

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

(6th DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION)

Date Requested: September 12, 2016

Date Responded: September 26, 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 6.1:

With respect to Applicants' response to ORA's data request 8, question 5, which states: "The pipeline being referenced is Gasoducto Rosarito. The assertion was based on a response from a Gasoducto Rosarito sales representative to a query from a SDG&E and SoCalGas representative."

- 6.1.1. Please identify the sales representative who was contacted and provide the individual's contact information.
- 6.1.2. What is the total firm capacity on Gasoducto Rosarito?
- 6.1.3. Do the Applicants know the identity of the entities that hold the firm capacity rights on Gasoducto Rosarito?
- 6.1.4. If the answer to the previous question is "yes," please identify those entities and state how what amount of capacity on Gasoducto Rosarito that each one holds.
- 6.1.5. Is Gasoducto Rosarito an affiliate of the Applicants?
 - 6.1.5.1. If your answer is "yes," please identify the parent company of Gasoducto Rosarito and explain where it fits within Sempra Energy's holdings.
 - 6.1.5.2. If your answer is "no," please identify the parent company of Gasoducto Rosarito.

RESPONSE 6.1:

- 6.1.1. Marcela Gastelum
Sub-Gerente Comercial, IEnova
mgastelum@IEnova.com.mx
- 6.1.2. Applicants object to this question insofar as it calls for information that is publicly available or otherwise equally accessible to SCGC. Subject to and without waiving this objection, Applicants respond as follows:

The Gasoducto Rosarito website (<http://www.gasoductorosarito.com/english/about-us.html>) states:

"The main pipeline is a 30-inch in diameter pipe capable of transporting 500 million cubic feet of gas per day begins with the interconnection with El Paso Natural Gas Co. near

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Ehrenberg, Arizona, crosses the border at Los Algodones, B.C., and ends at the interconnection with Transportadora de Gas Natural de Baja California (TGN), south of Tijuana.”

- 6.1.3. Applicants object to this question insofar as it calls for information that is publicly available or otherwise equally accessible to SCGC. Subject to and without waiving this objection, Applicants respond as follows.

Based on information available on Gasoducto Rosarito’s website, the Applicants have an understanding of the identity of the entities that hold firm main pipeline capacity rights on Gasoducto Rosarito. Specifically, see http://www.gasoductorosarito.com/docs/Suscribed%20capacity%20GRO_September%202016.pdf

- 6.1.4. Applicants object to this question insofar as it calls for information that is publicly available or otherwise equally accessible to SCGC. Subject to and without waiving this objection, Applicants respond as follows.

See table below for a list of customers with firm capacity rights on the main pipeline, as retrieved by Applicants from Gasoducto Rosarito’s website in September 2016.

Customer	Subscribed Capacity (MMbtu/d)
IEnova LNG	400,000
Energia Azteca X	135,000
Termoelectrica de Mexicali	105,000
Energia de Baja California	37,000
North Baja Pipeline	11,000
North Baja Pipeline	18,500
Igasamex	6,658
JMRal (cap release)	1,542
Gas Natural del Noroeste	2,200
Toyota Motor Manufacturing de Baja California	800
Shell México Gas Natural	227,410
Gazprom Trading Mexico	141,590
IEnova LNG	1,307,000
Shell México Gas Natural	1,164,331
Gazprom Trading Mexico	142,669
North Baja Pipeline LLC	62,750
North Baja Pipeline LLC	18,500

- 6.1.5. Yes.

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6.1.5.1. Gasoducto Rosarito is a subsidiary of Infraestructura Energética Nova S.A.B. de C.V (IEnova). IEnova is a subsidiary of Sempra Energy.

6.1.5.2. N/A.

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QUESTION 6.2:

With respect to Applicants' response to ORA's data request 8, question 10, which states: "In 2006, TGN and SDG&E entered into an agreement (at TGN's request) for SDG&E to construct an interconnection between TGN and SDG&E at Otay Mesa. This work was done in accordance with SDG&E Rule 39 and a related Commission-approved Collectible System Upgrade Agreement form (Form 143-003). Construction on the interconnection began in September 2007, and was completed in mid-2008. Under the agreement, TGN was required to pay for the cost of the new facilities, and therefore the costs of the facilities are not included in rate base. The total costs amounted to approximately \$6.0 million."

6.2.1. What is the current capacity of the receipt point between TGN and SDG&E?

6.2.2. Is the capacity of the TGN/SDG&E receipt point capable of expansion?

6.2.3. If the answer to the previous question is "yes," by how much could the receipt point be expanded?

6.2.4. What is the total firm capacity of TGN?

6.2.5. Do the Applicants know the identity of the entities that hold the firm capacity rights on TGN?

6.2.6. If the answer to the previous question is "yes," please identify those entities and state how what amount of capacity on TGN that each one holds.

6.2.7. Is TGN an affiliate of the Applicants?

6.2.7.1. If your answer is "yes," please identify the parent company of TGN and explain where it fits within Sempra Energy's holdings.

6.2.8. If your answer is "no," please identify the parent company of TGN.

RESPONSE 6.2:

6.2.1 Per SoCalGas Schedule No. G-BTS, the receipt capacity of Otay Mesa is 400 MMcfd.

6.2.2 Yes.

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- 6.2.3 Per SoCalGas Rule No. 39 and SDG&E Gas Rule No. 39, the receipt point could be expanded to whichever level an interconnecting entity is willing to fund. The interconnecting entity may also choose to expand the takeaway capacity at its expense.
- 6.2.4. TGN's delivery capacity is 940 MMcfd. The stated capacity in SoCalGas Schedule No. G-BTS for the TGN Otay Mesa Receipt Point is 400 MMcfd.
- 6.2.5. Applicants object to this question insofar as it calls for information that is publicly available or otherwise equally accessible to SCGC. Subject to and without waiving this objection, Applicants respond as follows.

Based on information available on TGN's website, the Applicants have an understanding of the identity of the entities that hold firm main pipeline capacity rights on TGN.

Specifically, see

http://www.tgndebajacalifornia.com/docs/Suscribed%20Capacity%20TGN_September%202016.pdf

- 6.2.6. Applicants object to this question insofar as it calls for information that is publicly available or otherwise equally accessible to SCGC. Subject to and without waiving this objection, Applicants respond as follows.

See table below for a list of customers with firm capacity rights on TGN, as retrieved by Applicants from TGN's website in September 2016.

Customer	Subscribed Capacity (MMbtu/d)
IEnova LNG	540,000
Igasamex	4,561
Shell México Gas Natural	400,000
JMRal (cap release)	1,539

- 6.2.7. Yes.

6.2.7.1. TGN is a subsidiary of Infraestructura Energética Nova S.A.B. de C.V (IEnova). IEnova is a subsidiary of Sempra Energy.

- 6.2.8. N/A.

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QUESTION 6.3:

With respect to Applicants' response to ORA's data request 8, question 11.g, which states: "Tools and factors to mitigate the number of Electric Generator curtailments if Line 1600 is taken out of service for pressure testing include:

- Testing from April 1st through June 15th and October 1st through December 15th to avoid peak gas usage during winter and summer months,
- Obtain capacity on pipelines from Ehrenberg to Otay Mesa during Hydro testing, and
- Coordinating the timing of hydro testing individual test segments with Electric Generator maintenance schedule."

6.3.1. How much capacity would the Applicants need to obtain on "pipelines from Ehrenberg to Otay Mesa during Hydro testing" if hydro testing Line 1600 were the alternative selected by the Commission in order to avoid curtailments of EG customers?

6.3.2. Would the Applicants expect to obtain capacity directly from Baja Norte or would the Applicants expect to be able to obtain brokered capacity from holders of firm capacity rights on Baja Norte?

6.3.3. Would the Applicants expect to obtain capacity directly from Gasoducto Rosarito or would the Applicants expect to be able to obtain brokered capacity from holders of firm capacity rights on Gasoducto Rosarito?

6.3.4. Would the Applicants expect to obtain capacity directly from TGN or would the Applicants expect to be able to obtain brokered capacity from holders of firm capacity rights on TGN?

RESPONSE 6.3:

6.3.1 The mitigation approaches of testing April 1st through June 15th and October 1st through December 15th and obtaining capacity on pipelines from Ehrenberg to Otay Mesa during hydrotesting identified in response to ORA data request, question 11 pertain to all customer classes and as such, no specific Electric Generator capacity requirements analysis was conducted.

6.3.2 Applicants would explore both options to procure firm transportation capacity on the North Baja Pipeline, Gasoducto Rosarito and TGN systems.

6.3.3 See response to Question 6.3.2 above.

6.3.4 See response to Question 6.3.2 above.

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QUESTION 6.4:

With respect to Applicants' response to ORA's data request 9, question 3, which provides the attachment for the Applicants' response, entitled Power Plant Locations 11x17.pdf:

- 6.4.1. Please add the location of the SDG&E transmission lines to the attachment showing the location of the power plants.
- 6.4.2. For each power plant designated on the attachment, Power Plant Locations 11x17.pdf, indicate which line serves each the power plant, and indicate whether the line is a transmission line, a high pressure distribution line, or other.

RESPONSE 6.4:

Applicants object to this Question on the ground that it does not appear to seek information relevant to any issue within the scope of this proceeding. Which power plants in SDG&E's service territory are served by which lines is not relevant to the safety of Line 1600, the reliance of the entire SDG&E system on Line 3010, or operational flexibility in SDG&E's gas transmission system. Rather, given that SCGC represents electric generation facilities in the Los Angeles area, it appears to be seeking information that might assist SCGC's members in unfairly competing with electric generation facilities in the San Diego area.

Applicants further object to this question insofar as it seeks information that is sensitive critical energy infrastructure information that if made publicly available, could present a risk to the security of California's electric and natural gas 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.

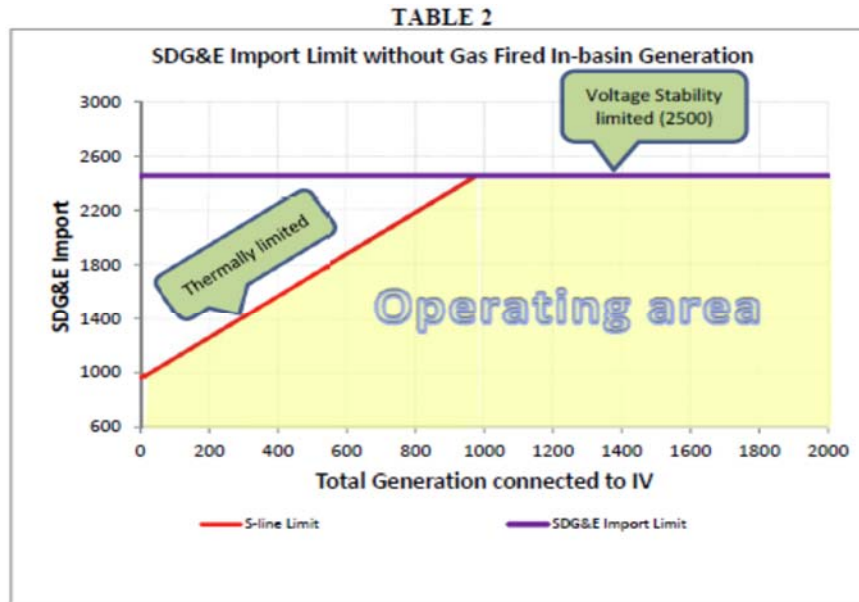
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QUESTION 6.5:

With respect to Mr. Yari’s testimony at page 16, which states: “A simple comparison of SDG&E’s maximum electric power import capability (up to 3,500 MW) to SDG&E’s peak load (5,372 MW for 2016) shows that even under maximum import conditions, up to 1,872 MW of local generation (which is more than 50 percent of the local generation) is needed and must have a reliable gas supply to serve SDG&E’s customer peak electric demand. That number will climb upward every year due to the projection of year-by-year increasing electric customer demand (projected through 2025).²⁵

Absent internal natural gas-fired electric generation due to a gas interruption, SDG&E’s power import capability would be reduced to approximately 2,500 MW or lower, as shown in the Table below.



If the gas supply were interrupted, about 70 MW of in-basin non-gas generation²⁶ would remain. Under this scenario, SDG&E could serve up to about 2,570 MW of customer load.”

6.5.1. Please explain what is meant by the term “IV” in Table 2.

6.5.2. Please explain what is meant by the term “S-line limit” in Table 2.

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- 6.5.3. Please explain why “Absent internal natural gas-fired electric generation...SDG&E’s power import capability would be reduced to approximately 2,500 MW or lower.”
- 6.5.4. Does the absence of gas-fired generation reduce the import capability of the transmission lines serving SDG&E?
- 6.5.5. If the answer to the previous question is “yes,” please explain in detail the reasons for this phenomenon.
- 6.5.6. If the answer to question 6.5.2 is “yes,” does the impact of the removal of gas-fired generation on the import capability of transmission lines service SDG&E vary by month?
- 6.5.7. If the answer to the previous question is “yes,” please state the amount by which the impact varies and explain each of the factors that would cause this variation to occur.
- 6.5.8. Taking into account the capacity of existing electric transmission lines to deliver electric power generated outside of the SDG&E service territory into the SDG&E service territory as well as the capacity of all non-gas fired sources of electricity located within the SDG&E service territory, what is the minimum amount of electric power that would have to be generated by gas-fired EG plants within SDG&E’s service territory in order to meet an N-1 electric reliability standard during each month of the year?
- 6.5.9. Please provide all workpapers to the calculations supporting the answer to the previous question.
- 6.5.10. Taking into account the capacity of existing electric transmission lines to deliver electric power generated outside of the SDG&E service territory into the SDG&E service territory as well as the capacity of all non-gas fired sources of electricity located within the SDG&E service territory, what is the minimum amount of electric power that would have to be generated by gas-fired EG plants within SDG&E’s service territory in order to meet an N-2 electric reliability standard during the each of the month of the year?
- 6.5.11. Please provide all workpapers to the calculations supporting the answer to the previous question.
- 6.5.12. Please provide a copy of SDG&E’s latest electric loss of load expectation (“LOLE”) or loss of load probability (“LOLP”) study.
- 6.5.13. Has SDG&E proposed any transmission expansions to the CAISO that would expand its transmission import capability?

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- 6.5.14. If the answer to the previous question is “yes,” please provide a copy of SDG&E’s transmission proposals to the CAISO.
- 6.5.15. Has SDG&E proposed any transmission expansions to the CPUC that would expand its transmission import capability?
- 6.5.16. If the answer to the previous question is “yes,” please provide a copy of SDG&E’s transmission proposals to the CPUC.

RESPONSE 6.5

- 6.5.1. “IV” refers to Imperial Valley Substation.
- 6.5.2. The S-Line refers to the 230 kV Transmission Line wholly-owned by the Imperial Irrigation District (IID) from Imperial Valley Substation to El Centro Substation. “S-line Limit” is a limit determined by the rating of the S-line as established by IID.
- 6.5.3. As indicated in Table 2, a voltage stability limit exists at the 2,500 MW power import level for a scenario in which there is no local gas-fired electric generation in SDG&E’s area. However, as also indicated in Table 2, the SDG&E power import limit may be less than 2,500 MW when IID’s S-Line limit is more limiting than the voltage stability limit, which occurs when the total dispatch of generation connected to Imperial Valley Substation is less than approximately 1,000 MW.
- 6.5.4. Yes.
- 6.5.5. Gas-fired generators provide the voltage support needed to mitigate the potential for voltage collapse and allow higher import into the SDG&E system.
- 6.5.6. Applicants assume the question has a typographical error and is meant to refer to Question 6.5.4, since Question 6.5.2 is not a “yes” or “no” type question. With this understanding, Applicants respond as follows: Yes, it varies by month.
- 6.5.7: Table 2 shows two limits: the S-line Thermal Limit and the 2,500 MW Voltage Stability Limit.

The S-line Limit varies with the amount of generation dispatched at Imperial Valley (IV). Approximately half of the generation at IV is renewables, mostly solar. Renewable resources are known to vary monthly. Gas-fired generation maintenance must be performed periodically, and is typically performed in months other than the summer

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months. Such generation is unavailable while maintenance is being performed. The amount of import limit variation, depending on generation at IV, is shown in Table 2.

The 2,500 MW limit will also vary monthly. Studies were done assuming maximum unit commitment for the Huntington Beach (HB) units (generators and synchronous condensers). The commitment of these units could vary monthly with system conditions in Southern California Edison and SDG&E. The limit could change from 2,500 MW (all HB units on) to 2,300 MW (No HB units on).

- 6.5.8: 1,886 MW of internal gas-fired generation is needed to meet an N-1 reliability standard, as shown in the attached workpapers (see the response to Question 6.5.9 below).
- 6.5.9: Please refer to attached workpapers and see the different tabs within the Excel file.
- 6.5.10: 1,971 MW of internal gas-fired generation is needed to meet an N-2 electric reliability standard, as shown in the workpapers provided in response to Question 6.5.9 above.
- 6.5.11: Please refer to the workpapers provided in response to Question 6.5.9 above.
- 6.5.12: SDG&E is part of the CAISO balancing authority and thus does not have a separate study of the loss of load expectation (LOLE) or loss of load probability (LOLP) for its service area. SDG&E plans and develops its system based on studies that look at the entire CAISO area as done by the CAISO and CPUC looking at the entire control area. In SDG&E's filing in A.15-04-012 in Exhibit 3 [testimony of Robert Anderson] filed December 1, 2015 SDG&E showed the hours that are most likely to experience a loss of load, if the system was actually short of capacity. This study was not a study as to whether or not the system is actually short of capacity but done for cost allocation purposes only.
- 6.5.13: In an earlier CAISO planning cycle (2013/2014), SDG&E submitted a transmission expansion project to extend a high-voltage connection from northern San Diego County to connect with Southern California Edison's system at Valley substation. This interconnection was proposed as either 500 kV AC or as an HVDC connection, and would have increased the import capability into the San Diego load center. This proposed project was not selected for further analysis by the CAISO and SDG&E is no longer pursuing this proposed project.

In the current planning cycle (2016/2017) SDG&E has not proposed any transmission expansion projects to the CAISO to increase SDG&E's import capability, but SDG&E has recently proposed a project to convert portions of SDG&E's existing 500 kV transmission system from AC to DC. This project is at the preliminary stages and SDG&E is working with industry experts to determine the scope of work required to

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make the conversion and to determine the incremental improvement in import capability. The project submittal form for this project is attached in the response to 6.5.14, below.

6.5.14: SDG&E has placed the project in the CAISO 2016 project submittal window. The submittal form is attached.

6.5.15: No, SDG&E has not submitted a proposal to increase SDG&E's import limit to the CPUC.

6.5.16: Not applicable.

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QUESTION 6.6:

With respect to Applicants' response to ORA's data request 10, question 7, which states: "The five winter seasons in the last decade (2005-2015) that had the highest level of natural gas consumption for electric generation customers were 2005, 2008, 2012, 2013, and 2010."

- 6.6.1. Please provide the peak EG consumption for each of the years identified.
- 6.6.2. Please provide the core consumption on the day of the EG peak for each of the years identified.
- 6.6.3. Please provide the noncore non-EG consumption on the day of the EG peak for each of the years identified.

RESPONSE 6.6:

Please refer to the following data.

Year	EG (MMcfd)	Core (MMcfd)	Non-EG noncore (MMcfd)
2005	1,325	845	807
2008	1,601	633	858
2012	1,835	772	829
2013	1,667	842	813
2010	1,747	908	794

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QUESTION 6.7:

With respect to Applicants' response to ORA's data request 10, question 8, which states: "In the San Diego area, there are 46.8 MW of solar plants currently installed."

- 6.7.1. What portion of SDG&E's RPS requirements do these solar plants represent?
- 6.7.2. Does SDG&E have any more RPS resources under contract but not yet built that would be located within SDG&E's service territory?
- 6.7.3. What portion of SDG&E's RPS requirements does SDG&E expect to be able to meet by 2020 with RPS resources located within SDG&E's service territory?
- 6.7.4. What portion of SDG&E's RPS requirements does SDG&E expect to be able to meet by 2030 with RPS resources located within SDG&E's service territory?

RESPONSE 6.7:

- 6.7.1. These solar plants currently represent 1.5% of SDG&E's estimated annual RPS deliveries from operating plants.
- 6.7.2. Yes, there are 11.3 MW of RPS resources, 6 MW utility owned and 5.3 MW under contract, not yet built that would be located within SDG&E's service territory.
- 6.7.3 SDG&E is currently projecting that 2.9% of the energy needed to hit the 2020 target will come from the combination of the resources from 6.7.1 and 6.7.2
- 6.7.4 SDG&E is currently projecting that 1.9% of the energy needed to hit the 2030 target will come from the combination of the resources from 6.7.1 and 6.7.2

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QUESTION 6.8:

With respect to Applicants' response to ORA's data request 13, question 3, which states:
"SDG&E and SoCalGas provided presentations during the following meetings. Please note that the information contained in these presentations may change over time as the proposed project is more fully developed:

- August 20, 2015 – Meeting with CPUC Energy Division, CEQA, SED and Gas Planning
- September 2, 2015 – Meeting with CPUC CEQA and E&E
- April 6, 2016 – Meeting with CPUC CEQA, SED, Gas Planning and E&E

Due to size, the presentations will be sent via Electronic Data Transfer. Please note that some of the information provided is confidential information provided pursuant to G.O. 66-C and Cal. Pub. Util. Code § 583.

6.8.1. Please provide a copy of each of the presentations described in the response to ORA-13, Q.3.

RESPONSE 6.8:

Please see the attached files. Some of the presentations contain **confidential information provided pursuant to the Non-Disclosure Agreement (NDA) between SDG&E/SoCalGas and SCGC.**

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QUESTION 6.9:

With respect to Applicants' response to Sierra Club's data request 5, question 1, which states: "At 320 psig, Line 1600 does not contribute to the SDG&E system throughput, and serves only as a distribution supply line."

- 6.9.1. If SDG&E were to derate Line 1600 to 320 psig, would Line 1600 continue to be connected at Rainbow Station?
- 6.9.2. If the answer to the previous question is "no," please describe in detail the location and pipeline number that Line 1600 would connect to.
- 6.9.3. If SDG&E were to derate Line 1600 to 320 psig, would Line 1600 continue to serve the EG customers that are currently connected to Line 1600?
- 6.9.4. If the answer to the previous question is "no," please identify specifically which pipelines would serve those EG customers that are currently served by Line 1600.
- 6.9.5. If SDG&E were to derate Line 1600 to 320 psig, would Line 1600 continue to connect with the distribution lines that it is currently connected to?
- 6.9.6. If the answer to the previous question is "no," please identify specifically which pipelines would serve those distribution lines that are currently served by Line 1600.

RESPONSE 6.9:

- 6.9.1 Yes.
- 6.9.2 N/A
- 6.9.3 Please refer to Response 14.3 to SCGC's 4th data request in this proceeding.
- 6.9.4 Please refer to Response 6.9.3 above.
- 6.9.5 Please refer to Response 6.9.4 above.
- 6.9.6 Please refer to Response 6.9.5 above and to Response 14.4 to SCGC's 4th data request in this proceeding.

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QUESTION 6.10:

With respect to Applicants' response to Sierra Club's data request 5, question 5, which states: "A graph showing the recorded throughput on the North Baja Pipeline system (which is comprised of three pipelines, North Baja Pipeline to Gasoducto Rosarito [GR] to Transportadora de Gas Natural de Baja California [TGN]) into Mexico is shown below. 1 Gas must go through the North Baja Pipeline system to get to Otay Mesa. As shown in the graph, capacity in excess of 50 MDth is not available periodically during the peak summer months.

- 6.10.1. Please provide the data in Excel format that was used to develop the graph.
- 6.10.2. How did the Applicants obtain the daily data that is shown in the graph?

RESPONSE 6.10:

- 6.10.1. Please refer to the attached spreadsheet.
- 6.10.2. SoCalGas uses a Pipeline data service (Bentek Energy - S&P Global – Platts Analytics). Further, pipeline data is publicly available via TransCanada's website: (see below URL)

North Baja Pipeline - Operationally Available Capacity

http://www.tcplus.com/North%20Baja/OperationalCapacity?GasDay=08%2F17%2F16&CycleType=4&ExportEnum=6#filter.GasDay=08/17/16&filter.CycleType=3&page=1&sort=LocationName&sort_direction=ascending

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QUESTION 6.11:

Please provide a non-redacted version of the Applicants' response to Sierra Club's data request 5.

RESPONSE 6.11:

Please see attached file, which contains **confidential information provided pursuant to the Non-Disclosure Agreement (NDA) between SDG&E/SoCalGas and SCGC.**

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QUESTION 6.12:

With respect to Applicants' response to UCAN's data request 1, question 14, please provide a copy of the requested map, which was to be provided as an attachment.

RESPONSE 6.12:

Applicants note that they did not provide the requested map in response to UCAN DR 1 Q14 because the information requested is confidential and UCAN has not executed a non-disclosure agreement (NDA) with SDG&E and SoCalGas.

While Applicants have not provided the requested map to UCAN, a map containing the requested information was provided to SCGC. Please see the attachment to Question 5.7.7 of the 5th Data Request from SCGC in this proceeding.

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QUESTION 6.13:

With respect to Applicants' response to TURN's data request 3, question 2, please provide the attached spreadsheet and map.

RESPONSE 6.13:

Please see attached files, which contain **confidential information provided pursuant to the Non-Disclosure Agreement between SDG&E/SoCalGas and SCGC.**

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QUESTION 6.14:

Please provide all attachments for the Applicants' response to TURN's data request 4.

RESPONSE 6.14:

Applicants have already provided the attachments to TURN DR 4 in response to SCGC DR 1 submitted June 30, 2016.

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QUESTION 6.15:

Please provide all attachments for the Applicants' response to TURN's data request 5.

RESPONSE 6.15:

Please see attached files. The attachments to TURN DR 5, Q5 contain **confidential information provided pursuant to the Non-Disclosure Agreement (NDA) between SDG&E/SoCalGas and SCGC.**

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QUESTION 6.16:

With respect to the Applicants' response to ORA's data request 16, please provide all attachments.

RESPONSE 6.16:

Please see attached file. The attachment to ORA DR 16 Q3 contains **confidential information provided pursuant to the Non-Disclosure Agreement (NDA) between SDG&E/SoCalGas and SCGC.**

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QUESTION 6.17

Please provide the unredacted version of the Applicants' response to ORA's data request 24 with all attachments

RESPONSE 6.17:

ORA DR 24 was not redacted and is posted on our public website. The attachment to ORA DR 24 Q3 contains **confidential information and is provided pursuant to the Non-Disclosure Agreement (NDA) between SDG&E/SoCalGas and SCGC.**

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QUESTION 6.18:

Please provide the unredacted version of the Applicants' response to ORA's data request 25 with all attachments.

RESPONSE 6.18:

Please see attached files. The response and attachment contain **confidential information provided pursuant to the Non-Disclosure Agreement (NDA) between SDG&E/SoCalGas and SCGC.**

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QUESTION 6.19:

Please provide the unredacted version of the Applicants' response to ORA's data request 26 with all attachments.

RESPONSE 6.19:

Please see the attached file. The response contains confidential information provided pursuant to the Non-Disclosure Agreement (NDA) between SDG&E/SoCalGas and SCGC.

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QUESTION 6.20:

Has the CPUC reviewed the Application and PEA for completion and deemed the Application to be complete?

RESPONSE 6.20:

Yes.

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QUESTION 6.21:

Are any deficiency letters from the CPUC outstanding so that the CPUC is awaiting a response the deficiency letters from the Applicants?

RESPONSE 6.21:

The Applicants have responded to all the deficiency letters received from Energy Division's CEQA Unit.

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QUESTION 6.22:

Have the CPUC and MCAS Miramar entered into a Memorandum of Understanding (“MOU”) for preparing a CEQA Environmental Impact Report/ National Environmental Policy Act (NEPA) document to evaluate the Proposed Project?

6.22.1. If your answer is “yes,” please provide the MOU.

6.22.2. If your answer is “no,” please identify the date by which the MOU will be available.

RESPONSE 6.22:

Applicants object to this question on the grounds that it calls for speculation. Subject to and without waiving their objection, Applicants respond as follows: As of the date of this response and to Applicants’ knowledge, no. Applicants are not a party to the MOU and do not know when the MOU will be available.

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QUESTION 6.23:

When do the Applicants expect an Notice of Preparation (“NOP”) to be issued indicating the CPUC’s intent to prepare an Environmental Impact Report (“EIR”) in accordance with the California Environmental Quality Act (“CEQA”)?

RESPONSE 6.23:

Applicants object to this question on the grounds that it calls for speculation. Applicants cannot speak for the Commission and do not know when the Commission will issue the NOP. Subject to and without waiving their objection, Applicants note that Administrative Law Judge Colette Kersten emailed a preliminary schedule for discussion at the prehearing conference to the service list for A.15-09-013 on September 20, 2016. Applicants understand that the draft schedule is subject to change pending the Commission’s issuance of a scoping memo.