SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(DATA REQUEST ORA-25)

Date Requested: July 29, 2016
Date Responded: August 12, 2016

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.

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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BACKGROUND INFORMATION:

In DR ORA-6, Q18 ORA asked and SDG&E answered as follows:

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.

ORA followed up in ORA-19, Q9 with two further questions, and SDG&E answered those. The questions and answers are shown as follows:

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.

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	**1968**	**2008**
Records (1968 vs 2008) Segment		
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.

Lastly, in response to SED DR-3, Q2 and Q3, SoCalGas/SDG&E provided a table. With this background in mind, please answer the following:

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Amended Response Submitted: April 27, 2017

The response to Question 1 has been amended, changes are noted in **red, bold and underline**.

QUESTION 1:

Please provide an updated 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

b. If the Joint is Known (K) or Unknown (U)

c. The year of each class location change (blank if no class location change)

d. The class location prior to each change

e. The class location after each change

Provide the response as an active Excel spreadsheet. If an entry has more than one class location change, append an additional set of items c-e to the end of the entry. Please highlight each column that contains information that SoCalGas/SDG&E claims to be confidential.

RESPONSE 1:

Some of the information provided in the attachment contains confidential information provided pursuant to G.O 66-C and Cal. Pub. Util. Code § 583 **and D.16-08-024. Accordingly, a confidentiality declaration is included with the attachment.**

The attached excel file appends the requested additional columns. Please note that the attachment also reflects the updates provided to ORA on August 4, 2016.

The updates to the table in the Corrected and Updated Attachment are noted in red and reflect the replacement of a segment in October 2016 per Resolution SED-1.

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QUESTION 2:

a. Does Table 1 cover increases in class on Line 1600 between the periods of 1968 and 2008 at all levels of granularity?
b. Please identify all class location increases on Line 1600 that are not identified by Table 1.
c. For all class location increases identified on Line 1600 in response to question 2b, please provide:

   a. The year of the class location change.
   b. The approximate mile posts of the line covered by the class location change.
   c. The old and new class location.

RESPONSE 2:

a. The available level of granularity has been provided in Table 1.

b. The class location changes since 2008 have been provided in Table 1.

c. N/A

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QUESTION 3:

Please confirm if any parts of Line 1600 have a longitudinal joint factor of less than 1.0. If there are parts of Line 1600 that have a longitudinal joint factor of less than 1.0, please identify all such parts, including beginning and ending mileposts. Please explain.

RESPONSE 3:

No parts of Line 1600 have a longitudinal joint factor of less than 1.0.

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QUESTION 4:

For any class location change while Line 1600 had a maximum allowable operating pressure at or above 800 psig, please provide the class location study, including the study results, and the action SoCalGas/SDG&E took to confirm or revise the maximum allowable operating pressure.

RESPONSE 4:

As provided in the attachment for Question 1 above, Line 1600 only contains Class 1, Class 2 and Class 3 allowing the line to operate up to 50% specified minimum yield strength (SMYS) and commensurate with the class location, which is validated per the class location process. Results from the class location study are not retained unless the process indicates the pipeline is not commensurate with the hoop stress.

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QUESTION 5:

CONTAINS DATA IDENTIFIED AS CONFIDENTIAL BY SCG/SDG&E

On line 5 of the table provided to SED DR-3, Q2 and Q3, SoCalGas/SDG&E give a series of values. Please explain why the 192619(A1) value is 650, given the response to ORA DR-6, Q12, where SoCalGas/SDG&E stated the longitudinal joint factor is 1.0.

RESPONSE 5:

Please see response to Question 1 above.

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QUESTION 6:

CONTAINS DATA IDENTIFIED AS CONFIDENTIAL BY SCG/SDG&E

When did SoCalGas/SDG&E become aware that the design factor (192.619 (A1)) of the pipe was 650 psig, not the 800 psig the pipeline was operated at under the grandfather clause (192.619(c)).

RESPONSE 6:

Please see response for Question 1 above.

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QUESTION 7:

a. Did any part on Line 1600 experience a class location change while it operated at more than 40 percent of SMYS?

b. If the answer to question 7a is yes, please identify the dates of all such occurrences.

c. Did Line 1600 operate at more than 40 percent SMYS after any part of it experienced a class location change?

d. If the answer to question 7c is yes, please provide the first date that Line 1600 operated at more than 40 percent SMYS following a class location change.

e. Did any segment of Line 1600 ever experience a hoop stress corresponding to the established maximum allowable operating pressure that was not commensurate with the present class location?

f. If the answer to question 7e is yes, please identify all such parts of Line 1600 that had such an experience, and also provide the date that each part of Line 1600 had such an experience.

g. Please provide all of the class location studies, including the study results, and the action SoCalGas/SDG&E took to confirm or revise the maximum allowable operating pressure.

RESPONSE 7:

Q7(a) – Q7(c) Please see attachment provided in response to Question 1 above.

Q7(d) – Please see attachment provided in response to Question 1 above. Segments with a class location change that occurred pre-2011 when the Line 1600 pressure reduction took place from 800 psig to 640 psig would have been operating over 40% SMYS.

Q7(e) – No, as previously stated, segments operating at or below 50% SMYS are commensurate with Class 1, Class 2 and Class 3.

Q7(f) – N/A

Q7(g) – As previously stated segments operating at or below 50% SMYS are commensurate with Class 1, Class 2 and Class 3 and require no action to confirm or revise the MAOP.