SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(DATA REQUEST ORA-95)

Date Requested: August 30, 2017
Date Responded: September 14, 2017

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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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QUESTION 1:

On August 17, SoCalGas/SDG&E provided the response to ORA data request 93, question 1. In the response SoCalGas/SDG&E stated:

> Please note that the spreadsheet provided by ORA reflects historic station segment extents that, in some cases, have been superseded with updated data in the High Pressure Pipeline Database (HPPD). SDG&E and SoCalGas (Applicants) have updated the spreadsheet to reflect the current pipe segment data in the HPPD.

Provide a current version of the spreadsheet provided to ORA in response to Data Request 25, Question 1, that also integrates the materials provided in response to ORA Data Request 93, Question 1.

RESPONSE 1:

SDG&E and SoCalGas (Applicants) object that this request is unduly burdensome and provides no new relevant information, and asks for Applicants to perform a mechanical task that ORA may perform itself if it wishes. ORA DR-25, Q1 asked Applicants for a "version of the table provided in response to SED DR-3, Q2 and Q3, that includes the following columns appended to the end: a. Longitudinal Joint Factor …" The spreadsheet provided in the response to ORA DR-25, Q1 provided the requested information based on the Line 1600 segmentation arising from querying the HPPD for the requested pipeline attributes at that point in time, including data showing that the longitudinal joint factor for each such segment of Line 1600 is 1. ORA DR-93, Q1 asked Applicants for numerous additional data relating to the longitudinal joint factor for each segment of Line 1600. The spreadsheet provided in the response to ORA DR-93, Q1 provided the requested information based on the Line 1600 segmentation arising from querying the HPPD for the requested pipeline attributes at that point in time, again all showing that the longitudinal joint factor for each such segment of Line 1600 is 1.

This requests asks Applicants to place information from the response to ORA DR-93, Q1 on the spreadsheet provided in response to ORA DR-25, Q1, even though the pipeline attributes requested by ORA DR-93, Q1 are different than requested in ORA DR-25, Q1, and the query is made at a different point in time. As an initial matter, the longitudinal joint factor for all segments is 1, regardless of how many columns are included in the spreadsheet. Therefore, the request asks Applicants to perform a task that provides no relevant new information. Moreover, because Line 1600 has changed over time as a result of work performed on the pipeline, and because the pipeline attributes requested in ORA DR-93, Q1 require the pipe segments responsive to those attributes to be identified differently than the pipe segments responsive to ORA DR-25, Q1, which sought different pipeline attributes (and, if combined, fewer of them)

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combining information responsive to both ORA DR-25, Q1 and ORA DR-93, Q1 in a single spreadsheet is difficult and unduly burdensome.

If there are particular pipe segments about which ORA has specific questions, please identify such segments and the specific questions.

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QUESTION 2:

Please confirm that the updated April 2017 response to ORA Data Request 25, Question 1 indicated that Line 1600 had 123 segments, while the August 2017 response to ORA Data Request 93, Question 1, indicates that Line 1600 has 201 segments.

If any of the segment counts are in error, please provide the correct number of segments identified in each of the two responses.

Note: If there are any changes in segment counts due to the response to Question 2, note that the values in Questions 3-5 may differ.

RESPONSE 2:

Applicants object that the question is vague and ambiguous in its use of the term "segment," and appears to misunderstand the function of querying a database for data at a particular point in time and for a particular set of values. Subject to and without waiving their objections, Applicants respond as follows:

The April 27, 2017 update to Applicants' response to ORA DR-25, Q1 only updated the original August 12, 2016 response to reflect the replacement of a Line 1600 segment in October 2016 per Resolution SED-1. The original August 12, 2016 response provided the additional pipeline attributes requested by ORA DR-25, Q1 to the table of Line 1600 data provided to SED in response to SED DR-3 (and later ORA in response to ORA DR-19). As a result, the responses to ORA DR-25, Q1, reflected segmentation from August 2016 based upon the pipeline attributes requested by SED and ORA at that time in 2016. The table had 123 records based upon the segmentation from 2016 and the requested attributes.

The attachment provided in Applicants' August 17, 2017 response to ORA DR-93, Q1 was created based upon the segmentation reflected in Applicants' high-pressure pipeline database (HPPD) in August of 2017 for the pipeline attributes requested, and had 201 records. The table structure was provided by ORA along with the pipeline segmentation from 2016. Continuing to respond to later data requests using historical segmentation, and based on previously requested pipeline attributes, is difficult and burdensome. Applicants have accommodated ORA's request to do so in several past data requests. Applicants responded to this latest data request (ORA DR-93) using the most up to date segmentation available from the HPPD for the requested pipeline attributes.

Because of the way pipeline segmentation is utilized and reported, the total number of pipeline segments may change over time and based upon the pipeline attributes requested.

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Over time, it is expected that pipe segmentation will change. This is normal in a linear referenced database model. Events such as new pipe segments added to the database when new pipe records are integrated into the database from recent pipeline construction activity, operational changes, and new geometry reports will cause the pipe segmentation to change.

Furthermore, segmentation can also be affected whenever new fields are added to an existing table. As seen in the example below, a single segment can be listed as two segments just with the addition of a long seam attribute to the table. This is because the segment list will begin to reflect changes in the newly introduced attribute.

Example:

	Station Start	Station Stop	Diameter	Wall	SMYS	
Single Segment	0	100	16	0.250	52,000	
						Long Seam Field Added
New Segment 1	0	50	16	0.250	52,000	ERW
New Segment 2	51	100	16	0.250	52,000	Seamless

Applicants' response to ORA DR-93, Q1 reflects changes to the pipeline database that has occurred over time and changes in the pipeline attributes requested by ORA.

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QUESTION 3:

Prior to ORA Data Request 93, question 1, did SoCalGas/SDG&E inform ORA that Line 1600 contained a different number of segments than 123? If the answer is anything other than an unqualified "no", please provide all documentation, including references to page numbers, that say and show the information requested.

RESPONSE 3:

Applicants object that the Question is vague and ambiguous in its use of the term "segment," and appears to misunderstand the function of querying a database for data at a particular point in time and for a particular set of values. Subject to and without waiving their objections, Applicants respond as follows:

As explained in the response to Question 2 above, prior to ORA DR-93, Q1, ORA asked for updates to pre-existing tables that had been constructed based upon the requested pipeline attributes and at a particular point in time. ORA-93, Q1 asks for different pipeline attributes at a different point in time. These different queries result in identification of a different number of pipeline segments in the reports generated to reflect the requested information.

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QUESTION 4:

Explain how, when, and why, SoCalGas/SDG&E became aware of the fact that there were not 123 segments on Line 1600.

RESPONSE 4:

Applicants object that the Question is vague and ambiguous in its use of the term "segment," and appears to misunderstand the function of querying a database for data at a particular point in time and for a particular set of values. Subject to and without waiving their objections, Applicants respond as follows:

As discussed in response to Question 2 above, the pipe segmentation reported by the HPPD system will depend when the report is generated and the pipeline attributes for which the HPPD system is queried. A change in the number of segments is expected over time and as a result of a different inquiry. ORA DR-93, Q1 asks for different pipeline attributes at a different point in time than ORA DR-25, Q1. These different queries result in identification of a different number of pipeline segments in the reports generated to reflect the requested information.

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QUESTION 5:

Explain how, when and why SoCalGas/SDG&E became aware of the fact that there were approximately 78 new segments on Line 1600, not identified in the responses to SED-3 Question 2, or ORA-25 Question 1.

RESPONSE 5:

Applicants object that the Question is vague and ambiguous in its use of the term "segment," and appears to misunderstand the function of querying a database for data at a particular point in time and for a particular set of values. Subject to and without waiving their objections, Applicants respond as follows:

As discussed in response to Question 2 above, the pipe segmentation reported by the HPPD system will depend when the report is generated and the pipeline attributes for which the HPPD system is queried. Changes in the number of records is expected with a linear referenced database model as new data is introduced or updated. ORA DR-93, Q1 asks for different pipeline attributes at a different point in time than SED DR-3, Q2 or ORA DR-25, Q1. These different queries result in identification of a different number of pipeline segments in the reports generated to reflect the requested information