

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(DATA REQUEST SIERRA CLUB-05)**

**Date Requested: June 9, 2016
Date Responded: June 23, 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 Sierra Club from Sierra Club's own files, from documents or information in Sierra Club's possession, or from documents or information that SDG&E and SoCalGas previously released to the public or produced to Sierra Club. 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 Sierra Club 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 Sierra Club'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:

SDG&E's response to Data Request Sierra Club-SDG&E-01 Question 2 stated: "The nominal capacity of Line 3010 when operated as part of the SDG&E system is 530 MMcfd. When operated without Line 1600, its nominal capacity increases to 570 MMcfd."

- a. Does the nominal capacity of Line 3010 differ if Line 1600 remains operation but is derated to distribution service (e.g. pressure is reduced from 640 to 320 psig). If yes, please state the nominal capacity of Line 3010 if Line 1600 remains in service but its pressure is reduced from 640 to 320 psig.
- b. What is the nominal capacity of Line 1600 if its pressure is reduced to 320 psig?

RESPONSE 1:

- a. No.
- b. At 320 psig, Line 1600 does not contribute to the SDG&E system throughput, and serves only as a distribution supply line.

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QUESTION 2:

Page 5 of the Testimony of David Bisi states that “Other customers not served directly by Line 1600 may also experience disruptions resulting from a prolonged outage on that pipeline. With Line 3010 in service, Line 1600 contributes approximately 100 MMcfd of capacity to the SDG&E system.” In response to Question 7 of Sierra Club Data Request 2, SDG&E listed only 15 instances since 2011, all of which were confined to December and January, where the combined daily throughput on Lines 3010 and 1600 exceeded the 530 MMcfd capacity of Line 3010.

- a) If pressure testing did not occur during winter peak months, which is the only time provided where throughput exceeded the capacity of Line 3010, please explain how pressure testing would result in customers not directly served by Line 1600 experiencing disruptions or require securing alternative supplies at Otay Mesa.
- b) Please provide the witness responsible for this answer.

RESPONSE 2:

- a. Even though pressure testing may not occur during winter peak months, remediation of issues found may extend through the winter operating season. In this situation, customers not directly served by Line 1600 may require curtailment or supply at Otay Mesa when demand exceeds the reduced system capacity.
- b. David Bisi

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QUESTION 3:

In response to Question 2c of Sierra Club's 4th Data Request for the date, duration and cause of each unplanned shutdown of a backbone transmission pipeline in SDG&E's system, SDG&E identified one unplanned outage on Line 3010 in 1985.

- a. Confirm this is the only recorded instance of an unplanned outage of a backbone transmission pipeline in SDG&E's system.
- b. What is the earliest year for which SDG&E would have records of unplanned outages on its backbone transmission lines?

RESPONSE 3:

- a. Since responding to Question 2(c) of Sierra Club's 4th data request, SDG&E has recently learned of three additional historical events. SDG&E also has information regarding additional historical repairs to its backbone system, but does not know whether the repairs required an unplanned shutdown (full or partial) or not. In light of this new information, SDG&E and SoCalGas will provide a revised response to Question 2(c) of Sierra Club's 4th data request. As will be explained in that updated response, SDG&E has not tracked all full or partial shutdowns on its backbone transmission system since 1949. Due to the limited information available that spans the 65 plus year operating history of the system, SDG&E cannot confirm with certainty whether these are or are not the only events that took place.
- b. Electronic recording of line outages began in 1999. As for the period prior to 1999, and with the limitations as explained in the response to part a. above, SDG&E has not been able to locate any outage records that have been retained other than the three historical reports and the work order discovered as part of responding to Sierra Club's data requests.

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QUESTION 4:

In response to Question 2c of Sierra Club's 4th Data Request, SDG&E identified a single unplanned outage of Line 3010 in 1985 that had a one day duration. Section VI of the Prepared Direct Testimony of Jani Kikuts describes a process to restore gas service that "would require mutual aid from other utilities for a period of weeks." Page 7:12-13 similarly states the restoration process "could take weeks to complete."

- a. In the unplanned outage that occurred on Line 3010 in 1985, how long did it take to restore gas service to affected customers?
- b. Please identify the witness responsible for this answer.

RESPONSE 4:

- a. As described in section IV of the Prepared Direct Testimony of Jani Kikuts, Line 3010 outage gas system and customer impacts are highly dependent on a variety of factors, including outage location, outage duration, extent of damage, weather conditions, system demand, and availability of alternate gas supplies at the time of the event.

In 1985, an unplanned outage on Line 3010 occurred when a contractor struck Line 3010 while installing a 16-inch liquid fuel line in the SDG&E right of way. The damage, while not a rupture, was 15 feet in length and required isolation and pressure reduction of the affected pipeline segment in order to make necessary repairs. This event did not result in customer outages but did require the curtailment of gas service to local electric generation, including the Miramar turbine, South Bay power plant, and Encina power plant. At the time of this incident these power plants had alternate fuel capability, which they relied upon for approximately a day and a half. This alternate fuel capability currently does not exist.

The Line 3010 outage scenario discussed in the Prepared Direct Testimony of Jani Kikuts is a plausible scenario should an event similar to the 1985 third party damage occur, potentially rupturing Line 3010 for a duration consistent with the presented scenario assumptions.

- b. The witness responsible for this answer is Jani Kikuts.

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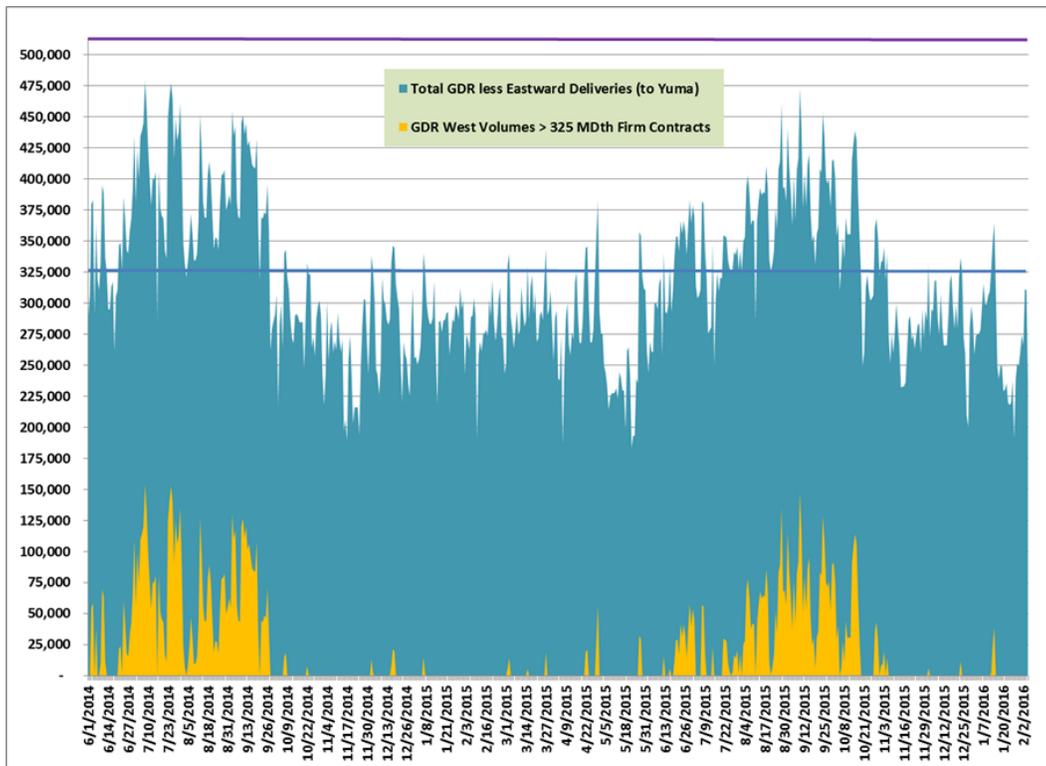
QUESTION 5:

The Line 3010 Outage Scenario described in the Prepared Direct Testimony of Jani Kikuts assumes that “[a]lternate gas supplies through Otay Mesa are not available in the short term at the time of the Line 3010 outage.” (Page 3).

- a. Has SDG&E does any analysis or examined data on the historic availability of gas supplies through Otay Mesa? If yes, please provide any such analysis or data.

RESPONSE 5:

A graph showing the recorded throughput on the North Baja Pipeline system (which is comprised of three pipelines, North Baja Pipeline to Gasoducto Rosarito [GR] to Transportadora de Gas Natural de Baja California [TGN]) into Mexico is shown below.¹ Gas must go through the North Baja Pipeline system to get to Otay Mesa. As shown in the graph, capacity in excess of 50 MDth is not available periodically during the peak summer months.



¹ The blue horizontal line on the graph at 325 MDth represents firm contracts on the North Baja Pipeline (as known to SDG&E and SoCalGas in February 2016). The purple horizontal line represents the capacity of the GR system from North Baja to TGN as of July 14, 2016 (<http://www.gasoductorosarito.com/english/about-us.html>).

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QUESTION 6:

Alternative D on page 25 of the Cost-Effectiveness Analysis is to “Replace Line 1600 in Place with a New 16” Transmission Pipeline Alternative (In-Kind Replacement)”. In Response to Sierra Club-SDG&E-03, Q. 4 requesting the feasibility study evaluating the cost of right-of-way procurements for Alternative D, SDG&E provided the CONFIDENTIAL Line 1600 Gas Pipeline Feasibility Report for Acquisition of Right of Way (“Feasibility Report”). Page 1 of the Feasibility Report states that the existing easement is for a single pipeline and that “another pipe cannot be constructed within the current easement.” The Feasibility Report then analyzes right-of-way costs for an *additional* 36” pipeline adjacent to the existing Line 1600.

- a. Under the existing easements, could Line 1600 be removed and replaced in the same location with a new 16” pipeline? If not, please explain why. If so, please explain how the cost analysis in the Feasibility Report accurately captures the costs of Alternative D.
- b. The total right of way costs identified on page 11 of the Feasibility Report differ from the cost of Alternative D listed on page 3 of the Cost-Effectiveness analysis. Please provide the total right-of-way cost included in Alternative D and explain how this cost was calculated.
- c. Sierra Club has labelled this question confidential in an abundance of caution. Given that the reference to the Feasibility Report is very high level, if SDG&E believes a response to this data request merits confidential treatment, please explain the basis for that belief. To the extent portions can be redacted, please provide a redacted and unredacted version of your response.

RESPONSE 6:

- a. As shown in Exhibit A of the referenced Feasibility Report, existing easements allow one pipeline in the right of way. This easement does not explicitly contain language that would prevent SDG&E from removing the existing pipeline from the right of way and replacing it with a new pipeline. However, implementation of this alternative would be very difficult from a construction perspective, and as discussed on pages 5 and 6 of the Feasibility Report, have a large impact on the community and the environment due to the need to obtain enough free and clear right of way necessary to perform construction. These impacts are further discussed in the Proponent’s Environmental Assessment Supplement Chapter 5 pages 5-8 through 5-11. In order to complete construction, a minimum of a 40 to 50 foot clear right of way must be provided for all construction options that follow the existing Line 1600 alignment. The costs to acquire adequate right of way necessary to complete

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construction are described in detail in the Feasibility Report on pages 7 through 11. Since this right of way must be acquired for all the options that follow the existing Line 1600 alignment, these same costs were incorporated into the overall cost estimate for Alternative D.

- b. The right of way costs listed on page 11 of the Feasibility Report are \$106,050,000. This value was incorporated into the overall cost estimate for Alternative D. Details of the calculation for total right of way costs are shown on pages 7 through 11 of the Feasibility Report. The Feasibility Report includes minimum costs required for obtaining the necessary ROW and, as such, is a conservative estimate of the required ROW costs for alternatives within the existing L1600 ROW. As Applicants fully analyzed Alternative D for the Cost Effectiveness Analysis some additional ROW costs were identified and are described in the table, below. The overall cost estimate of \$560.4 million for Alternative D shown on page 3 of the Cost Effectiveness Analysis includes the above referenced cost for right of way as well costs for engineering and design, materials, construction, environmental, direct company labor and a variety of other project related costs.

Estimated ROW Direct Cost (\$000,000 in 2015\$)	
Clark Land Resources Feasibility Report	\$106.1
SDG&E Additional ROW	
50-foot temporary ROW	\$3.7
Misc. Demolition	\$3.2
Clear & Grub	\$0.9
Temporary Laydown Area	\$0.4
Temporary Access Roads	\$0.3
Total ROW Cost	\$114.5

- c. The information contained in this response does not require confidential treatment.

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QUESTION 7:

The CONFIDENTIAL map of the SDG&E Transmission Backbone System provided in response to Question 4 of Sierra Club's 4th Data Request shows a transmission line along the coast roughly along the I-5 from San Onofre to south of Solano Beach.

- a. What is the name, diameter, pressure, and nominal capacity of this pipeline?
- b. Sierra Club has labelled this question confidential in an abundance of caution. Given that the reference to the pipeline is at a high level and is likely publicly available elsewhere, if SDG&E believes a response to this request merits confidential treatment, please explain the basis for that belief. To the extent portions can be redacted, please provide a redacted and unredacted version of your response.

RESPONSE 7:

The following response contains **confidential information that is submitted pursuant to the Nondisclosure and Protection Agreement between Sierra Club and SDG&E/SoCalGas.**

- a. The referenced pipeline is ■-inch diameter SoCalGas Line 1026, which has a Maximum Allowable Operating Pressure (MAOP) of ■ psig. For additional information, please refer to footnote 2 on page 2 of the Prepared Direct Testimony of David M. Bisi in this proceeding.
- b. The Confidential SDG&E Transmission Backbone System map in combination with MAOP, diameter, pressure, and capacity data is sensitive critical energy infrastructure information that if made publicly available, could present a risk to the security of California's critical energy infrastructure.

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.