

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

(1st DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION)

**Date Requested: June 20, 2016
Date Responded: June 30, 2016**

QUESTION 1.1:

1.1 The Southern California Gas Company (“SoCalGas”) and the San Diego Gas and Electric Company (“SDG&E”) have posted responses to data requests from the Office of Ratepayer Advocates (“ORA”), The Utility Reform Network (“TURN”), the Sierra Club, and the Utility Consumers’ Action Network (“UCAN”) in A.15-09-013 on their websites. However, the postings of the data responses are in a PDF format which prevents downloading of files that are embedded in the data responses. The data responses which contain embedded files that cannot be downloaded from the SoCalGas/SDG&E websites are:

- Response to ORA Data Request 2
- Response to ORA Data Request 6
- Response to ORA Data Request 7
- Response to ORA Data Request 8
- Response to ORA Data Request 9
- Response to ORA Data Request 10
- Response to ORA Data Request 12
- Response to Sierra Club Data Request 1
- Response to Sierra Club Data Request 2
- Response to Sierra Club Data Request 3
- Response to Sierra Club Data Request 4
- Response to TURN Data Request 1
- Response to TURN Data Request 2
- Response to TURN Data Request 4
- Response to UCAN Data Request 1
- Response to UCAN Data Request 2

Please provide to the Southern California Generation Coalition (“SCGC”) all of the SoCalGas/SDG&E data responses to the ORA, TURN, Sierra Club, and UCAN data requests in Word rather than PDF format so that embedded files that are included in the responses can be downloaded.

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RESPONSE 1.1:

SDG&E and SoCalGas object to this question on the grounds that it is unreasonably burdensome. Without waiving this objection, and subject thereto, SDG&E and SoCalGas respond as follows.

The embedded documents in ORA Data Request 2 may be obtained from the Energy Division's Project Website. Please see "Responses to Deficiency Letter #1": <http://www.cpuc.ca.gov/Environment/info/ene/sandiego/sandiego.html>

Due to size, the embedded documents in the following data requests will be sent via Electronic Data Transfer. Please note that some of the documents contain **confidential information provided pursuant to the Nondisclosure and Protection Agreement between SDG&E/SoCalGas and SCGC**.

- Response to ORA Data Request 6: Q3, Q4, Q12, Q15, Q18
- Response to ORA Data Request 7: Q3, Q8
- Response to ORA Data Request 8: Q1, Q4, Q9
- Response to ORA Data Request 9: Q1, Q12, Q14, Q16, Q21
- Response to ORA Data Request 10: Q5
- Response to ORA Data Request 12: Q8, Q21
- Response to Sierra Club Data Request 1: Q10
- Response to Sierra Club Data Request 2: Q3, Q6, Q7, Q8
- Response to Sierra Club Data Request 3: Q4, Q8
- Response to Sierra Club Data Request 4: Q4, Q5
- Response to TURN Data Request 1: Q8, Q11
- Response to TURN Data Request 2: Q2, Q8
- Response to TURN Data Request 4: Q5
- Response to UCAN Data Request 1: Q2, Q8, Q11, Q19, Q25
- Response to UCAN Data Request 2: Q6, Q7