SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(23rd DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)

Date Requested: September 5, 2017
Date Responded: September 19, 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.

SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(23rd DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)

Date Requested: September 5, 2017
Date Responded: September 19, 2017

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.

SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(23rd DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)

Date Requested: September 5, 2017
Date Responded: September 19, 2017

QUESTION 23.1:

Regarding the 4.7 miles of Line 1600 that extends from the Kearny Villa Pressure Limiting Station to the Mission Station:

23.1.1 Please identify the facilities, if any, which the Applicants would need to construct in order to de-rate the 4.7 miles to 320 psig.

23.1.2 Please confirm that if the Maximum Allowable Operating Pressure ("MAOP") on the 4.7 miles of Line 1600 were reduced to 320 psig, no segments of the 4.7 miles would be operated above 20 percent of Specified Minimum Yield Strength ("SMYS").

23.1.3 If there are segments that would be operated above 20 percent of SMYS if the MAOP for the 4.7 miles of Line 1600 were reduced to 320 psig, please identify the segments.

RESPONSE 23.1:

23.1.1 SDG&E and SoCalGas (Applicants) object that this question calls for information not in Applicants' possession, custody or control. The southern 4.7 miles of Line 1600 are outside the scope of this application and this information is not available as Applicants have not performed a detailed planning and engineering study to determine the modifications necessary to de-rate the southern 4.7 miles of Line 1600 to 320 psig.

23.1.2 If it was determined that the southern 4.7 miles of Line 1600 are to be de-rated to a MAOP of 320 psig, it would be the Applicants intent to take the necessary steps to ensure that the entire subject 4.7 mile segment of pipeline would operate at below 20% of SMYS at 320 psig.

23.1.3 N/A. See the response to Question 23.1.2 above.

SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(23rd DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)

Date Requested: September 5, 2017
Date Responded: September 19, 2017

QUESTION 23.2:

Mr. Bisi states in his Updated Prepared Direct Testimony, Exhibit SDGE-3-R (at 2, footnote 2) that in addition to SDG&E Lines 3010 and 1600 the "natural gas pipe network includes a SoCalGas pipeline that distributes gas along the Pacific Coast, with product flowing from Orange County into San Diego County." Mr. Bisi states further: "Less than 1 percent of SDG&E system capacity enters the county through this pipeline." With Mr. Bisi's statement in mind, regarding Line 1600, please identify the percent of SDG&E system capacity that enters or would enter San Diego County through Line 1600 at the following pressures, assuming that Line 3010 and the Moreno Compressor Station are fully operational:

23.2.1. 640 psig
23.2.2. 512 psig.
23.2.3. 325 psig.
23.2.4. 321 psig.
23.2.5. 320 psig.
23.2.6. 319 psig.
23.2.7. 300 psig.

RESPONSE 23.2:

23.2.1. Please refer to Ex. SDGE-3-R, Updated Direct Testimony of David Bisi, page 2, lines 10-12, and page 5, footnote 4.

23.2.2. Please refer to Ex. SDGE-12, Supplemental Testimony of SDG&E and SoCalGas, page 41 footnote 70, and page 80 footnote 135.

23.2.3. Line 1600 would not contribute to system capacity if the pressure is limited to 325 psig or less.

23.2.4. Please refer to the response to Question 23.2.3. above.

23.2.5. Please refer to the response to SCGC Data Request 4, Question 3.

23.2.6. Please refer to the response to Question 23.2.3. above.

23.2.7. Please refer to the response to Question 23.2.3 above.

SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(23rd DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)

Date Requested: September 5, 2017
Date Responded: September 19, 2017

QUESTION 23.3:

Please identify the amount of line pack that is currently provided by Line 1600 at the following pressures, assuming that Line 3010 and the Moreno Compressor Station are fully operational:[1]

23.3.1 640 psig.

23.3.2 512 psig.

23.3.3 325 psig.

23.3.4 321 psig.

23.3.5 320 psig.

23.3.6 319 psig.

23.3.7 300 psig.

RESPONSE 23.3:

Applicants object to this question as vague and ambiguous. Line 1600 does not operate at all of the pressures listed in the question and "the amount of line pack that is currently provided" is undefined. Subject to and without waiving their objections, Applicants respond as follows:

Applicants have not performed the requested calculations.

[1] *See* Transcript 671, 730-732.

SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(23rd DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)

Date Requested: September 5, 2017
Date Responded: September 19, 2017

QUESTION 23.4:

Please identify the incremental construction, if any, that would be required on transmission lines north of the Otay Mesa receipt point to increase the receipt point's capacity from 400 MMcf/d to:[2]

23.4.1 570 MMcf/d.

23.4.2 630 MMcf/d.

RESPONSE 23.4:

Please refer to Ex. SDGE-12, Supplemental Testimony of SDG&E and SoCalGas at page 47, which provides a preliminary cost estimate to increase the Otay Mesa receipt capacity to 570 MMcfd by installing new pipeline parallel to SDG&E transmission Line 2010. Applicants have not examined a receipt point expansion of Otay Mesa beyond 570 MMcfd for this application.

[2] *See* Transcript 833.

SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(23rd DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)

Date Requested: September 5, 2017
Date Responded: September 19, 2017

QUESTION 23.5:

What would be the maximum capacity of the existing transmission lines to transport gas from Otay Mesa, assuming expansion of the capacity of the Otay Mesa receipt point to fully utilize the capacity of the existing transmission lines from Otay Mesa to Kearny Villa Station?

RESPONSE 23.5:

Applicants object to this question as vague and ambiguous. It asks about the capacity of "existing transmission lines" but then says to assume "expansion of the capacity of the Otay Mesa receipt point" without describing such "expansion." The maximum capacity of the existing transmission pipelines between the Otay Mesa receipt point and Kearny Villa Station is dependent upon the availability of new or existing facilities downstream on the SDG&E system. Subject to and without waiving their objections, Applicants respond as follows:

The maximum firm capacity of the Otay Mesa receipt point is 400 MMcfd.

SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(23rd DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)

Date Requested: September 5, 2017
Date Responded: September 19, 2017

QUESTION 23.6:
What would be the maximum capacity of the existing transmission lines to transport gas from Otay Mesa, assuming expansion of the capacity Otay Mesa receipt point to fully utilize the capacity of the existing transmission lines from Otay Mesa to Santee and assuming expansion or looping of Line 2010 to take the fullest advantage of expanding the Otay Mesa receipt point capacity?

RESPONSE 23.6:

Applicants object to this question as vague and ambiguous. It asks about the capacity of "existing transmission lines" but then says to assume "expansion of the capacity of the Otay Mesa receipt point" and includes "expansion or looping of Line 2010." The maximum capacity of the existing transmission pipelines between the Otay Mesa receipt point and Santee is dependent upon the availability of new or existing facilities downstream on the SDG&E system. Subject to and without waiving their objections, Applicants respond as follows:

Please refer to the response to Question 23.5 above.

SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(23rd DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)

Date Requested: September 5, 2017
Date Responded: September 19, 2017

QUESTION 23.7:
Please explain the projection that Line 3602 would provide full redundancy for Line 3010 or the Moreno Compressor Station, but not both, for at least 100 years.[3]

RESPONSE 23.7:

Proposed Line 3602 is expected to safely function to transmit natural gas indefinitely, which, for purposes of the Cost-Effectiveness Analysis (CEA), Applicants have estimated at 100 years. Applicants assumed that a well-maintained and periodically assessed pipeline can safely transport natural gas for longer than the typical depreciation periods of natural gas pipeline infrastructure (e.g., 30 to 50 years). Applicants selected a 100-year term for the proposed Line 3602 for calculation purposes based on Applicants' engineering expertise. (See CEA at page 27, footnote 64: The Role of Pipeline Age in Pipeline Safety, Kiefner and Rosenfield. The report states, ". . . a well-maintained and periodically assessed pipeline can safely transport natural gas indefinitely")

See also the response to SCGC Data Request 14, Question 14.

[3] *See* Transcript 742.

SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(23rd DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)

Date Requested: September 5, 2017
Date Responded: September 19, 2017

QUESTION 23.8:

In the Supplemental Testimony of David Bisi, Exhibit SDGE-12, Mr. Bisi discusses (at 24, line 12) the "lifetime of the proposed project."

23.8.1. Please confirm that the Applicants propose that the "lifetime of the proposed project" will be 100 years.

23.8.2. If the Applicants do not propose that the "lifetime of the proposed project" will be 100 years, please provide the "lifetime of the proposed project" that is proposed by the Applicants.

23.8.3. Please provide the depreciation periods that were assumed for purpose of preparing Table 5A, "L3602 Revenue Requirement Summary," and Table 5B, "L1600 De-Rate Revenue Requirement Summary," presented in the Prepared Direct Testimony of Michael R. Woodruff (at 6).

RESPONSE 23.8:

23.8.1. Please refer to the response to Question 23.7 above.

23.8.2. Please refer to the response to Question 23.7 above.

23.8.3. The depreciation period for Line 3602 is 45 years. The depreciation period for Line 1600 is 69 years.

SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(23rd DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)

Date Requested: September 5, 2017
Date Responded: September 19, 2017

QUESTION 23.9:

In the Updated Prepared Direct Testimony of David Bisi, Exhibit SDGE-3-R, Mr. Bisi states (at 7, footnote 11): "The capacity of a single 30-inch pipeline is 570 MMcfd. Line 3010 by itself can provide slightly more than its 530 MMcfd nominal capacity as part of the SDG&E system."

23.9.1. What is the nominal capacity of Line 3010 as part of the SDG&E system that is "slightly more" than 530 MMcf/d?

23.9.2. If Line 1600 were unavailable to transport gas south of Rainbow Station, would the capacity of Line 3010 be 570 MMcf/d?

23.9.3. If the capacity of Line 3010 would not be 570 MMcf/d if Line 1600 were unavailable, please provide the capacity and explain why that capacity would be different from 570 MMcf/d.

RESPONSE 23.9:

23.9.1. The nominal capacity of Line 3010 as part of the existing SDG&E gas transmission system is 530 MMcfd.

23.9.2. Please refer to SDGE-3-R, Updated Prepared Direct Testimony of David Bisi at page 7.

23.9.3. Please refer to the response Question 23.9.2 above.

SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(23rd DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)

Date Requested: September 5, 2017
Date Responded: September 19, 2017

QUESTION 23.10:

In the Updated Prepared Direct Testimony of David Bisi, Exhibit SDGE-3-R, Mr. Bisi states (at 8): "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."

23.10.1. Please explain the malfunction in the Emergency Shut Down system which caused the loss of compression.

23.10.2. Please explain whether the Moreno Emergency Shut Down system been repaired to prevent a future malfunction?

RESPONSE 23.10:

The cause of the incident was a complete loss of power to the Moreno Compressor Station. Backup auxiliary power at the Moreno Compressor Station has since been improved, minimizing but not eliminating the risk of similar incidents in the future.

SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(23rd DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)

Date Requested: September 5, 2017
Date Responded: September 19, 2017

QUESTION 23.11:

In the Updated Prepared Direct Testimony of David Bisi, Exhibit SDGE-3-R, Mr. Bisi states (at 10, footnote 18): "The amount of usable linepack on the SDG&E system will also increase by approximately 22 million cubic feet (MMCF). 'Usable linepack' is the net amount of gas storage in a pipeline operating between its Maximum Allowable Operating Pressure (MAOP) and its Minimum Operating Pressure (MinOP)."

23.11.1. Please provide the current amount of usable linepack on the SDG&E system that Mr. Bisi says would be increased by approximately 22 MMcf.

23.11.2. Does Mr. Bisi intend the "22 MMcf" to be a daily figure, i.e., 22 MMcf/d?

23.11.3. Is the amount of the usable linepack increase of "22 MMcf" calculated on the assumption that Line 1600 is derated to an MAOP below 20 percent of SMYS, i.e., is repurposed to distribution service?

RESPONSE 23.11:

23.11.1. Please refer to SDGE-12, Supplemental Testimony of SDG&E and SoCalGas, page 17 lines 8-9.

23.11.2. No. Linepack is a volume that may or may not be fully available on a daily basis.

23.11.3. Yes.

SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(23rd DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)

Date Requested: September 5, 2017
Date Responded: September 19, 2017

QUESTION 23.12:
Please provide the Minimum Operating Pressure ("MinOP") of Line 1600. If the MinOP of Line 1600 varies by segment, please identify the MinOP for each segment.

RESPONSE 23.12:

This response contains confidential information (shaded in gray) and is provided pursuant to the Nondisclosure and Protection Agreement between SCGC and Applicants.

The current MinOP of Line 1600 from Rainbow Meter Station to Escondido is [redacted] psig, from Escondido to Poway is [redacted] psig, from Poway to Miramar is [redacted] psig, and from Miramar to the Mission City Gate is [redacted] psig.

SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(23rd DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)

Date Requested: September 5, 2017
Date Responded: September 19, 2017

QUESTION 23.13:
Please provide the MinOP for Line 3010. If the MinOP varies by segment, please identify the MinOP for each segment.

RESPONSE 23.13:

This response contains confidential information (shaded in gray) and is provided pursuant to the Nondisclosure and Protection Agreement between SCGC and Applicants.

The current MinOP of Line 3010 from Rainbow Meter Station to Carlsbad is [redacted] psig, from Carlsbad to Encinitas is [redacted] psig, from Encinitas to Linda Vista is [redacted] psig, and from Linda Vista to the Tecolote City Gate is [redacted] psig.

SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(23rd DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)

Date Requested: September 5, 2017
Date Responded: September 19, 2017

QUESTION 23.14:
Please provide the MinOP for the proposed Line 3602. If the MinOP would vary by segment, please identify the MinOP for each segment.

RESPONSE 23.14:

Please refer to the response to SCGC DR-8, Question 8 o and the response to SCGC DR-9, Question 7. Applicants have not evaluated the MinOP for specific segments of Line 3602.

SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(23rd DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)

Date Requested: September 5, 2017
Date Responded: September 19, 2017

QUESTION 23.15:

In the Prepared Direct Testimony of David Bisi, Exhibit SDGE-3-R, Mr. Bisi states (at 1): that the "connected capacity" in San Diego is "over 1 billion cubic feet per day." What percentage of the connected load is electric generation ("EG") load?

RESPONSE 23.15:

Applicants object to this question as release of the requested percentage will violate the Company customer confidentiality policy, as a single customer constitutes more than 15% of the total.

SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(23rd DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)

Date Requested: September 5, 2017
Date Responded: September 19, 2017

QUESTION 23.16:

In the Updated Prepared Direct Testimony of David Bisi, Exhibit SDGE-3-R, Mr. Bisi states (at 15, footnote 28): "The Rainbow Corridor consists of several pipelines that run south from Moreno Compressor Station to Rainbow Station."

23.16.1. Please confirm that the pipelines in the Rainbow Corridor are Lines 1027, 1028, and 6900.

23.16.2. Please provide the total current capacity of the Rainbow Corridor pipelines from Moreno Station to Rainbow Station.

23.16.3. Please provide the capacity of the Rainbow Corridor pipelines from Moreno Station to Rainbow Station upon completion of Line 3602 and derating of Line 1600 as proposed by the Applicants.

RESPONSE 23.16:

23.16.1. Confirmed.

23.16.2. Please refer to Applicants' response to ORA DR-66, Question 18.

23.16.3. Please refer to the response to Question 23.16.2. above.

SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(23rd DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)

Date Requested: September 5, 2017
Date Responded: September 19, 2017

QUESTION 23.17:

In the Updated Prepared Direct Testimony of David Bisi, Exhibit SDGE-3-R, Mr. Bisi states (at 15, footnote 29): "As explained by the NERC, the structure within electric capacity planning is fundamentally different." Mr. Bisi cites a NERC Report. Please provide the NERC Report referenced by Mr. Bisi.

RESPONSE 23.17:

Please see the attached report.

SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(23rd DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)

Date Requested: September 5, 2017
Date Responded: September 19, 2017

QUESTION 23.18:

In the Supplemental Testimony of David Bisi, Exhibit SDGE-12, Mr. Bisi states (at 23) that "the Otay Mesa receipt point was established in 2008." In the Supplemental Testimony of David Bisi, Exhibit SDGE-12, Mr. Bisi states (at 55, footnote 95) that the establishment of the Otay Mesa receipt point "changed the functional nature of the SDG&E transmission system from 'local' to 'backbone'."

23.18.1. Please provide the date that the Applicants regard as being the date when "the Otay Mesa receipt point was established."

23.18.2. Please provide the date on which the Otay Mesa receipt point became available for nominations for deliveries of gas into the Applicants' transmission system.

23.18.3. Please provide the date on which the Applicants re-functionalized the SDG&E transmission system from "local transmission" to "backbone transmission."

23.18.4. Please provide the date on which the Applicants began operating the SoCalGas and SDG&E transmission systems as an integrated transmission system.

23.18.5. If there are differences among the answers to the previous sub-questions, please explain the differences.

23.18.6. Please identify the Commission decision or resolution which provided the authority for the re-functionalization of the SDG&E transmission system from "local transmission" to "backbone transmission."

23.18.7. Please identify the Commission decision or resolution which provided the authority for the Applicants to operate the SoCalGas and SDG&E transmission systems as an integrated transmission system.

RESPONSE 23.18:

23.18.1 The Otay Mesa receipt point became operational on May 9, 2008.

23.18.2 Please see the response to Question 23.18.1 above.

23.18.3 Please see the response to Question 23.18.1 above.

23.18.4 June 26, 1998.

SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(23rd DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)

Date Requested: September 5, 2017
Date Responded: September 19, 2017

23.18.5 Question 23.18.4 refers to the date that SDG&E and SoCalGas became subsidiaries of Sempra.

23.18.6 D.06-04-033 and D.06-12-031.

23.18.7 D.98-03-073.

SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(23rd DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)

Date Requested: September 5, 2017
Date Responded: September 19, 2017

QUESTION 23.19:

In the Supplemental Testimony of David Bisi, Exhibit SDGE-12, Mr. Bisi states (at 55, footnote 95) regarding D.06-09-039:

> The Rulemaking [04-01-025] and Decision [06-09-039] predate the establishment of the Otay Mesa Receipt Point, which changed the functional nature of the SDG&E transmission system from "local" to "backbone". The Utilities believe that the concerns regarding reliance upon noncore transportation contracts and emergency conditions expressed in D.06-09-039 are still relevant to the SDG&E transmission system regardless of its functional nature.

D.06-09-039, in turn, states (at 49), "The Commission requires SDG&E and SoCalGas to apply the following planning criteria to their local transmission systems: the systems must be designed to provide service to core customers during a 1-in-35 year cold day event (one curtailment event in 35 years) and service to firm non-core customers during a 1-in-10 year cold day event (one curtailment event in 10 years)." Please confirm that SDG&E continues to apply the core 1-in-35 year cold day event and the noncore 1-in-10 year cold day event standards to its transmission system event though the system has been re-functionalized from "local transmission" to "backbone transmission."

RESPONSE 23.19:

The entire transmission system must be able to meet the Commission-mandated design criteria since the backbone transmission system supplies the local transmission system.

SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(23rd DATA REQUEST FROM SOUTHERN CALIFORNIA GAS COALITION)

Date Requested: September 5, 2017
Date Responded: September 19, 2017

QUESTION 23.20:

In the Supplemental Testimony of David Bisi, Exhibit SDGE-12, Mr. Bisi discusses (at 25) the Ehrenberg, Arizona, receipt point, which Mr. Bisi says "has a capability to receive 1,210 MMcf/d." However, in Application 16-12-011, SoCalGas includes (at 3, footnote 1) an excerpt from a SoCalGas ENVOY Critical Notice as follows:

> Decrease in Maximum Operating Pressure on Line 2000 Effective Friday, August 5, 2011 and until further notice, SoCalGas will voluntarily decrease the maximum operating pressure on its Line 2000 pipeline located on the SoCalGas Southern Transmission Zone by approximately 20%. This change is being made to further improve and maintain the safety of SoCalGas' pipeline network. The affected pipeline runs from Blythe in Riverside County to Brea Station in Orange County. Customers served from Line 2000 may experience lower delivery pressure than that currently provided. Due to the lower operating pressure, the total Receipt Point capacity available for nominations and scheduling at the El Paso – Ehrenberg and North Baja – Blythe receipt points will be limited to 1010 MMcfd. The total Southern Transmission Zone capacity available for nominations and scheduling will remain at 1210 MMcfd. The sale of Backbone Transportation Service (BTS) capacity from the EPN Ehrenberg and NBP Blythe Sub-Zone will be limited to 1010 MMcfd for BTSC contracts effective from October 1, 2011. Total Southern Transmission Zone capacity available for sale will remain at 1210 MMcfd.

23.20.1. Is the 200 MMcfd decrease in the Maximum Operating Pressure on Line 2000 that became effective Friday, August 5, 2011, still in effect?

23.20.2. If the decrease in the Maximum Operating Pressure on Line 2000 is still in effect, please provide the projected date by which the decrease in the Maximum Operating Pressure on Line 2000 will end.

23.20.3. If the "sale of Backbone Transportation Service (BTS) capacity from the EPN Ehrenberg and NBP Blythe Sub-Zone is limited to 1010 MMcfd for BTSC contracts effective from October 1, 2011," but the "Total Southern Transmission Zone capacity available for sale remains at 1210 MMcfd," is the 200 MMcfd of Southern Transmission Zone capacity that is sold above 1010 MMcfd consist of capacity from Otay Mesa?

23.20.4. If the answer to the previous question is "no," please identify the receipt point at which the incremental 200 MMcfd would be received into the Southern Transmission Zone.

SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

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RESPONSE 23.20:

23.20.1. Pressure is not measured as a flow rate. The reduction to the maximum operating pressure of Line 2000 is still in effect, and therefore there is still a 200 MMcfd capacity decrease at the Ehrenberg receipt point.

23.20.2. Unknown at this time.

23.20.3. Yes.

23.20.4. N/A

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SOUTHERN CALIFORNIA GAS COMPANY

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QUESTION 23.21:

In the Supplemental Testimony of David Bisi, Exhibit SDGE-12, Mr. Bisi states (at 54, footnote 89) that "the Commission issued D.16-07-008, which eliminated the open season process." Please provide the tariff sheets that contained the provisions for the open seasons that were conducted prior to the implementation of D.16-07-008.

RESPONSE 23.21:

Please refer to the section titled "Firm Noncore Service in Potentially Capacity-Constrained Areas" beginning on Sheet 8 of Schedule No. GT-F (attached).

Please also refer to Attachment A of the Direct Testimony of Tuan Nguyen in A.15-06-020 for open season provisions eliminated by the implementation of D.16-07-008, available at the following link: https://www.socalgas.com/regulatory/documents/a-15-06-020/Ch%204%20Curtailment%20Testimony%20-%20Nguyen.pdf.

SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY

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QUESTION 23.22:
In the Supplemental Testimony of David Bisi, Exhibit SDGE-12, Mr. Bisi states (at 54, footnote 89), Mr. Bisi states: "The results of these open seasons, which were held every two years between 2007 and 2015, were documented via Advice Letter to the Commission." Please provide the advice letters referenced by Mr. Bisi.

RESPONSE 23.22:

These Advice Letters are publicly available at:
https://www.socalgas.com/regulatory/tariffs/advice-approved.shtml

Rainbow Corridor Advice Letters:
https://www.socalgas.com/regulatory/tariffs/tm2/pdf/3757.pdf
https://www.socalgas.com/regulatory/tariffs/tm2/pdf/4001.pdf
https://www.socalgas.com/regulatory/tariffs/tm2/pdf/4252.pdf
https://www.socalgas.com/regulatory/tariffs/tm2/pdf/4512.pdf
https://www.socalgas.com/regulatory/tariffs/tm2/pdf/4829.pdf

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SOUTHERN CALIFORNIA GAS COMPANY

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QUESTION 23.23:

In the Supplemental Testimony of David Bisi, Exhibit SDGE-12, Mr. Bisi states that Line 3602 would add 200 MMcfd to SDG&E system capacity "relative to Line 1600 operating at 640 psig."

23.23.1. Given Mr. Bisi's Updated Prepared Direct Testimony, Exhibit SDGE-3-R (at 8) that the "system capacity with Line 1600 operating at 640 psig is 630 MMcfd," would Line 3602 raise SDG&E system capacity to 830 MMcfd?

23.23.2. Given Mr. Bisi's Supplemental Testimony (at 80, footnote 135) that on "July 8, 2016, SDG&E was ordered to reduce the MAOP of Line 1600 further to 512 psig, reducing the SDG&E system capacity to 595 MMcfd, would Line 3602 raise SDG&E system capacity to 795 MMcfd?

RESPONSE 23.23:

23.23.1. Please refer to SDGE-3-R, Updated Prepared Direct Testimony of David Bisi page 10 lines 7-9.

23.23.2. No, the SDG&E system capacity would be 830 MMcfd with the proposed project.

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SOUTHERN CALIFORNIA GAS COMPANY

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

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QUESTION 23.24:

In the Supplemental Testimony of David Bisi, Exhibit SDGE-12, Mr. Bisi states (at 81) that extending the new Line 3602 beyond Kearny Villa Station to tie into the existing 36-inch diameter Line 3600 at Santee would add an additional 100 MMcfd to the SDG&E system for a total gain of 300 MMcfd,

23.24.1. Given Mr. Bisi's Updated Prepared Direct Testimony, Exhibit SDGE-3-R (at 8) that the "system capacity with Line 1600 operating at 640 psig is 630 MMcfd," would extending Line 3602 to Santee raise SDG&E system capacity to 930 MMcfd?

23.24.2. Given Mr. Bisi's Supplemental Testimony (at 80, footnote 135) that on "July 8, 2016, SDG&E was ordered to reduce the MAOP of Line 1600 further to 512 psig, reducing the SDG&E system capacity to 595 MMcfd," would extending Line 3602 to Santee raise SDG&E system capacity to 895 MMcfd?

RESPONSE 23.24:

23.24.1. Yes.

23.24.2. No, system capacity would be raised to 930 MMcfd.

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SOUTHERN CALIFORNIA GAS COMPANY

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QUESTION 23.25:
Please provide an update of Tables 8 and 9 that are presented in the Supplemental Testimony of David Bisi, Exhibit SDGE-12 to include data from months after January 2017.

RESPONSE 23.25:

The average and maximum daily volumes through Rainbow Metering Station into Line 1600 in 2017 were 29.96 MMcfd and 46.32 MMcfd, respectively. The average daily volume by month through Rainbow Metering Station into Line 1600 in 2017 in MMcfd are:

January	33.39
February	29.5
March	22.18
April	28.37
May	26.83
June	30.95
July	33.52
August	34.85

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QUESTION 23.26:

Please provide links to the Applicants' semi-annual Receipt Point Utilization Reports. Please provide copies of the Reports if links to postings of the Reports on the Applicants' websites are unavailable.

RESPONSE 23.26:

Please see the attached.

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QUESTION 23.27:

In the Rebuttal Testimony of David Bisi, Exhibit SDGE-13, Mr. Bisi states (at 79): "All three regulator stations will supply a de-rated Line 1600 at constant 300 psig." Please confirm that the Applicants propose to operate the de-rated Line 1600 at 300 psig Maximum Operating Pressure.

RESPONSE 23.27:

With the Proposed Project, Applicants intend on operating Line 1600 at an MAOP and a Maximum Operating Pressure (MOP) of 320 psig.

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QUESTION 23.28:

In the Rebuttal Testimony of David Bisi, Exhibit SDGE-13, Mr. Bisi states (at 177, footnote 403): "'Suction' and 'compressor' are not synonyms…." Please provide Mr. Bisi's definitions of "suction" and "compression."

RESPONSE 23.28:

Applicants object to this request for a definition of "suction" and "compression" as these are non-technical words, not unique to SoCalGas, SDG&E or to the gas industry, and are equally available to SCGC from other sources.