

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

**APPLICATION TO RECOVER COSTS RECORDED IN THE
PIPELINE SAFETY AND RELIABILITY MEMORANDUM ACCOUNTS,
THE SAFETY ENHANCEMENT EXPENSE BALANCING ACCOUNTS, AND
THE SAFETY ENHANCEMENT CAPITAL COST BALANCING ACCOUNTS
(A.16-09-005)**

(DATA REQUEST ORA-07)

Date Requested: July 28, 2017

Date Responded: August 18, 2017

1st Amendment Date Responded: September 8, 2017

QUESTION 7.01:

For each segment identified in the attachment provided on July 24, 2017 to ORA in response to ORA data request 05 (Q5.01_Spreadsheet_Amended 7-24-17.xlsx) please:

a. State whether, prior to PSEP, the pipe segment had been previously tested

RESPONSE 7.01 (a):

The attached supporting documents include Confidential and Protected Information pursuant to PUC Section 583, GO 66-C, and D.16-08-024. See column AC within the attached spreadsheet.

Most changes between this response to ORA DR-07 and the previous responses to ORA DR-05 and ORA DR-06 are due to a change in interpretation of item U of ORA DR-05. ORA DR-05, item U requested: "Test pressure in PSIG of most recent pressure test. If no pressure test, please enter 'None.'" Because all PSEP replacements or hydrotest projects include pressure tests, and because some other items listed in ORA DR-05 sought historical data, SoCalGas/SDG&E misunderstood this request as seeking data for pipe lines as of the point in time prior to implementation of the PSEP project. After receiving ORA DR-07, question 7.01a, which requested "State whether, prior to PSEP, the pipe segment had been previously tested" SoCalGas/SDG&E reconsidered this prior interpretation and now construes this request in ORA DR-05 as seeking each pipeline's current test pressure (following completion of the PSEP scope of work). This change in interpretation results in changes to the data in a number of columns such as test pressure and test date and, for replacement projects, a possible change in pipe grade, pipe wall thickness, pipe diameter, and % SMYS.

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b. For segments that have previously been tested, please provide (for the prior test):

- i. The number of feet tested
- ii. Test year and month
- iii. Test duration (at maximum pressure)
- iv. Test medium

RESPONSE 7.01 (b)

The attached supporting documents include Confidential and Protected Information pursuant to PUC Section 583, GO 66-C, and D.16-08-024. See the following specific columns within the attached spreadsheet:

- i. Column AD (number of feet tested)
- ii. Column AE (test year and month)
- iii. Column AF (test duration)
- iv. Column AG (test medium)

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QUESTION 7.02:

On page 5 of Chapter III (Direct Testimony of Rick Phillips), SCG/SDG&E state: “Where incidental mileage has been included only to facilitate the constructability of post-1955 hydrotest projects without sufficient record of a pressure test, SoCalGas and SDG&E have included that mileage in calculating the disallowance.”

Please identify all segments or mileages that were included only to facilitate the constructability of post-1955 hydro test projects without sufficient record of a pressure test. If the included segments are not the same as the segments identified in Q5.01_Spreadsheet_Amended 7-24-17.xlsx, please identify the length of included pipe in each identified segment.

RESPONSE 7.02:

There is no such mileage.

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(A.16-09-005)**

(DATA REQUEST ORA-07)

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QUESTION 7.03:

On July 24, 2017, SCG sent ORA a revised attachment to ORA data request 05 containing pipeline segment information.

a. Please provide a redline or similar document for all changes from SCG's original attachment to its response to ORA DR-05.

RESPONSE 7.03 (a):

A redline of the changes initially was provided with the ORA DR-05 amendment sent on August 10, 2017 and was amended again on September 8, 2017.

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(A.16-09-005)**

(DATA REQUEST ORA-07)

Date Requested: July 28, 2017

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b. Please explain why two sections of Line 2000-West were deleted from the original attachment to the revised version.

RESPONSE 7.03 (b):

The two rows were deleted because the data provided in those rows were not part of the PSEP project.

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(DATA REQUEST ORA-07)

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c. Please list (if not apparent from the document provided in response to part (a) of this question) and explain all changes to values in columns “Segment Total Feet,” “Phase 1 Total Feet,” “Incidental Feet,” “Accelerated Feet,” “Current MAOP % SMYS,” “Test Pressure (psig),” and “Test Ratio.”

RESPONSE 7.03 (c):

The reasons for changes in values in the amendments are in the comments column of the ORA DR-05 amendments sent on August 10, 2017 and September 8, 2017.

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d. Please provide the supporting documentation underlying all changes, including but not limited to Form 2112 (Pipeline Database Update).

RESPONSE 7.03 (d):

The attached supporting documents include Confidential and Protected Information pursuant to PUC Section 583, GO 66-C, and D.16-08-024. Each Form 2112 for the changes in Maximum Allowable Operating Pressure (MAOP) is attached. Since the remaining changes were mostly transcription errors and a change in interpretation of item U of ORA DR-05, as stated in the amended response to 7.01(a) dated September 8, 2017, there is no supporting documentation for the remaining changes.

**BEFORE THE PUBLIC UTILITIES
COMMISSION OF THE STATE OF CALIFORNIA**

**DECLARATION OF HUGO MEJIA
REGARDING CONFIDENTIALITY OF CERTAIN DATA/DOCUMENTS
PURSUANT TO D.16-08-024**

I, Hugo Mejia, do declare as follows:

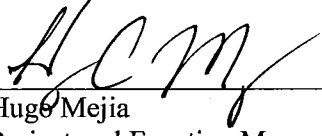
1. I am a Project and Execution Manager in the Major Programs & Project Controls for San Diego Gas & Electric Company (“SDG&E”) and Southern California Gas Company (“SoCalGas”) designated by Jimmie Cho, Senior Vice President, Gas Operations and System Integrity for SDG&E and SoCalGas. I have been delegated authority to sign this declaration by Mr. Cho. I have reviewed the Response of SoCalGas and SDG&E to the Seventh Data Request of the Office of Ratepayer Advocates (ORA) of the California Public Utilities Commission (CPUC) in the Pipeline Safety and Enhancement Plan (PSEP) 2016 Reasonableness Review A.16-09-005 proceeding, submitted concurrently herewith (Response to ORA’s Seventh Data Request). I personally am familiar with the facts and representations in this Declaration, except where stated as based upon my information and belief. If called upon to testify, I could and would testify to the following based upon my personal knowledge and/or information and belief.

2. I hereby provide this Declaration in accordance with Decision (D.) 16-08-024 to demonstrate that the confidential information (Protected Information) provided in the Response to ORA’s Seventh Data Request is within the scope of data protected as confidential under applicable law and pursuant to Public Utilities Code (“PUC”) § 583 and General Order (“GO”) 66-C, as further described in Attachment A.

3. In accordance with the legal authority described herein, the Protected Information should be protected from public disclosure.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed this 18th day of August, 2017, at Los Angeles, California.



Hugo Mejia
Project and Execution Manager

ATTACHMENT A

SoCalGas and SDG&E Request Confidential Treatment of the Following Information in Their Response to ORA's Seventh Data Request in A.16-09-005, Application to Recover Costs Recorded in Pipeline Safety & Reliability Memorandum Accounts, Safety Enhancement Capital Costs Balancing Accounts, and Safety Enhancement Expense Balancing Accounts

SDG&E and SoCalGas designated the combination of the pipeline diameter attribute and location data as confidential in their response to ORA's Seventh Data Request in A.16-09-005, Application to Recover Costs Recorded in Pipeline Safety & Reliability Memorandum Accounts, the Safety Enhancement Expense Balancing Accounts, and the Safety Enhancement Capital Cost Balancing Accounts, because:

- (1) This data is sensitive critical energy infrastructure information that is not currently published by PHMSA and, if made publicly available, could present a risk to the security of California's critical energy infrastructure. SoCalGas' and SDG&E's assessment of the risks associated with critical energy infrastructure data will continue to evolve as the sophistication, frequency and volume of security threats increase. In light of certain events, such as the attack on Pacific Gas & Electric Company's Metcalf Substation in 2013, SoCalGas and SDG&E believe pipeline diameter data must be treated as confidential. SoCalGas and SDG&E designate this pipeline diameter data as confidential pursuant to several laws, regulations, and guides that seek to protect critical infrastructure information and sensitive security information from public disclosure for national security reasons. These include, but are not limited to: (i) the Protected Critical Infrastructure Information (PCII) Program; (ii) FERC Order 630 - Critical Energy Infrastructure Information (CEII); (iii) Sensitive Security Information Regulations; and (iv) the Transportation Security Administration's (TSA) Pipeline Security Guidelines. *See also* the Federal Register Notice on August 27, 2015 (Volume 80, Number 166) concerning PHMSA/OPS' proposed changes to the National Pipeline Mapping System (NPMS) data collection and the protection of pipeline information such as MAOP and pipe diameter. The yellow highlighted portions on the pages identified in the table below fall within the category of sensitive critical energy infrastructure.

DATA / INFORMATION	JUSTIFICATION FOR CONFIDENTIALITY	ATTACHMENTS
<p>Pipeline attribute (i.e. diameter, pressure, and location)</p>	<p>This information has been identified as confidential protected information as this data constitutes sensitive critical energy infrastructure information that is not currently published by the PHMSA and, if made publicly available, could present a risk to the security of the SoCalGas and SDG&E pipeline system and California's critical energy infrastructure.</p> <p><u>CEII</u>: 18 CFR §388.113(c); FERC Orders 630, 643, 649, 662, 683, and 702 (defining CEII).</p> <p><u>Critical Infrastructure Information</u>: 6 U.S.C. §§131(3), 133(a)(1)(E); 6 CFR §§ 29.2(b), 29.8 (defining CII and restricting its disclosure).</p> <p>Gov't Code § 6254(e) ("Geological and geophysical data, plant production data, and similar information relating to utility systems development, or market or crop reports, that are obtained in confidence from any person.")</p> <p>Gov't Code § 6254 (ab) ("Critical infrastructure information, as defined in Section 131(3) of Title 6 of the United States Code, that is voluntarily submitted to the Office of Emergency Services for use by that office")</p>	<p>Attachment Q7.01 Tab: Sheet 1 - Column: S, T, U & V. Q7.03 D CONFIDENTIAL 1005 - 2015-06-12 (Ref 4440).pdf: pp.1 Q7.03 D CONFIDENTIAL 41-30-A - 2015-02-20 - Ref ID 3840.pdf: pp.1</p>
<p>Employee identifying information (e.i. names, signatures, other contact information)</p>	<p>Public disclosure of staff level employee names, signatures, and other contact information is being prevented to protect against privacy, employee security, identity theft, and cyber-security risks.</p> <p>Gov't Code § 6254(c); Gov't Code 6255;</p> <p>Civil Code §§ 1798.3 & 1798.24 (the California Information Practices Act);</p> <p>Cal. Const., Art. I, § 1 (California constitutional right to privacy).</p>	<p>Q7.03 D CONFIDENTIAL 1005 - 2015-06-12 (Ref 4440).pdf: pp.1 Q7.03 D CONFIDENTIAL 41-30-A - 2015-02-20 - Ref ID 3840.pdf: pp.1</p>