

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(24th DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)**

**Date Requested: September 8, 2017
Date Responded: September 22, 2017**

PRELIMINARY STATEMENT

1. These responses and objections are made without prejudice to, and are not a waiver of, SDG&E's 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 do 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, as set forth in the California Public Utilities Commission ("Commission or CPUC") Rules of Practice and Procedure. SDG&E and SoCalGas possession, custody, or control does not include any constructive possession that may be conferred by SDG&E's and 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 expressly reserves 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).
6. 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.
7. Publicly available information and documents including, but not limited to, documents that are part of the proceeding record, newspaper clippings, court papers, and materials available on the Internet, will not be produced.

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GENERAL OBJECTIONS

1. SDG&E and SoCalGas object to each instruction, definition, and request to the extent that it purports to impose any requirement or discovery obligation greater than or different from those under the CPUC Rules of Practice and Procedure, Statutes, and the applicable Orders of the Commission.
2. SDG&E and SoCalGas object to each request that is overly broad, unduly burdensome, or not reasonably calculated to lead to the discovery of admissible evidence.
3. SDG&E and SoCalGas object to each instruction, definition and data request to the extent that it seeks information protected from disclosure by the attorney-client privilege, deliberative process privilege, attorney work product doctrine, or any other applicable privilege. Should any such disclosure by SDG&E and SoCalGas occur, it is inadvertent and shall not constitute a waiver of any privilege.
4. SDG&E and SoCalGas object to each instruction, definition and data request as overbroad and unduly burdensome to the extent it seeks documents or information that are readily or more accessible to Southern California Generation Coalition (SCGC) from SCGC's own files, from documents or information in SCGC's possession, or from documents or information that SDG&E and SoCalGas previously released to the public or produced to SCGC. Responding to such requests would be oppressive, unduly burdensome, and unnecessarily expensive, and the burden of responding to such requests is substantially the same or less for SCGC as for SDG&E and SoCalGas.
5. SDG&E and SoCalGas object to each instruction, definition and data request to the extent that it seeks the production of documents and information that were produced to SDG&E and SoCalGas by other entities and that may contain confidential, proprietary, or trade secret information.
6. To the extent any of SCGC's data requests seek documents or answers that include expert material, including but not limited to analysis or survey materials, SDG&E and SoCalGas object to any such requests as premature and expressly reserves the right to supplement, clarify, revise, or correct any or all responses to such requests, and to assert additional objections or privileges, in one or more subsequent supplemental response(s) in accordance with the time period for exchanging expert reports set by the Commission.
7. SDG&E and SoCalGas incorporate by reference every general objection set forth above into each specific response set forth below. A specific response may repeat a general objection for emphasis or some other reason. The failure to include any general objection in any specific response does not waive any general objection to that request. Moreover, SDG&E and SoCalGas do not waive their right to amend any responses.

QUESTION 24.1:

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In Decision (“D.”) 07-05-022 (May 2, 2007), the California Public Utilities Commission (“Commission”) approved a proposal by SDG&E/SoCalGas in Application (“A.”) 06-10-034 to increase capacity and maintain system reliability at Otay Mesa through contractual commitments. The Commission summarized (at 2) the SDG&E/SoCalGas proposal as follows:

On October 27, 2006, SDG&E/SoCalGas filed an application seeking Commission authorization to issue a request for offers (RFO) seeking reliable deliveries of natural gas supplies at SDG&E’s Otay Mesa receipt point by contracting for up to 50 million cubic feet per day (MMcf/d) of interstate and foreign pipeline capacity deliverable at that point, or through the functionally equivalent contractual guarantees of physical delivery of supplies. SDG&E/SoCalGas propose that using contractual commitments in place of physical facilities is the least cost and most flexible means available to increase system capacity and reliability to serve customer demand in southern Riverside County and San Diego County.

24.1.1. Please provide the RFO that SDG&E/SoCalGas used to solicit bids for contractual commitments to support reliable deliveries of up to 50 MMcf/d at Otay Mesa.

24.1.2. Please provide the results of the RFO.

RESPONSE 24.1:

24.1.1. No RFO was issued to solicit bids for contractual commitments to support reliable deliveries of up to 50 MMCFD at Otay Mesa. D.07-05-022 limited any RFOs for contractual commitments to support reliable deliveries at Otay Mesa to a term of two years ending March 31, 2009.

24.1.2. Please see the response to Question 24.1.1 above.

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QUESTION 24.2:

D.07-05-022, Ordering Paragraph 4, imposed filing requirements on SDG&E/SoCalGas as follows:

4. SoCalGas and SDG&E shall file the following advice letters (AL). The ALs shall be served by e-mail on the service list to this proceeding and all other interested parties who have requested notification of AL filings for SDG&E and SoCalGas. The AL's are subject to protest. The AL's ordered in a. and b. below shall be filed within 30 days of today's decision. The AL ordered in c. below shall be filed prior to the start of the November 2007 – March 2008 winter heating season.
- a. SDG&E and SoCalGas shall file an advice letter to revise tariff Schedule GT-F, Special Condition 34 to be consistent with issues two and three of the Joint Recommendation.
- b. SDG&E and SoCalGas shall file an advice letter to revise tariffs to establish the Otay Mesa System Reliability Memorandum Account (OMSRMA).
- c. SDG&E and SoCalGas shall file an advice letter requesting approval of the final contracts.

Please provide the filings that SDG&E/SoCalGas submitted to the Commission to comply with D.07-05-022, Ordering Paragraph 4.

RESPONSE 24.2:

Please see SoCalGas Advice Letter (AL) No. 3748-A filed in compliance with D.07-05-022, Ordering Paragraph 4 available at the following link:

<https://www.socalgas.com/regulatory/tariffs/tm2/pdf/3748-A.pdf>

As noted in AL 3748-A, the filing ensures full compliance with D.07-05-022 and revised Special Condition 34 to be consistent with issues two and three of the Joint Recommendation (see page 2) and established the Otay Mesa System Reliability Memorandum Account (OMSRMA).

No advice letter was submitted requesting approval of contracts because SDG&E and SoCalGas did not enter into any such contracts.