

**SAN DIEGO GAS & ELECTRIC COMPANY  
SOUTHERN CALIFORNIA GAS COMPANY**

**LINE 1600  
PHASE 2  
(A.15-09-013)**

**(1<sup>st</sup> DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION)**

**Date Requested: September 2, 2020  
Date Responded: September 11, 2020**

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**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 or additional response(s).
6. 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 2**

Please provide a copy of the confidential (unredacted) testimony of Norm G Kohls and attachments.

**Response 2**

There is no confidential version of the testimony of Norm G Kohls and attachments.

**Question 3**

Please provide a copy of the confidential (unredacted) workpapers to the testimony of Norm G. Kohls.

**Response 3:**

There is no confidential version of the workpapers to the testimony of Norm G. Kohls.

**Question 4:**

Please provide a confidential (unredacted) copy of the Line 1600 Test or Replacement Plan. (Included in attachment of filing.

**Response 4:**

The Line 1600 Test or Replacement Plan attached to the testimony of Norm G. Kohls is the public version posted on SDG&E's website at <https://www.sdge.com/regulatory-filing/15786/pipeline-safety-reliability-project>, pursuant to D.20-02-024, of which the service list was notified by email on February 19, 2020. The confidential version of the Line 1600 Test or Replacement Plan is not an attachment to the testimony of Norm G. Kohls. The Utilities understand SCGC to be requesting a copy of the confidential Plan, regardless of whether it is an attachment to the testimony of Norm G. Kohls. Attached is a copy of the unredacted

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confidential Plan, which contains confidential information and is provided pursuant to the Non-Disclosure Agreement between SDG&E/SoCalGas and SCGC.



Confidential Line  
1600 Test or Replace

**Question 5:**

Referring to the redacted version of the Line 1600 Test or Replacement Plan at page 20, the Black Mountain Replacement project (“project”) is estimated to have an in-service date sometime in the fourth quarter of 2020.

**Question 5.1**

Would the Applicants expect to record any costs for this project in the Safety Enhancement Capital Cost Balancing Account (“SECCBA”)?

**Response 5.1:**

Yes.

**Question 5.2:**

If the answer to the previous question is “yes,” please state when the Applicants would expect to record costs associated with this project assuming that it is completed by the end of the fourth quarter of 2020.

**Response 5.2:**

SDG&E would record the revenue requirement associated with capital-related costs incurred to implement the Line 1600 Test or Replacement Plan in SECCBA after the asset is placed in service. Assuming the Black Mountain Replacement Project is completed and placed in service

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at the end of the fourth quarter of 2020, SDG&E would expect to record the associated revenue requirement in the SECCBA beginning the first quarter of 2021.

**Question 5.3:**

Assuming the project is completed by the end of the fourth quarter of 2020, when would the Applicants expect to begin recovering the amounts for the project that were recorded in the SECCBA?

**Response 5.3:**

Pursuant to D.16-08-003 Ordering Paragraph 3, SDG&E and SoCalGas amortize in rates “50% of the balances recorded in Southern California Gas Company and San Diego Gas & Electric Company Safety Enhancement Capital Cost Balancing Account, the Safety Enhancement Expense Balancing Account, and the Pipeline Safety and Reliability Memorandum Account. . . through the utilities’ annual regulatory account balance update Advice Letter process.”

**Question 5.4:**

If the Applicants do not expect to record any costs for this project in the SECCBA, please describe the cost recovery mechanism that the Applicants expect to employ.

**Response 5.4:**

Not applicable.

**Question 6:**

Referring to the redacted version of the Line 1600 Test or Replacement Plan at page 22, the Kearny Mesa Replacement project (“project”) is estimated to have an in-service data sometime in the first quarter of 2021.

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**Response 6:**

As set forth in the Direct Testimony of Norm G. Kohls at NGK-17, the expected in-service date for the Kearny Mesa Replacement Project is “Q4 2020.” The following responses assume Question 6 is intended to reflect that date.

**Question 6.1:**

Would the Applicants expect to record any costs for this project in the SECCBA?

**Response 6.1:**

Yes.

**Question 6.2**

If the answer to the previous question is “yes,” please state when the Applicants would expect to record costs associated with this project assuming that it is completed by the end of the first quarter of 2021.

**Response 6.2:**

SDG&E would record the revenue requirement associated with capital-related costs incurred to implement the Line 1600 Test or Replacement Plan in SECCBA after the assets are placed in service. Assuming the Kearny Mesa Replacement Project is completed and placed in service at the end of the fourth quarter of 2020, SDG&E would expect to record the associated revenue requirement in the SECCBA beginning the first quarter of 2021.

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**Question 6.3**

Assuming the project is completed by the end of the first quarter of 2021, when would the Applicants expect to begin recovering the amounts for the project that were recorded in the SECCBA?

**Response 6.3:**

Pursuant to D.16-08-003 Ordering Paragraph 3, SDG&E and SoCalGas amortize in rates “50% of the balances recorded in Southern California Gas Company and San Diego Gas & Electric Company Safety Enhancement Capital Cost Balancing Account, the Safety Enhancement Expense Balancing Account, and the Pipeline Safety and Reliability Memorandum Account. . . through the utilities’ annual regulatory account balance update Advice Letter process.”

**Question 6.4:**

If the Applicants do not expect to record any costs for this project in the SECCBA, please describe the cost recovery mechanism that the Applicants expect to employ.

**Response 6.4:**

Not applicable.

**Question 7:**

Referring to the redacted version of the Line 1600 Test or Replacement Plan at page 22, the Serra Mesa Replacement project is estimated to have an in-service data sometime in the first quarter of 2021.

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**Response 7**

As set forth in the Direct Testimony of Norm G. Kohls at NGK-17, the expected in-service date for the Serra Mesa Replacement Project is “Q4 2020.” The following responses assume Question 7 is intended to reflect that date.

**Question 7.1:**

Would the Applicants expect to record any costs for this project in the SECCBA?

**Response 7.1:**

Yes.

**Question 7.2:**

If the answer to the previous question is “yes,” please state when the Applicants would expect to record costs associated with this project assuming that it is completed by the end of the first quarter of 2021.

**Response 7.2:**

SDG&E would record the revenue requirement associated with capital-related costs incurred to implement the Line 1600 Test or Replacement Plan in SECCBA after the assets are placed in service. Assuming the Serra Mesa Replacement Project is completed and placed in service at the end of the fourth quarter of 2020, SDG&E would expect to record the associated revenue requirement in the SECCBA beginning the first quarter of 2021.



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**Question 7.3:**

Assuming the project is completed by the end of the first quarter of 2021, when would the Applicants expect to begin recovering the amounts for the project that were recorded in the SECCBA?

**Response 7.3:**

Pursuant to D.16-08-003 Ordering Paragraph 3, SDG&E and SoCalGas amortize in rates “50% of the balances recorded in Southern California Gas Company and San Diego Gas & Electric Company Safety Enhancement Capital Cost Balancing Account, the Safety Enhancement Expense Balancing Account, and the Pipeline Safety and Reliability Memorandum Account. . . through the utilities’ annual regulatory account balance update Advice Letter process.”

**Question 7.4:**

If the Applicants do not expect to record any costs for this project in the SECCBA, please describe the cost recovery mechanism that the Applicants expect to employ.

**Response 7.4:**

Not applicable.

**Question 8:**

Referring to the redacted version of the Line 1600 Test or Replacement Plan at page 19, the Moosa Creek Hydrotest project is estimated to have an in-service data sometime in the second quarter of 2023.

**Question 8.1:**

Would the Applicants expect to record any costs for this project in the SECCBA?

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**Response 8.1:**

Yes.

**Question 8.2:**

If the answer to the previous question is “yes,” please state when the Applicants would expect to record costs associated with this project assuming that it is completed by the end of the second quarter of 2023.

**Response 8.2:**

SDG&E would expect to record the revenue requirement associated with the capital-related costs incurred to implement the Line 1600 Test or Replacement Plan in SECCBA after the asset is placed in service. Assuming the Moosa Creek Hydrotest Project is completed and placed in service at the end of the second quarter of 2023, SDG&E would expect to record the associated revenue requirement in the SECCBA beginning the third quarter of 2023.

**Question 8.3:**

Assuming the project is completed by the end of the second quarter of 2023, when would the Applicants expect to begin recovering the amounts for the project that were recorded in the SECCBA?

**Response 8.3:**

Pursuant to D.16-08-003 Ordering Paragraph 3, SDG&E and SoCalGas amortize in rates “50% of the balances recorded in Southern California Gas Company and San Diego Gas & Electric Company Safety Enhancement Capital Cost Balancing Account, the Safety Enhancement Expense Balancing Account, and the Pipeline Safety and Reliability Memorandum Account. . . through the utilities’ annual regulatory account balance update Advice Letter process.”

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**Question 8.4:**

If the Applicants do not expect to record any costs for this project in the SECCBA, please describe the cost recovery mechanism that the Applicants expect to employ.

**Response 8.4:**

Not applicable.

**Question 8.5:**

Would the Applicants expect to record any costs for this project in the Safety Enhancement Expense Balancing Account (SEEBA)?

**Response 8.5:**

Yes.

**Question 8.6:**

If the answer to the previous question is “yes,” please state when the Applicants would expect to record costs associated with this project assuming that it is completed by the end of the second quarter of 2023.

**Response 8.6:**

SDG&E intends to record O&M costs incurred to implement the Line 1600 Test or Replacement Plan in SEEBA as the expenses are incurred.

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**Question 8.7:**

Assuming the project is completed by the end of the second quarter of 2023, when would the Applicants expect to begin recovering the amounts for the project that were recorded in the SEEBA?

**Response 8.7:**

Pursuant to D.16-08-003 Ordering Paragraph 3, SDG&E and SoCalGas amortize in rates “50% of the balances recorded in Southern California Gas Company and San Diego Gas & Electric Company Safety Enhancement Capital Cost Balancing Account, the Safety Enhancement Expense Balancing Account, and the Pipeline Safety and Reliability Memorandum Account. . . through the utilities’ annual regulatory account balance update Advice Letter process.”

**Question 8.8:**

If the Applicants do not expect to record any costs for this project in the SEEBA, please describe the cost recovery mechanism that the Applicants expect to employ.

**Response 8.8:**

Not applicable.