

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

(19th DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION)

Date Requested: March 29, 2017

Date Responded: April 14, 2017

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 19.1:

In the Updated Direct Testimony of David Bisi at page 8, he describes a potential loss of compression at Moreno: “The chance of losing all compression at Moreno is relatively small, although such a situation did nearly occur at least once due to a malfunction in the Emergency Shut Down system at the station. Frequently, however, individual engines at the station unexpectedly fail or delivered pressures from SoCalGas to Moreno Compressor Station drop below that required for the compressors to operate.”

- 19.1.1. Please describe each category of problem that will occur in an outage or partial outage at Moreno Compressor Station as Mr. Bisi has envisioned.
- 19.1.2. For each category of problem identified in 17.1.1, please state the number of times Moreno Compressor Station has experienced each type of outage due to this type of occurrence.
- 19.1.3. For each category of problem discussed in the previous question, please identify the extent of the impairment to the functionality of the Moreno Compressor Station that occurred in terms of the reduction in gas flow into SDG&E’s system at Rainbow.
- 19.1.4. For each category of problem identified in 17.1.1, please state the number of times that Moreno Compressor Station has experienced a problem that could have but did not actually result in an outage due to a problem of this type and please explain why the problem did not actually result in an outage or partial outage.
- 19.1.5. For each category of problem that could have but did not actually occur as discussed in the previous question, please identify the expected extent of the impairment to the functionality of the Moreno Compressor Station in terms of the reduction in gas flow into SDG&E’s system at Rainbow.
- 19.1.6. For each category of problem identified in 17.1.1, please state Mr. Bisi’s estimate of the probability that an outage of this type could occur.

RESPONSE 19.1:

- 19.1.1. The following is a represented sample of common issues that may cause individual engines at the station to unexpectedly fail. This is not an all-inclusive list.
 - Electrical Power Outage
 - Loss of Station Air
 - Instrumentation Faults on Units or Auxiliary Equipment
 - Instrumentation Alarms on Units or Auxiliary Equipment
 - Emergency Shut Down

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19.1.2 – 19.1.6 Applicants object that these Questions are unduly burdensome. Without waiving and subject to their objection, Applicants respond that they do not have this data readily available.

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QUESTION 19.2:

At page 6 of his updated testimony, Mr. Bisi talks about an outage on Line 3010, either planned or unplanned.

- 19.2.1. Please describe each type of outage that Mr. Bisi has envisioned in making this statement.
- 19.2.2. Please describe the extent of the impairment to the functionality of Line 3010 associated with each type of outage described in response to Q.17.2.1.
- 19.2.3. For each category of problem identified in 17.2.1, please state the number of times Line 3010 has experienced each type of outage due to this type of occurrence.
- 19.2.4. For each category of problem discussed in the previous question, please identify the extent of the impairment to the functionality of Line 3010 that occurred in terms of the reduction in gas flow on SDG&E's transmission system.
- 19.2.5. For each category of problem discussed in the previous question, please identify the location of such an occurrence.
- 19.2.6. For each category of problem identified in 17.2.1, please state Mr. Bisi's estimate of the probability that an outage of this type could occur.

RESPONSE 19.2:

- 19.2.1. Applicants are not aware of what is meant by "each type of outage". The following is a represented sample of common issues that may be associated with planned or unplanned outages. This is not an all-inclusive list.
 - Pipeline integrity anomalies and/or anomalies resulting from ILIs
 - Required maintenance
 - Third party dig-ins
 - Inadvertent valve closure
- 19.2.2. –19.2.6. Applicants object that these Questions are unduly burdensome. Without waiving and subject to their objection, Applicants respond that they do not have this data readily available.

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QUESTION 19.3:

Please describe in detail any instances where the System Operator attempted to obtain gas supplies for delivery to Otay Mesa but was unsuccessful.

- 19.3.1. Please provide the date and amount of gas the System Operator was attempting to procure.
- 19.3.2. Was the gas available in sufficient quantity at a location that could have been routed to Otay Mesa?
- 19.3.3. If the answer to the previous question is “no,” please identify the nearest location that gas supplies were available and explain why the gas could not have been relocated to Ehrenberg.
- 19.3.4. Was sufficient transportation capacity available on (1) North Baja, (2) Gasoducto Rosarito, and (3) TGN?
- 19.3.5. If the answer to the previous question is “no,” in whole or in part, please identify the pipeline(s) over which no capacity either firm or interruptible was available to transport the gas.
- 19.3.6. Please describe the consequence of the System Operator’s failure to obtain supplies of gas at Otay Mesa.

RESPONSE 19.3:

- 19.3.1. On February 2 and 3, 2011 the System Operator requested the Operational Hub to deliver 1000 MMcfd to the SoCalGas Southern System for the February 3 Gas Day. The Operational Hub attempted to purchase higher priced supply at Otay Mesa due to a shortage of available supply on the El Paso Natural Gas (EPNG) South Mainline system.
- 19.3.2. No.
- 19.3.3. Gas supplies were available at other non-Southern Zone system receipt points that could not be delivered to the SoCalGas Southern System due to well documented system limitations.

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19.3.4. Unknown.

19.3.5. See the response to Question 19.3.4.

19.3.6. The inability of the Operational Hub and Gas Acquisition to deliver enough gas to meet demand resulted in a curtailment of noncore customers on SDG&E and the SoCalGas' Southern System on February 3, 2011.

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QUESTION 19.4:

Has the System Operator ever acquired supplies of gasified LNG from Energia Costa Azul?

RESPONSE 19.4:

Yes, in February 2011.

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QUESTION 19.5:

If the answer to the previous question is “yes,” please provide:

19.5.1. The date of the purchased

19.5.2. The amount of gas purchased

19.5.3. The unit price of the gas purchased

19.5.4. The cost if any of the delivery of the gas purchased

RESPONSE 19.5:

See below for a table detailing the requested information on direct purchases at Otay Mesa in early February 2011 by the Operational Hub. A portion of the gas brought in was LNG.

Flow Date	Otay Mesa Delivered Price (Dollars per Dth)	Purchase Quantity (MDth)	Delivery Cost (Dollars per Dth)
2/2/2011	8.50	80,000	0
2/2/2011	15.00	100,000	0
2/3/2011	12.75	100,000	0
2/4/2011	10.00	15,000	0