

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(DATA REQUEST ORA-43)
Date Requested: October 18, 2016
Date Responded: November 3, 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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QUESTION 1:

Subject: Otay Mesa as a Backup Source

Decision (D).07-05-022 approved SDG&E/SoCalGas' proposal to increase capacity and maintain system reliability at Otay Mesa through contractual commitments and the memorandum account mechanism proposed in the application. (See D.07-05-022, mimeo, p. 1). The Commission found that the request for offers (RFO) "shall solicit offers from interested parties to provide an arrangement that secures additional system capacity, i.e. firm deliveries up to 50 MMcf/d at Otay Mesa for winter months November through March of 2007-2008 and 2008-2009." (See D.07-05- 022, mimeo, p. 8, Finding of Fact 2; See also D.07-05-022, mimeo, p. 9, Ordering Paragraph 3.).

- a. Please provide a list of every entity that bid into the solicitation authorized via D. 07-05-022.
- b. Please provide all offers from each interested party that made in response to the RFO solicitation.
- c. Please provide the SDG&E and SoCalGas RFO solicitation.

RESPONSE 1:

SDG&E and SoCalGas did not post an RFO solicitation as authorized by D.07-05-022.

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QUESTION 2:

On Jani Kikuts' testimony page 3, one of the assumptions states that "Alternate gas supplies through Otay Mesa are not available in the short term at the time of the line 3010 outage."

- a. Please clarify what is meant by "short term"?
- b. If the outage of line 3010 is planned, why are alternate gas supplies through Otay Mesa not available in the short term?
- c. Have there been any times in the last year when SDG&E/SoCalGas were able to obtain gas through Otay Mesa in the "short term", as defined in response to question 2a? Please explain.
- d. Have there been any times in the last year when SDG&E/SoCalGas were able to obtain short term alternate gas supplies through Otay Mesa? Please explain.
- e. Have there been any times in the last year when SDG&E/SoCalGas were NOT able to obtain short term alternate gas supplies through Otay Mesa? Please explain.

RESPONSE 2:

As used in the Prepared Direct Testimony of Jani Kikuts and in the responses to this question, the phrase "short term" refers to supplies needed on a short notice basis rather than for a short duration.

- a. For the scenario described in the Prepared Direct Testimony of Jani Kikuts, "short term" means within approximately 6 hours.
- b. In the scenario set forth in Mr. Kikuts' testimony, the outage of Line 3010 is not planned.
- c. In June 2016, there was an instance in which the System Operator was able to obtain gas supplies in the short term through Otay Mesa. Due to an unplanned shutdown at the Blythe Compressor Station, there was a loss of flowing supplies into the Southern System as well as diminishing inventories in San Diego. The System Operator was able to arrange for some of the gas scheduled to be delivered at Blythe to be delivered to Otay Mesa. This was possible because sufficient pipeline capacity was available on North Baja and the Mexican pipelines for the supply to be delivered at Otay Mesa. Gas supply and the corresponding pipeline capacity to Otay Mesa are not always readily available, particularly on a short notice basis.

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- d. See the response to question 2.c above.
- e. The System Operator only needed to ask for supplies on short notice one time in the last year.

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QUESTION 3:

- a. Please provide the available daily capacity that could be provided through the Otay Mesa receipt point into the SDG&E system over the next ten years.
- b. ORA understands that the capacity could be variable along the years. Please provide a forecast of capacity through Otay Mesa receipt point into the SDG&E system on a seasonal basis.

RESPONSE 3:

The current firm capacity of the Otay Mesa receipt point is 400 MMcfd regardless of season, and SoCalGas/SDG&E have no plans at this time to alter this receipt capacity over the specified timeframe. Please refer to SoCalGas' electronic bulletin board at <https://scgenvoy.sempra.com> for daily firm capacity.

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QUESTION 4:

Subject: Manual Distribution Valves

Kikuts' testimony at p.8 discusses that the distribution valves are not automated and require a field response with windshield time, potential traffic control requirements and potential resource constraints depending on the number of valves to be isolated.

An article from S&P Global Platt's¹, 10/12/2016 states that "Natural gas distributors will face a new requirement to install valves that automatically halt gas flows to damaged lines serving multi-family buildings, under a final federal regulation released Tuesday, designed to cut risks of fires and explosions."

- a. Are there any plans to replace these valves as a part of SDG&E/SoCalGas's PSEP? If so when?
- b. Does SDG&E or SoCalGas have any plans to replace distribution valves with automated valves as part of their General Rate Cases or through any other mechanism? Please explain.
- c. Have there been any changes in, or proposed changes to, federal or state law in 2015 or 2016 (through October 14) governing automated valves on the distribution system?

^{1/} S&P Global Platt's is the independent provider of information and benchmark prices for the commodities and energy markets.

RESPONSE 4:

- a. SoCalGas and SDG&E's PSEP is focused on larger gas pipelines serving large numbers of customers or secondary smaller pipelines from which multiple individual customers might be served. As such, there is no plan to replace or install Excess Flow Valves (EFV) or automatic valves on pipelines serving a single multi-family structure.
- b. SDG&E and SoCalGas have plans to either install and/or retrofit some existing mainline distribution valves to support remote control and automatic operation. This work is being conducted to provide for the rapid isolation and depressurization of larger (12" and greater diameter) high-pressure gas pipelines in accordance with our PSEP filed in 2012. Some of the identified PSEP valve work may be submitted as part of the General Rate Cases and/or PSEP proceedings in the future. Additionally, SoCalGas is currently developing its plan to comply with the new requirements of PHMSA's final rule "Pipeline Safety: Expanding the

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use of Excess Flow Valves in Gas Distribution Systems to Applications Other Than Single Family Residences” for service lines. The Plan to comply with this requirement will be submitted in future General Rate Cases or other mechanisms.

- c. As intimated in the preamble of this question, the federal Department of Transportation has proposed changes to 49 CFR Part 192 sections 381 and 383 to expand the use of “excess flow valves” in gas distribution systems to applications other than single-family residences. These excess flow valves are valves located on the service line feeding a premise where natural gas is consumed and have inherent characteristics that will automatically shut off gas flow during periods of excess gas flow such as could happen should the line be hit and damaged during excavation activities. Additional information describing this change can be found in the Federal Register/Volume 81, No.199/Friday, October 14, 2016/Rules and Regulations Page 70987.

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QUESTION 5:

Subject: Operating pressure

On Jani Kikuts' testimony page 2, it states that "To illustrate the potential impact to the SDG&E gas system and customers in the event of a Line 3010 outage, my testimony assumes that Line 1600 has been pressure tested and placed back into service operating at 640 psig" and footnote 2 "Due to the specific characteristics of Line 1600, the maximum allowable operating pressure (MAOP) of Line 1600 is now 640 psig, even though it historically operated at 800 psig. See Prepared Direct Testimony of Travis Sera". With Moreno compression station operational, if the Applicants' Proposal to build Line 3602 and derate Line 1600 were to be authorized:

- A. What would the Maximum Operating Pressure (MOP), Minimum Operating Pressure (MinOP), expected Operating Pressure (OP), and the Maximum Allowable Operating Pressure (MAOP) be for Line 1600? What would be the average annual and maximum seasonal mmcf/day flowing through the pipe?
- B. What would the MOP, MinOP, expected OP, and the MAOP for Line 3010? What would be the average annual and maximum seasonal mmcf/day flowing through the pipe?
- C. What would be the MOP, MinOP, expected OP, and the MAOP for Line 3602? What would be the average annual and maximum seasonal mmcf/day flowing through the pipe?

RESPONSE 5:

- A. If Line 1600 was derated to a distribution pipeline, the MAOP and MOP would be 320 psig. Distribution pipelines do not have specified minimum operating pressures. The expected operating pressure would be up to 320 psig. At 320 psig, Line 1600 does not contribute to the SDG&E system throughput and serves only as a distribution supply line.
- B. **This response contains confidential information (shaded in gray) and is provided pursuant to P.U. Code § 583, General Order 66-C, D.16-08-024 and the accompanying declaration.**

The MAOP on line 3010 has several different MAOP changes and varies between [REDACTED] and [REDACTED] psig. The MOP also varies and ranges from [REDACTED] to [REDACTED] psig, and the minimum operating pressures range between [REDACTED] to [REDACTED] psig. The expected operating pressure ranges between the MinOP and MOP along the entire pipeline. Please refer to Response 1A to ORA's 6th data request regarding daily flow through Line 3010.

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C. The MAOP and MOP of the proposed Line 3602 would be 800 psig. The MinOP would range from 350 psig to 250 psig depending upon location. The expected operating pressure ranges between the MinOP and the MAOP for each segment. Please refer to Response 1A to ORA's 6th data request regarding daily flow through the proposed Line 3602.

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QUESTION 6:

Without Moreno compression station in service, if the Applicants' Proposal to build Line 3602 and derate Line 1600 were to be authorized:

- A. What would be the MOP, MinOP, expected OP, and the MAOP for Line 1600? What would be the average annual and maximum seasonal mmcf/day flowing through the pipe?
- B. What would be the MOP, MinOP, expected OP, and the MAOP for Line 3010? What would be the average annual and maximum seasonal mmcf/day flowing through the pipe?
- C. What would be the MOP, MinOP, expected OP, and the MAOP for Line 3602? What would the average annual and maximum seasonal mmcf/day flowing through the pipe?

RESPONSE 6:

As set forth in the Moreno Compressor Station-Operation Analysis, Attachment XII to the Prepared Direct Testimony of Neil Navin, SDG&E and SoCalGas expect that construction and operation of the proposed Line 3602 and the derating of Line 1600 will result in reduced operation of the Moreno Compressor Station. However, SDG&E and SoCalGas do not plan to operate without Moreno Compressor Station. Please refer to the response to Question 5 above for pressures and flows.

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

**DECLARATION OF JIMMIE I. CHO
REGARDING CONFIDENTIALITY OF CERTAIN DATA/DOCUMENTS
PURSUANT TO D.16-08-024**

I, Jimmie I. Cho, do declare as follows:

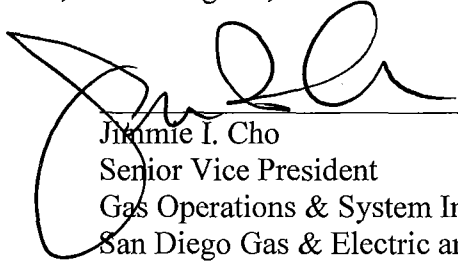
1. I am the Vice President of System Integrity and Asset Management for San Diego Gas & Electric Company (“SDG&E”) and Southern California Gas Company (“SoCalGas”). I have reviewed the following documents: ORA DR 43 submitted concurrently herewith. I am personally familiar with the facts and representations in this Declaration and, if called upon to testify, I could and would testify to the following based upon my personal knowledge and/or 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 document is within the scope of data protected as confidential under applicable law, including, but not limited to, Public Utilities (“PUC”) Code § 583, General Order (“GO”) 66-C, and other legal authority specifically 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 3rd day of November, 2016, at Los Angeles, California.



Jimmie I. Cho
Senior Vice President
Gas Operations & System Integrity
San Diego Gas & Electric and
Southern California Gas Company

ATTACHMENT A

SDG&E and SoCalGas Request for Confidentiality On the following Protected Information

Location of Data	Description of Data	Applicable Confidentiality Provisions	Basis for Confidentiality
<p>PSRP Data Request: ORA DR 43 Question 5b</p>	<p>Maximum Allowable Operating Pressure</p> <p>Minimum Operating Pressure (Min Op)</p> <p>Maximum Operating Pressure (MOP)</p>	<ul style="list-style-type: none"> Sensitive Security Information (“SSI”) under 49 CFR §1520.5(a)(3), that, if revealed would be detrimental to transportation security. The Pipeline and Hazardous Materials Safety Administration’s (“PHMSA”) guidelines in the Federal Register, Vol 81, pg. 40764, published on 6/22/2016 and U.S. Department of Homeland Security Transportation Security Administration (“TSA”) guidelines consider the data to be restricted pipeline information. The SSI regulation requires that only “covered persons with a need to know” may have access to SSI. The CPUC’s access to this information must be necessary for the performance of its official duties and is restricted to CPUC Staff, Air Resources Board (“ARB”) Staff under the CARB/CPUC Interagency Information Sharing Agreement, and the Office of Ratepayer Advocates (“ORA”) only 	<p>Operating "pressure" is a specific engineering design value as well as an operating parameter depicting an attribute of an existing critical infrastructure. This operating parameter could be used to determine the criticality of a gas pipe or facility and identify vulnerabilities of the gas delivery network. The release of this operating parameter is detrimental to public safety as it can be used as a means to identify the volume of gas present and potential energy that could be released in an area in order to identify the potential consequences of an intentional act of sabotage. Because of the critical nature of the parameter, it has been identified by PHMSA to be restricted pipeline information as well being an SSI element in the Federal Register Vol 81, pg. 40764 published on 6/22/2016. Pressure information is also exempt from public disclosure per the CEII and CII regulations for the same security reasons</p> <p>Pressure information is also exempt from public disclosure per Cal. Gov't Code § 6254(e) as it is a type of production data relating to utility systems similar to plant production data.</p>