the response contains confidential information (shaded in gray) and is provided to ORA pursuant to Cal. Pub. Util. Code § 583, G.O. 66-C, D.16-08-024 and the accompanying declaration.

As stated in SDG&E's and SoCalGas' (Applicants) response to ORA DR-85, Q1(a): "In preparing his testimony, Mr. Rosenfeld reviewed the original data used in response to ORA DR-6, Q12." As Applicants explained in response to ORA DR 84, Q1: "Applicants clarify that the attachment to Applicants' response to ORA DR-06, Q12, including Applicants' April 27, 2017 Corrected and Updated Confidential Attachment to Applicants' Response to ORA DR 6, Question 12 1600 Pipe Segment Data, refers to "cumulative stations," not "engineering stations." By contrast, the attachment to Applicants' response to ORA DR-25, Q1, including Applicants' April 27, 2017 Corrected and Updated Confidential Attachment to Applicants' Response to ORA DR-25, Q1, refers to "engineering stations," not "cumulative stations."

Resolution No. SED-1 required that SoCalGas/SDG&E, "Replace segments on Line 1600 from Engineering Stations [REDACTED]. The replacement of this segment was completed in October 2016. The segment from [REDACTED]" was replaced in 2012.

The costs associated with this replacement are included in a work order that includes expenses for the mandated in-line inspection run, the cut-out repair denoted in this response, and on-going follow-up excavations that are still pending. As such, a complete project cost is not available at this time, however, the expenses incurred through 2016 are \$1.23M Capital and \$1.15M O&M. This project is estimated to have a total expense of \$4.39M after the completion of work in 2017.

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QUESTION 4:

Engineering stations [REDACTED]

RESPONSE 4:

The question contains confidential information (shaded in gray) which has been previously provided to ORA pursuant to Cal. Pub. Util. Code § 583, G.O. 66-C, D.16-08-024 with an accompanying declaration. Additionally, the response contains confidential information (shaded in gray) and is provided to ORA pursuant to Cal. Pub. Util. Code § 583, G.O. 66-C, D.16-08-024 and the accompanying declaration.

As stated in Applicants' response to ORA DR 85, Question 1a: "In preparing his testimony, Mr. Rosenfeld reviewed the original data used in response to ORA DR-6, Q12." As Applicants explained in response to ORA DR 84, Q1: "Applicants clarify that the attachment to Applicants' response to ORA DR-06, Q12, including Applicants' April 27, 2017 Corrected and Updated Confidential Attachment to Applicants' Response to ORA DR 6, Question 12 1600 Pipe Segment Data, refers to "cumulative stations," not "engineering stations." By contrast, the attachment to Applicants' response to ORA DR-25, Q1, including Applicants' April 27, 2017 Corrected and Updated Confidential Attachment to Applicants' Response to ORA DR-25, Q1, refers to "engineering stations," not "cumulative stations."

Therefore, ORA's reference in this question to "Engineering stations [REDACTED] [REDACTED]" is incorrect as the referenced stationing is cumulative stationing. The engineering stations corresponding to these cumulative stations are [REDACTED] to [REDACTED], and the relevant attributes are set forth in the spreadsheets provided in response to ORA DR 25, Q1. Please further note that this Line 1600 segment is not within the scope of the Proposed Project, which is defined in SDGE-08 Updated Prepared Direct Testimony of Norm G. Kohls.

As explained in Applicants' response to ORA DR-84, Q4, this segment was changed from a conservative specified minimum yield strength (SMYS) value of [REDACTED] to a documented SMYS value of [REDACTED] psi.

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- a. In service
- b. [REDACTED] inch
- c. [REDACTED] inch
- d. [REDACTED]
- e. [REDACTED]
- f. [REDACTED]
- g. [REDACTED] feet
- h. [REDACTED]
- i. For a theoretical MAOP of [REDACTED] psig and at the corrected SMYS value of [REDACTED] SMYS, the replaced segment will operate at [REDACTED] SMYS.
- j. Please see the response to ORA DR-84, Q4.
- k. In the response to ORA DR-91, Q1 this segment was flagged with 'DT' under the correctly referenced engineering stationing listed above.

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Date Requested: July 21, 2017

Date Responded: August 11, 2017

Supplemental Response Submitted: August 16, 2017

This response has been modified to include supplemental information regarding the replaced sections. Additions to the response are denoted in bold and underline.

QUESTION 5:

Engineering stations [REDACTED]

RESPONSE 5:

The question contains confidential information (shaded in gray) which has been previously provided to ORA pursuant to Cal. Pub. Util. Code § 583, G.O. 66-C, D.16-08-024 with an accompanying declaration. Additionally, the response contains confidential information (shaded in gray) and is provided to ORA pursuant to Cal. Pub. Util. Code § 583, G.O. 66-C, D.16-08-024 and the accompanying declaration.

As stated in Applicants' response to ORA DR 85, Question 1a: "In preparing his testimony, Mr. Rosenfeld reviewed the original data used in response to ORA DR-6, Q12." As Applicants explained in response to ORA DR 84, Q1: "Applicants clarify that the attachment to Applicants' response to ORA DR-06, Q12, including Applicants' April 27, 2017 Corrected and Updated Confidential Attachment to Applicants' Response to ORA DR 6, Question 12 1600 Pipe Segment Data, refers to "cumulative stations," not "engineering stations." By contrast, the attachment to Applicants' response to ORA DR-25, Q1, including Applicants' April 27, 2017 Corrected and Updated Confidential Attachment to Applicants' Response to ORA DR-25, Q1, refers to "engineering stations," not "cumulative stations."

Therefore, ORA's reference in this question to "Engineering stations [REDACTED] [REDACTED]" is incorrect as the referenced stationing is cumulative stationing. The engineering stations corresponding to these cumulative stations are [REDACTED], and the relevant attributes are set forth in the spreadsheets provided in response to ORA DR 25, Q1. Please further note that this Line 1600 segment is not within the scope of the Proposed Project, which is defined in SDGE-08 Updated Prepared Direct Testimony of Norm G. Kohls.

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As explained in Applicants' response to ORA DR-84, Q5, this segment was changed from a conservative SMYS value of [REDACTED] to a documented SMYS value of [REDACTED]. Furthermore, 14 feet of this segment was partially replaced.

Remaining Section:

- a. In service, partially replaced.
- b. [REDACTED] inch (remaining segment)
- c. [REDACTED] inch (remaining segment)
- d. [REDACTED]
- e. [REDACTED]
- f. [REDACTED]
- g. Approximately [REDACTED] feet of remaining segment.
- h. [REDACTED]
- i. For a theoretical MAOP of [REDACTED] psig and at the corrected SMYS value of [REDACTED] SMYS, the replaced segment will operate at [REDACTED] % SMYS.
- j. See response to ORA DR-84, Q5 response
- k. This segment in the response for ORA DR-91, Q1 was flagged with 'DT' under the correctly referenced engineering stationing listed above.

Partially Replaced Section:

- a. **In service.**
- b. **[REDACTED] inch**
- c. **[REDACTED] inch**
- d. [REDACTED]
- e. [REDACTED]
- f. [REDACTED]
- g. **Approximately [REDACTED] feet**
- h. [REDACTED]
- i. **For a theoretical MAOP of [REDACTED] psig and at the replaced section SMYS value of [REDACTED] SMYS, the replaced segment will operate at [REDACTED] % SMYS.**
- j. **N/A**
- k. **N/A**

Additionally, costs are not provided because a portion of the segment remains in operation. The installation date was August 2012 and the specification for the long seam is attached (See "ORA-93 Q5 Attachment MTR.pdf").

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This response has been modified to include supplemental information regarding the replaced sections. Additions to the response are denoted in bold and underline.

QUESTION 6:

Engineering stations [REDACTED] + [REDACTED].

RESPONSE 6:

The question contains confidential information (shaded in gray) which has been previously provided to ORA pursuant to Cal. Pub. Util. Code § 583, G.O. 66-C, D.16-08-024 with an accompanying declaration. Additionally, the response contains confidential information (shaded in gray) and is provided to ORA pursuant to Cal. Pub. Util. Code § 583, G.O. 66-C, D.16-08-024 and the accompanying declaration.

The pipe segment range listed above is incorrectly denoted as engineering stationing. It is actually cumulative stationing. As explained in Applicants' response to ORA DR-84 Q6, this segment was changed from a SMYS of [REDACTED] to a SMYS of [REDACTED] and the corresponding engineering station values are [REDACTED] to [REDACTED] (as reflected in ORA DR-25, Q1). **After the partial replacement and including a station equation, the remaining segment has an engineering station of 243,575 to 244,020.**

Remaining Section:

- a. In service, partially replaced
- b. [REDACTED] inch (remaining segment)
- c. [REDACTED] (remaining segment)
- d. [REDACTED]
- e. [REDACTED]
- f. [REDACTED]
- g. [REDACTED] feet (remaining section)
- h. [REDACTED]
- i. For a theoretical MAOP of [REDACTED] psig and at the corrected SMYS value of [REDACTED] SMYS, the replaced segment will operate at [REDACTED] % SMYS
- j. See the response to ORA DR-84, Q6

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- k. This segment in the response to ORA DR-91, Q1 was flagged with 'DT' under the correctly referenced engineering stationing listed above.

Costs were not provided in the other data requests since most of the segment remains in operation.

Partially Replaced Section (Engineering Station 242,307 to 243,305):

- a. **In service.**
b. **██████ inch**
c. **████ inch**
d. **████**
e. **██████**
f. **█**
g. **Approximately █████ feet**
h. **█**
i. **For a theoretical MAOP of █████ psig and at the replaced section SMYS value of █████ SMYS, the replaced section will operate at █████ SMYS**
j. **N/A**
k. **N/A**

The installation date was March of 2013 and the specification for the long seam is attached (See "ORA-93 Q6 Attachment MTR.pdf").

**BEFORE THE PUBLIC UTILITIES
COMMISSION OF THE STATE OF CALIFORNIA**

**DECLARATION OF MARIA MARTINEZ
REGARDING CONFIDENTIALITY OF CERTAIN DATA/DOCUMENTS
PURSUANT TO D.16-08-024**

I, Maria Martinez, do declare as follows:


1. I am the Director of Pipeline Integrity for San Diego Gas & Electric Company (“SDG&E”) and Southern California Gas Company (“SoCalGas”). I have been delegated authority to sign this declaration by Douglas M. Schneider, Vice President of System Integrity and Asset Management for SDG&E and SoCalGas. I have reviewed SDG&E’s and SoCalGas’ responses to the Office of Ratepayer Advocates (“ORA”) Data Request 93, Questions 3 through 6, submitted concurrently herewith (“ORA-93_Partial (Q3-Q6)_Confidential.pdf”). I am personally familiar with the facts and representations in this Declaration and, if called upon to testify, I could and would testify to the following based upon my personal knowledge and/or belief.

2. I hereby provide this Declaration in accordance with Decision (“D.”) 16-08-024 to demonstrate that the confidential information (“Protected Information”) provided in *ORA-93_Partial (Q3-Q6)_Confidential.pdf* are within the scope of data protected as confidential under applicable law, and pursuant to California Public Utilities Code (“P.U. Code”) § 583 and General Order (“GO”) 66-C, as described in Attachment A hereto.

3. In accordance with the legal authority described herein, the Protected Information should be protected from public disclosure.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed this 11th day of August 2017, at Los Angeles, California.



Maria Martinez
Director of Pipeline Integrity
San Diego Gas & Electric and
Southern California Gas Company

ATTACHMENT A

SDG&E and SoCalGas Request for Confidentiality on the following Protected Information in its response to Office of Ratepayer Advocates (“ORA”) Data Request 93, Questions 3 through 6

Location of Data	Description of Data	Applicable Confidentiality Provisions	Basis for Confidentiality
ORA-93_Partial (Q3-Q6)_Confidential.pdf	<p>Page 3: Yield Strength</p> <p>Page 4: Engineering Stationing</p> <p>Page 5: Engineering Stationing, Cumulative Stationing, and Specified Minimum Yield Strength (SMYS) Value</p> <p>Page 6: Wall thickness, Pipeline Diameter, API Specification, Pipe Seam Type, Longitudinal Joint Factor, Segment Length, MAOP, SMYS Value, and %SMYS</p> <p>Page 7: Engineering Stationing, Cumulative Stationing, and SMYS Value</p> <p>Page 8: Wall Thickness, Pipeline Diameter, API Specification, Pipe Seam Type, Longitudinal Joint Factor, Segment Length, MAOP,</p>	<p>D.11-01-036, 2011 WL 660568 (2011)</p> <p>GO 66-C Sections 2.2(b), 2.8</p> <p>Personnel Information - Gov't Code §6254(c)</p> <p>Critical Energy Infrastructure Information ("CEII") under 18 CFR § 388.113(c); Federal Energy Regulatory Commission ("FERC") Orders 630, 643, 649, 662,683, and 702 (defining CEII).</p> <p>Critical Infrastructure Information ("CII") under 6 U.S.C. §§ 131(3), 133(a)(1)(E); 6 CFR §§ 29.2(b), 29.8 (defining CII and restricting its disclosure).</p> <p>Cal. Gov't Code § 6254(e) exempts from mandatory disclosure, plant production data, and similar information relating to utility systems. Pressure information is also exempt from public disclosure per Cal. Gov't Code § 6254(e).</p> <p>The Pipeline and Hazardous Materials Safety Administration ("PHMSA") guidelines in the Federal Register, Vol 81, pg. 40764, published on 6/22/2016 and U.S. Department of Homeland Security Transportation Security Administration ("TSA") guidelines consider the data to be restricted pipeline information.</p>	<p>Assessment Information is a type of production data that is protected by Gov't Code § 6254(e) and critical energy infrastructure. It relates details related to the transmission and distribution of energy. This information if released to the public can be used to predict repair schedules and availability of segments of the transportation network. It may affect market pricing for gas transportation and delivery and lead to speculation in the energy markets that may be detrimental to consumers. This information could also be used to identify vulnerabilities of the gas network.</p> <p>Based on security concerns, these production data sets have been proposed by PHMSA to be a restricted pipeline attribute in the Federal Register Vol 81, No. 120, pg. 40764 published on 6/22/2016. Furthermore Cal. Gov't. Code § 6254(e) exempts mandatory disclosure to the public of plant production data, and similar information relating to utility systems. This exemption is also mirrored in Federal Code 18 CFR 388.113 related to</p>

	<p>SMYS Value, and %SMYS</p> <p>Page 9: Engineering Stationing, Wall thickness, Pipeline Diameter, API Specification, Pipe Seam Type, Longitudinal Joint Factor, Segment Length, MAOP, SMYS Value, and %SMYS</p>		<p>details related to the transmission and distribution of energy.</p> <p>Specific engineering design information (i.e., Pipeline Attributes) about an existing critical infrastructure that could be used to determine the criticality of a gas facility and identify vulnerabilities of the gas delivery network. The values can be used to calculate stress levels of a pipe. Because of the critical nature of these attributes, they have been proposed by PHMSA to be restricted attributes available only to government officials in the Federal Register Vol. 81, No. 120, pg. 40764 published in 6/22/2016.</p> <p>Diameter is a specific engineering design value depicting an attribute of a proposed or existing critical infrastructure that could be used to determine the criticality of a gas facility and identify vulnerabilities of the gas delivery network. The value can be used to identify the volume of gas present in an area and ascertain the relative potential consequences of intentional acts against the gas transportation and distribution network. Because of the critical nature of the attribute, it has been identified by PHMSA to be a restricted pipeline attribute in the Federal Register Vol 81, pg. 40764 published on 6/22/2016. Diameter is also exempt for public disclosure</p>
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			per the CEII as it's a specific engineering design value.
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**BEFORE THE PUBLIC UTILITIES
COMMISSION OF THE STATE OF CALIFORNIA**

**DECLARATION OF MARIA MARTINEZ
REGARDING CONFIDENTIALITY OF CERTAIN DATA/DOCUMENTS
PURSUANT TO D.16-08-024**

I, Maria Martinez, do declare as follows:


1. I am the Director of Pipeline Integrity for San Diego Gas & Electric Company (“SDG&E”) and Southern California Gas Company (“SoCalGas”). I have been delegated authority to sign this declaration by Douglas M. Schneider, Vice President of System Integrity and Asset Management for SDG&E and SoCalGas. I have reviewed SDG&E’s and SoCalGas’ responses to the Office of Ratepayer Advocates (“ORA”) Data Request 93, Questions 3 through 6, submitted concurrently herewith (“ORA-93_(Q5 and Q6)_Supplemental_Confidential.pdf”). I am personally familiar with the facts and representations in this Declaration and, if called upon to testify, I could and would testify to the following based upon my personal knowledge and/or belief.

2. I hereby provide this Declaration in accordance with Decision (“D.”) 16-08-024 to demonstrate that the confidential information (“Protected Information”) provided in *ORA-93_(Q5 and Q6)_Supplemental_Confidential.pdf* is within the scope of data protected as confidential under applicable law, and submitted pursuant to California Public Utilities Code (“P.U. Code”) § 583 and General Order (“GO”) 66-C, as described in Attachment A hereto.

3. In accordance with the legal authority described herein, the Protected Information should be protected from public disclosure.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed this 16th day of August 2017, at Los Angeles, California.



Maria Martinez
Director of Pipeline Integrity
San Diego Gas & Electric and
Southern California Gas Company

ATTACHMENT A

SDG&E and SoCalGas Request for Confidentiality on the following Protected Information in its response to ORA Data Request 93, Questions 5 and 6

Location of Data	Description of Data	Applicable Confidentiality Provisions	Basis for Confidentiality
<p>ORA-93_(Q5 and Q6)_Supplemental_Confidential.pdf</p> <p>Please note portions of this response, including items marked as confidential, were provided on August 11, 2017. Additions made for purposes of the supplemental response have been denoted in bold and underline.</p>	<p>Page 1: Engineering Stationing</p> <p>Page 2: Specified Minimum Yield Strength (SMYS) Value, Engineering Stationing, Wall thickness, Pipeline Diameter, API Specification, Pipe Seam Type, Longitudinal Joint Factor, Segment Length, MAOP, and %SMYS</p> <p>Page 3: SMYS Value, Engineering Stationing, Wall thickness, Pipeline Diameter, and Pipe Seam Type</p> <p>Page 4: SMYS Value, Engineering Stationing, Wall thickness, Pipeline Diameter, API Specification, Pipe Seam Type, Longitudinal Joint Factor, Segment Length, MAOP, and %SMYS</p>	<p>D.11-01-036, 2011 WL 660568 (2011)</p> <p>GO 66-C Sections 2.2(b), 2.8</p> <p>Personnel Information - Gov't Code §6254(c)</p> <p>Critical Energy Infrastructure Information ("CEII") under 18 CFR § 388.113(c); Federal Energy Regulatory Commission ("FERC") Orders 630, 643, 649, 662,683, and 702 (defining CEII).</p> <p>Critical Infrastructure Information ("CII") under 6 U.S.C. §§ 131(3), 133(a)(1)(E); 6 CFR §§ 29.2(b), 29.8 (defining CII and restricting its disclosure).</p> <p>Cal. Gov't Code § 6254(e) exempts from mandatory disclosure, plant production data, and similar information relating to utility systems. Pressure information is also exempt from public disclosure per Cal. Gov't Code § 6254(e).</p> <p>The Pipeline and Hazardous Materials Safety Administration ("PHMSA") guidelines in the Federal Register, Vol 81, pg. 40764, published on 6/22/2016 and U.S. Department of Homeland Security Transportation Security Administration ("TSA") guidelines consider the data to be restricted pipeline information.</p>	<p>Assessment Information is a type of production data that is protected by Gov't Code § 6254(e) and critical energy infrastructure. It relates details related to the transmission and distribution of energy. This information if released to the public can be used to predict repair schedules and availability of segments of the transportation network. It may affect market pricing for gas transportation and delivery and lead to speculation in the energy markets that may be detrimental to consumers. This information could also be used to identify vulnerabilities of the gas network.</p> <p>Based on security concerns, these production data sets have been proposed by PHMSA to be a restricted pipeline attribute in the Federal Register Vol 81, No. 120, pg. 40764 published on 6/22/2016. Furthermore Cal. Gov't. Code § 6254(e) exempts mandatory disclosure to the public of plant production data, and similar information relating to utility systems. This exemption is also mirrored in Federal Code 18 CFR 388.113 related to</p>

			<p>details related to the transmission and distribution of energy.</p> <p>Specific engineering design information (i.e., Pipeline Attributes) about an existing critical infrastructure that could be used to determine the criticality of a gas facility and identify vulnerabilities of the gas delivery network. The values can be used to calculate stress levels of a pipe. Because of the critical nature of these attributes, they have been proposed by PHMSA to be restricted attributes available only to government officials in the Federal Register Vol. 81, No. 120, pg. 40764 published in 6/22/2016.</p> <p>Diameter is a specific engineering design value depicting an attribute of a proposed or existing critical infrastructure that could be used to determine the criticality of a gas facility and identify vulnerabilities of the gas delivery network. The value can be used to identify the volume of gas present in an area and ascertain the relative potential consequences of intentional acts against the gas transportation and distribution network. Because of the critical nature of the attribute, it has been identified by PHMSA to be a restricted pipeline attribute in the Federal Register Vol 81, pg. 40764 published on 6/22/2016. Diameter is also exempt for public disclosure</p>
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