

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(DATA REQUEST ORA-81)**

Date Requested: March 23, 2017

Date Responded: April 6, 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: Moreno station outage events

QUESTION 1:

- A. Please provide a list of all Moreno Station Events (as provided in the definitions section of this Data Request) between and including 2006 and 2015 (3'562 days).
- B. For each Moreno Station Event provided in response to question 1A, please answer the following questions in a spreadsheet format and please provide the format as a native file:
1. Date the Moreno Event began.
 2. Duration of the Moreno Station Event (in hours).
 3. Trigger of the Moreno Station Event (including route cause).
 4. List of utilities affected by each Moreno Station Event.
 5. List all curtailments resulting from each Moreno Station Event.
 6. For each Moreno Station Event, identify whether it was planned or unplanned.
 7. For each Moreno Station Event, indicate whether the procedure for mitigating that Moreno Station Event was followed.
 8. For each Moreno Station Event, indicate whether any core customers were ordered to have service interrupted.
 9. For each Moreno Station Event, indicate whether any non-core customers were ordered to have service interrupted.
 10. For each Moreno Station Event, did SDG&E/SoCalGas procure gas during the Moreno Station Event?
 11. If the answer to question 1.B.10 is yes, please identify all sources from which gas was procured. (An example of a source of gas would be through Otay Mesa receipt point.)
 12. During each Moreno Station Event, what was the daily gas demand on SCG/SDG&E's system?
 13. During each Moreno Station Event, please provide the temperature, including the highest and lowest in the local area.
 14. Identify if information from each Moreno Station Event was used to inform the CEA. If so, explain.

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RESPONSE 1:

A. Please refer to the table below:

1. Date of Event	2. Duration (hr)	3. Trigger	6. Planned/Unplanned
3/6/2006	1	Fault - heat detector	Unplanned
4/14/2006	1	Planned Maintenance	Planned
4/27/2006	12.5	Annual Test	Planned
7/1/2006	1.5	Fault - heat detector	Unplanned
11/30/2006	1.5	Fault - smoke detector	Unplanned
3/13/2007	12.3	Annual Test	Planned
10/24/2007	1.45	Fault - heat detector	Unplanned
3/11/2008	2	Bi-Directional Project Prep	Planned
8/18/2008	1	Fault - smoke detector	Unplanned
12/2/2008	1.7	Generator Control Upgrade	Planned
4/17/2009	12.3	Annual Test	Planned
4/23/2009	5.3	Test - Critical Valve	Planned
8/19/2009	0.83	UV Detector - Alarmed	Unplanned
8/24/2009	1	UV Detector - Alarmed	Unplanned
1/25/2010	1.2	UV Detector - Alarmed	Unplanned
2/1/2010	0.83	UV Detector - Alarmed	Unplanned
4/2/2010	12.5	Annual Test	Planned
9/9/2010	8	ESD vent stack replaced	Planned
2/3/2011	2.1	UV Detector - Alarmed	Unplanned
5/13/2011	9	Annual Test	Planned
7/6/2011	1.1	Fault - ESD Switch	Unplanned
11/10/2011	1.3	Fault - smoke detector	Unplanned
11/11/2011	2.3	Fault - smoke detector	Unplanned
12/8/2011	1	hot fuel valve / UV	Unplanned
4/17/2012	4	Annual Test	Planned
8/28/2012	1	UV Detector - Alarmed	Unplanned
4/12/2013	14	Annual Test	Planned
8/21/2013	1.1	Fault - UV Detector	Unplanned
2/28/2014	7	Generator Issues	Unplanned
4/11/2014	13	Annual Test	Planned
4/14/2014	1	Accidental ESD - Maintenance	Unplanned
4/10/2015	10.45	Annual Test	Planned
5/26/2015	1.1	UV Detector - Alarmed	Unplanned

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- B. Please refer to the table provided in response to Question 1(A) above as well as the information provided below:
1. Please refer to the table provided in response to Question 1(A) above.
 2. Please refer to the table provided in response to Question 1(A) above.
 3. Please refer to the table provided in response to Question 1(A) above.
 4. For each of the events listed in the table provided in response to Question 1(A) above, the affected utilities were SoCalGas and SDG&E.
 5. For each of the events listed in the table provided in response to Question 1(A) above, there were no curtailments.
 6. For each of the events listed in the table provided in response to Question 1(A) above, the last column indicates whether the event was planned or unplanned.
 7. For each of the events listed in the table provided in response to Question 1(A) above, yes.
 8. For each of the events listed in the table provided in response to Question 1(A) above, no.
 9. For each of the events listed in the table provided in response to Question 1(A) above, no.
 10. For each of the events listed in the table provided in response to Question 1(A) above, no.
 11. N/A
 12. Please refer to Envoy at <https://scgenvoy.sempra.com/> for the daily gas demand on SoCalGas/SDG&E's system during each of the events listed in the table provided in response to Question 1(A) above.
 13. Please refer to the following website for the temperature: <http://utilinet.sempra.com/departments/massmarkets/weather/browse.htm> during each of the events listed in the table provided in response to Question 1(A) above.

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14. The section of the CEA where Moreno Compressor Station reliability is addressed is in the Reliability Benefits scoring section on pages 45-48. The scoring for redundancy was based on the system's existing capabilities to meet customer demand in the event of an outage. In developing the CEA, no specific scenarios were run against actual historical outage events at Moreno Compressor Station.