

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(DATA REQUEST ORA-75)**

**Date Requested: March 13, 2017
Date Responded: March 27, 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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Subject: Lines 1600 & 3010

QUESTION 1:

Please provide the nominal and maximum capacity for Line 1600 when operating at 512psig, 340, and 320psig.

RESPONSE 1:

The nominal capacity of Line 1600 at 512 psig is 65 MMcfd. The nominal capacities at 340 psig and 320 psig are zero.

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QUESTION 2:

Please provide the operating pressures for Line 3010 under the three scenarios stated above as well as its respective nominal and maximum capacities. If L3010 operates within a range of operating pressures for each scenario provided above, please provide the range for each scenario.

RESPONSE 2:

Applicants object that Question 2 is vague and ambiguous in referring to “the three scenarios stated above,” as it is not clear whether ORA is suggesting that Line 3010 be operated at the pressures identified in Question 1 or asking what the operating pressure in Line 3010 would be if Line 1600 were operated at the pressures identified in Question 1. Without waiving and subject to their objection, Applicants respond as follows:

The operating pressure range for Line 3010 will fluctuate between its minimum and maximum operating pressures under each of the three scenarios stated above in Question 1. SoCalGas and SDG&E do not utilize “maximum capacity” for planning purposes. Maximum capacity is a function of several variables including the state of the transmission system, the location and type of customer demand. As these vary from day to day, a maximum capacity experienced on one day may not be repeatable on another. Nominal capacities for Line 3010 may be found in SDGE-3-R Updated Prepared Direct Testimony of David M. Bisi at page 7, n.11. The nominal capacity of Line 3010 when operated as part of the SDG&E system is 530 MMcfd. When operated without Line 1600, its nominal capacity increases to 570 MMcfd.