

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

(2ND DATA REQUEST FROM SOUTHERN CALIFORNIA GENERATION COALITION)

**Date Requested: July 19, 2016
Date Responded: August 2, 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).
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 2.1:

Please provide a complete, working Excel version of the Workpaper Table Avoided Cost Model that was provided as a workpaper to the Volume III: Cost-Effectiveness Analysis that was submitted in response to the January 22, 2016 Assigned Commissioner and Administrative Law Judge Joint Ruling directing the Applicants to file and serve an Amended Application by March 21, 2016. As defined in this data request, a complete working Excel model contains all formulas and links to other working Excel models as well as all data directly input into the model.

RESPONSE 2.1:

Due to file size, the workpaper will be provided via electronic data transfer.

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QUESTION 2.2:

Please provide a complete, working Excel version of all Excel workbooks that are directly linked to the Avoided Cost Model either providing an input to the model or receiving an output from the model.

RESPONSE 2.2:

There are no linked Excel workbooks for the Avoided Cost Model.

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QUESTION 2.3:

Please provide a complete, working Excel version of the Workpaper Table Scenario Analysis Model that was provided as a workpaper to the Volume III: Cost-Effectiveness Analysis described previously.

RESPONSE 2.3:

Due to file size, the workpaper will be provided via electronic data transfer.

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QUESTION 2.4:

Please provide a complete, working Excel version of all Excel workbooks that are directly linked to the Scenario Analysis Model either providing an input to the model or receiving an output from the model.

RESPONSE 2.4:

There are no linked Excel workbooks for the Scenario Analysis Model.

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QUESTION 2.5:

In a letter dated July 8, 2016, from CPUC Executive Director Tim Sullivan to Lee Schavrien at SDG&E, Executive Director Sullivan said: "The Commission has received information in response to the Safety and Enforcement Division's and The Energy Division's data requests regarding SDG&E's Line 1600 in connection with Application ("A.") 15-09-013." Please provide all responses that SDG&E provided to the Commission in response to Safety and Enforcement Division and Energy Division data requests regarding SDG&E's Line 1600 in connection with A.15-09-013.

RESPONSE 2.5:

Due to file size, SDG&E's and SoCalGas' responses to Safety and Enforcement Division and Energy Division data requests regarding Line 1600 in connection with A.15-09-013 will be provided via electronic data transfer. **Please note that some of the data request responses contain confidential information or protected materials provided pursuant to the Non-Disclosure Agreement (NDA) between SDG&E/SoCalGas and SCGC.**

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QUESTION 2.6:

In his July 8, 2016 letter, Executive Director Sullivan directed SDG&E to reduce pressure on Line 1600 to 512 psig and said that the 512 psig “represents a 20% reduction from a design-based maximum allowable operating pressure (MAOP)....” In connection with this directive:

- 2.6.1. If 512 psig represents a 20% reduction from a “design-based” MAOP, the “design-based” MAOP would mathematically have to be 640 psig. Is 640 psig currently the “design-based” maximum allowable operating pressure for Line 1600 640 MAOP?
- 2.6.2. Please provide the definition of “design-based MAOP” that is used by the Sempra Utilities.
- 2.6.3. Prior to reducing the pressure on Line 1600 from 800 psig to 640 psig, was 800 psig the “design-based MAOP” for Line 1600?
- 2.6.4. Please provide the Sempra Utilities’ letters or other communications with the Commission that informed the Commission about the reduction from 800 psig to 640 psig.
- 2.6.5. Given that the pressure on Line 1600 was reduced by 20% from 800 psig to 640 psig, what do the Sempra Utilities believe is the Commission’s rational for a second reduction by 20% from 640 psig to 640 psig?
- 2.6.6. Do the Sempra Utilities agree with that rational?

RESPONSE 2.6:

- 2.6.1 SDG&E and SoCalGas interpret the “design-based” MAOP to be the design pressure. The calculated design pressure for Line 1600 is 812.5 psig. An MAOP of 800 psig was based on operational conditions.
- 2.6.2 SDG&E and SoCalGas adhere to 49 CFR Section 192.105 (Subpart C), which states that the design pressure is determined by the following formula:
$$P = \left(2 \frac{St}{D}\right) * F * E * T.$$
- 2.6.3 The “design-based MAOP” for Line 1600 prior to the reduction to 640 psig was 812.5 psig, as none of the inputs to the design pressure formula discussed above changed.

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- 2.6.4 SDG&E and SoCalGas object to this question on the bases that the term “other communications” is vague, ambiguous, unclear and subject to speculation in interpretation. Further, depending upon one’s interpretation of the term, the investigation required by the question is overly burdensome, overly broad and unnecessarily time-consuming. Without waiving this objection, SDG&E made a diligent search for all responsive documents, which specifically informed or address the reduction from 800 psig to 640 psig with the Commission and respond as follows: See Report of SoCalGas and SDG&E on Actions Taken in Response to the National Transportation Safety Board Safety Recommendations (April 15, 2011) filed in R.11-02-019.
<https://www.socalgas.com/regulatory/documents/r-11-02-019/reportInResponseToNTSBrecommendations.pdf>
- 2.6.5-2.6.6 SDG&E and SoCalGas object to this question on the ground that it calls for speculation. SDG&E and SoCalGas do not know the Commission’s rationale for this directive other than what was stated in the Executive Director’s July 8, 2016 Letter (July 8 Letter) and Draft Resolution No. SED-1 issued on July 19, 2016, and cannot speak for the Commission.

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QUESTION 2.7:

If both Line 3010 and Line 1600 are operated with the Line 1600 MAOP set at 512 psig, what would be the capacity of Line 1600 assuming full availability of the Moreno Compressor Station?

RESPONSE 2.7:

Line 1600 contributes 65 million cubic feet per day (MMcfd) to the capacity of the SDG&E system when operated at an MAOP of 512 psig.

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QUESTION 2.8:

If Line 3010 was out of service so that Line 1600 is the only capacity available to receiver gas from the Rainbow Metering Station with the Line 1600 MAOP set at 512 psig, what would be the capacity of Line 1600 assuming full availability of the Moreno Compressor Station?

RESPONSE 2.8:

With Line 3010 out of service, and Line 1600 operating at 512 psig, Line 1600 has a capacity of 110 MMcfd.

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QUESTION 2.9:

In his July 8, 2016 letter to SDG&E, Executive Director Sullivan directed to SDG&E to “perform In Line Inspections (ILI) of Line 1600 using identical technologies as in your previous ILI run and compare the results with the 2012-2015 ILI data....”

2.9.1. Please identify the technologies used in your “previous ILI.”

2.9.2. Please confirm that, in compliance with Executive Director Sullivan’s order, you will use those same technologies in performing the In Line Inspections that are ordered in the July 8, 2016 letter.

RESPONSE 2.9:

2.9.1. Please see the discussion in Section II.B.2 of the Prepared Direct Testimony of Travis Sera (March 21, 2016) in A.15-09-013.

2.9.2. SDG&E will utilize the same technologies used in its previous IL run for the in-line inspection of Line 1600 in compliance with the directives in the July 8 Letter.

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QUESTION 2.10:

Please provide the Sempra Utilities response to Executive Director Sullivan's July 8, 2016 letter.

RESPONSE 2.10:

SDG&E's and SoCalGas' response to the July 8 Letter is attached.

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QUESTION 2.11:

In his July 8, 2016, Executive Director Sullivan ordered SDG&E to “replace segment from Engineering Stations ‘17-131’ on Line 1600....”

- 2.11.1. Please provide a map showing the location of the segment from Engineering Station 17-131 on Line 1600.
- 2.11.2. Please provide the length of the segment from Engineering Stations 17-131.
- 2.11.3. Please identify the estimated cost of replacing the segment from Engineering Stations 17-131 on Line 1600.
- 2.11.4. If Line 1600 were de-rated to 320 psig, would there still be a need to replace the segment from Engineering Stations 17-131 on Line 1600.

RESPONSE 2.11:

- 2.11.1 Please see the attached map, which contains **confidential information provided pursuant to the NDA between SDG&E/SoCalGas and SCGC.**
- 2.11.2 The approximate length of the segment is 114 ft.
- 2.11.3 This work is still in the initial planning stages and consequently a detailed final estimate not yet been prepared. The preliminary estimate is approximately \$900,000.
- 2.11.4 SDG&E and SoCalGas object to this question on the grounds that it calls for speculation. SDG&E and SoCalGas do not know the Commission’s rationale for this directive other than what was stated in the July 8 Letter and Draft Resolution No. SED-1 issued on July 19, 2016, and cannot speak for the Commission.

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QUESTION 2.12:

In his July 8, 2016 letter to SDG&E, Executive Director Sullivan says: “If SDG&E believes that complying with these directives may pose any risk to maintaining service reliability for its customers, it should provide supporting information within 4 working days....”

2.12.1 Please provide any information that was provided to Executive Director Sullivan in response to this statement.

RESPONSE 2.12:

Please refer to the response to Question 2.10 above.

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QUESTION 13:

Draft Resolution No. SED-1 that was served on parties on July 19, 2016, says that the Sempra Utilities have told SED that the lower pressure at 512 psig is sufficient to meet the 1-in-10 and 1-in-35 cold year design conditions. If the pressure were reduced further to 320 psig in Line 1600, do the Sempra Utilities agree that they would still meet the 1-in-10 and 1-in-35 cold year design conditions?

- 2.13.1. If the answer to the previous question is “yes,” please identify the transmission lines that would provide the capacity to meet the design standard.
- 2.13.2. If the answer is “no,” please explain the reason for your answer.

RESPONSE 2.13:

To clarify, SDG&E and SoCalGas informed SED that the lower pressure of 512 psig is sufficient to currently meet the 1-in-10 year cold day and 1-in-35 year peak day design standards. If Line 1600 is derated to 320 psig, system capacity is reduced to 570 MMcfd, which is insufficient for the 1-in-10 design condition from the 2016/17 winter season through at least the 2035/36 winter season, based on the demand forecast provided in the April 2016 SDG&E Gas Capacity Planning and Demand Forecast Semi-Annual Report. Sufficient capacity exists for the 1-in-35 year peak day design standard under this scenario.

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QUESTION 2.14:

Please provide the latest SDG&E Gas Capacity Planning and Demand Forecast Semi-Annual Report ("Report") that SDG&E sent to the Commission in compliance with D.02-11-073.

RESPONSE 2.14:

Please see the attached file.

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QUESTION 2.15:

Please identify the CEC California Energy Demand (“CED”) forecast that was used by SDG&E to determine the electric generation gas demand that was included in the Report.

2.15.1. Please provide a copy or a link to the CEC CED that was used to develop the Report.

RESPONSE 2.15:

2.15 California Energy Commission’s (CEC’s) California Energy Demand Updated Forecast, 2015 - 2025, dated December 2014.

2.15.1 Please see the link below:

<http://www.energy.ca.gov/2014publications/CEC-200-2014-009/CEC-200-2014-009-SD.pdf>