

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(DATA REQUEST ORA-94)**

**Date Requested: August 4, 2017
Date Responded: August 18, 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:

On August 2, SoCalGas/SDG&E provided the second amended response to ORA data request 92.

In the amended response, SoCalGas/SDG&E changed at page 6, that “there were instances where purchase records documented the pipe had a joint factor of 1.0, but the long seam type was not indicated (either ERW or **seamless Double Submerged Arc Welded**).

- a. Please provide all supporting documentation for SoCalGas/SDG&E’s original assertion that the long seam type could have been seamless.
- b. Please provide all supporting documentation for SoCalGas/SDG&E’s new assertion that the long seam type could have been double submerged arc welded (DSAW).
- c. How did SoCalGas/SDG&E become aware of this discrepancy.
- d. Please explain how the purchase records could have changed from seamless to double submerged arc welded.
- e. Please provide all Form 2112s if the information was changed in the High Pressure Pipeline Database.
- f. Please provide the basis for the assertion that a 1.0 joint factor would be either ERW or DSAW, absent the information on the specific long seam type of the segment.
- g. Please explain any differences in SoCalGas/SDG&E’s Transmission Integrity Management for ERW vs seamless, ERW vs DSAW, and seamless vs DSAW long seams.
- h. Please explain any differences in SoCalGas/SDG&E’s Distribution Integrity Management for ERW vs seamless, ERW vs DSAW, and seamless vs DSAW long seams.

RESPONSE 1:

- a. The “original assertion” was simply a mistake. The amended response to ORA 92 dated July 12, 2017 was prepared over the telephone while in evidentiary hearings. The preparer confused the information provided regarding the type of long seam information leading to null entries, and ORA’s demand for a prompt response did not allow time for sufficient review by the team providing the information. Because it was a mistake, there is no documentation.
- b. SDG&E and SoCalGas’ (Applicants) amended response to ORA 92, Question 1(a) states, in relevant part: “Specifically, there were instances where purchase records documented the pipe had a joint factor of 1.0, but the long seam type was not indicated (either ERW or Double Submerged Arc Weld).” Attached is an example of a purchasing specification that was used to establish that the pipe was purchased as either the ERW or DSAW long seam (See “ORA-94_1B Attachment_Section 204.pdf”).

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- c. As noted above, Applicants' amended response to ORA 92 dated July 12, 2017 was prepared over the telephone while in evidentiary hearings. The preparer confused the information provided regarding type of long seam information leading to null entries, and ORA's demand for a prompt response did not allow time for sufficient review by the team providing the information. Upon review of the purchase records, it was noted that the original July 12, 2017 response referencing seamless pipe should have instead stated Double Submerged Arc Welded.
- d. The purchase records did not change. Please see the response to ORA 94, Question 1(a).
- e. The correction did not arise from or result in any changes to the HPPD.
- f. The seams are either ERW or DSAW as stated in the purchasing records.
- g. ERW, DSAW, and seamless pipe are all managed within TIMP according to 49 CFR Part 192, Subpart O, with the main difference being seamless pipe is not susceptible to seam related integrity threats.
- h. ERW, DSAW, and seamless pipe are all managed within DIMP according to 49 CFR Part 192, Subpart P, and as part of threat/risk analysis further evaluation may be conducted if necessary.

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QUESTION 2:

Regarding the statement, “The HPPD is designed to accept entry of an alphanumeric value into the longitudinal long seam field in the HPPD”, ORA is unclear what the basis of the Alphanumeric value is. Please clarify whether the Alphanumeric value is conveying information of actual records of long seams, assumptions or something else. Please identify all sources of information upon which these “Alphanumeric values” are based.

RESPONSE 2:

The alphanumeric value can convey information from records or from default values, as described in the response to ORA DR 92. Please refer to the response to ORA 93, Question 1(f), regarding source information.

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QUESTION 3:

Please confirm that absent the “Specification” and “Pipe Class”, as used in 49 Code of Federal Regulations 192.113, that for Line 1600 SoCalGas/SDG&E use a 1.0 longitudinal joint factor for pipe over 4 inches in diameter.

RESPONSE 3:

All segments of Line 1600 have been assigned a longitudinal joint factor of 1.0. When the longitudinal joint factor is a relevant value with respect to Line 1600, Applicants use 1.0. Please see the Pipeline and Hazardous Material Safety Administration (PHMSA) interpretation PI79035, which states that “‘hoop stress’ is the actual stress produced by a given internal gas or liquid pressure in a pipeline and would be calculated using ‘Barlows’ formula. This calculation would not involve the use of the de-rating factors specified in § 192.105 Design formula for steel pipe.” (See the attachment provided in response to ORA 93, Question 1 “ORA-93_Q1_Attachment_PI79035.pdf”).¹ Thus, the joint efficiency factor is not required to be used to determine whether a pipeline “operates at a hoop stress of 20 percent or more of SMYS” under 49 CFR Section 192.3.

¹ Also available at <https://www.phmsa.dot.gov/staticfiles/PHMSA/DownloadableFiles/Files/Interpretation%20Files/Pipeline/1979/PI79035.pdf>