

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

LINE 1600

(A.15-09-013)

(ORA/PAO DATA REQUEST 105)

Date Requested: March 4, 2020

Date Responded: March 18, 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” or “PAO”) 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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QUESTION 1:

Provide GIS data files showing the locations of the proposed pipeline and Right of Way associated with all sections of the gas line described in the L1600 test and replacement plan of 09/26/2018. If the proposed route has been updated since the plan was provided in 2018 then provide the data that represents the most recent version. The data shall be provided in .shp or .gdb file formats that are accessible to standard ESRI software. In addition, the route of the proposed replacement plan shall be provided as map figures in a PDF format to allow immediate review and QA/QC of the GIS files.

RESPONSE 1:

These data files contain specific locational information of critical energy infrastructure and are considered **confidential and protected material pursuant to PUC Section 583, GO 66-D, D.17-09-023.**

Attached are the data files showing the current alignment and GIS based Right of Way associated with the Line 1600 Test or Replacement Plan. The data provided includes aerial imagery with the latest planned alignment of each of the 19 pipeline projects, the breakpoints of each of the projects, existing easements, planned/potential new easements, and land parcel data. The parcel data is utilized to show Right of Way boundaries associated to City and County jurisdictions. The parcel data was sourced from The San Diego Geographic Information Source (SanGIS). SanGIS is publicly available and is a Joint Powers Authority (JPA) created between the City of San Diego and the County of San Diego, to provide common, central repository for GIS (mapping) data. SanGIS serves both government agencies and the public. The data is not survey quality, and generally captures the Right of Way accurately enough for project planning purposes. The Utilities make no warranties on the accuracy of the parcel layer data, or the placement of the pipeline or of the parcel data relative to the aerial imagery. For additional information about SanGIS data, please visit Sangis.org.

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QUESTION 2:

Provide GIS data showing the following information:

- Indicate in the row symbology where the utility has existing franchise or ROW agreements and easements for locating pipelines of the size proposed for L1600 and structure.
- Provide the parties with which the utility has an agreement and
- please provide the end date of the agreement.

The data shall be provided in .shp or .gdb file formats that are accessible to standard ESRI software. In addition, the data shall be provided as maps figures in a PDF format to allow immediate review and QA/QC of the GIS files.

RESPONSE 2:

SDG&E and SoCalGas (jointly, Utilities) object to this data request on the following grounds: In responding to Data Request 105, Question 2, the Utilities do not concede that the subject matter of Question 2, the Utilities' response or any documents, data or materials produced with such response is within the scope of Phase 2 in this proceeding, as set forth in D.20-02-024, or admissible in evidence in Phase 2. Subject to and without waiving the foregoing objection, the Utilities respond as follows:

SDG&E has franchise agreements in place across its service territory that allow for natural gas pipelines and associated infrastructure to be installed within public right of ways such as streets. In the Line 1600 corridor, agreements are in place with the County of San Diego and the cities of Escondido, Poway and San Diego. These agreements expire on January 4, 2030, December 31, 2035, indeterminate (no expiration) and January 17, 2021, respectively.

A description of the characteristics of routing criteria and locations that are suitable for the Line 1600 pipeline and associated infrastructure is presented in the Section E of the Line 1600 Test or Replace Plan (Plan) dated September 26, 2018. Illustrative photographs of examples of appropriate street locations are provided in the Plan beginning at page A-13. GIS information available from SDG&E and SoCalGas showing existing franchise right of ways and easements that are associated with the Plan's approved scope of work has been provided in response to Question 1. Should Cal Advocates desire additional information, GIS information describing franchise street right of locations in ESRI software is publicly available from local county and city governments. Please refer to <http://sangis.org/index.html>.

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QUESTION 3:

For all sections of the L1600 rebuild described in the Line 1600 test and replacement plan of 09/26/2018 or any subsequent plan, provide the completed Detailed Environmental Review that SDG&E/SoCalGas have stated it will complete. Provide supporting traffic analysis, biological reports, air quality modeling assessment and reports, noise impact analysis.

RESPONSE 3:

SDG&E and SoCalGas (jointly, Utilities) object to this data request on the following grounds: In responding to Data Request 105, Question 3, the Utilities do not concede that the subject matter of Question 3, the Utilities' response or any documents, data or materials produced with such response is within the scope of Phase 2 in this proceeding, as set forth in D.20-02-024, or admissible in evidence in Phase 2.

Subject to and without waiving the foregoing objection, the Utilities respond as follows:

The attachments contain **confidential and protected material pursuant to PUC Section 583, GO 66-D, D.17-09-023.**

SDG&E conducts a Detailed Environmental Review to identify permitting requirements and any potential environmental impacts arising from each project as proposed. This information is developed and applied during the detailed project engineering and design stage. If there are potential environmental impacts identified as part of the Detailed Environmental Review, some project elements may be rescope or relocated in order to avoid or mitigate them where feasible.

At this time, Detailed Environmental Reviews are complete for three projects, including 1) Midway Drive Replacement, 2) Black Mountain Replacement, and 3) Serra Mesa Replacement. Detailed Environmental Reviews for the remaining projects have not been completed. For the three previously referenced projects, SDG&E and SoCalGas have enclosed the Detailed Environmental Reviews, as well as the results of the non-confidential cultural resource reports for each project. Confidential cultural resource reports are not enclosed – see note below. The preparation of traffic analysis, air quality modeling, and noise impact analysis are not studies conducted in support of the preparation of a Detailed Environmental Review and therefore analysis and reports do not exist for these items. A report summarizing the results of a California gnatcatcher protocol level survey for the Black Mountain Replacement Project is in final production and is not scheduled to be available until April 2020.

Important information about confidential cultural resources data:

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As explained below, this response contains certain confidential and restricted information regarding archaeological sites, which can only be provided to a qualified individual, pursuant to restrictions that are discussed further below. SDG&E is unable to provide the confidential archaeological site information until PAO provides the name(s) of the qualified individual that will receive the information. Non-confidential Built Environment historic resources and historic addresses have been provided as part of this data response.¹

Access to archaeological site information is confidential and restricted from public disclosure by California Government Code 6254.10, National Historic Preservation Act Section 304, Archaeological Resources Protection Act Section 9, and the Freedom of Information Act Section 552(b)(3). In addition, the contracts and agreements that SDG&E has with the California Historical Resources Information System (CHRIS) Information Centers restricts access to this information to qualified professional staff only. Based on the protections provided by the law and the contractual limitations placed by the CHRIS Information System, SDG&E and SCG are restricted in the ability to share the confidential information pursuant to the following:

According to the CHRIS Information Center Rules of Operation Manual, pursuant to federal and state law, information within the CHRIS pertaining to historical resources of an archaeological nature is managed as confidential, with access to and release of said information determined as specified in Section III of this Manual:²

- (A) Unless otherwise prohibited by law, all CHRIS information pertaining to historical resources may be released by an Information Center to an individual who:
- (1) Meets the minimum qualifications of a professional in the disciplines of Archaeology, Architectural History, Architecture, Historic Architecture, or History as defined in the Secretary of Interior's Standards; or
 - (2) Meets the requirements of the California State Personnel Board for the positions of Associate State Archaeologist or State Historian II; or
 - (3) Meets the California Business and Professions Code requirements for a state licensed Landscape Architect, plus additional experience requirements added by the State Historical Resources Commission on July 31, 2009; or
 - (4) Is working under the supervision of an individual who qualifies for access to CHRIS information under (A)(1), (A)(2), or (A)(3) criteria, and who assumes full responsibility for the disposition of said information.

¹ CHRIS data is not always accurate in its GIS depictions of historic address locations – the point data is approximate in its geographic location. Points are often generated on parcels and do not always reflect the locations of historic buildings.

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For additional information regarding how to seek information from CHRIS Information Center, see the CHRIS Information Center Rules of Operation manual or Access and Use Agreement.³

³ CHRIS Information Center Rules of Operation Manual available at: CHRIS Rules of Operation Manual, https://ohp.parks.ca.gov/pages/1068/files/CHRIS_IC_Rules_of_Operation_Manual.pdf; and CHRIS Access and Use Agreement,

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Date Responded: March 18, 2020**

QUESTION 4:

Provide all GIS files relating to the locations of environmental resources that SDG&E/SoCalGas analyzed as part of the preparation of the Detailed Environmental Review. The GIS data shall be provided in either .shp or .gdb file formats that are accessible to standard ESRI software. In addition, the data shall be provided as maps figures in a PDF format to allow immediate review and QA/QC of the GIS files.

RESPONSE 4:

SDG&E and SoCalGas (jointly, Utilities) object to this data request on the following grounds: In responding to Data Request 105, Question 4, the Utilities do not concede that the subject matter of Question 4, the Utilities' response or any documents, data or materials produced with such response is within the scope of Phase 2 in this proceeding, as set forth in D.20-02-024, or admissible in evidence in Phase 2. Subject to and without waiving the foregoing objection, the Utilities respond as follows:

The attachments contain **confidential and protected material pursuant to PUC Section 583, GO 66-D, D.17-09-023.**

The Utilities incorporate herein by reference their response to Question 3. GIS files and Map Figures of the environmental resources SDG&E analyzed for the preparation of the following Detailed Environmental Reviews are enclosed: 1) Midway Drive Replacement, 2) Black Mountain Replacement, and 3) Serra Mesa Replacement. This data includes non-confidential historical resources, environmental elements (biological resources, aquatic and water resources), geological elements, and land use elements. Confidential cultural resource GIS files and map figures are not enclosed – see note below.

Important information about confidential cultural and paleontological resources data:

Access to archaeological site information and paleontological fossil localities is confidential and restricted from public disclosure by California Government Code 6254.10, National Historic Preservation Act Section 304, Archaeological Resources Protection Act Section 9, Paleontological Preservation Act, Public Law 111-11, Title VI, Subtitle D, Section 6309 (March 30, 2009); 16 USC § 470aaa-8, and the Freedom of Information Act Section 552(b)(3). In addition, the contracts and agreements that SDG&E has with the California Historical Resources Information System (CHRIS) Information Centers restricts access to archaeological site information to qualified professional staff only. SDG&E and SoCalGas hereby incorporate the response to Q3, regarding restrictions applied to confidential archeological information and paleontological fossil locality locations and request that PAO provides the name(s) of the qualified individual that will receive the information.

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QUESTION 5:

Where a Detailed Environmental Review has not been completed for a section, provide the schedule for its completion of the review.

RESPONSE 5:

SDG&E and SoCalGas (jointly, Utilities) object to this data request on the following grounds: In responding to Data Request 105, Question 5, the Utilities do not concede that the subject matter of Question 5, the Utilities' response or any documents, data or materials produced with such response is within the scope of Phase 2 in this proceeding, as set forth in D.20-02-024, or admissible in evidence in Phase 2. Subject to and without waiving the foregoing objection, the Utilities respond as follows:

PSEP includes a 5-stage project lifecycle for each project. A Detailed Environmental Review (DER), is generally performed during the first half of Stage 3-Detailed Design and Engineering. Provided below is a summary table of the current estimated timeframe when the DER for each of the 19 projects will be completed. The DERs for the Midway, Black Mountain, and Serra Mesa projects are complete.

Project Name	DER Timeframe to Complete
10. Midway Project Replacement	Complete
14. Black Mountain Replacement	Complete
19. Serra Mesa Replacement	Complete
18. Kearny Mesa Replacement	Q2-2020
10. Bear Valley Replacement	Q2-2020
15. MCAS North Replacement	Q4-2020
16. MCAS Central Replacement	Q4-2020
17. MCAS South Replacement	Q4-2020
11. Pomerado North Replacement	Q1-2021
12. Pomerado South Replacement	Q2-2021
13. Scripps Poway Parkway Replacement	Q3-2021
8. La Honda and Lincoln Replacement	Q4-2021
1. Rainbow Replacement	Q4-2021
5. Lilac Replacement	Q1-2022
6. Moosa Creek Hydrotest	Q4-2022
7. Daley Ranch Hydrotest	Q4-2022
2. Rice Canyon Hydrotest	Q2-2023

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3. Couser North Hydrottest	Q2-2023
4. Couser South Hydrottest	Q2-2023

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(DATA REQUEST 105 Q6-Q7)

Date Requested: March 4, 2020

Date Responded: March 13, 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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(DATA REQUEST 105 Q6-Q7)

Date Requested: March 4, 2020

Date Responded: March 13, 2020

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” or “PAO”) 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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(DATA REQUEST 105 Q6-Q7)

Date Requested: March 4, 2020

Date Responded: March 13, 2020

QUESTION 6:

Provide the California Environmental Quality Act (CEQA) notice/s of determination of either negative declaration, mitigated negative declaration, or the certified Environmental Impact Report that has been completed, for individual, some, or all sections of the proposed rebuild laid out in Line 1600 test or replacement plan or its successor.

RESPONSE 6:

SDG&E and SoCalGas (jointly, Utilities) object to this data request on the following grounds:

1. In responding to Data Request 105, Question 6, the Utilities do not concede that the subject matter of Question 6, the Utilities' response or any documents, data or materials produced with such response are within the scope of Phase 2 in this proceeding, as set forth in D.20-02-024, or admissible in evidence in Phase 2.
2. The Utilities object to this request insofar as it requests documents that do not exist, and therefore, the Utilities cannot produce them.

Subject to and without waiving the foregoing objection, the utilities respond as follows:

Pursuant to the Commission's D.18-06-028, neither the Commission's requirement that the Utilities submit a Line 1600 Test or Replace Plan, including Options 1 and 2, nor the delegation to the Safety and Enforcement Division (SED) to approve such Plan, required CEQA review.¹ Notably, the PAO (then ORA) argued that CEQA review by the Commission was not required on various grounds. In the Line 1600 Test or Replace Plan, the Utilities stated that they would identify and comply with applicable permitting requirements for each segment.²

Following the approval of the Plan by SED in January 2019, the Utilities have undertaken the detailed design and planning of the Plan segments. Most Plan segments have not yet reached the stage of planning where any necessary permits have been sought from state or local agencies. The first segment to go into construction, the Midway Segment, required a discretionary permit from CalTrans and the attached Notice of Exemption was filed by that agency. The Utilities will continue to comply with the applicable laws and regulations, including CEQA.

¹ D.18-06-028 at 103-04 (referencing various CEQA exceptions identified by the California Public Advocates Office).

² See, e.g., Plan at 59 and 66.

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Date Requested: March 4, 2020

Date Responded: March 13, 2020

QUESTION 7:

For sections of the proposed L1600 rebuild where no determination described in Q5 [sic] exists, please provide justification for the lack of any CEQA determination and describe how, where, when, and by what authority the project has complied with CEQA.

RESPONSE 7:

SDG&E and SoCalGas (jointly, Utilities) object to this data request on the following grounds:

1. In responding to Data Request 105, Question 6, the Utilities do not concede that the subject matter of Question 6, the Utilities' response or any documents, data or materials produced with such response are within the scope of Phase 2 in this proceeding, as set forth in D.20-02-024, or admissible in evidence in Phase 2.
2. The Utilities object to this Question 6 insofar as it is not required to create documents that do not exist.
3. The Utilities object to Question 6 as vague, ambiguous, and overbroad by its use of the phrase "please provide justification for the lack of any CEQA determination and describe how, where, when, and by what authority the project has complied with CEQA."

Subject to and without waiving this objection, the Utilities respond as follows:

See response to Q6, above, which is hereby incorporated by reference for purposes of responding to Question 7.