

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**

**APPLICATION TO PROCEED WITH PHASE 2 OF
THE PIPELINE SAFETY ENHANCEMENT PLAN AND
ESTABLISH MEMORANDUM ACCOUNTS TO RECORD PHASE 2 COSTS**

(A.15-06-013)

(DATA REQUEST ORA-01)

Date Requested: March 16, 2016

Date Responded: March 30, 2016

QUESTION 1:

Do SCG and SDG&E use a decision tree to make test-vs-replace decisions for natural gas pipelines installed prior to 1946? If so, please provide the decision tree. If not, please explain why not and how SCG/SDG&E makes such decisions.

RESPONSE 1:

SoCalGas and SDG&E object to this question under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that the information sought is neither admissible as evidence in this proceeding, nor reasonably calculated to lead to the discovery of admissible evidence. Application (A.)15-06-013 was filed as a request for authorization to proceed with PSEP Phase 2 and establish Pipeline Safety Enhancement Plan Memorandum Accounts (PSEPMAAs) for the purpose of recording Phase 2 planning and engineering design costs for subsequent review and approval by the Commission. This proceeding is now also addressing general procedural issues related to SoCalGas and SDG&E's PSEP (e.g., interim rate recovery and the schedule and cost recovery processes for future PSEP work). Therefore, this question is not reasonably calculated to lead to the discovery of evidence that would be admissible in this proceeding. Without waiving these objections, and subject thereto, in a good faith effort to provide information, SoCalGas and SDG&E respond as follows:

Yes, SoCalGas and SDG&E use a decision tree for prioritization and decision-making (test or replace) for pipeline segments. Further, as a complement to the decision tree, SoCalGas and SDG&E, as prudent pipeline operators, also factor engineering judgement based on the manufacturing and construction characteristics of the pipeline. The decision tree is attached below.

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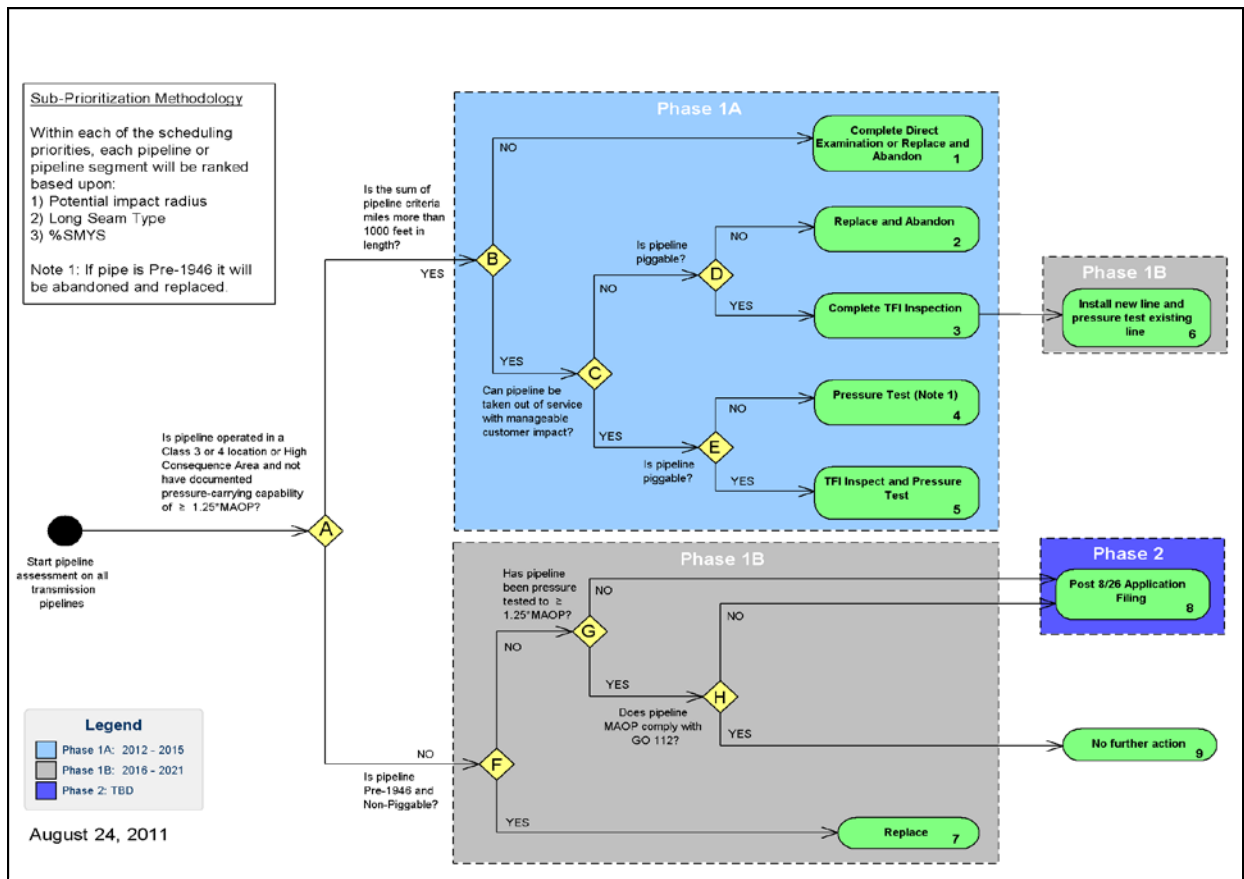
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QUESTION 2:

Please provide the total mileage of pipe to that is or will be within the scope of PSEP Phase 1B. Please include mileage subtotals of pressure testing, replacement, and other mitigation for pipe addressed in Phase 1B.

RESPONSE 2:

SoCalGas and SDG&E object to this question under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that the information sought is neither admissible as evidence in this proceeding, nor reasonably calculated to lead to the discovery of admissible evidence. A.15-06-013 was filed as a request for authorization to proceed with PSEP Phase 2 and establish PSEPMA's for the purpose of recording Phase 2 planning and engineering design costs for subsequent review and approval by the Commission. This proceeding is now also addressing general procedural issues related to SoCalGas and SDG&E's PSEP (e.g., interim rate recovery and the schedule and cost recovery processes for future PSEP work). Thus, this question is not reasonably calculated to lead to the discovery of evidence that would be admissible in this proceeding. Without waiving these objections, and subject thereto, in a good faith effort to provide information, SoCalGas and SDG&E respond as follows:

PSEP Phase 1B is currently expected to total 151.811 miles¹ and is currently divided into the following project types:

Type of 1B Project	Total Mileage	Pre-1946 non-piggable Mileage
Pressure Test	4.979 miles	2.849 miles
Replacement	46.065 miles	44.205 miles
Abandon	28.973 miles	24.293 miles
De-rate	20.642 miles	17.716 miles
Other (TBD)	51.152 miles	49.849 miles

*At this point, Phase 1B remains in the early designing and planning stages. As such, the project type and mileage are subject to change.

**"Other" Phase 1B projects represent mileage where the type of project remains to be determined.

¹ The 151.811 miles identified in these data responses do not include the Pipeline Safety and Reliability Project (separately filed in Application 15-09-013) or Line 85 (which is planned to be the subject of a separate application).

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QUESTION 3:

Of the total mileage of pipe addressed or to be addressed in SCG/SDG&E's PSEP Phase 1B work, how much:¹

- a. Is located in HCAs (High-Consequence Areas)?
- b. Is located in Class 1 or 2, non-HCA locations?
- c. Is located in Class 3 locations?
- d. Is located in Class 4 locations?
- e. Is operating one class out?
- f. Is operating more than one class out?
- g. Had a valid class location study?
- h. Was installed prior to 1946?
- i. Was installed between 1946 and 1960?
- j. Was installed between 1960 and 1970?
- k. Was installed after 1970?

¹Please note that questions (a) through (f) are using terms assuming the applicable requirements of Section 192 under Title 49 of the Code of Federal Regulations.

RESPONSE 3:

SoCalGas and SDG&E object to this line of questioning under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that the information sought is neither admissible as evidence in this proceeding, nor reasonably calculated to lead to the discovery of admissible evidence. SoCalGas and SDG&E further object on the grounds that this line of questioning is unreasonably burdensome and premature in that it appears to seek information to be presented in a future application that has not yet been filed, rather than in the instant proceeding.

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QUESTION 4:

Please provide a completed version of the following table showing the status of projects in PSEP Phase 1B. For projects/mileage listed in the 'Pre-Stage 1' or 'Post-Stage 7' categories, please explain:

Work Process Stage	Number of Projects	Total Mileage
Pre-State 1		
Stage 1		
Stage 2		
Stage 3		
Stage 4		
Stage 5		
Stage 6		
Stage 7		
Post-Stage 7		

It is ORA's understanding that the categories in the above table cover the universe of all PSEP Phase 1B-related projects. If this understanding is incorrect, please explain.

RESPONSE 4:

SoCalGas and SDG&E object to this question under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that the information sought is neither admissible as evidence in this proceeding, nor reasonably calculated to lead to the discovery of admissible evidence. A.15-06-013 was filed as a request for authorization to proceed with PSEP Phase 2 and establish PSEPMA's for the purpose of recording Phase 2 planning and engineering design costs for subsequent review and approval by the Commission. This proceeding is now also addressing general procedural issues related to SoCalGas and SDG&E's PSEP (e.g., interim rate recovery and the schedule and cost recovery processes for future PSEP work). Thus, this question is not reasonably calculated to lead to the discovery of evidence that would be admissible in this proceeding. Without waiving these objections, and subject thereto, in a good faith effort to provide information, SoCalGas and SDG&E respond as follows:

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Work Process Stage	Number of Projects	Total Mileage
Pre-Stage 1	1	51.152
Stage 1	1	0.001
Stage 2	5	34.416
Stage 3	14	51.034
Stage 4		
Stage 5		
Stage 6	3	15.208
Stage 7		
Post-Stage 7		

*At this point, Phase 1B remains in the early designing and planning stages. As such, total Phase 1B mileage is subject to change.

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QUESTION 5:

Please provide a table or spreadsheet of all PSEP Phase 1B pipeline segments showing:

- a. Line number
- b. Segment number
- c. MP Start
- d. MP End
- e. Segment mileage
- f. Class Location at time of installation
- g. Month and year of installation
- h. Current Class Location
- i. If the segment is subject to additional leak surveys due to being in a business district and/or in the vicinity of schools, hospitals, and churches (pursuant to GO 112-F section 143.1)
- j. Month and year that the Class Location changed (**Enter a value of 0 if not applicable**)
- k. Pipeline material
- l. Yield Strength (**Enter a value of 0 if unknown or assumed**)
- m. Diameter (**Enter a value of 0 if unknown or assumed**)
- n. Wall Thickness (**Enter a value of 0 if unknown or assumed**)
- o. Weld Type (**Enter a value of 0 if unknown or assumed**)
- p. Weld Longitudinal Joint Factor (**Enter a value of 0 if unknown or assumed**)
- q. Design MAOP (49 CFR 192.619(a)(1))
- r. Hydrotest MAOP (49 CFR 192.619(a)(2)) (**Enter a value of 0 if no pressure test**)
- s. Date of hydrotest establishing MAOP (**Enter a value of 0 if not applicable**)
- t. Class Location Factor utilized in determining Hydrotest MAOP (**Enter a value of 0 if not applicable**)
- u. Actual Operating Pressure MAOP (49 CFR 192.619(a)(3))
- v. Operator's Safe Operating Pressure MAOP (49 CFR 192.619(a)(4))
- w. Historical MAOP (49 CFR 192.619(c)), only if this is being used to establish the MAOP
- x. The Maximum Allowable Operating Pressure that SCG/SDG&E applies to each segment

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RESPONSE 5:

SoCalGas and SDG&E object to this line of questioning under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that the information sought is neither admissible as evidence in this proceeding, nor reasonably calculated to lead to the discovery of admissible evidence. SoCalGas and SDG&E further object on the grounds that this line of questioning is unreasonably burdensome and premature in that it appears to seek information to be presented in a future application that has not yet been filed, rather than in the instant proceeding.

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QUESTION 6:

Please provide the results of SCG's and SDG&E's Transmission Integrity Management Program (TIMP) analysis performed pursuant to 49 CFR 192 Subpart O, for all applicable PSEP Phase 1B projects.

RESPONSE 6:

SoCalGas and SDG&E object to this question under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that the information sought is neither admissible as evidence in this proceeding, nor reasonably calculated to lead to the discovery of admissible evidence. A.15-06-013 was filed as a request for authorization to proceed with PSEP Phase 2 and establish PSEPMA's for the purpose of recording Phase 2 planning and engineering design costs for subsequent review and approval by the Commission. This proceeding is now also addressing general procedural issues related to SoCalGas and SDG&E's PSEP (e.g., interim rate recovery and the schedule and cost recovery processes for future PSEP work). Thus, this question is not reasonably calculated to lead to the discovery of evidence that would be admissible in this proceeding. Without waiving these objections, and subject thereto, in a good faith effort to provide information, SoCalGas and SDG&E respond as follows:

SoCalGas and SDG&E's Transmission Integrity Management Program (TIMP) requires results from integrity assessments in Subpart O to be reported annually in accordance with 49 CFR 191.917. The annual performance metrics related to assessment findings for PSEP Phase 1B projects are shown below. Pipelines designated as "N/A" are not within the scope of TIMP and are not applicable.

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Pipeline Name	Miles Inspected	Immediate Repairs Completed	Scheduled Repairs Completed
1004	71.3	7	47
103	N/A	N/A	N/A
127	3.22	0	7
128	N/A	N/A	N/A
36-1001	0.13	0	0
36-1002	N/A	N/A	N/A
36-1032	N/A	N/A	N/A
36-37*	29.4	3	4
36-9-09 NORTH	6.73	1	1
38-101	N/A	N/A	N/A
38-1102	N/A	N/A	N/A
38-1102-A	N/A	N/A	N/A
38-143	N/A	N/A	N/A
38-278	N/A	N/A	N/A
38-514**	0	0	0
38-960	N/A	N/A	N/A
38-980	N/A	N/A	N/A
38-981	N/A	N/A	N/A
43-121	3.44	0	0
44-1008	0.49	0	0
45-1001	N/A	N/A	N/A
7043	N/A	N/A	N/A

Note:

* This response lists 22 high pressure transmission lines that are included in PSEP Phase 1B. The response to Question 4 above includes 24 Phase 1B projects because segments of Line 36-37 are planned to be addressed separately.

**Pipeline added to the assessment plan in 2015. Assessment will be conducted prior to the end of 2025 in accordance with 49 CFR 192.921(f).

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QUESTION 7:

Please provide SCG's current Estimate at Completion (EAC) for each PSEP Phase 1B project. If any such an estimate is not available, please explain why and state when such an estimate will be available.

RESPONSE 7:

SoCalGas and SDG&E object to this question under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that the information sought is neither admissible as evidence in this proceeding, nor reasonably calculated to lead to the discovery of admissible evidence. A.15-06-013 was filed as a request for authorization to proceed with PSEP Phase 2 and PSEPMA's for the purpose of recording Phase 2 planning and engineering design costs for subsequent review and approval by the Commission. This proceeding is now also addressing general procedural issues related to SoCalGas and SDG&E's PSEP (e.g., interim rate recovery and the schedule and cost recovery processes for future PSEP work). Thus, this question is not reasonably calculated to lead to the discovery of evidence that would be admissible in this proceeding. Without waiving these objections, and subject thereto, in a good faith effort to provide information, SoCalGas and SDG&E respond as follows:

SoCalGas and SDG&E are in the process of scoping and preliminary design work for Phase 1B, with the intent to develop estimates. At this time, SoCalGas and SDG&E do not have the information needed to provide reasonably accurate estimates. SoCalGas and SDG&E plan to complete the scoping and associated Phase 1B estimates in approximately Q4 2016.