

**SAN DIEGO GAS & ELECTRIC COMPANY  
SOUTHERN CALIFORNIA GAS COMPANY  
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)  
(A.15-09-013)  
(DATA REQUEST ORA-19)  
Date Requested: June 30, 2016  
Date Responded: July 15, 2016**

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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:**

Please provide the most recent proposed comprehensive pressure testing implementation plan that SoCalGas and SDG&E have provided the California Public Utilities Commission, in compliance with California Public Utilities Code Section 958.

**RESPONSE 1:**

SDG&E and SoCalGas object to this request insofar as it calls for the production of documents which are publicly available or otherwise equally accessible to ORA and on the grounds that it is unduly burdensome. Subject to and without waiving these objections, SDG&E and SoCalGas respond as follows.

SDG&E's and SoCalGas' most recent Pipeline Safety Enhancement Plan provided to the Commission in compliance with P.U. Code § 958 may be obtained here: <https://socalgas.com/regulatory/R11-02-019.shtml>

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**QUESTION 2:**

At the historical operating pressure of 800 psig, what was the percentage of SMYS that Line 1600 operated at? If the percentage SMYS varies based on the pipeline segments, provide a listing of the percentage SMYS.

**RESPONSE 2:**

The pipeline operated a maximum of 49% SMYS.

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**QUESTION 3:**

In response to ORA DR-06, Question 6, SDG&E stated:

**QUESTION 6:**

Does SCG/SDG&E solely use 20% or greater Specified Minimum Yield Strength to define transmission versus distribution pipe? If the answer is anything other than an unqualified yes, please explain.

**RESPONSE 6:**

No. In accordance with 49 CFR 192, SDG&E and SoCalGas define a transmission line as a pipeline segment that meets one of the following criteria:

1. Produces a hoop stress equivalent to 20% of SMYS or more based on the established maximum allowable operating pressure (MAOP).
  2. Regardless of the operating stress level, transports gas within a storage field for the purpose of well injection or withdrawal, and is not a gathering line. Injection piping ends and withdrawal piping begins at the respective block valves nearest the wellhead used to control or isolate flow to and from the individual well.
  3. Transports gas to a large volume customer that is not downstream of a distribution center. A distribution center is the point at which gas supply and gas delivery are demarcated by a block valve(s).
- a. By each of the three categories, provide the percentage and total number of transmission miles that SDG&E defines under each criteria.
  - b. Provide SDG&E's criteria for determining whether a pipeline is identified as transmission under (1) hoop stress, or (3) large volume customer.
  - c. Are any of the customers connected to Line 1600 "large volume customers"? If they are, what would prevent SDG&E or SoCalGas from changing the definition of Line 1600 back to transmission if it is derated? Are there any operational restrictions? Please explain.
  - d. If Line 1600 is downrated, would any of the large volume customers identified in response to ORA DR-06 Q5 now be served by the distribution system? Would the rates they pay change since they would be served by the distribution system change? Please explain.
  - e. For questions a-d above, if SoCalGas uses any different definitions, please provide them and explain.

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**RESPONSE 3:**

- a. SDG&E defines 100% of the transmission miles by the 1<sup>st</sup> criteria: Produces a hoop stress equivalent to 20% of SMYS or more based on the established maximum allowable operating pressure (MAOP). Note that the Department of Transportation (DOT) definition of transmission pipelines differs from the definition used for customer rate determination, however in the SDG&E service territory, at this time all DOT transmission lines are also classified as transmission lines for customer rates.
- b. For SDG&E all transmission pipelines are defined using (1) hoop stress, since SDG&E defines the term distribution center to be “the transition point at which gas supplies from an Intrastate, Interstate or International pipeline, a California Producer, or a company gas storage field, are transferred into a transmission or distribution pipeline system”.
- c. Yes, large volume customers are connected to Line 1600. However, as provided in part (b) above the definition of Distribution Center as defined by SDG&E avoids the need to track large volume customers. This allows for a consistent application of the hoop stress definition across the system and avoids pipelines changing DOT designation due to the presence of a large volume customer. Once the pipeline is de-rated, the presence of a large volume customer will not affect the determination of Distribution since it will be operating below the 20% SMYS threshold.
- d. As noted the DOT definition of transmission pipelines differs from the definition used for customer rate determination. SDG&E has not yet determined whether this pressure change will translate to moving the customer rate determination. Note that electric generation (EG) customers with average annual usage of 50 million therms or greater are on the Transmission Level Service (TLS) rate, independent of the designation of the pipeline from which they are served.
- e. The definition and explanations provide for questions a-d above are applicable to SoCalGas with the exception that SoCalGas operators storage fields within its service territory, therefore the (3) definition of transmission is also used.

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**QUESTION 4:**

In response to ORA DR-06, SCG/SDG&E provided the following two responses:

**QUESTION 19:**

What was the average volume of gas transported through Line 1600 in 2013, 2014, and 2015?

**RESPONSE 19:**

The average volume of gas supply delivered into Line 1600 at Rainbow Meter Station in 2013, 2014, and 2015 was 42, 62, and 83 MMcfd, respectively.

**QUESTION 20:**

What was the average volume of gas transported through Line 3010 in 2013, 2014, and 2015?

**RESPONSE 20:**

The average volume of gas supply delivered into Line 3010 at Rainbow Meter Station in 2013, 2014, and 2015 was 323, 258, and 252 MMcfd, respectively.

Please explain the increase in volumes transported between 2013 and 2015 on Line 1600 while volumes on Line 3010 decreased.

**RESPONSE 4:**

During 2013 and 2014, Line 1600 was shut in or operating at reduced pressure for extended periods of time for pipeline maintenance purposes. The increase in average volume on Line 1600, and corresponding decrease on Line 3010, reflects Line 1600 returning to normal operating conditions.

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**QUESTION 5:**

Please provide the Line 1600 Gas Pipeline Feasibility Report for Acquisition Right of Way.

**RESPONSE 5:**

Attached is the Line 1600 Gas Pipeline Feasibility Report for Acquisition Right of Way. **This report contains confidential information that is submitted pursuant to Cal. Pub. Util. Code § 583 and G.O. 66-C.**



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**QUESTION 6:**

Please provide any and all past and present data responses from SDG&E, SoCalGas, Sempra, and Sempra affiliates to Commission staff and all other parties. Include the data requests that prompted each data response. This request covers any data requests and responses since SDG&E/SoCalGas prepared their response to ORA DR-05 that are not posted on the SDG&E/SoCalGas website.

**RESPONSE 6:**

SDG&E and SoCalGas object to this request as vague and ambiguous, and thus potentially overbroad and unduly burdensome. SDG&E and SoCalGas interpret this request as calling for data request responses in this proceeding. SDG&E and SoCalGas further object to this request insofar as it calls for the production of documents which are publicly available or otherwise equally accessible to ORA and on the grounds that it is unduly burdensome.

SDG&E and SoCalGas object to this request to the extent the request purports to impose any requirement or discovery obligation greater than or different from those under the California Public Utilities Commission ("Commission or CPUC") Rules of Practice and Procedure, Statutes, and the applicable Orders of the Commission. 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/or SoCalGas, as set forth in the CPUC Rules of Practice and Procedure. SDG&E's and SoCalGas' possession, custody, or control does not include any constructive possession that may be conferred by SDG&E's and 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. Specifically, SDG&E and SoCalGas object to providing Sempra and Sempra affiliate data responses due to affiliate compliance rules. Without waiving this objection, and subject thereto, SDG&E and SoCalGas respond as follows:

SDG&E and SoCalGas are not the makers of the Sempra and Sempra affiliates data responses in this proceeding. Sempra Energy, based in San Diego, is a Fortune 500 energy services holding company. Sempra Energy's California regulated utilities, SDG&E and SoCalGas, are separate legal entities with detached accountability.

Data responses to intervening parties in this proceeding are posted on SDG&E's and SoCalGas' respective webpages.

<http://www.sdge.com/regulatory-filing/15786/pipeline-safety-reliability-project>  
<https://www.socalgas.com/regulatory/A15-09-013.shtml>

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Please refer to ORA DR 5 for copies of data responses sent to SED, Sierra Club, TURN, and UCAN. Data responses provided since that submittal, with attachments or confidential data provided as of July 14, 2016 will be sent via Electronic Data Transfer due to size. For future data requests, please provide references to specific data responses that you are requesting. Please note that some of the information provided contains **confidential information provided pursuant to Cal. Pub. Util. Code § 583 and G.O. 66-C.**

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Amended Response Submitted: April 27, 2017  
Second Amended Response Submitted: May 25, 2017**

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This second corrected and amended response replaces the response to ORA DR-19, Question 7 submitted on July 15, 2016 and the amended response submitted on April 27, 2017 in its entirety.

**QUESTION 7:**

Please explain the discrepancies in pipeline records between SDG&E's 1968 report on Line 1600 (provided in response to ORA DR-14 Q2) and the L1600 pipe segment data (provided in response to ORA DR-06 Q12).

**RESPONSE 7:**

The pipeline record provided in ORA DR-14 Q2 was developed in 1968, and the pipeline record provided in the May 22, 2017 Amended Response (and the Corrected and Updated Attachment thereto) to ORA DR-06 Q12 is the current status of Line 1600, which accounts for changes to the pipelines due to various reasons, such as replacement or relocations. The primary segment is still the 16" Diameter, 0.250" Wall Thickness and 52,000 SMYS in the current report (see DR 14). The May 22, 2017 Amended Response to ORA DR-06, Question 12 (and the Corrected and Updated Attachment thereto) also reflects corrections of inaccurate information provided in the original May 12, 2016 Attachment to ORA DR-06, Question 12. The original data was taken from a database that had not been fully updated to reflect information learned from research of historical records and to reflect recent construction activity. The corrected information was previously provided to ORA in: (1) Applicants' August 12, 2016 response to ORA DR 25, Question 1; (2) Applicants' August 4, 2016 email to ORA (Ogeonye Enyinwa, Nathaniel Skinner, Mina Botros, Pearlie Sabino, and Darryl Gruen) attaching an amendment to a document previously provided in response to ORA DR 19, specifically a copy of Applicants' August 2, 2016 amended response to SED DR 3, Q2 and Attachment thereto; and (3) Applicants' July 15, 2016 response to ORA DR 19 (which provided a copy of Applicants' original response to SED DR 3, Q2 and Attachment thereto). Corrections are noted in red in the attachment to the May 22, 2017 Amended Response to ORA DR-06, Question 12.

In addition, the May 22, 2017 Amended Response (and the Corrected and Updated Attachment thereto) to ORA DR-06, Q12 also reflects that the Line 1600 segment for Engineering Station 17-131 was replaced as of October 26, 2016, as ORA previously was informed in Applicants' November 30, 2016 response to ORA DR 51, Q3.

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**QUESTION 8:**

To SDG&E/SCG's knowledge does Line 1600 have:

- a. Girth welds defects?
- b. Wrinkle bends?
- c. Acetylene girth welds?

**RESPONSE 8:**

To SDG&E/SoCalGas' knowledge, based on the extensive work completed on Line 1600,

- a. no.
- b. yes.
- c. no.

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**QUESTION 9:**

In response to ORA DR-06 Q18, SDG&E/SoCalGas stated:

**QUESTION 18:**

Has Line 1600 undergone any class location changes after installation? If so, please provide at the segment level, the date of class location change, the old class location, the new class location, and the percentage of Specified Minimum Yield Strength of the pipe before and after the class location change.

**RESPONSE 18:**

Yes, the pipeline has undergone class location changes since installation.

The entire pipeline operates at a stress level that is less than 50% of SMYS and would be commensurate for class 1, 2 and 3 areas. As such, there would be no need for a change in the percentage of SMYS from a change in class location between class 1, 2 and 3 for Line1600.

Please note that some of the information provided contains confidential information provided pursuant to G.O. 66-C and Cal. Pub. Util. Code §583. The attached document identifies the segments that increased in class location since 2008 with the associated percentage of SMYS.

- a. Please provide a listing of the segments that increased in class location prior to 2008.
- b. For all segments that experienced a change in change location, provide the stress level (as a percentage of SMYS) before and after the class location change.

**RESPONSE 9:**

The term "class location" was not in existence at the time of construction of Line 1600. While some early industry guidelines did introduce the concept of class location in relation to the design of new pipelines, monitoring for changes in class location on existing pipelines was introduced into federal regulation in 1970.

Based upon the pipe record provided as part of ORA DR-14 Q2, the design calculation to qualify the pipe assumed that all segments of Line 1600 operated in a class 3 location with a safety factor of 0.5 which allowed for an MAOP of 812 psig.

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In an attempt to be responsive to this question, Table 1 was constructed to compare the reported class location with records from 2008 in the same mile post ranges listed in the 1968 document. The table shows that class location segment determinations have mostly reduced when evaluating on a milepost segment level established in 1968. This is reflective of improved technology and less conservatism in the class location determination.

Table 1: Comparison of Class Location Records (1968 vs 2008)

| Segment            | 1968        | 2008        |
|--------------------|-------------|-------------|
| MP 0 to 29.1       | Class 1,2,3 | Class 1,2,3 |
| MP 29.1 to MP 29.6 | Class 2     | Class 1     |
| MP 29.6 to MP 49.6 | Class 2,3   | Class 1,2,3 |

As denoted in Table 1, there were no increases in class between the periods of 1968 and 2008 at the granularity of the mile post ranges that was used in the 1968 document.

It is important to note that prior to 2008, class location was managed at the milepost segment level and there are no historical records that provide class location determination at a pipe segment detail as is being requested. Reporting of class information by pipe segment is a modern practice that became possible once a class location database was introduced.