

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY
PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)
(A.15-09-013)
(DATA REQUEST ORA-99)
Date Requested: May 31, 2018
Date Responded: June 4, 2018**

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. 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 Office of Ratepayer Advocates (ORA) from ORA's own files, from documents or information in ORA's possession, or from documents or information that SDG&E and SoCalGas previously released to the public or produced to ORA. 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 ORA 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 ORA'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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Attachment A.docx

QUESTION 1:

Regarding Attachment A, Page 9

- a) Provide the address for the apartments in the “Mira Mesa” area identified in this photo.
- b) Provide the distance from the centerline of Line 1600 to the apartments.
- c) How many stories are the apartments?
- d) When were the apartments built?
- e) What is the current class location for the segments of Line 1600 in this area?
- f) Provide the engineering start and engineering end stations for the segments within the class location unit for these apartments.
- g) Provide the cumulative start and cumulative end stations for the segments within the class location unit for these apartments.
- h) Provide all information regarding these segments including the installation data, yield strength, long seam type, longitudinal joint factor, wall thickness, diameter, and identify each and every value where an assumption is being used.
- i) For each assumption provide the basis for that assumption under 49 Code of Federal Regulations Part 192.
- j) Provide the most recent class location study for these segments.
- k) Provide an overhead map of the area, including an overlay of the PIR and the location of Line 1600.
- l) Provide the date when the photo was taken.

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RESPONSE 1:

SDG&E and SoCalGas object to this data request on the following grounds:

1. It seeks information not admissible in evidence or reasonably calculated to lead to the discovery of admissible evidence because evidentiary hearings on Phase 1 issues have been completed and the evidentiary record closed. A Proposed Decision, if adopted by the Commission, would close this proceeding. If the Commission directs a Phase 2 to this proceeding or another proceeding is opened, and the questions presented in ORA Data Request #99 are relevant to the scoped issues, SDG&E and SoCalGas will entertain such a data request at that time.
2. It is unduly burdensome given that it seeks information not admissible in evidence or reasonably calculated to lead to the discovery of admissible evidence
3. The requested response date is unreasonable, allowing only two business days to research and provide considerable information.

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QUESTION 2:

Regarding Attachment A, Pages 12 & 13

- a) Provide the address for the theater in Mira Mesa identified in these photos.
- b) Provide the distance from the centerline of Line 1600 to the theater.
- c) How many stories is the theater?
- d) When was the theater built?
- e) What is the current class location for the segments of Line 1600 in this area?
- f) Provide the engineering start and engineering end stations for the segments within the class location unit for this theater.
- g) Provide the cumulative start and cumulative end stations for the segments within the class location unit for this theater.
- h) Provide all information regarding these segments including the installation data, yield strength, long seam type, longitudinal joint factor, wall thickness, diameter, and identify each and every value where an assumption is being used.
- i) For each assumption provide the basis for that assumption under 49 Code of Federal Regulations Part 192.
- j) Provide the most recent class location study for these segments.
- k) Provide an overhead map of the area, including an overlay of the PIR and the location of Line 1600.
- l) Provide the SoCalGas/SDG&E standards regarding right of way in place when the theater was built.
- m) Provide any federal or state standards regarding the right of way in place when the theater was built.

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n) The caption on page 12 states “The yellow pipeline marker and marking on the street show that the pipeline runs underneath [sic] the theater.”

- a. Are there any additional federal or state requirements regarding transmission pipelines that run underneath structures?
- b. Provide all documents demonstrating compliance with the federal or state requirements.

o) Explain how SoCalGas/SDG&E has performed transmission integrity management for the segments of Line 1600 under the theater.

p) Provide the date when the photo was taken.

RESPONSE 2:

SDG&E and SoCalGas object to this data request on the following grounds:

1. It seeks information not admissible in evidence or reasonably calculated to lead to the discovery of admissible evidence because evidentiary hearings on Phase 1 issues have been completed and the evidentiary record closed. A Proposed Decision, if adopted by the Commission, would close this proceeding. If the Commission directs a Phase 2 to this proceeding or another proceeding is opened, and the questions presented in ORA Data Request #99 are relevant to the scoped issues, SDG&E and SoCalGas will entertain such a data request at that time.
2. It is unduly burdensome given that it seeks information not admissible in evidence or reasonably calculated to lead to the discovery of admissible evidence.
3. The requested response date is unreasonable, allowing only two business days to research and provide considerable information