

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(DATA REQUEST ORA-29)

Date Requested: August 5, 2016
Date Responded: August 19, 2016

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.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(DATA REQUEST ORA-29)

Date Requested: August 5, 2016
Date Responded: August 19, 2016

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.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(DATA REQUEST ORA-29)

Date Requested: August 5, 2016
Date Responded: August 19, 2016

Subject: Questions about Whether Cost Effectiveness Analysis for A.15-09-013 Applied Safety Requirement in the Safety Portion of the Benefits Section

For this set of questions, please refer to the Cost-Effectiveness Analysis (CEA) document in A.15-09-013, Prepared by PWC with input and data from applicants and content from applicants' consultants.

QUESTION 1:

On pages 36 to 38 of the CEA, under Section A entitled "Increased Safety", did any of the scoring criteria rely upon or in any way apply the safety requirements provided in Sections 191 or 192 of Title 49 of the Code of Federal Regulations (49 CFR §§191 or 192)?

RESPONSE 1:

SDG&E and SoCalGas object to this data request as vague and ambiguous in asking whether the Cost-Effectiveness Analysis (CEA) "scoring criteria rely upon or in any way apply [certain] safety requirements." The scoring criteria for safety benefits are set forth in the CEA at 35-37, and speak for themselves. The Pipeline Safety & Reliability Project (PSRP or Proposed Project) and the evaluated alternatives were developed and are intended to comply with or exceed legal requirements, the CEA assumes each would do so, and that is reflected in the scoring. Thus, the question is inherently vague and ambiguous. Subject to and notwithstanding their objection, SDG&E and SoCalGas respond as they best understand this question.

Yes. Please see response to Question 2 below.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(DATA REQUEST ORA-29)

Date Requested: August 5, 2016
Date Responded: August 19, 2016

QUESTION 2:

If the answer to question 1 is yes, please identify all such criteria that relied upon or applied the safety requirements in 49 CFR §§191 or 192. Please reference and articulate all requirements in 49 CFR §§191 or 192 that were applied.

RESPONSE 2:

SDG&E and SoCalGas object to this data request as vague and ambiguous in asking whether the CEA “scoring criteria rely upon or in any way apply [certain] safety requirements.” The scoring criteria for safety benefits are set forth in the CEA at 35-37, and speak for themselves. The Proposed Project and the evaluated alternatives were developed and are intended to comply with or exceed legal requirements, the CEA assumes each would do so, and that is reflected in the scoring. Thus, the question is inherently vague and ambiguous. Subject to and notwithstanding their objection, SDG&E and SoCalGas respond as they best understand this question.

The CEA filed in Application (A.) 15-09-013 was prepared by Pricewaterhouse Coopers (PwC) with input and data from SDG&E and SoCalGas (Applicants) and content from Applicants’ consultants. The Applicants’ Proposed Project and each of the alternatives developed as part of the Application were developed with the fundamental premise that at a minimum, each of them would be developed, constructed, operated, inspected, maintained and reported out on so as to comply with, and in some cases exceed, all applicable federal, state and local codes, regulations and laws. Many of the provisions within the above mentioned codes and laws relate to criteria around safety and those provisions are inherently incorporated in the information provided to and utilized by PwC. A listing and basic description of some of the specific provisions incorporated into the Applicants’ Proposed Project and the alternatives being considered are:

49 CFR §§ 191 – Transportation of Natural and other Gas by Pipeline; Annual Reports, and Safety-Related Condition Reports

49 CFR §§ 192- Transportation of Natural and other Gas by Pipeline: Minimum Federal Safety Standards

Requirements included within are:

- Materials
- Pipe Design
- Design of Pipeline Components

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(DATA REQUEST ORA-29)

Date Requested: August 5, 2016
Date Responded: August 19, 2016

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- Welding of Steel Pipelines
 - Joining of Materials Other than by Welding
 - General Construction Requirements for Transmission Lines and Mains
 - Customer Meters, Service Regulators and Service Lines
 - Requirements for Corrosion Control
 - Test Requirements
 - Uprating
 - Operations
 - Maintenance
 - Qualification of Pipeline Personnel
 - Gas Transmission Pipeline Integrity Management
 - Gas Distribution Pipeline Integrity Management

General Order (GO) 112F State of California Rules Governing Design, Construction, Testing, Operation, and Maintenance of Gas Gathering, Transmission, and Distribution Piping Systems

The rules within GO 112F incorporate and are in addition to the Federal Pipeline Safety Regulations, specifically, Title 49 of the Code of Federal Regulations (49 CFR), Parts 191, 192, 193, and 199, which also govern the Design, Construction, Testing, Operation, and Maintenance of Gas Piping Systems in the State of California. GO 112F does not supersede the Federal Pipeline Safety Regulations, but are supplements to the Federal Regulations. Absent modifications to 49 CFR by this GO 112F, the requirements and definitions within 49 CFR, Parts 191, 192, 193 and 199 prevail.

The purpose of GO 112F is to establish, in addition to the Federal Pipeline Safety Regulations, minimum requirements for the design, construction, quality of materials, locations, testing, operations and maintenance of facilities used in the gathering, transmission and distribution of gas and in liquefied natural gas facilities to safeguard life or limb, health, property and public welfare and to provide that adequate service will be maintained by gas Operators under the jurisdiction of the California Public Utilities Commission.

These rules are concerned with safety of the general public and employees' safety to the extent they are affected by basic design, quality of the materials and workmanship, and requirements for testing and maintenance of gas gathering, transmission and distribution facilities and liquefied natural gas facilities.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(DATA REQUEST ORA-29)

Date Requested: August 5, 2016
Date Responded: August 19, 2016

California Public Utilities Code Section 451

This code addresses matters related to provision of utility services on a just and reasonable basis. Specifically it requires that every public utility shall furnish and maintain such adequate, efficient, just, and reasonable service, instrumentalities, equipment, and facilities, including telephone facilities, as defined in Section 54.1 of the Civil Code, as are necessary to promote the safety, health, comfort, and convenience of its patrons, employees, and the public.

California Public Utilities Code Section 958

This code requires that each gas corporation shall prepare and submit to the Commission a proposed comprehensive pressure testing implementation plan for all intrastate transmission lines to either pressure test those lines or to replace all segments of intrastate transmission lines that were not pressure tested or that lack sufficient details related to performance of pressure testing. The comprehensive pressure testing implementation plan shall provide for testing or replacing all intrastate transmission lines as soon as practicable.

In response to this requirement and associated CPUC Decisions, SoCalGas and SDG&E created and are implementing their Pipeline Safety Enhancement Plan (PSEP). Based on the mandates contained within this Code, it was determined that Line 1600 must be tested or replaced. The Pipeline Safety & Reliability Project was developed in accordance with and in response to this requirement.

The Occupational Safety and Health Act

This is the primary federal law which governs occupational health and safety in the private sector and federal government in the United States. Its main goal is to ensure that employers provide employees with an environment free from recognized hazards, such as exposure to toxic chemicals, excessive noise levels, mechanical dangers, heat or cold stress, or unsanitary conditions. The Act created the Occupational Safety and Health Administration (OSHA).

The alternatives developed and included in the subject Application and provided to PwC assume compliance with all codes, laws and regulations including those discussed above.

Additional safety information included in the Application and provided to PwC includes the information that is set forth in pages 1-41 of the Amended Application and in the specific prepared direct testimony of the witnesses. Amended Application, Section V. at page 10 begins the specific section covering "Safety Evaluation and Compliance Analysis."

With respect to Line 1600, safety related information for consideration in the Application included, but was not limited to, pipe material used during the original construction in 1949

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(DATA REQUEST ORA-29)

Date Requested: August 5, 2016

Date Responded: August 19, 2016

(electric flash welded pipe from manufacturer A.O. Smith), manufacturing related anomalies and integrity monitoring of Line 1600, operations and maintenance repair history, Line 1600 Integrity Assessment History and information about the existing state of Line 1600.

With respect to the Pipeline Safety & Reliability Project, proposed new Line 3602 offers increased safety features above and beyond compliance with the minimal “test or replace” compliance requirement of Public Utilities Code section 958. For example, Line 3602 includes a fiber optics system to monitor for land movement that could cause strain on the pipeline as well as provide signaling information regarding excavation activity in the immediate vicinity of the pipeline. Furthermore, to enhance safety, Line 3602 as proposed will utilize pipe material with a combination of increased wall thickness and grade that exceeds the minimum code requirements for its class location. Main line valves used for emergency shut off and isolation will be fully automated and can be operated locally or remotely as necessary. In addition, as an added safety benefit, the valves will be positioned closer together than required by code minimum for their class location. Other safety enhancements include, but are not limited to, burying the pipe deeper than the code minimum and installing warning tape in the trench line above the pipe to alert anyone excavating that there is a high pressure gas pipeline below.

In summary, the safety criteria and scoring give consideration to all of the above information. Please refer to the subject Application for additional detail.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(DATA REQUEST ORA-29)

Date Requested: August 5, 2016
Date Responded: August 19, 2016

QUESTION 3:

If the hydro test Line 1600 alternative identified in the CEA was completed, please identify each section of 49 CFR §§191 or 192 that would be violated on Line 1600 if all directives in Resolution SED-1 are followed.

RESPONSE 3:

As discussed in the response to Question 2 above, it is Applicants' intent to develop, construct, test, operate, inspect and maintain their natural gas infrastructure so as to comply with, and in some cases exceed, all applicable federal, state and local codes, regulations and laws.

Applicants, as prudent operators, propose replacing Line 1600 with the Proposed Project because it presents the opportunity to eliminate known flaws and incorporate new, significant safety features (e.g., increased wall thickness and tougher steel with increased grade and modern manufacturing methods) that would not exist if Line 1600 is simply hydrotested. Additionally, replacing Line 1600 at this time avoids both the significant costs associated with hydrotesting (including any repairs identified during hydrotesting), as well as any costs associated with replacing Line 1600's transmission function in the future. Nonetheless, if Applicants were ordered to hydrotest Line 1600 and assuming Line 1600 successfully passed that hydrotest, Applicants as prudent operators would have to determine that the line complied with applicable federal, state and local codes, regulations and laws and was safe to operate following the hydrotest and conducting of any necessary repairs - therefore there would be no known violations if and when the line could be placed back in transmission-level service.

As noted above and discussed in the subject Application, Applicants believe that replacing Line 1600 with the Proposed Project is the superior alternative to hydrotesting Line 1600. The Proposed Project has enhanced safety benefits compared to Line 1600 and provides additional operating flexibility to manage stress conditions and enhances system reliability. In contrast, the hydrotest will not remove sub-critically sized hook cracks and other known anomalies associated with the nearly 70-year-old electric flash welded pipe and does not improve reliability, resiliency or operation flexibility compare to the proposed replacement project. Nor would hydrotesting alone provide any of the modern safety features that could be provided if a new line is constructed. A successful hydrotest will not alleviate the Applicants' on-going obligation to ensure safe and reliable future operation of this pipeline, and hydrotesting will not diminish future uncertainty in terms of both system reliability and future integrity management of a vintage pipeline system that would contain flaws that survive

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(DATA REQUEST ORA-29)

Date Requested: August 5, 2016

Date Responded: August 19, 2016

the hydrotest; thus creating increased opportunity for exposure to potential future interactive threats.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(DATA REQUEST ORA-29)

Date Requested: August 5, 2016

Date Responded: August 19, 2016

QUESTION 4:

If any requirement in 49 CFR §§191 or 192 would be violated on Line 1600 in response to question 3, for each such violation, please briefly explain why it would be a violation.

RESPONSE 4:

N/A.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(DATA REQUEST ORA-29)

Date Requested: August 5, 2016
Date Responded: August 19, 2016

QUESTION 5:

If the hydrotest Line 1600 alternative identified in the CEA was completed, please identify each section of 49 CFR §§191 or 192 that would be violated on Line 1600 if that pipeline was operated as it was just before the directives in Resolution SED-1 were followed.

RESPONSE 5:

Please see response to Question 3 above.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(DATA REQUEST ORA-29)

Date Requested: August 5, 2016
Date Responded: August 19, 2016

QUESTION 6:

If any requirement in 49 CFR §§191 or 192 would be violated on Line 1600 in response to question 5, for each such violation, please briefly explain why it would be a violation.

RESPONSE 6:

N/A.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(DATA REQUEST ORA-29)

Date Requested: August 5, 2016

Date Responded: August 19, 2016

QUESTION 7:

If the answer to question 3 is “none”, please say so.

RESPONSE 7:

Please see the response to Question 3 above.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(DATA REQUEST ORA-29)

Date Requested: August 5, 2016

Date Responded: August 19, 2016

QUESTION 8:

If the answer to question 5 is “none”, please say so.

RESPONSE 8:

Please see the response to Question 3 above.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(DATA REQUEST ORA-29)

Date Requested: August 5, 2016

Date Responded: August 19, 2016

QUESTION 9:

On pages 36 to 38 of the CEA, under Section A entitled “Increased Safety”, did any of the scoring criteria rely upon or any way apply the safety requirements provided in California Public Utilities Commission General Order 112F?

RESPONSE 9:

Yes; please see the response to Question 2 above.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(DATA REQUEST ORA-29)

Date Requested: August 5, 2016

Date Responded: August 19, 2016

QUESTION 10:

If the answer to question 9 is yes, please identify all such criteria that relied upon or applied the safety requirements in California Public Utilities Commission General Order 112F.

RESPONSE 10:

Please see the response to Question 2 above.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(DATA REQUEST ORA-29)

Date Requested: August 5, 2016

Date Responded: August 19, 2016

QUESTION 11:

If the hydro test Line 1600 alternative identified in the CEA was completed, please identify each section of Commission General Order 112F that would be violated on Line 1600 if all directives in Resolution SED-1 are followed.

RESPONSE 11:

Please see the response to Question 3 above.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(DATA REQUEST ORA-29)

Date Requested: August 5, 2016

Date Responded: August 19, 2016

QUESTION 12:

If any requirement in GO112F would be violated on Line 1600 in response to question 11, for each such violation, please briefly explain why it would be a violation.

RESPONSE 12:

N/A.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(DATA REQUEST ORA-29)

Date Requested: August 5, 2016

Date Responded: August 19, 2016

QUESTION 13:

If the hydro test Line 1600 alternative identified in the CEA was completed, please identify each section of Commission General Order 112F that would be violated on Line 1600 if that pipeline was operated as it was just before the directives in Resolution SED-1 were followed.

RESPONSE 13:

Please see the response to Question 3 above.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(DATA REQUEST ORA-29)

Date Requested: August 5, 2016

Date Responded: August 19, 2016

QUESTION 14:

If any requirement in GO112F would be violated on Line 1600 in response to question 13, for each such violation, please briefly explain why it would be a violation.

RESPONSE 14:

N/A.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(DATA REQUEST ORA-29)

Date Requested: August 5, 2016

Date Responded: August 19, 2016

QUESTION 15:

If the hydro test Line 1600 alternative identified in the CEA was completed, please identify each section of the California Public Utilities Code, including, but not limited to Sections 451 and 958, that would be violated on Line 1600 if all directives in Resolution SED-1 are followed.

RESPONSE 15:

Please see the response to Question 3 above.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(DATA REQUEST ORA-29)

Date Requested: August 5, 2016

Date Responded: August 19, 2016

QUESTION 16:

If any requirement in the California Public Utilities Code would be violated on Line 1600 in response to question 15, for each such violation, please briefly explain why it would be a violation.

RESPONSE 16:

N/A.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(DATA REQUEST ORA-29)

Date Requested: August 5, 2016

Date Responded: August 19, 2016

QUESTION 17:

If the hydro test Line 1600 alternative identified in the CEA was completed, please identify each section of the California Public Utilities Code, including, but not limited to Sections 451 and 958, that would be violated on Line 1600 if that pipeline was operated as it was just before the directives in Resolution SED-1 were followed.

RESPONSE 17:

Please see the response to Question 3 above.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(DATA REQUEST ORA-29)

Date Requested: August 5, 2016

Date Responded: August 19, 2016

QUESTION 18:

If any requirement in the California Public Utilities Code would be violated on Line 1600 in response to question 17, for each such violation, please briefly explain why it would be a violation.

RESPONSE 18:

N/A.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(DATA REQUEST ORA-29)

Date Requested: August 5, 2016
Date Responded: August 19, 2016

QUESTION 19:

If the hydro test Line 1600 alternative identified in the CEA was completed and operated in compliance with the directives in Resolution SED-1, does SCG/SDG&E foresee any upcoming violations on Line 1600 of 49 CFR §§191 or 192; GO 112F; Sections in the California Public Utilities Code, including but not limited to Sections 451 and 958; or the Occupational Safety and Health Act (OSHA)?

RESPONSE 19:

SDG&E and SoCalGas object to this question on the grounds that it calls for speculation. Codes, regulations and laws are subject to change and the condition of the pipeline may change as it is subject to external forces, natural disasters and time dependent deterioration, which could affect the future condition of the line and ultimately its compliance. Subject to and without waiving this objection, SDG&E and SoCalGas respond as follows.

Please see the response to Question 3 above. Applicants, as prudent operators, propose replacing Line 1600 with a new pipeline constructed in accordance with modern day practices and high quality design. In the event Applicants are ordered instead to hydrotest Line 1600 and assuming Line 1600 passes the hydrotest, future compliance will be determined based on future conditions as revealed by future inspections and monitoring, the results of which cannot be predicted at this time.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(DATA REQUEST ORA-29)

Date Requested: August 5, 2016
Date Responded: August 19, 2016

QUESTION 20:

If the hydro test Line 1600 alternative identified in the CEA was completed and operated in compliance with the directives in Resolution SED-1, does SCG/SDG&E foresee any upcoming post-hydro test violations on Line 1600 of 49 CFR §§191 or 192; GO 112F; or Sections in the California Public Utilities Code, including but not limited to Sections 451 and 958; or OSHA?

RESPONSE 20:

SDG&E and SoCalGas object to this question on the grounds that it calls for speculation. Codes, regulations and laws are subject to change and the condition of the pipeline may change as it is subject to external forces, natural disasters and time dependent deterioration, which could affect the future condition of the line and ultimately its compliance. Subject to and without waiving this objection, SDG&E and SoCalGas respond as follows.

Please see the responses to Question 3 and 19 above.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(DATA REQUEST ORA-29)

Date Requested: August 5, 2016

Date Responded: August 19, 2016

QUESTION 21:

If the answer to question is yes, please identify all such violations. Please explain the basis for each identified foreseeable violation.

RESPONSE 21:

N/A.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(DATA REQUEST ORA-29)

Date Requested: August 5, 2016
Date Responded: August 19, 2016

QUESTION 22:

If the hydro test Line 1600 alternative identified in the CEA was completed and operated in the same fashion it was operated just before the issuance of Resolution SED-1, would SCG/SDG&E foresee any upcoming post-hydro test violations on Line 1600 of 49 CFR §§191 or 192; GO 112F; Sections in the California Public Utilities Code, including but not limited to Sections 451 and 958; or OSHA?

RESPONSE 22:

SDG&E and SoCalGas object to this question on the grounds that it calls for speculation. Codes, regulations and laws are subject to change and the condition of the pipeline may change as it is subject to external forces, natural disasters and time dependent deterioration, which could affect the future condition of the line and ultimately its compliance. Subject to and without waiving this objection, SDG&E and SoCalGas respond as follows.

Please see the responses to Questions 3 and 19 above.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(DATA REQUEST ORA-29)

Date Requested: August 5, 2016

Date Responded: August 19, 2016

QUESTION 23:

If the answer to question 22 is yes, please identify all such violations. Please explain the basis for each identified foreseeable violation.

RESPONSE 23:

N/A.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(DATA REQUEST ORA-29)

Date Requested: August 5, 2016
Date Responded: August 19, 2016

QUESTION 24:

If the hydro test Line 1600 alternative identified in the CEA was completed and operated in compliance with the directives in Resolution SED-1, does SCG/SDG&E foresee any upcoming post-hydro test violations on Line 1600 of 49 CFR §§191 or 192; GO 112F; or Sections in the California Public Utilities Code, including but not limited to Sections 451 and 958; or OSHA?

RESPONSE 24:

SDG&E and SoCalGas object to this question on the grounds that it calls for speculation. Codes, regulations and laws are subject to change and the condition of the pipeline may change as it is subject to external forces, natural disasters and time dependent deterioration, which could affect the future condition of the line and ultimately its compliance. Subject to and without waiving this objection, SDG&E and SoCalGas respond as follows.

Please see the responses to Questions 3 and 19 above.

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(DATA REQUEST ORA-29)

Date Requested: August 5, 2016
Date Responded: August 19, 2016

QUESTION 25:

Please identify all employees at Sempra Utilities and at Price Waterhouse Coopers who answered any of this set of questions.

RESPONSE 25:

SDG&E and SoCalGas object to this question as it is overly broad, not related to the facts being deliberated and unlikely to result in admissible evidence. Subject to and notwithstanding their objections, SDG&E and SoCalGas respond as follows. The information contained in these data request responses were developed by utility employees and consultants familiar with the PSRP Application and the subject matter contained within. In addition to PwC as it related to the CEA, groups within SoCalGas and SDG&E include team members directly supporting the PSRP Application primarily for witnesses Douglas M. Schneider, Travis Sera, Deanna Haines and Neil Navin and are from groups such as Gas Engineering & Major Projects and System Integrity & Asset Management.