

**SAN DIEGO GAS & ELECTRIC COMPANY  
SOUTHERN CALIFORNIA GAS COMPANY  
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)  
(A.15-09-013)  
(DATA REQUEST ORA-51)  
Date Requested: November 15, 2016  
Date Responded: November 30, 2016**

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**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 - In Line Inspection**

Safety and Enforcement Division SED resolution (Resolution No. SED-1) issued on August 18, 2016 includes the requirement to “Perform In-Line Inspections (ILI) of Line 1600 using identical technologies as in the previous ILI run and compare the results with the data gathered in the 2012- 2015 ILI tool runs”. On July 14, 2016, SoCalGas/SDG&E also wrote to the CPUC’s Executive Director, “As directed, the Utilities’ ILI plan for Line 1600 is being modified to accelerate the inspection of the 16-inch pipe. . .

The modified, accelerated ILI schedule is set forth below:

- Phase I: Rainbow to Lake Hodges - tool runs completed prior to December 31, 2016.
- Phase II: Lake Hodges to Mission - tool runs completed prior to December 31, 2016.
- Phase III: Under Lake Hodges - tool run to be completed in 2021.”

**QUESTION 1:**

Please provide the ILI status for line 1600 and include the following points.

- a. The current progress of the ILI. In particular, please identify whether SoCalGas/SDG&E will be able to keep the accelerated ILI schedule they wrote to the CPUC’s Executive Director. If the utilities’ proposed ILI schedule can no longer be kept, what is the new schedule for each Phase?
- b. Please provide details if SDG&E/SoCalGas faced any problem(s) during the ILI.
- c. Please provide the results of the ILI and the comparison of results with the data gathered in the 2012-2015.

**RESPONSE 1:**

- a. SDG&E and SoCalGas (Applicants) completed the Axial Magnetic Flux Leakage (AMFL) and Geometry inspections for Phase 1 on November 3, 2016 and Phase 2 on October 20, 2016. The Circumferential Magnetic Flux Leakage (CMFL) inspections for Phases 1 and 2 have been postponed and the inspections using this technology will not be completed prior to December 31, 2016. The reasons for postponement are provided in the response to Question 1(b) below.

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- b. Applicants object that this Question as it pertains to “problem(s)” as vague and ambiguous. To the extent that Applicants understand the question, and without waiving their objections, Applicants respond as follows: The Applicants faced the following issues:
  - i. **Issue #1 – Lodged tool during ILI of Phase 1:** The CMFL tool became lodged approximately 4.5 miles into the survey and the inspection could not be completed. An investigation is currently under way to determine the reason for the failed inspection. Results from the investigation will be used to determine locations throughout Phases 1 and 2 that could present potential passage issues, which may lead to retrofits.
  - ii. **Issue #2 – ILI of Phase 2 cannot be conducted due to feature restriction identified during procurement process:** Multiple ILI vendors notified the Applicants that they did not have a CMFL tool available that was capable of negotiating through one (1) set of back-to-back bends. Therefore, ILI cannot be performed until a retrofit is performed.
- c. Results for the AMFL inspections will not be available until the first quarter of 2017. Results for the CMFL inspections are typically available 3 to 6 months following the inspections (ILI pending). Once data for all inspections are submitted by the ILI vendor, results comparing data to that from the 2012-2014 inspections can be performed.

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**QUESTION 2:**

Resolution No. SED-1 also required that SoCalGas/SDG&E “Perform Quarterly Instrumented Leak Surveys on the entirety of Line 1600. On July 14, 2016, SoCalGas/SDG&E also wrote to the CPUC’s Executive Director: “The Utilities will continue to perform bi-monthly leak surveys, and will report any leaks identified during the surveys to SED.”

- a. Since issuing its July 14, 2016 letter, has SoCalGas/SDG&E conducted bi-monthly leak surveys on Line 1600?
- b. Please provide the results of the leak surveys conducted in the years 2015 and 2016.

**RESPONSE 2:**

- a. Yes.
- b. For the period in question, no leaks were found on the main Line 1600 pipeline. However, there were four small leaks discovered and repaired on pipeline appurtenances as described below:
  - February 2015: A small leak was detected at the valve bonnet of a small valve associated with a main line valve assembly. The small leak was repaired by tightening the valve bonnet.
  - April 2015: A small non-hazardous leak was detected on an above ground tubing connection on control piping associated with a main line valve assembly. This small leak was repaired by tightening the fitting.
  - August 2015: Two small non-hazardous leaks were detected on above ground Swagelok tubing connections on control piping associated with two valve assemblies. These small leaks were repaired by tightening the fittings.

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**QUESTION 3:**

Resolution No. SED-1 also required that SoCalGas/SDG&E, “Replace segments on Line 1600 from Engineering Stations “17-131”. Also, on July 14, 2016, SoCalGas/SDG&E wrote to the CPUC’s Executive Director, “As directed, the pipeline segment for Engineering Station 17-131 will be replaced. The Utilities plan to complete this work by December 31, 2016 with construction likely to begin in the 4th quarter of 2016. . . As more details are developed or if a change in schedule is necessary to avoid system or customer impacts, the Utilities will provide an update to SED.”

- a. What is the status of SoCalGas/SDG&E’s replacement of the Line 1600 segment for Engineering Station 17-131?
- b. If the replacement of Engineering Station 17-131 is complete, were there anomalies, features, or pipe conditions for Engineering Station 17-131 that differed from information in SDG&E/SoCalGas’ records? Please explain.
- c. If the replacement of Engineering Station 17-131 is complete, please provide all additional anomalies, or unusual pipe features or conditions that SDG&E/SoCalGas found.

**RESPONSE 3:**

- a. The pipe segment for Engineering Station 17-131 replacement was completed on October 26, 2016.
- b. Seven (7) linear anomalies at the EFW longitudinal seam were detected through nondestructive examination (NDE) and this discovery is consistent with the Applicants experience and observations for pipe segments of similar vintage and longitudinal seam type for this pipeline. The anomalies will be submitted for additional testing to characterize the anomalies. Procurement of services with a third party vendor is in progress.
- c. No additional anomalies, features or conditions other than what was provided in Response 3b were discovered.