

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(9TH DATA REQUEST FROM UCAN)**

Date Requested: April 20, 2017

Date Responded: May 5, 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 UCAN from UCAN's own files, from documents or information in UCAN's possession, or from documents or information that SDG&E and SoCalGas previously released to the public or produced to UCAN. 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 UCAN 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 UCAN'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:

Please provide the total cost of the repairs identified in the Post Assessment Report for the 2012-2015 In-line Inspection of SDG&E Pipeline 1600, Pipeline Integrity – Transmission Integrity & Analysis, February 16, 2017.

RESPONSE 1:

SDG&E and SoCalGas (Applicants) object to this question on the grounds that it appears to seek information that is outside the scope of this proceeding, neither itself admissible in evidence nor appears reasonably calculated to lead to the discovery of admissible evidence. Applicants further object to this question on the ground that the information sought has limited, if any, relevance, to issues in this proceeding. Applicants are not seeking the costs of the referenced repairs in this proceeding. Subject to and notwithstanding their objections, Applicants respond as follows.

The total cost of repairs identified in the Post Assessment Report for the 2012-2015 In-Line Inspection of SDG&E Pipeline 1600, dated February 16, 2017 (Line 1600 Post-Assessment Report) is \$7,499,314.

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QUESTION 2:

Please provide the cost for each individual repair noted in the Post Assessment Report for the 2012-2015 In-line Inspection of SDG&E Pipeline 1600, Pipeline Integrity – Transmission Integrity & Analysis, February 16, 2017.

RESPONSE 2:

Applicants object to this question on the grounds that it seeks information that is neither itself admissible in evidence nor appears reasonably calculated to lead to the discovery of admissible evidence. Applicants further object to this question on the ground that, if it has any limited relevance, it is unduly burdensome to calculate and provide the individual cost for each repair identified in the Line 1600 Post-Assessment Report. Applicants are not seeking the costs of the referenced repairs in this proceeding. Subject to and notwithstanding their objections, Applicants respond as follows.

Please see the response to Question 1 above for total costs of repairs identified in the Line 1600 Post-Assessment Report.

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QUESTION 3:

Has SDG&E sought cost recovery for these repairs?

A. If so, please identify the docket number for the application filed with the Commission for SDG&E's cost recovery efforts for these repairs.

B. If SDG&E has not sought cost recovery for these repairs, does it intend to do so?
- If so, how?

RESPONSE 3:

Applicants object to this question on the grounds that it seeks information that is neither itself admissible in evidence nor appears reasonably calculated to lead to the discovery of admissible evidence. Applicants further object to this question on the ground that the information sought has limited, if any, relevance to issues in this proceeding. Applicants are not seeking the costs of the referenced repairs in this proceeding. Subject to and notwithstanding their objections, Applicants respond as follows.

The costs for the Line 1600 repairs identified as Transmission Integrity Management Plan (TIMP) costs were sought for recovery in the Applicants' previous General Rate Case (GRC) proceedings and associated Tier 3 Advice Letter.

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QUESTION 4:

Were the costs for any of these repairs identified in the Post Assessment Report for the 2012-2015 In-line Inspection of SDG&E Pipeline 1600, Pipeline Integrity – Transmission Integrity & Analysis, February 16, 2017, included in SDG&E's PSEP application?"

- A. If so, please identify the line or lines in the SDG&E PSEP Application cost accounting pages that include these costs.
- B. If any additional costs related to testing, repair and maintenance of L-1600 are included in the PSEP costs, please identify where those costs are in the accounting and specify what they were for.

RESPONSE 4:

Applicants object to this question on the grounds that it seeks information that is neither itself admissible in evidence nor appears reasonably calculated to lead to the discovery of admissible evidence. Applicants further object to this question on the ground that, if it has any limited relevance, it is unduly burdensome to locate such information and respond. Applicants are not seeking the costs of the referenced repairs in this proceeding. Subject to and notwithstanding their objections, Applicants respond as follows.

The total costs for the repairs identified in the Line 1600 Post-Assessment Report are prior operation & maintenance costs, recovery of which was not sought in Applicants' Pipeline Safety Enhancement Plan (PSEP) proceeding.

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QUESTION 5:

Based on the results of the Post Assessment Report for the 2012-2015 In-line Inspection of SDG&E Pipeline 1600, Pipeline Integrity – Transmission Integrity & Analysis, February 16, 2017, does SDG&E plan to do any additional repairs on Line 1600?

- A. If so, has SDG&E estimated the number of additional repairs that will need to be made based on the results of that report?
 - If so, please provide that estimate, and describe the general types of repairs that will be made.
- B. If so, has SDG&E estimated the cost to conduct the additional repairs?
 - If so, please provide that estimate
- C. Has SDG&E estimated the amount of time it will take for that additional work to be completed?
 - if so, please provide that time estimate

RESPONSE 5:

No.