

**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)**

**(2<sup>ND</sup> DATA REQUEST FROM UCAN)**

**Date Requested: February 21, 2016**

**Date Responded: March 7, 2016**

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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 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:**

At any point in time since Lines 1600 and 3010 were installed did SDG&E pressure test either Line 1600 and 3010? If yes, please explain when that testing occurred. If testing records exist, please provide all pressure testing records.

**RESPONSE 1:**

Line 3010 was pressure tested prior to the pipeline being placed in service. Line 1600 was not required to be pressure tested prior to being placed in service, and the absence of records of pressure testing support a determination that the pipeline was not pressure tested prior to being placed in service.

Pressure tests for newly constructed segments (for example, cylindrical replacements) have been conducted in accordance with applicable code requirements on both pipelines.

The pre-commissioning (prior to the pipeline being placed into service) pressure test records of Line 3010 can be provided upon execution of a Non-Disclosure Agreement.

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**QUESTION 2:**

In SDG&E's Proponents Environmental Assessment (PEA), Chapter 2 at page 2-2 it says:

"The Applicants are not aware of any other major metropolitan area that is so dependent on a single pipeline. A system outage on Line 3010 or the Moreno Compressor Station would constrain available capacity in San Diego, which may lead to gas curtailments. This would be alleviated with the new 36-inch-diameter line providing resiliency for both Line 3010 and the Moreno Compressor Station."

- A. Since lines 1600 and 3010 have been in service has SDG&E experienced a system outage on line 3010 or the Moreno Compressor Station? If so, please explain.
- B. What contingency plans are now in place should SDG&E experience planned or unplanned service reductions or outages in line 1600 for core and noncore customers.
- C. What contingency plans are now in place should SDG&E experience planned or unplanned service reductions or outages in line 3010 for core and noncore customers?

**RESPONSE 2:**

- A. Yes, there have been two incidents where curtailments were called that would constitute system outages.
  - In October 1985, Line 3010 was hit by a contractor during the installation of a liquid fuel line. The pressure of Line 3010 was reduced to enable repairs. As a result, gas flow to the electric generation (EG) plants was curtailed.
  - In March 1993, several severe rainstorms caused settlement in part of the Moreno Compressor Station. Sections of the plant were out of service for several months, which resulted in EG plant curtailments.
- B. Should the SDG&E system experience an outage that renders system capacity insufficient to meet the current level of demand, the System Operator will first attempt to procure supply at Otay Mesa, and failing that, implement customer curtailment per SDG&E Gas Rule No. 14.
- C. Please refer to Response 2B of this data request.

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**QUESTION 3:**

Does SDG&E anticipate pressure testing line 3010 in the near future?

- If so, does SDG&E anticipate any system curtailments due to the testing?
- If so, please indicate what contingency plans are in place to mitigate any system curtailments due to the pressure testing.

**RESPONSE 3:**

No, SDG&E does not anticipate pressure testing Line 3010 in the near future.

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**QUESTION 4:**

Does SDG&E experience constraints on specific sections of its pipeline 1600 and/or 3010 such that if available capacity in those sections was augmented it would reduce the likelihood of a curtailment event?

- If yes, please explain

**RESPONSE 4:**

No, SDG&E does not experience constraints on *specific sections* of Line 1600 and/or Line 3010 such that if available capacity were augmented on specific sections it would reduce the likelihood of a curtailment event. As explained in our Application, the San Diego system has long been recognized as a potentially “capacity constrained” region and therefore, increasing the capacity of the SDG&E system would reduce the likelihood of curtailment events in San Diego.

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**QUESTION 5:**

**Follow-up to UCAN Data Request Set #1, question 6:** In that question UCAN asked about methods used to validate pipeline integrity for Lines 1600 and 3010. SDG&E responded that the assessment methods used to validate the integrity of lines 1600 and 3010 are:

**Line 1600**

- In line inspection
- External Corrosion Direct Assessment
- Fatigue analysis

**Line 3010**

- In-line inspection – axial magnetic flux leakage

After testing the integrity of the lines using the methods noted above, did SDG&E discover any portions of either line that needed to be repaired or replaced?

- a. If so, please explain
- b. If so, has all remediation work been completed?
- c. Has any remediation work resulted in any system curtailment? If so how did SDG&E alleviate that curtailment?
- d. When is the last time SDG&E has conducted an integrity test on lines 1600 and line 3010?

**RESPONSE 5:**

- a. SDG&E and SoCalGas interpret “needed,” as used in this question, to mean “required” by code or regulation. Subject to that interpretation, following in-line inspections (ILI) of Line 1600, eleven (11) dents with metal loss, six (6) plain dents, one (1) gouge, and one (1) external metal loss defect were identified that required remediation. Following ILI of Line 3010, no portions of Line 3010 were identified as requiring repair or replacement.
- b. Yes.
- c. No.
- d. SDG&E conducted an ILI of Line 1600 on December 10, 2015 and ILI of Line 3010 on November 14, 2013.

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**QUESTION 6:**

**Follow-up to UCAN Data Request Set #1, question 8,** in that question UCAN asked, “Please provide data on current daily and hourly stress conditions.”

**SDG&E responded,** “Daily and hourly demand data for SDG&E in 2015, and the daily system capacity, are provided in the attached spreadsheet. Historical hourly data for SDG&E system capacity is unavailable.”

Does SDG&E have daily demand data for system capacity for years 2014, 2013, 2012 and 2011?

– If so please provide that data

**RESPONSE 6:**

SoCalGas and SDG&E interpret this question as seeking daily demand data and daily system capacity for the years 2011-2014. Please note that daily system capacity is the nominal system capacity and does not account for any transmission facility outages that may have been in effect at that time. Please refer to the attached spreadsheet.



UCAN DR2Q6.xlsx



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**QUESTION 7:**

Does SDG&E have any hourly demand data for system capacity for years 2014, 2013, 2012 and 2011?

– If so please provide that data

**RESPONSE 7:**

SoCalGas and SDG&E interpret this question as seeking hourly demand data for the years 2011-2014. Please note that hourly system capacity is unavailable as stated in Response 6 to UCAN's first data request in this proceeding. Please refer to the attached spreadsheet.



UCAN DR2Q7.xlsx

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**QUESTION 8:**

**In response to UCAN's Data Request #1, question 8, SDG&E provided a spreadsheet of daily and hourly demand data which reveals that for nine days in 2015 daily demand was greater than 80% of system capacity:**

<u>Date</u>	Daily Demand	System Capacity	% Capacity
10/13/2015	494	570	86.70%
12/16/2015	527	610	86.46%
9/9/2015	476	570	83.57%
12/29/2015	507	610	83.14%
9/8/2015	472	570	82.84%
12/15/2015	505	610	82.75%
12/30/2015	498	610	81.56%
1/1/2015	506	630	80.33%
12/27/2015	490	610	80.26%

In reviewing the above figures it appears that SDG&E's system never experienced a daily capacity in excess of 86.70%. At what point does SDG&E consider the capacity of its system constrained to the point that gas service is curtailed?

**RESPONSE 8:**

SDG&E will implement a curtailment on its system when demand is expected to exceed capacity.

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**QUESTION 9:**

In the past five years please indicate the dates and by how much system capacity exceeded 80% of daily system capacity.

**RESPONSE 9:**

The data below is based on nominal SDG&E system capacities of 630 MMcfd for the winter operating season and 590 MMcfd for the summer.

<b>Date</b>	<b>MMCFD</b>	<b>Date</b>	<b>MMCFD</b>	<b>Date</b>	<b>MMCFD</b>
12/12/2011	18	12/20/2012	1	10/29/2013	12
12/6/2011	10	1/14/2013	171	12/7/2013	10
12/13/2011	7	12/8/2013	110	2/12/2013	9
12/7/2011	5	1/15/2013	108	12/10/2013	7
12/19/2012	63	1/11/2013	70	12/13/2013	7
11/26/2012	38	1/12/2013	66	9/6/2013	5
2/27/2012	34	1/13/2013	64	1/6/2013	4
12/14/2012	26	12/9/2013	58	2/20/2013	3
2/15/2012	25	12/5/2013	44	1/1/2013	2
10/15/2012	21	12/11/2013	42	2/11/2013	2
11/29/2012	21	12/12/2013	39	12/31/2014	83
4/13/2012	19	1/2/2013	34	9/16/2014	37
11/27/2012	19	12/6/2013	30	9/17/2014	4
11/28/2012	18	1/7/2013	28	10/13/2015	38
8/13/2012	16	1/16/2013	27	12/16/2015	39
8/29/2012	9	1/4/2013	25	9/9/2015	20
2/28/2012	7	2/21/2013	24	12/29/2015	19
4/2/2012	6	9/5/2013	22	9/8/2015	16
7/11/2012	3	1/3/2013	18	12/15/2015	17
12/13/2012	3	1/10/2013	16	12/30/2015	10
9/14/2012	3	2/8/2013	14	1/1/2015	2
8/14/2012	2	9/4/2013	13	12/27/2015	2

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**QUESTION 10:**

**In SDG&E's Proponents Environmental Assessment (PEA), Chapter 3, p. 3-9** SDG&E writes, "SDG&E has experienced inter-daily and sometimes hourly spikes on the gas system. Accordingly, during peak gas demand periods on not just a daily but an hourly basis, SDG&E has already experienced curtailments, and SDG&E service areas have experienced calls for conservation. Since 2011, SDG&E has had five curtailment events related to supply, capacity or emergencies on the SDG&E system."

Please provide the data that shows the "inter-daily and sometimes hourly spikes on the gas system" that SDG&E refers to in its application.

**RESPONSE 10:**

Recorded data does not exist to demonstrate these inter-daily and hourly spikes on the gas system. Recorded data measures flowrate only on the top of the hour, and only accumulated usage for the hour.

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**QUESTION 11:**

Did SDG&E have to take any steps to alleviate inter-daily and hourly spikes? If yes, please explain in detail.

**RESPONSE 11:**

SDG&E implemented customer curtailment when the inter-daily and hourly spikes could not be accommodated.

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**QUESTION 12:**

What conditions constitute a “spike” on the gas system?

**RESPONSE 12:**

Spikes result from rapid changes in customer demand.

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**QUESTION 13:**

What steps does SDG&E take when it registers a “spike” during peak gas demand periods on the gas system to avoid having to curtail service?

**RESPONSE 13:**

The SDG&E system affords little opportunity to manage spikes in customer demand other than curtailment.

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**QUESTION 14:**

What factors are considered in deciding whether to order a curtailment of service?

**RESPONSE 14:**

Please refer to Response 2B of this data request.



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**QUESTION 15:**

Please describe the five curtailment events since 2011 including:

- a. Date and time
- b. Length of curtailment
- c. Triggering conditions

**RESPONSE 15:**

There have been 12 curtailment events on the SDG&E system since January 2011. See table below for the date and time, length of curtailment and triggering conditions.

<b>Start Date and Time</b>	<b>End Date and Time</b>	<b>Duration</b>	<b>Trigger</b>	<b>Affected Utility</b>
Feb 3, 2011 3PM	Feb 4, 2011 12 noon	21 hours	Lack of Supply	SCG/SDGE
Oct 1, 2011 6AM	Oct 1, 2011 9PM	13 hours	Planned Maintenance	SDGE
Oct 8, 2011 6AM	Oct 8, 2011 11PM	17 hours	Planned Maintenance	SDGE
Oct 15, 2011 6AM	Oct 15, 2011 11PM	17 hours	Planned Maintenance	SDGE
Oct 22, 2011 6AM	Oct 22, 2011 9PM	15 hours	Planned Maintenance	SDGE
Oct 29, 2011 6AM	Oct 30, 2011 4AM	22 hours	Planned Maintenance	SDGE
Nov 5, 2011 6AM	Nov 5, 2011 1PM	7 hours	Planned Maintenance	SDGE
Nov 12, 2011 6AM	Nov 12, 2011 10PM	16 hours	Planned Maintenance	SDGE
Nov 19, 2011 6AM	Nov 19, 2011 8PM	14 hours	Planned Maintenance	SDGE
Dec 6, 2013 12AM	Dec 11, 2013 11:59 PM	6 days	Lack of Supply	SCG/SDGE
Feb 6, 2014 8AM	Feb 10, 2014 11:59 PM	4 days 16 hours	Lack of Supply	SCG/SDGE

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<b>Start Date and Time</b>	<b>End Date and Time</b>	<b>Duration</b>	<b>Trigger</b>	<b>Affected Utility</b>
Feb 6, 2014 6:45AM	Feb 7, 2014 12AM	17 hours 15 minutes	Emergency*	SCG/SDGE

\* Emergency Curtailment is defined in the curtailment rules as: "Curtailments may result with little notice due to capacity restrictions or emergencies. The foregoing gas curtailment procedures do not apply to curtailment under local or emergency conditions, which will be handled in a manner that immediate operating conditions appear to require at the time."

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**QUESTION 16:**

SDG&E's application at page 3 notes that approval of SDG&E's proposal will:

"Enable the Applicants to comply with the Commission-approved Pipeline Safety Enhancement Plan (PSEP) by replacing Line 1600 with a new gas transmission pipeline as soon as is practicable."

- a. If SDG&E's proposal to replace line 1600 in this application is not approved, please describe how SDG&E intends to comply with the Commission-approved Pipeline Safety Enhancement Plan (PSEP) for line 1600.

**RESPONSE 16:**

In order to comply with the Commission-approved Pipeline Safety Enhancement Plan (PSEP), SDG&E may pressure test or replace Line 1600, or derate the line to distribution level service to remove it from the scope of State test or replace requirements.

If SDG&E's proposal to replace and derate Line 1600 in this application is not approved, SDG&E intends to comply with the Commission-approved PSEP by following the Commission's guidance in the decision in this proceeding.