SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(DATA REQUEST ORA-58)

Date Requested: December 23, 2016
Date Responded: January 13, 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.

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:

Please provide the full Cost Effective Analysis (CEA) model that was provided to Energy Division (ED), including any Excel spread sheet file(s) with all worksheets and active linking, including all loaders and assumptions.

RESPONSE 1:

To clarify, there is no "CEA model" per se, rather there are workpapers that support the CEA. These workpapers were provided to ORA in response to ORA DR 3. Please note there was an update to the workpapers supporting the CEA scenario analysis due to a correction of an error in Table 37. The relevant corrected CEA pages and corresponding updated workpaper are attached. These corrections do not change the overall relative benefit rank of the Proposed Project or the Project Alternatives.

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QUESTION 2:

In the CEA at page 35, table 10, please explain how the "Total of Average Scores" was calculated.

RESPONSE 2:

The "Total Average Score" for the Proposed Project and the alternatives in the CEA at page 35, table 10, is the average of Benefits Criteria (1 through 7) scores. The scores for Benefits Criteria in Table 10 on page 35 have been rounded to whole numbers. The calculation of the "Total Average Scores" in the CEA at page 35, table 10 is documented in Application 15-09-013 – Volume III Workpaper Benefits Scoring Model Final, Summary tab.

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QUESTION 3:

In ORA DR-11 question 3, ORA asked SoCalGas/SDG&E to provide the independent and combined probabilities of each of the events and the specific scenario occurring.

SoCalGas/SDG&E responded "The purpose of the Prepared Direct Testimony of J. Kikuts is to describe how a specific supply disruption on an existing SDG&E gas transmission line would impact SDG&E's and SoCalGas' system and resulting ability to provide gas service to customers. As the testimony was focused on the impacts [of] a specific supply disruption scenario on an existing pipeline and not the statistical probability of it occurring, no corresponding probability data was calculated."

Please fill in the table below with number of days the event occurred.

#	Event[1]	Number of days event occurred in 2015 (number of days in 365 days)	Number of days event occurred in 2006-2015 (number of days in 3'652 days)
1	L3010 at 80%		
2	L3010 complete outage		
3	Otay Mesa full supply		
4	Otay Mesa medium supply		
5	Otay Mesa low supply		
6	Otay Mesa no supply		
7	Summer day with low electric generation		
8	Summer day with high electric generation		
9	Winter day		
10	Winter 1-in-10 year day		
11	Spring day		
12	Fall Day		

[1] Events in this column were taken from the CEA dated March 2016; table 31 p. 64 and table 32 p.65.

RESPONSE 3:

SDG&E/SoCalGas are only able to provide a partial response to this question as the format and periods for which the data is being requested is mostly incompatible with the source data. For example, ORA requests the count of events in a 365-day period for a winter day when the winter period is much shorter than the 365-day period ORA is requesting. Furthermore, as described in Tables 34 and 35 of the CEA, the CEA considers both gas and electric supply and demand components but the requested table does not accommodate each of these variables. Additionally, there are differing values utilized in the CEA for the six seasonal scenarios. Further, the figures for Otay Mesa supply ("full," "medium," and "low") are based on an estimate of daily operationally available capacity (OAC) for the Gasoducto Rosarito pipeline. See Workpaper Table – Scenario Analysis Gas Demand and Supply. The figures do not represent historical deliveries at the Otay Mesa receipt point, but rather an assumption that there would be such capacity on all the North Baja, Gasoducto Rosarito and TGN systems to deliver gas to Otay Mesa or that such supply would be available for purchase sourced from Energia Costa Azul LNG at the time of a Line 3010 outage or partial outage. If either gas or capacity were not available for such supply at Otay Mesa in the event of a Line 3010 outage, the risk of curtailment would be represented by the calculations for scenarios with less or no gas supply at Otay Mesa. Given the aforementioned, SDG&E and SoCalGas provide the following information:

#	Event[2]	Number of days event occurred in 2015 (number of days in 365 days)	Number of days event occurred in 2006-2015 (number of days in 3'652 days)
1	L3010 at 80%	7	Applicants do not have Line 3010 specific data for the entire period requested.[3] 104 based on data since May 2011
2	L3010 complete outage	0	30
3	Otay Mesa full supply	Information not available as Applicants do not have the	Information not available as

[2] Events in this column were taken from the CEA dated March 2016; table 31 p. 64 and table 32 p.65.
[3] Prior to May 2011 Lines 3010 and 1600 did not have separate meters to monitor data separated per line.

		operational capacity information and actual historic data from pipelines that Applicants do not own or operate that is necessary to determine the requested information.	Applicants do not have the operational capacity information and actual historic data from pipelines that Applicants do not own or operate that is necessary to determine the requested information.
4	Otay Mesa medium supply	Information not available as Applicants do not have the operational capacity information and actual historic data from pipelines that Applicants do not own or operate that is necessary to determine the requested information.	Information not available as Applicants do not have the operational capacity information and actual historic data from pipelines that Applicants do not own or operate that is necessary to determine the requested information.
5	Otay Mesa low supply	Information not available as Applicants do not have the operational capacity information and actual historic data from pipelines that Applicants do not own or operate that is necessary to determine the requested information.	Information not available as Applicants do not have the operational capacity information and actual historic data from pipelines that Applicants do not own or operate that is necessary to determine the requested information.
6	Otay Mesa no supply	Information not available as Applicants do not have the operational capacity information and actual historic data from pipelines that Applicants do not own or	Information not available as Applicants do not have the operational capacity information and actual historic

		operate that is necessary to determine the requested information.	data from pipelines that Applicants do not own or operate that is necessary to determine the requested information.
7	Summer day with low electric generation	Request incompatible with source data	Request incompatible with source data
8	Summer day with high electric generation	Request incompatible with source data	Request incompatible with source data
9	Winter day	Request incompatible with source data	Request incompatible with source data
10	Winter 1-in-10 year day	Request incompatible with source data	Request incompatible with source data
11	Spring day	Request incompatible with source data	Request incompatible with source data
12	Fall Day	Request incompatible with source data	Request incompatible with source data

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QUESTION 4:

In D. Bisi Testmony, p. 6 section IV, it states "As previously stated, the integrity of the SDG&E system is highly dependent upon two transmission assets: Line 3010 and the Moreno Compressor Station. An outage at either of these two facilities may impact the Utilities' ability to maintain continuous service to their customers, including core customers; an outage at both facilities certainly will. (Footnote 6) Because of the Gas System's dependence on Line 3010 and its larger 30-inch diameter, Line 3010 transports and provides approximately 90 percent of the entire SDG&E gas supply (assuming compression is available). An outage on Line 3010, either planned or unplanned, severely reduces the capacity of the SDG&E system. Without Line 3010, only gas supply transported via Line 1600 is available, reducing the total capacity of the SDG&E system to 150 MMcfd. This level of capacity is just sufficient to serve only the core load on the SDG&E system in the summer operating season – the time when core demand is at its lowest level. Further, such an outage would also affect in-basin EG, as explained in the Prepared Direct Testimony of S. Ali Yari. As explained in the Prepared Direct Testimony of Jani Kikuts, an outage on the gas transmission system could result in significant disruptions to customers, including core customers. (Footnote 6) The Cost-Effectiveness Analysis includes a scenario analysis that evaluates SDG&E's system performance in the case of an outage or pressure reduction of Line 3010. I have provided data input to the analysis, which PWC used to model a range of scenarios across a variety of parameters and variables, with the aim to assess any resulting gas and electric curtailment impacts to customers".

a. Please confirm that the CEA did not assume an event in which Moreno Compressor Station was either partially or totally out of service.

b. If Moreno Compressor Station was assumed to be either partially or totally out of service in the CEA, then please do the following:

   1. Please identify each instance in the CEA where such an assumption was made, including page number and the sentence or passage that included this assumption.

   2. Please identify in each instance identified in response to the previous question whether Moreno Compressor Station was assumed to be partially or totally out of service.

c. Please identify which alternatives in the CEA did and which did not assume Moreno Compressor Station was partially or totally out of service.

d. Please explain all other ways in which outage of Moreno Compressor Station was considered in the CEA, and impacted the CEA scoring.

RESPONSE 4:

a. The CEA Scenario Analysis, CEA pages 63-73, assumes that Moreno Compressor Station is functioning, see Table 30 on page 64.

b. See response to Question 4(a) above.
   1. N/A
   2. N/A

c. See response to Question 4(a) above.

d. Moreno Compressor Station redundancy is considered in the CEA scoring in the Benefits Evaluation Model under 2.1 Redundancy to natural gas system on page 42. See CEA Tables 14 through 16, pages 45-47 for impact on scoring of Proposed Project and alternatives.