**QUESTION 1:**

**In the “APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY (U 904 G) AND SAN DIEGO GAS & ELECTRIC COMPANY (U 902 G) FOR AUTHORITY TO RECOVER NORTH-SOUTH PROJECT REVENUE REQUIREMENT IN CUSTOMER RATES AND FOR APPROVAL OF RELATED COST ALLOCATION AND RATE DESIGN PROPOSALS”,** dated December 20, 2013, Sempra states on page 13, “In addition, approximately 31 miles of new pipeline between Whitewater Station and Moreno Pressure Limiting Station would need to be installed in order to facilitate the higher pressures that would result from the new Adelanto-Moreno pipeline and compression, and move those gas supplies transported from Adelanto to load centers on the Southern System east of Moreno Pressure Limiting Station. New pressure controlled ties from Line 5000 to Lines 2000 and 2001 are also needed.” ORA understands that Sempra has since eliminated its proposal to add approximately 31 miles of new pipeline between Whitewater Station and Moreno Pressure Limiting Station, as well as the pressure controlled ties. With this passage and these facts in mind, please answer the following:

a. Please provide a spreadsheet in native file format that has columns entitled as follows:

1) Pipelines to Experience Higher Pressure as a Result of the New Adelanto-Moreno Pipeline and Compression; 2) Maximum Pressure Expected to be Experienced on a Pipeline as a Result of the New Adelanto- Moreno Pipeline and Compression; 3) Maximum Allowable Operating

Pressure on a Pipeline. Please provide the following under each column:

i. Under column 1, provide those pipelines that are anticipated to experience higher pressures that would result from the new Adelanto-Moreno pipeline and compression.

ii. Under column 2, provide the maximum pressure to be experienced by each segment provided in response to question 1.a.i.

iii. Under column 3, provide the maximum allowable operating pressure (MAOP) of each pipeline, pursuant to 49 CFR Section 192.619

iv. Under column 4, provide the subparts of 619 Sempra will apply to each segment in determining the maximum allowable operating pressure under column 3.

v. Please highlight in yellow all cells under column 2 that are to experience a higher maximum pressure than the MAOP provided for that same segment under column 3.

vi. Please count and provide the number of cells under column 2 that are to experience a higher pressure than their corresponding MAOP under column 3.

b. If any cells under column 2 experience a higher pressure than their

corresponding MAOP under column 3, please explain how the proposed

project will continue to mitigate those pressures to keep them below

MAOP without 31 miles of new pipeline between Whitewater Station and

Moreno Pressure Limiting Station, as well as the pressure controlled ties.

**RESPONSE 1:**

SoCalGas and SDG&E have eliminated our proposal to add approximately 31 miles of new pipeline between Whitewater Station and Moreno Pressure Limiting Station, but the “pressure controlled ties” referenced by ORA in its question are still necessary and planned.

1. SoCalGas and SDG&E interpret this request for “pipelines that are anticipated to experience higher pressures” as a comparison between our original and updated North-South project proposals.   
     
   The spreadsheet requested in this question is unnecessary because there were no pipelines in our updated proposal for the North-South Project which operated at higher pressures than in our original proposal which included the Moreno-Whitewater pipeline segment. This is due to the installation of overpressure protection where the Adelanto-Moreno pipeline terminates at Moreno Station to protect the MAOP of the existing facilities. Further, when evaluating our system for operating capacity or new projects, SoCalGas and SDG&E never plan to violate our MAOPs. If our analyses find that an MAOP would be violated, we identify improvements to rectify that problem.
2. N/A

**QUESTION 2:**

For this next set of questions, please reference the document in A.13-12-013 entitled **“SUPPLEMENTAL PREPARED DIRECT TESTIMONY OF DEANNA HAINES SOUTHERN CALIFORNIA GAS COMPANY AND SAN DIEGO GAS & ELECTRIC COMPANY”.**

a. Please provide a spreadsheet in native file format that has columns entitled

as follows: 1) Regulation Violated in the last three years; 2) Number of times violated; 3) Dates of violations

b. Referencing Table 1 of this testimony, pages 3 through 13, during the last three years, has Sempra been found in violation of any of these regulations from any regulatory agency with jurisdiction (eg. California Public Utilities Commission or Pipeline Hazardous Materials and Safety Administration)?

c. If the answer to question 2a is yes, please list all of the regulations for which Sempra been found to be in violation over the last three years? This list should be provided under column 1 (Regulation Violated in the last three years).

d. For each regulation provided in the list in response to question 2b, please indicate the number of times Sempra has been found to be in violation. (This should be provided under column 2 (Number of times violated).

e. For each regulation provided in the list in response to question 2b, please indicate the date or range of dates the violation or violations occurred. (This should be provided under column 3 (Dates of Violations).

f. Please provide this information in a spreadsheet in native file format.

g. For each provided in the spreadsheet, please provide the underlying document from the agency that found the violation. For example, if the violation was identified in an audit or citation by the Commission’s safety and enforcement division, please provide the audit results or citation.

**RESPONSE 2:**

2. a. – f. With reference to violations identified by the CPUC as “Citation for Violation(s) Issued Pursuant to Resolution ALJ -274 of General Order 112-E,” for the regulations listed in the referenced Table 1 of Ms. Haines’ testimony, SoCalGas has received one as a result of CPUC audit, on January 23, 2015, for violation of 49 CFR 192.751. SoCalGas and San Diego Gas & Electric have not received any violations from PHMSA. Additionally, SoCal Gas has received one other CPUC citation from self-reported violations, but not with reference to the regulations listed in Table 1 of .Ms. Haines’ testimony.



2. g.



**QUESTION 3:**

What factors would require Sempra to propose constructing all or any part of the pipeline between Whitewater Station and Moreno Pressure Limiting Station in the future?

**RESPONSE 3:**

Please refer to the Updated Direct Testimony of David M. Bisi at page 11, and to the Prepared Rebuttal Testimony on Ratesetting and Safety of David M. Bisi at page 14.

**QUESTION 4:**

Were any of the factors provided in response to question 3 part of or related to the basis for the proposed project in A.13-12-013? If so, which ones?

**RESPONSE 4:**

Yes. The North-South Project as originally proposed was to allow the SoCalGas and SDG&E system to operate without the need for any supply delivered on the Southern System. The Moreno-Whitewater pipeline was necessary to meet that design condition.

**QUESTION 5:**

As a result of eliminating approximately 31 miles of new pipeline between Whitewater Station and Moreno Pressure Limiting Station, as well as the pressure controlled ties, what, if anything, has Sempra had to change from its original application?

**RESPONSE 5:**

As explained above in our response to Question 1, SoCalGas and SDG&E have not proposed the removal of any “pressure controlled ties” in its updated project scope.  The only scope change between our original and updated proposal for the North-South Project is the elimination of approximately 31 miles of new pipeline between Whitewater Station and Moreno Pressure Limiting Station.

The change in scope resulted in revisions captured in the Updated Direct Testimonies of Mr. Bisi, Mr. Buczkowski, Ms. Marelli, Mr. Yee, Mr. Ahmed, and Mr. Bonnett.  The estimated costs associated with the North-South Project were revised, in part, as a result of this change in scope, as provided in David Buczkowski’s Updated Direct Testimony (November 12, 2014).  The design basis was revised as a result of this change in scope, as provided in Dave Bisi’s Updated Direct Testimony (November 12, 2014).  Updated Direct Testimony was served in redline and clean versions to track the revisions.

**QUESTION 6:**

Of all of the items identified in response to question 5, please list those that are not

disclosed as part of Sempra’s Proponent’s Environmental Assessment (“PEA”).

**RESPONSE 6:**

The elimination of approximately 31 miles of new pipeline between Whitewater Station and Moreno Pressure Limiting Station was not disclosed as part of the PEA.

**QUESTION 7:**

Of all of the items identified in response to question 5, please list those that have not been disclosed to the CPUC as part of the Commission’s California Environmental Quality Act environmental review process.

**RESPONSE 7:**

There are no items identified in response to question 5 that have not been disclosed to the CPUC as part of the Commission’s environmental review process.

**QUESTION 8:**

Please identify the costs (additional or savings) associated with each of the items provided in response to question 5.

**RESPONSE 8:**

Please refer to the Updated Direct Testimony of David Buczkowski for the savings afforded to the North-South Project with the elimination of the Moreno-Whitewater pipeline.

**QUESTION 9:**

For this next set of questions, please reference the document entitled**, “PREPARED REBUTTAL TESTIMONY ON RATESETTING AND SAFETY OF DAVID BUCZKOWSKI SAN DIEGO GAS & ELECTRIC COMPANY AND SOUTHERN CALIFORNIA GAS COMPANY”.**

a. Does the list on pages 10 and 11 constitute all of the items of Sempra’s proposed “Comprehensive Project Outreach and Education Program”? If not, what are the rest of the items?

b. How much does Sempra propose that each of the items provided in response to question 3a cost?

c. On page 8, footnote 24, it states, “The project outreach and education budget is distinct from the efforts required to support the CPUC and United States Forest Service public scoping as part of the CEQA/NEPA process before a final EIR/EIS is issues for the North-South Project”. For each item provided in response to question 3a, please identify:

i. Functions that are also covered by the CEQA or NEPA process; and

ii. Functions that are not covered by the CEQA or NEPA process.

**RESPONSE 9:**

1. The Prepared Rebuttal Testimony on Ratesetting and Safety of David Buczkowski includes the following functions for the Comprehensive Project Outreach and Education Program

* Website Development
* Community Meetings
* Direct Mail
* Creative & Production
* Research & Focus Groups
* Community Based Outreach Program
* Advertisement (Including Social Media)

Additional detail on the activities associated with each of these functions is provided in the attachment to this response.



1. Please refer to the attachment provided in Response 9a.

c.i.) The focused CEQA/NEPA public scoping support services summarized herein will be performed in close coordination with the Project Outreach and Education efforts. The focus of such CEQA/NEPA outreach activities is on the communication of the evaluation of potential environmental impacts and environmental regulatory compliance for the Proposed Project. Through public outreach related to scoping, SoCalGas will begin to identify the numerous stakeholders interested in this project, their particular area of interest and coordinate with SoCalGas’ experts to address publicly stated concerns or areas of interest. Other functions that are covered by the CEQA or NEPA public scoping support services include providing mailing addresses that will be maintained in an overall outreach contact database for direct mail and preparing for and participating at the numerous scoping meetings anticipated for the Proposed Project.

The Project Education and Outreach components provided in the response to 9.a. and 9.b. do not cover the specific efforts required to support the CPUC and United States Forest Service public scoping as part of the CEQA/NEPA process.  SoCalGas anticipates supporting the CPUC and San Bernardino National Forest with the scoping process by facilitating the following:

* Providing mailing addresses for individuals within 300-feet of the Proposed Project to prepare for the scoping process
* Supporting a direct mail of the Notice of Preparation/Notice of Intent for the scoping meetings
* Coordinating and providing logistical support at the actual scoping meetings.
  + Due to the length of the pipeline, at least eight meetings are anticipated
* Participating at scoping meetings as needed
* Outreach to Native American tribes and the Bureau of Indian Affairs
* Provide stakeholder briefings that may be requested as a result of the scoping process
* Providing any equipment, including projectors, microphones, placards, and comment card stock, in advance of the scoping meetings

c.ii.) Functions that are not covered by the CEQA/NEPA process include those identified in 9.a., with the exception of those provided in 9.c.i.