

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(DATA REQUEST ORA-100)
Date Requested: May 31, 2018
Date Responded: June 4, 2018**

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 or additional 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 Office of Ratepayer Advocates (ORA) from ORA's own files, from documents or information in ORA's possession, or from documents or information that SDG&E and SoCalGas previously released to the public or produced to ORA. 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 ORA 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 ORA'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.

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Subject: SED Data Request SED-06 (Additional Question Per December 20, 2017 ALJ Ruling), requested on December 20, 2017 and provided on December 29, 2017 [Exhibit SDGE-45]

QUESTION 1:

At pdf page 35 of Exh. SDG&E-45, SoCalGas/SDG&E state “approximately 3,500 miles of pipelines operated at hoop stress levels less than 20% of SMYS would be reclassified as transmission pipelines.” Provide a breakdown of the approximately 3,500 miles of pipeline operating below 20% SMYS and provide:

- a) The year of installation
- b) Number of miles that have been pressure tested
- c) Current class location
- d) The pressure test ratio of the most recent test

RESPONSE 1:

SDG&E and SoCalGas object to this data request on the following grounds:

1. It seeks information not admissible in evidence or reasonably calculated to lead to the discovery of admissible evidence because evidentiary hearings on Phase 1 issues have been completed and the evidentiary record closed. A Proposed Decision, if adopted by the Commission, would close this proceeding. If the Commission directs a Phase 2 to this proceeding or another proceeding is opened, and the questions presented in ORA Data Request #100 are relevant to the scoped issues, SDG&E and SoCalGas will entertain such a data request at that time.
2. The Proposed Decision, Ordering Paragraph 4, if adopted, provides that “Safety and Enforcement Division shall complete a study of the California pipeline operators’ definitions of transmission and distribution pipelines to determine whether there is a need for the Commission to provide further definitions than those provided under 49 Code of Federal Regulations Part 92 § 192.3 and at what cost.” If the Proposed Decision is adopted, that study is not part of this proceeding.
3. The referenced 3,500 miles of pipeline does not include Line 1600, which currently operates at greater than 20% SMYS. Therefore, the information sought is not admissible in evidence or reasonably calculated to lead to the discovery of admissible evidence, even if the evidentiary record were not already closed.
4. It is unduly burdensome given that it seeks information not admissible in evidence or reasonably calculated to lead to the discovery of admissible evidence.