

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**
**CERTIFICATE OF PUBLIC CONVENIENCE & NECESSITY FOR THE
PIPELINE SAFETY & RELIABILITY PROJECT - CPCN**
(A.15-09-013)

(3RD DATA REQUEST FROM TURN)
Date Requested: January 19, 2016
Date Responded: March 1, 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).

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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.

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 TURN from TURN's own files, from documents or information in TURN's possession, or from documents or information that SDG&E and SoCalGas previously released to the public or produced to TURN. 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 TURN 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

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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 TURN'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 1:

Follow-up to DR 01, Question 18 and 19:

- a. Are any of the projects in the responses “PSEP” projects? If yes, please provide the relevant PSEP project ID.
- b. If any of the projects are not PSEP projects, please explain why not.

RESPONSE 1:

- a. The responses provided in TURN DR-1, Questions 18 and 19 for SDG&E did not include PSEP projects.
- b. In order to identify projects responsive to the request, SDG&E identified capital budget categories that were likely to contain costs pertaining to transmission replacement projects. Those Budget Categories include projects planned and managed by the Transmission Organization and are 412, 413, 414 and 11469. SDG&E did not interpret TURN DR-1 Questions 18 and 19 as seeking information pertaining to projects planned and managed under the PSEP, but, pursuant to clarifications and discussions with TURN on February 18, 2016, SDG&E includes PSEP project data in Response 2 below.

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QUESTION 2:

Follow-up to DR 01, Question 18: Please interpret the question to include project information for projects in BOTH the territory of SoCalGas and SDG&E. For each completed project, please provide the following data (in working spreadsheet format):

- a. Year of completion;
- b. Total nominal and unloaded project capital costs, disaggregated at minimum into the following categories: pipeline materials, construction, company labor, and all other costs;
- c. Total project footage;
- d. Project number and PSEP ID (if PSEP project);
- e. Line number;
- f. Predominant diameter of replacement pipe;
- g. Predominant diameter of replaced pipe;
- h. % SMYS;
- i. Relevant category of construction terrain (urban, rural, etc.)
- j. County location;
- k. Utility service territory of project location;
- l. Map showing location of project.

RESPONSE 2:

SDG&E and SoCalGas object to this request on the grounds that it is vague, overbroad, unduly burdensome and appears to seek information that is neither admissible in evidence nor likely to lead to the discovery of admissible evidence. Subject to and without waiving these objections, SDG&E and SoCalGas respond as follows:

SDG&E and SoCalGas met and conferred with TURN telephonically on February 18, 2016 to discuss how the data is stored and retrieved and reach agreement regarding the scope and form of information to be provided. Per those discussions and agreements, SoCalGas and SDG&E provide the following:

The attached Excel spreadsheet and map contains confidential information that is submitted pursuant to the Nondisclosure and Protection Agreement between TURN and SoCalGas/SDG&E.

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The first tab of the attached Excel spreadsheet provides a list of SoCalGas and SDG&E transmission pipeline replacement projects completed between 2005-2014 that were planned by the respective utilities in the following capital budget categories:

SoCalGas: 312, 322, 332 and 512

SDG&E: 412,413, 414 and 11469

These capital budget categories were selected as a basis for identifying replacement projects. These budget categories are used to track types of work and are where replacements projects are planned in our general rate case for our Transmission Operations organization and tracked through our financial systems.

In addition, the SoCalGas Budget Category 521 and SDG&E Budget Category 11469, which track PSEP transmission projects, are included in this response.

As discussed and agreed during the telephonic conference on February 18, 2016, the scope of this response does not include projects planned by SoCalGas and SDG&E's Distribution Organization or SoCalGas' Storage Organization.

The capital budget categories listed above also include other types of work that are outside the scope of this data request. Work such as reconditioning, repairs, hydrotests, pipe wrapping, retrofits, erosion mitigation, valve replacements, electronic control upgrades, casing work, assessment activities and other non-pipeline replacement type activities were not included.

Per the agreement of the parties on February 18, 2016, the following categories of data are provided in the attachments:

- a. Year of completion. The year that the project was closed was provided.
- b. Total nominal and unloaded project capital costs, disaggregated at minimum into the following categories: pipeline materials, construction, company labor, and all other costs; The disaggregated costs are provided where available.
- c. Total project footage. The total replacement footage was provided.

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- d. Project number and PSEP ID (if PSEP project). There is not a unique PSEP ID numbering system in the Company. As such, PSEP projects have been flagged with a 'y' under the PSEP column in the attached spreadsheets.
 - e. Line number. The line number of the project is identified based upon the project description. Where a line number is not included in the project description, the predominant line number for the project is used.
 - f. Predominant diameter of replacement pipe. Some projects include multiple diameters of pipe. The main pipeline has a diameter, and the project may include appurtenances, branches to connect with the system, or other pipe that has a different diameter that is not part of the main pipeline. The diameter selected for replacement would be designed to support in-line inspection activities, and therefore, would typically be the same as the pipe being replaced or the diameter of the main transmission pipeline immediately upstream or downstream of the replaced section. The predominant diameters of the installed pipe for each replacement project is listed.
 - g. Predominant diameter of replaced pipe. As noted above, SoCalGas and SDG&E typically install pipe consistent with the diameter of the replaced pipe in order to support pigability. Where the replaced pipe is of a non-standard diameter, SoCalGas and SDG&E may install a standard diameter of pipe (for example, a 22" pipe may be replaced with 24" pipe). For PSEP projects, the predominant diameters of the replaced pipe is provided. Per agreement of the parties reached during a conference call on February 29, 2016, SoCalGas and SDG&E also provide the predominant diameters of the replaced pipe for a sampling of 25 projects managed by the Transmission Organization, including the five largest projects (by cost).
 - h. MAOP. Per the agreement of the parties during the conference on February 18, 2016, MAOP is being provided in lieu of % SMYS.
 - i. Relevant category of construction terrain (urban, rural, etc.). Construction terrain categories as described (urban, rural, etc.) are not readily available. SoCalGas and SDG&E do not currently track this type of data on a project-by-project or pipeline basis.
 - j. County location.

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- k. Utility service territory of project location.

 - l. Map showing location of project. Per the agreement of the parties on February 18, 2016, a map providing project locations is provided in the attachment.

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QUESTION 3:

Follow-up to DR 01, Question 19: Please interpret the question to include project information for projects in BOTH the territory of SoCalGas and SDG&E. For each completed project, please provide the following data (in working spreadsheet format):

- a. Year of completion;
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- c. Total project footage;
- d. Project number and PSEP ID (if PSEP project);
- e. Line number;
- f. Predominant diameter of pipe;
- g. % SMYS;
- h. Relevant category of construction terrain (urban, rural, etc.)
- i. County location;
- j. Utility service territory of project location;
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RESPONSE 3:

See Response 2: Excel spreadsheet; Tab 2; DR - "New pipe Summary".

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QUESTION 4:

Re DR 01-Q18 and 19: Sempra asserts that the pipe diameter data is confidential. Please explain why these data are confidential, but Sempra provides pipeline diameter data in Appendix A of the monthly PSEP reports provided pursuant to D.12-04-021?

RESPONSE 4:

SDG&E and SoCalGas designated the diameter attribute data as confidential in response to TURN DR 01, Questions 18 and 19, because this data is sensitive critical energy infrastructure information that is not currently published by PHMSA and, if made publicly available, could present a risk to the security of California's critical energy infrastructure.

SoCalGas and SDG&E's assessment of the risks associated with critical energy infrastructure data must continue to evolve as the sophistication, frequency and volume of security threats increase. At the time SoCalGas and SDG&E began preparing and publishing the PSEP monthly reports, this data was not identified as presenting a potential risk to critical energy infrastructure security. At this time, however, in light of subsequent events, such as the attack on Pacific Gas & Electric Company's Metcalf Substation in 2013, SoCalGas and SDG&E believe it is prudent to designate pipeline diameter and pressure data as confidential. SoCalGas and SDG&E appreciate TURN's observation that this data has not been designated as confidential in the PSEP monthly reports and will designate this data as confidential in future reports unless ordered by the California Public Utilities Commission to make this information publicly available.

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. See also the Federal Register Notice on August 27, 2015 (Volume 80, Number 166) concerning PHMSA/OPS' proposed changes to the National Pipeline Mapping System (NPMS) data collection and the protection of pipeline information such as MAOP and pipe diameter.