

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

LINE 1600

(A.15-09-013)

(DATA REQUEST ORA DR 104)

Date Requested: February 24, 2020

Date Responded: March 9, 2020

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 reserve, their 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 make the responses and objections herein without in any way implying that they consider 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 Public Advocates Office (“Cal Advocates”) from Cal Advocates’ own files, from documents or information in Cal Advocates’ possession, or from documents or information that SDG&E and SoCalGas previously released to the public or produced to Cal Advocates. 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 Cal Advocates 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 Cal Advocates’ 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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As a follow-up on The Public Advocates Office Data Request DR ORA-L1600-SCG-103 in regard to Line 1600 MAOP audit dated October 17, 2019. Please answer the following:

QUESTION 1:

It is the Public Advocates Office understanding that Appendix C, page 29, under the column “Seam Type/Manufacturing Process” the term “UNK (White Paper)” means that the Seam Type or Manufacturing Process is unknown. Please confirm that the Public Advocates Office understanding is correct or please provide that correct meaning for the term “UNK (White Paper).”

RESPONSE 1:

The phrase “UNK (White Paper)” is intended to reference the fact that while the exact type of longseam is not documented in historical pipeline records, SDG&E has determined, as set forth and described in greater detail in the White Paper provided herewith (included in response to Question 2.a), the only possible longseam types for this pipeline by reviewing the historical work order documents which state API 5L or API 5LX, Interstate Natural Gas Association of America (INGAA) report, API 5L and 5LX, and SDG&E Gas Material Specification Standards. These identified longseam types are specified on Page 5 of the Line 1600 Longitudinal Joint Factors White Paper.

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QUESTION 2:

Please provide the following:

- a. White Paper(s) that are referenced on page 29, in relation to seam type or manufacturing process in the Line 1600 MAOP audit dated October 17, 2019.
- b. SDG&E's internal study or studies that are referenced in point iii, page 10, regarding long seam types based on the history of the company's Pipe Design Standards.

RESPONSE 2:

- a. Please refer to the attached white paper titled, *Line 1600 Longitudinal Joint Factors*.
- b. SDG&E's internal study/studies referenced in point iii, page 10 is the White Paper. The White Paper contains SDG&E Pipeline Material Specifications (Appendix A, page 6), and the Moody Report (Appendix B, page 11).