

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(DATA REQUEST ORA-72)**

**Date Requested: February 27, 2017
Date Responded: March 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.

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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:

Compared to the current proposed route for Line 3602, did SoCalGas/SDG&E propose in their Proponent's Environmental Assessment or elsewhere in their Application, an alternative to construct a pipeline with the same attributes as the proposed project (including, but not limited to pipe diameter size), but running a different route that:

- a. Runs through fewer class 3 locations.
- b. Runs through fewer class 4 locations.
- c. Runs through fewer "High Consequence Areas"?

RESPONSE 1:

SDG&E and SoCalGas (Applicants) did not propose alternatives to the Proposed Project based on the specific criteria of passing through fewer Class 3, Class 4 and High Consequence Area (HCA) locations compared to the Proposed Project. Applicants set out to include in the Application a well-reasoned proposal that meets the Proposed Project's purpose and need while balancing consideration of a number of economic, environmental, legal, social, and technological factors, consistent with the California Environmental Quality Act (CEQA) Guidelines. These factors are embodied in the following "routing criteria" which were used by Applicants to evaluate a range of potential alternatives and, ultimately, to identify a specific route for the Proposed Project:

- Implement new pipeline safety requirements for the existing Line 1600 as expeditiously as possible;
- Follow generally accepted principles for siting infrastructure, such as the "Garamendi Principles" for electric transmission infrastructure siting;
- Avoid unnecessary impacts to the environment;
- Avoid unnecessary acquisition of private property;
- Avoid impacts to mission-critical operations at Marine Corps Air Station (MCAS); and
- Meet current and near-term energy needs in a cost effective and efficient manner.

Please see the Proponent's Environmental Assessment (PEA), Chapter 2, Section 2.4 for additional detail.

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QUESTION 2:

If the answer to question, 1a is yes, please identify all such alternatives, including the document and page number where they are proposed.

RESPONSE 2:

N/A.

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QUESTION 3:

If the answer to question 1a is yes, please provide a side by side comparison of the number of structures within class 3 locations of each of the different alternatives, including the proposed project.

RESPONSE 3:

N/A.

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QUESTION 4:

If the answer to question, 1b is yes, please identify all such alternatives, including the document and page number where they are proposed.

RESPONSE 4:

N/A.

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QUESTION 5:

If the answer to question 1b is yes, please provide a side by side comparison of the number of structures within class 4 locations of each of the different alternatives, including the proposed project.

RESPONSE 5:

N/A.

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QUESTION 6:

If the answer to question, 1c is yes, please identify all such alternatives, including the document and page number where they are proposed.

RESPONSE 6:

N/A.

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QUESTION 7:

If the answer to question 1c is yes, please provide a side by side comparison of the number of structures within High Consequence Areas of each of the different alternatives, including the proposed project.

RESPONSE 7:

N/A.

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QUESTION 8:

If the answer to question 1c is yes, please identify which methodology allowed for in 49 CFR §192.903 is used to calculate the number of buildings in the High Consequence Area. Please make sure that whichever methodology has been selected by SoCalGas/SDG&E, the same one is used when identifying buildings within a High Consequence Area of each alternative identified in response to question 1.

RESPONSE 8:

N/A.

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QUESTION 9:

Regarding SoCalGas/SDG&E's proposed derated Maximum Allowable Operating Pressure on Line 1600 of 320 pounds per square inch gauge, please identify the regarding testing in compliance with 49 CFR Subpart J for the following elements of Line 1600:

- a. The cost to test parts of Line 1600 only in current Class 3, 4, and High Consequence Areas (plus any incidental miles needed for operational, contiguous, or other reasons) with water.
- b. The cost to test parts of Line 1600 only in current Class 3, 4, and High Consequence Areas (plus any incidental miles needed for operational, contiguous, or other reasons) with gas.
- c. The pressure in psig and percentage of MAOP that the tests in response to questions 9a and 9b would need to be conducted to support a MAOP of 320 psig or less.

RESPONSE 9:

De-rating Line 1600 and repurposing it into a distribution line with an MAOP of 320 psig as proposed by the Applicants does not require a pressure test. Therefore, there are no estimated costs associated with pressure testing Line 1600 for this proposal.

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QUESTION 10:

To complement each answer provided in response to questions 9 a and b, please update the total linear distance of Line 1600 (both in miles and feet) that SoCalGas/SDG&E is estimating to fall within:

- a. Class 3 locations;
- b. Class 4 locations;
- c. Non-class 3 and non-class 4, high consequence areas; and
- d. The approximate total number of feet and miles of Line 1600 that would be tested under question 9a.
- e. Please confirm that the distance provided in response to questions 10a, b, and c is the same as the estimated number of miles that are assumed to be tested in response to questions 9a. If these two numbers are different, please explain why.
- f. The approximate total number of feet and miles of Line 1600 that would be tested under question 9 b. Please confirm that the distance provided in response to questions 10a, b, and c is the same as the estimated number of miles that are assumed to be tested in response to questions 9b. If these two numbers are different, please explain why.

RESPONSE 10:

- a. Approximately 32.2 miles in Class 3 or 169,853 ft.
- b. 0 miles in Class 4.
- c. 0 miles. At an MAOP of 320 psig, Line 1600 would no longer be considered a transmission line and would not have high consequence segments.
- d. See the response to Question 9 above.
- e. See the response to Question 9 above.
- f. See the response to Question 9 above.