

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)**

(5th DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION)

Date Requested: September 9, 2016

Date Responded: September 23, 2016

PRELIMINARY STATEMENT

1. These responses and objections are made without prejudice to, and are not a waiver of, SDG&E's 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 do 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, as set forth in the California Public Utilities Commission ("Commission or CPUC") Rules of Practice and Procedure. SDG&E 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.
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 expressly reserves 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).
6. 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.
7. Publicly available information and documents including, but not limited to, documents that are part of the proceeding record, newspaper clippings, court papers, and materials available on the Internet, will not be produced.

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GENERAL OBJECTIONS

1. SDG&E and SoCalGas object to each instruction, definition, and request to the extent that it purports to impose any requirement or discovery obligation greater than or different from those under the CPUC Rules of Practice and Procedure, Statutes, and the applicable Orders of the Commission.
2. SDG&E and SoCalGas object to each request that is overly broad, unduly burdensome, or not reasonably calculated to lead to the discovery of admissible evidence.
3. SDG&E and SoCalGas object to each instruction, definition and data request to the extent that it seeks information protected from disclosure by the attorney-client privilege, deliberative process privilege, attorney work product doctrine, or any other applicable privilege. Should any such disclosure by SDG&E and SoCalGas occur, it is inadvertent and shall not constitute a waiver of any privilege.
4. SDG&E and SoCalGas object to each instruction, definition and data request as overbroad and unduly burdensome to the extent it seeks documents or information that are readily or more accessible to Southern California Generation Coalition (SCGC) from SCGC's own files, from documents or information in SCGC's possession, or from documents or information that SDG&E and SoCalGas previously released to the public or produced to SCGC. Responding to such requests would be oppressive, unduly burdensome, and unnecessarily expensive, and the burden of responding to such requests is substantially the same or less for SCGC as for SDG&E and SoCalGas.
5. SDG&E and SoCalGas object to each instruction, definition and data request to the extent that it seeks the production of documents and information that were produced to SDG&E and SoCalGas by other entities and that may contain confidential, proprietary, or trade secret information.
6. To the extent any of SCGC's data requests seek documents or answers that include expert material, including but not limited to analysis or survey materials, SDG&E and SoCalGas object to any such requests as premature and expressly reserves the right to supplement, clarify, revise, or correct any or all responses to such requests, and to assert additional objections or privileges, in one or more subsequent supplemental response(s) in accordance with the time period for exchanging expert reports set by the Commission.
7. SDG&E and SoCalGas incorporate by reference every general objection set forth above into each specific response set forth below. A specific response may repeat a general objection for emphasis or some other reason. The failure to include any general objection in any specific response does not waive any general objection to that request. Moreover, SDG&E and SoCalGas do not waive their right to amend any responses.

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QUESTION 5.1:

With respect to Applicants' response to Sierra Club data request 1, question 2, which states: "The nominal capacity of Line 3010 when operated as part of the SDG&E system is 530 MMcfd. When operated without Line 1600, its nominal capacity increases to 570 MMcfd."

5.1.1. If Line 1600 is operated at distribution pressure, that is 320 psig, what would be the nominal capacity of Line 3010?

RESPONSE 5.1:

As SDG&E and SoCalGas (Applicants) stated in their response to Question 1 of Sierra Club's 5th data request in this proceeding, the nominal capacity of Line 3010 does not change if Line 1600 is derated to a distribution pressure of 320 psig.

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QUESTION 5.2:

With respect to Applicants' response to Sierra Club data request 1, question 2, please provide each date when the combined daily throughput of Line 1600 and Line 3010 exceeded the maximum capacity of Line 3010.

RESPONSE 5.2:

Applicants note a typo in this Question and respond assuming that the Question is referring to Applicants' response to Sierra Club data request 1, question 3.

Please refer to SDG&E and SoCalGas' response to SCGC DR 1, dated June 30, 2016 for attachments to Sierra Club Data Request 2 question 3 and Sierra Club Data Request 3 question 8. The attachments show the daily flow into Line 1600 and Line 3010 at Rainbow Metering Station respectively.

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QUESTION 5.3:

With respect to Applicants' response to Sierra Club data request 1, question 7, please provide:

- 5.3.1. The average pressure observed over the last two years for Line 3600 and Line 3012
- 5.3.2. The minimum and maximum pressures observed over the last two years for Line 3600 and Line 3012.
- 5.3.3. The MAOP for Line 3600 and Line 3012.

RESPONSE 5.3:

This response contains **confidential information (shaded in gray) provided pursuant to the Nondisclosure and Protection Agreement (NDA) between SDG&E/SoCalGas and SCGC.**

The MAOP for Line 3600 and Line 3012 is [REDACTED] psig. For the period of September 2014 to September 2016, the minimum pressure on Line 3600 was [REDACTED] psig, and on Line 3012 was [REDACTED] psig; the maximum pressure on Line 3600 was [REDACTED] psig, and on Line 3012 was [REDACTED] psig; the average pressure on Line 3600 and Line 3012 was [REDACTED] psig.

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QUESTION 5.4:

With respect to Applicants' response to Sierra Club data request 1, question 11:

- 5.4.1. Why did Mr. Yari base his analysis on the "Mid Case Demand Baseline Forecast" instead of basing his analysis on the "Mid AAEE Scenario" or other CEC "managed" forecasts?
- 5.4.2. What is the EG natural gas usage forecast for all areas served by Line 3010 or Line 1600 associated with Mid Case Demand Baseline Forecast?
- 5.4.3. What is the EG natural gas usage forecast for all areas served by Line 3010 or Line 1600 associated with Mid AAEE Scenario?

RESPONSE 5.4:

- 5.4.1. Mr. Yari used the same type of forecast as the one SDG&E has used in its own operational studies. Any other forecast would illustrate the same points that Mr. Yari made in his prepared direct testimony.
- 5.4.2. The California Energy Commission (CEC) provides 3 baseline cases for its California Energy Demand (CED) electricity demand forecast: High Demand Case, Mid Demand Case and Low Demand Case. The CEC also provides 3 additional achievable energy efficiency (AAEE) scenarios for the baseline cases: High AAEE, Mid AAEE and Low AAEE. An electricity demand forecast for a Mid Demand Baseline Case with Mid AAEE scenario refers to a single set of electricity demand forecast.

There is no gas demand forecast with just Mid Case Demand Baseline Forecast assumption for electricity demand. There is no gas demand forecast with just Mid AAEE Scenario electricity demand assumption.

- 5.4.3. Please see the response to 5.4.2 above.

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QUESTION 5.5:

With respect to Applicants' response to Sierra Club data request 2, question 5, please provide the daily volumes for the combined daily throughput for Line 1600 and Line 3010 for the 2011-2014 time period. Please note that Excel spreadsheet provided as response to question 3 does not seem to appropriately respond to this question. The spreadsheet has been included here for reference:

RESPONSE 5.5:

Please refer the response to Question 5.2 above.

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QUESTION 5.6:

With respect to Applicants' response to Sierra Club data request 2, question 6, please provide a copy of the Sempra Energy 2016 Analyst Conference if one has been held during 2016. If one has not yet been held, please state the date that such a conference would be expect to be held.

RESPONSE 5.6:

Applicants object to this question insofar as it calls for the production of documents which are publicly available or otherwise equally accessible to SCGC. Subject to and without waiving this objection, Applicants respond as follows:

Materials related to Sempra Energy's 2016 Analyst Conference may be obtained from Sempra Energy's website. Please see "Sempra Energy Analyst Conference" dated July 19, 2016:
<http://investor.shareholder.com/sre/events.cfm>

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QUESTION 5.7:

With respect to Applicants' response to Sierra Club data request 2, question 8, and referring directly to the map attachment that is provided in that response:

- 5.7.1. Please identify the "Other Pipeline" that is located between Line 3010 and Line 1600 south of Miramar. Identification should include the Line number and the diameter of the pipeline.
- 5.7.2. Please identify the "Other Pipeline" that is located between Line 3010 and Carlsbad. Identification should include the Line number and the diameter of the pipeline.
- 5.7.3. Do the city gates as indicated on the map locations denote locations where SDG&E's high pressure distribution lines connect with SDG&E's transmission lines?
- 5.7.4. If the answer to the previous question is "no," please explain the significance of these city gates.
- 5.7.5. Are there other locations on SDG&E's transmission system where the high pressure distribution system connects?
- 5.7.6. If the answer to the previous question is "yes," please identify the location of each of these locations.
- 5.7.7. Please identify the location of the existing segment of 36 inch pipe that is referred to in the Applicants' response to ORA data request 7, question 10 by marking the line on the map.
- 5.7.8. Please identify the location of Line 3011 that is referred to in the Applicants' response to Sierra Club data request 3, question 7 by marking the line on the map.
- 5.7.9. Please identify the location of Line 3602 by marking the line on the map.

RESPONSE 5.7:

The information below contains **confidential information (shaded in gray) provided pursuant to the Nondisclosure and Protection Agreement (NDA) between SDG&E/SoCalGas and SCGC.**

- 5.7.1. Line 3011, inch

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5.7.2. Line 2009, ■ inch

5.7.3. The City Gates on the map indicate the locations where the high pressure distribution system serving the greater San Diego metropolitan area is supplied by the transmission system.

5.7.4. N/A

5.7.5. Yes.

5.7.6. Applicants object to this question insofar as it seeks information that, together with the map, is sensitive critical energy infrastructure information that if made publicly available, could present a risk to the security of California's critical energy infrastructure.

There are several laws, regulations, and guides, that seek to protect critical infrastructure information and sensitive security information from public disclosure, for national security reasons. These include, but are not limited to: (i) the Protected Critical Infrastructure Information (PCII) Program; (ii) FERC Order 630 - Critical Energy Infrastructure Information (CEII); (iii) Sensitive Security Information Regulations; and (iv) the Transportation Security Administration's (TSA) Pipeline Security Guidelines.

5.7.7. Please see the attached document.

5.7.8. Please refer to the response to Question 5.7.1 above.

5.7.9. Please refer to Figure 1 in the Prepared Direct Testimony of David M. Bisi served in this proceeding on March 21, 2016.

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QUESTION 5.8:

With respect to Applicants' response to Sierra Club data request 3, question 8, are these volumes additive to the volumes identified in response to Sierra Club data request 2, question 3?

RESPONSE 5.8:

Please refer to the response to Question 5.2 above.

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QUESTION 5.9:

With respect to Applicants' response to Sierra Club data request 4, question 3:

- 5.9.1. For each of the dates listed in response to 3a, please identify the amount of the shortfall associated with each of the outages listed in response 3a.
- 5.9.2. For each of the dates listed in response to 3a, please identify whether EG customers or noncore non-EG customers were interrupted due to the shortfall.
- 5.9.3. For each of the dates listed in response to 3a, please state what steps the System Operator took to procure supply at Otay Mesa on the date.
- 5.9.4. For each of the dates listed in response to 3a, please state the reason(s) why the System Operator was unable to procure any supply at Otay Mesa.

RESPONSE 5.9:

- 5.9.1 A specific shortfall amount was not determined for each of the outages. Shortfall was significant enough to require 100% curtailment of noncore transportation from Rainbow.
- 5.9.2 Yes.
- 5.9.3 Customers wanting to operate during the outages had to declare an operating emergency and procure supply through Otay Mesa in order to maintain service.
- 5.9.4 The System Operator does not procure gas supply. Under Section 9 of Rule 41, the System Operator can now request the Operational Hub to deliver gas to Southern Zone receipt points including Otay Mesa. In 2011, the System Operator did not have the authority to request deliveries at Otay Mesa by the Operational Hub.

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QUESTION 5.10:

With respect to Applicants' response to ORA data request 2, question 1, please provide the attachments shown in the response as well as the CD with the "shape files for Lines 3010 and 1600."

RESPONSE 5.10:

The three attachments shown in the Applicants' response to ORA data request 2, question 1 may be obtained from the Energy Division's Project Website:

<http://www.cpuc.ca.gov/Environment/info/ene/sandiego/sandiego.html>

Applicants object to the request for the "shape files for Lines 3010 and 1600" insofar as it seeks information that is highly sensitive critical energy infrastructure information that if made publicly available, could present a risk to the security of California's critical energy infrastructure.

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QUESTION 5.11:

Please provide the confidential version of the Applicants' response to ORA data request 11.

RESPONSE 5.11:

Please see the attached document, which **contains confidential information (shaded gray) provided pursuant to the NDA between SDG&E/SoCalGas and SCGC.**

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QUESTION 5.12:

Please provide the confidential attachments to the Applicants' response to ORA data request 3.

RESPONSE 5.12:

Please see the attached documents, which **contain confidential information provided pursuant to the NDA between SDG&E/SoCalGas and SCGC.**

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QUESTION 5.13:

With respect to Applicants' response to ORA data request 7, question 5, for each of the events listed in the response, please identify the size of the curtailment.

RESPONSE 5.13:

Start Date and Time	End Date and Time	Size
Feb 3, 2011 3PM	Feb 4, 2011 12 noon	Approximately 200 MMcfd
Oct 1, 2011 6AM	Oct 1, 2011 9PM	See Response 5.9.1
Oct 8, 2011 6AM	Oct 8, 2011 11PM	See Response 5.9.1
Oct 15, 2011 6AM	Oct 15, 2011 11PM	See Response 5.9.1
Oct 22, 2011 6AM	Oct 22, 2011 9PM	See Response 5.9.1
Oct 29, 2011 6AM	Oct 30, 2011 4AM	See Response 5.9.1
Nov 5, 2011 6AM	Nov 5, 2011 1PM	See Response 5.9.1
Nov 12, 2011 6AM	Nov 12, 2011 10PM	See Response 5.9.1
Nov 19, 2011 6AM	Nov 19, 2011 8PM	See Response 5.9.1
Dec 6, 2013 12AM	Dec 11, 2013 11:59 PM	N/A – Curtailment of standby service
Feb 6, 2014 8AM	Feb 10, 2014 11:59 PM	N/A – Curtailment of standby service
Feb 6, 2014 6:45AM	Feb 7, 2014 12AM	Approximately 295 MMcfd

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QUESTION 5.14:

With respect to Mr. Navin's testimony at 14:

- 5.14.1. What is the diameter of the other pipeline in the distribution loop system that the pre-lay segment is attached to?
- 5.14.2. Please identify the installed cost of the segment of 36 inch pipe.
- 5.14.3. Please provide an estimate of the installed cost of the same segment if it had been installed at the same diameter as the remainder of the distribution loop system that it is attached to.
- 5.14.4. Please explain in detail why it was appropriate to add a 36 inch pipe segment to a distribution loop system.
- 5.14.5. Referring to the Applicants' response to ORA data request 7, question 10, please list in detail each of the "valuable benefits to the SDG&E gas system" that was created by adding a 36 inch pipe segment to a distribution loop system.

RESPONSE 5.14:

- 5.14.1 As stated in the Prepared Direct Testimony of Neil Navin at page 14, the pipelines are 8 inches in diameter.
- 5.14.2 Applicants objects to this request as overly burdensome. Actual cost data is not readily available as this project was completed approximately 22 years ago with costs tracked in a system that is no longer in use. Notwithstanding, and in an attempt to be responsive, Applicants were able to locate the work order authorizing this work. Based on the work order, the cost of the project was estimated at \$2.328 million.
- 5.14.3 The estimated cost to install an 8-inch line to serve as part of the distribution loop along Pomerado Road to replace the 36-inch line is approximately \$5,930,883.
- 5.14.4 In 1992, SDG&E planned to install an 8-inch 400 psig pipeline through Poway as an improvement to the high pressure distribution system serving the Poway-Scripps Ranch area. SDG&E was also planning the Rainbow to Santee 36-inch pipeline (Phase II) that would go through Poway. During discussions with Poway

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staff, the staff requested that SDG&E expand the planned 8-inch pipe to 36 inches and place it in Pomerado road, instead, to avoid construction twice.

5.14.5 As stated in our response to ORA data request 7, question 10 (d):

“The 36-inch segment of pipe in Poway is an existing asset that currently provides valuable benefits to the SDG&E gas system. This pipeline serves the important system function of connecting the Poway 400 psig high pressure distribution system to the 400 psig high pressure distribution system in Scripps Ranch and also provides a direct feed to the 400 psig high pressure distribution line serving the Poway business park. It was designed and constructed so that it could operate as a transmission line with a MAOP of 800 psig. Given this and the fact that it is 36 inches in diameter, it is optimally suited to be integrated into the Proposed Project and provides the optimal pigging configuration.”

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QUESTION 5.15:

With respect to Applicants' response to ORA data request 8, question 1a:

- 5.15.1. For each of the dates listed in the response, please state the location where the gas was purchased.
- 5.15.2. For each of the dates listed in the response, does the "price paid" refer to any transportation costs incurred by the Applicants?
- 5.15.3. If the answer to the previous question is "yes," for each of the dates listed in the response, please identify the amount of the "price paid" that corresponds to the transportation cost.

RESPONSE 5.15:

- 5.15.1 See Table below for purchase location and transportation cost

Otay Mesa Delivered Cost Breakdown				
Date	Purchase Location	Commodity Price	Transportation Cost	Otay Price Paid
1/15/2013	EP-So. Mainline	\$4.15	\$.3672	\$4.5172
1/15/2013	EP-So. Mainline	\$4.25	\$.3672	\$4.6172
1/16/2013	EP-So. Mainline	\$3.95	\$.3672	\$4.3172
3/23/2013	EP-So. Mainline	\$4.20	\$.3559	\$4.5559
3/24/2013	EP-So. Mainline	\$4.44	\$.3559	\$4.7959
10/15/2013	EP-So. Mainline	\$3.915	\$.3587	\$4.2737
10/16/2013	EP-So. Mainline	\$3.985	\$.3587	\$4.3437
10/17/2013	EP-So. Mainline	\$4.00	\$.3587	\$4.3587
11/14/2013	EP-So. Mainline	\$3.745	\$.3515	\$4.0965
12/10/2013	EP-So. Mainline	\$8.30	\$.3977	\$8.6977
12/11/2013	EP-So. Mainline	\$5.80	\$.3977	\$6.1977
12/11/2013	EP-So. Mainline	\$6.50	\$.3977	\$6.8977
12/11/2013	EP-So. Mainline	\$7.25	\$.3977	\$7.6477

- 5.15.2 Yes.
- 5.15.3 See response to 5.15.1, above. Note that Transportation Cost includes Mexico customs, fees and taxes.

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QUESTION 5.16:

With respect to Applicants' response to ORA data request 8, question 1c:

- 5.16.1. Why does the response assume that a firm 400 MMcf/d path is required and not some other amount?
- 5.16.2. What analysis was done to determine the appropriate amount?
- 5.16.3. Please provide a map showing each of the three pipelines referred to in the response.

RESPONSE 5.16:

- 5.16.1. 400 MMcfd is the maximum level of firm capacity at Otay Mesa that does not exceed the capacity of Line 3602 and requires no construction on the SDG&E system.
- 5.16.2. Please see the response to 5.16.1, above.
- 5.16.3. A map showing all three pipelines can be found via this link:
http://www.northbajapipeline.com/aboutus/system_map.html

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QUESTION 5.17:

With respect to Applicants' response to ORA data request 8, question 1f, please provide the URLs for the Gasoducto Rosarito and TGN websites.

RESPONSE 5.17:

Applicants object to this request on the grounds that it calls for the compilation of publicly available information equally available to SCGC. Subject to and without waiving their objection, Applicants respond as follows:

TGN Website: <http://www.tgndebajacalifornia.com/english/information.aspx>

Gasoducto Rosarito Website: <http://www.gasoductorosarito.com/english/information.aspx>