

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(DATA REQUEST ORA-55)**

**Date Requested: November 23, 2016
Date Responded: December 15, 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.

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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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Subject: Line 1600

ORA DR-46, Question 4 asked:

For how many years has SoCalGas/SDG&E been operating Line 1600 using assumed data for the section of pipe that was ordered to be replaced under Resolution SED-01?

SoCalGas/SDG&E responded:

Applicants object to this Question on the ground that it assumes facts not in evidence. Subject to and without waiving their objection, Applicants respond as follows.

On an annual basis, operators are required to submit a Transmission Annual report to the Pipeline and Hazardous Materials Safety Administration (PHMSA) (Form F71002-1). In 2012, PHMSA required operators to provide an MAOP Determination (Part Q) to categorize the method per 49 CFR 192.619 used to establish MAOP for transmission pipelines. During this process Applicants identified that the segment that was ordered to be replaced under Resolution SED-01 had limited information regarding the wall thickness and grade as part of the installation work order. However, using this limited information combined with Applicants' engineering design standards, materials and standards catalogs, material requisitions and purchase orders, Applicants were able to establish conservative minimum values for wall thickness and grade and prefixed them "DT" to indicate additional data research or nondestructive testing should be completed. Confirming these values, Applicants performed a physical inspection of this segment of pipe and found that the physically measured wall thickness was consistent with wall tolerances published for .250 inch 16" pipe in API 5L. In fact, the physical measurements on average across multiple points was .270-inch. Thus providing further validation of the minimum "DT" values employed for the pipe segment. It should be noted that the MAOP of the segment replaced under Resolution SED-01 is established per 49 CFR 192.619(c) and therefore the segment had demonstrated it could operate safely 800 psig.

QUESTION 1:

Please state what facts ORA DR 46, Question 4 assumes that are not in evidence.

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RESPONSE 1:

The facts not in evidence assumed by ORA DR 46, Question 4 are that SDG&E and SoCalGas (Applicants) have been operating Line 1600 using assumed data for the section of pipe that was ordered to be replaced under Resolution SED-1.

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QUESTION 2:

Does SoCalGas/SDG&E contend that Line 1600 was not assuming data for the section of pipe that was ordered to be replaced under Resolution SED-01?

RESPONSE 2:

Yes.

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QUESTION 3:

How many lengths of pipe are in Engineering Stations 17-131? In your response, provide the definition that SoCalGas/SDG&E uses for “lengths” of pipe.

RESPONSE 3:

Applicants define pipe lengths from girth weld to girth weld. There were 11 pipe lengths within retired Engineering Stationing 17-131.

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QUESTION 4:

The response in the attachment to ORA DR-25 Q1, and ORA DR-46 Q4, seems to indicate that a single portion of pipe was examined to determine the wall thickness of the pipe between engineering stations 17-131. Is this true? If so, please explain.

RESPONSE 4:

No. As stated in Applicants' response to ORA DR 46, Q4: "Applicants performed a physical inspection of this segment of pipe [engineering station 17-131] and found that the physically measured wall thickness was consistent with wall tolerances published for .250 inch 16" pipe in API 5L. In fact, the physical measurements on average across multiple points was .270-inch." (emphasis added)

Using the definition of "pipe lengths" provided in response to Question 3 above, a total of 5 pipe lengths were examined during the inspection of the retired pipe segment.

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QUESTION 5:

The response to ORA DR-46 Q4 only indicates that the portion of pipe examined was found to be API 5L. Please provide the API 5L Grade, tensile strength minimum (ksi), yield to tensile ratio (maximum), and elongation minimum % that accompany the portion of the pipe that was found to be API 5L.

RESPONSE 5:

To clarify, API 5L was referenced in ORA DR-46 Q4 in order to identify that the retired pipe segment was operating within the appropriate wall thickness tolerance specifications and was not intended to confirm the additional properties. Applicants are not relating specific pipe specs such as grade and wall thickness to the segment of pipe removed.

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QUESTION 6:

Since Line 1600 was built in 1949, why was one portion of pipe replaced in 1953?

RESPONSE 6:

The pipe segment that was replaced in 1953 was done so to accommodate an aqueduct right of way.

See attachment "Q6 Response 1953 Cover Sheet".

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QUESTION 7:

What is the total length, and percentage of Line 1600, installed after 1955, for which SoCalGas/SDG&E does not have evidence of pressure testing?

RESPONSE 7:

0.15% (40 feet) of Line 1600 was installed after 1955, and does not have test pressure records.

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QUESTION 8:

What is the total length, and percentage of Line 1600, installed after 1955, for which SoCalGas/SDG&E does not have traceable, verifiable and complete strength test pressure records?

RESPONSE 8:

Applicants believe the term “traceable, verifiable and complete” was first used in the natural gas industry in the National Transportation Safety Board’s January 3, 2011 Safety Recommendations to PG&E and the Commission. The definition and prospective applicability of this phrase in the natural gas industry is currently being established by the Pipeline and Hazardous Materials Safety Administration through workshops and interpretation letters to operators. The phrase “traceable, verifiable, and complete” was not defined by the Commission during the course of SoCalGas and SDG&E’s Pipeline Safety Enhancement Plan proceeding. During that proceeding, counsel for The Utility Reform Network (TURN) successfully argued that SoCalGas’ and SDG&E’s testimony on the term “traceable, verifiable and complete” should be stricken from the record as irrelevant. In making those arguments, counsel for TURN argued that the term, “traceable, verifiable and complete,” is understood to mean “reliable and accurate.” Therefore, in responding to this question, SoCalGas and SDG&E assume ORA’s use of the term “traceable, verifiable and complete,” means “reliable and accurate.” See response to Question 7 above.

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QUESTION 9:

If SoCalGas/SDG&E assumes that there is another form of evidence of pressure testing on Line 1600 other than traceable, verifiable and complete strength test pressure records, what is that form of evidence? For which portions of Line 1600 is SoCalGas/SDG&E asserting this form of evidence shows pressure testing on the portion of Line 1600 installed after 1955.

RESPONSE 9:

No.

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QUESTION 10:

Please provide the installation work order referred to in SoCalGas/SDG&E response to ORA DR-46 Q4.

RESPONSE 10:

See the response to Question 6 above.

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QUESTION 11:

Please confirm that the next wall thickness below the average of all portions measured on this part of Line 1600 is 0.25". If it is another value, please explain.

RESPONSE 11:

Confirmed.

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QUESTION 12:

A portion of Line 1600 between engineering stations 1693 and 1785 was replaced in 1952. Please confirm this is true, and explain and provide the work order for this portion of Line 1600.

RESPONSE 12:

Correct, in order to accommodate changes to pipeline configuration

See attachment "DR 55 Q12 Response."

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QUESTION 13:

On the basis of the engineering assumptions used for the portion of Line 1600 between engineering stations 17-131, please confirm that:

- a. The MAOP of design is 1312.5 (without the design factor) based on SCG/SDG&E's assumptions.
- b. That for most of its operational history, this segment of pipeline would have been operating at 60.9% of its SMYS.
- c. That this segment of pipeline was installed in, what by today's standards, is a Class 3 location, which allows a pipe to only operate at or below 50% of SMYS.

RESPONSE 13:

- a. Based on established conservative values, the design calculation would be 1312, however, as previously stated, confirmation of those values is pending additional research and testing.
- b. Applicants cannot confirm until inspection and test results from the retired pipe segment are received and validated.
- c. The retired segment, if still in operation, would be operating in class 3.

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QUESTION 14:

Please provide the documents underlying SoCalGas/SDG&E's statement (from the Response to ORA DR-46 Question 4 that:

“Applicants’ engineering design standards, materials and standards catalogs, material requisitions and purchase orders, Applicants were able to establish conservative minimum values for wall thickness and grade and prefixed them “DT” to indicate additional data research or nondestructive testing should be completed.”

RESPONSE 14:

Applicants established the values after considering the following documents: the 1968 CPUC filing provided in response to ORA DR 14 Question 2, the work order provided in response to Question 6 above, and the attached pipe specification sheets from 1956 and 1968 (see attachments “Q14 1956 Spec Sheet” and “Q14 Steel Pipe Specs 68”).

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QUESTION 15:

Has SoCalGas/SDG&E ever excavated the portion of Line 1600 between engineering stations 17-131, prior to 2012? Please explain. Please include in the explanation the number of excavations, years of excavations, and what data about that section of pipe was discovered during those excavations. Please include documentation.

RESPONSE 15:

No.

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Subject: Line 1600 and Reconditioned or Relocated Pipe

QUESTION 16:

Are any segments of Line 1600 made from reconditioned or relocated pipe? Please explain and identify the specific segments (if any).

RESPONSE 16:

No.