

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(DATA REQUEST ORA-47)**

**Date Requested: November 9, 2016
Date Responded: November 29, 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:

In response to ORA DR-43, Question 2e: “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.

SoCalGas/SDG&E stated: “The System Operator only needed to ask for supplies on short notice one time in the last year.”

Have there been any times in any of the last 10 years when SDG&E/SoCalGas were NOT able to obtain short term alternate gas supplies through Otay Mesa? (ORA is using the term short term in this to mean within approximately 6 hours, as defined by SoCalGas/SDG&E in response to ORA DR 43, Question 2a.). Please provide the date of each such instance, and explain.

RESPONSE 1:

On February 2, 2011 during a Force Majeure event on the El Paso Natural Gas (EPNG) South Mainline the SDG&E/SoCalGas Operational Hub was able to purchase 180,000 Dth of spot supply at Otay Mesa, a lower amount of 100,000 Dth on February 3, and an even lower amount of 15,000 Dth on February 4. Requests for more supply for February 3 were rejected by the supplier who stated that larger amounts of supply were unavailable. The unavailability of this supply in conjunction with the continued shortage of supply on the EPNG South Mainline required the curtailment of noncore customers including Electric Generators on February 3 at 3 PM. Curtailment was lifted at 12 noon February 4 when Force Majeure conditions became less severe and EPNG South Mainline gas supply became readily available.

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The response to Question 2 has been amended, changes are noted in red, bold and underline.

QUESTION 2:

Please provide a map that shows Line 1600 in SDG&E's service territory, as well as SDG&E's service territory demarcated in its entirety. Please provide each of the following attributes on this map. Please ensure that each attribute requested below is provided in a different color and marked so that one attribute can be discerned from each of the others.

- a. All gathering lines connecting to Line 1600.
- b. All distribution centers on or near Line 1600. Please include all distribution lines that connect with or are within 1 mile of Line 1600.
- c. All storage facilities connected to or within 1000 feet of Line 1600.
- d. All large volume customers (eg-gas fired electric power plants) can receive service from Line 1600, or are connected to Line 1600.
- e. All transmission lines to which Line 1600 connects. Please be sure to properly label each transmission line number.
- f. The location of service regulators or other pressure limiting devices in series that would meet the requirements of 49 Code of Federal Regulations § 192.197(c) if Line 1600 was to be properly characterized as a high-pressure distribution line.

RESPONSE 2:

Please see the revised attached map, which is confidential (e.g. customer specific information cannot be released publicly unless the customer consents to the release in writing per D.01-07-032) and is provided pursuant to Cal. Pub. Util. Code § 583, General Order 66-C, D.16-08-024 and the accompanying declaration. The attached map shows the 6 large volume customers as defined by SDG&E's and SoCalGas' gas standards. The map has been revised to show the distribution center located at Rainbow. Additionally, the graphical representation of Line 1032 near the community of Pala has been changed to correctly represent it as a high-pressure distribution main and its line number removed from the map. There are no gathering lines connected to Line 1600 and no storage facilities connected to or within

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1000 feet of Line 1600. Applicants object that “All large volume customers (eg-gas fired electric power plants) can receive service” is vague and ambiguous as to time, and speculative as to any future such customers. Applicants’ response is limited to large volume customers that are connected to Line 1600.

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QUESTION 3:

Have any of the CAISO renewable integration studies provided distinct geographical requirement for where renewable integration needs to occur?

Please explain, and provide reference to those studies, if the response is anything other than an unqualified “no”.

RESPONSE 3:

No.