

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

**APPLICATION TO RECOVER COSTS RECORDED IN THE
PIPELINE SAFETY AND RELIABILITY MEMORANDUM ACCOUNTS,
THE SAFETY ENHANCEMENT EXPENSE BALANCING ACCOUNTS, AND
THE SAFETY ENHANCEMENT CAPITAL COST BALANCING ACCOUNTS
(A.16-09-005)**

(DATA REQUEST ORA-05 (A.16-09-005))

Date Requested: July 5, 2017

Date Responded: July 20, 2017

Date Amended: July 24, 2017

2nd Amended Response Submitted: August 09, 2017

3rd Amended Response Submitted: September 8, 2017

QUESTION 5.01:

Please complete the attached spreadsheet for all project segments in this application. For any cell information that is not available or does not apply, please enter "N/A" and provide a separate written explanation. The columns in the spreadsheet are described as follows:

- A. Project name or identifier
- B. Segment name or identifier
- C. Reference to SCG workpapers. If none, please enter "None"
- D. Total segment length in feet
- E. Total segment length in feet that are part of PSEP Phase I
- F. *[calculation column; please do not enter any data]*
- G. Segment incidental pipeline length in feet
- H. *[calculation column, please do not enter any data]*
- I. Segment accelerated pipeline length in feet
- J. *[calculation column, please do not enter any data]*
- K. Segment class location at the time of installation
- L. Segment class location as of January 1, 1970
- M. Segment class location as of July 1, 2017
- N. Date(s) of class location change(s). If none, please enter "None".
- O. Maximum Allowable Operating Pressure (MAOP) at time of installation
- P. MAOP in PSIG as percentage of Standard Minimum Yield Strength (SMYS) at time of installation
- Q. MAOP in PSIG as of January 1, 1970
- R. MAOP PSIG as percentage of SMYS as of January 1, 1970
- S. MAOP in PSIG as of July 1, 2017.
- T. MAOP PSIG as percentage of SMYS as of July 1, 2017.
- U. Test pressure in PSIG of most recent pressure test. If no pressure test, please enter "None."
- V. Test ratio.
- W. Test duration in minutes of most recent pressure test
- X. Segment year of installation
- Y. Project cost in thousands of US dollars
- Z. Project costs borne by shareholders in thousands of US dollars

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AA. *[calculation column, please do not enter any data]*

AB. Any additional notes or comments

RESPONSE 5.01:

The attachment, as amended on September 8, 2017, supersedes the August 10, 2017, July 24, 2017, and July 20, 2017 versions.

Amendment 1 dated July 24, 2017 to ORA DR-05 addressed inadvertent cut-and-paste errors that were identified after the response was submitted to ORA. Amendment 2 to ORA DR-05, dated August 10, 2017, addressed inadvertent data transcription and cut-and-paste errors that were identified after the first amended response was submitted to ORA. Amendment 3 dated September 8, 2017 to ORA DR-05 addresses responses previously provided for columns T (MAOP PSIG as percentage of SMYS as of July 1, 2017) and U (Test pressure in PSIG of most recent pressure test. If no pressure test, please enter "None") as SoCalGas/SDG&E previously misunderstood the questions (T and U) as requesting historic (pre-PSEP) rather than current information.

We apologize for any inconvenience to ORA caused by the multiple amendments. As discussed during the meet and confers on this data request, the data requested is not readily available in the format requested and therefore, SoCalGas personnel had to review multiple data sets/sources and manually extract and compile the data to present the data in the manner requested. This process was challenging to complete in the timeframes typically allotted for data requests.

- A. See spreadsheet.
- B. See spreadsheet.
- C. See Column C of "Sheet 2" of spreadsheet. Note, this information is not tracked by segment and is provided at the project level.
- D. See spreadsheet.

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- E. See spreadsheet. In the August 09, 2017 amended response, SoCalGas and SDG&E have rounded lengths to the nearest foot.
- F. *[calculation column]*
- G. See spreadsheet. In the August 09, 2017 amended response, SoCalGas and SDG&E have rounded lengths to the nearest foot.
- H. *[calculation column]*
- I. See spreadsheet. In the August 09, 2017 amended response, SoCalGas and SDG&E have rounded lengths to the nearest foot.
- J. *[calculation column]*
- K. SoCalGas and SDG&E object to this request under CPUC Rule of Practice and Procedure 10.1 on the grounds that the burden and expense of responding to the request outweigh the likelihood that the information sought will lead to the discovery of admissible evidence in this proceeding. Pursuant to a telephonic meet-and-confer between ORA and SoCalGas/SDG&E on July 19, 2017, and subsequent email from Nils Stannik dated July 20, 2017, ORA has withdrawn this request.
- L. SoCalGas and SDG&E object to this request under CPUC Rule of Practice and Procedure 10.1 on the grounds that the burden and expense of responding to the request outweigh the likelihood that the information sought will lead to the discovery of admissible evidence in this proceeding. Pursuant to a telephonic meet-and-confer between ORA and SoCalGas/SDG&E on July 19, 2017, and subsequent email from Nils Stannik dated July 20, 2017, ORA has withdrawn this request.
- M. See spreadsheet.
- N. SoCalGas and SDG&E object to this request under CPUC Rule of Practice and Procedure 10.1 on the grounds that the burden and expense of responding to the request outweigh the likelihood that the information sought will lead to the discovery of admissible evidence in this proceeding. Per the email from Nils Stannik dated July 20, 2017 (hereafter referred to as ORA Data Request 06), ORA modified this request. SoCalGas and SDG&E will provide a response to ORA Data Request 06 in due course.
- O. SoCalGas and SDG&E object to this request under CPUC Rule of Practice and Procedure 10.1 on the grounds that the burden and expense of responding to the request outweigh the likelihood that the information sought will lead to the discovery of admissible evidence in this proceeding. Pursuant to a telephonic meet-and-confer between ORA and SoCalGas/SDG&E on July 19, 2017, and subsequent email from Nils Stannik dated July 20, 2017, ORA has withdrawn this request.

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- P. SoCalGas and SDG&E object to this request under CPUC Rule of Practice and Procedure 10.1 on the grounds that the burden and expense of responding to the request outweigh the likelihood that the information sought will lead to the discovery of admissible evidence in this proceeding. Pursuant to a telephonic meet-and-confer between ORA and SoCalGas/SDG&E on July 19, 2017, and subsequent email from Nils Stannik dated July 20, 2017, ORA has withdrawn this request.
- Q. SoCalGas and SDG&E object to this request under CPUC Rule of Practice and Procedure 10.1 on the grounds that the burden and expense of responding to the request outweigh the likelihood that the information sought will lead to the discovery of admissible evidence in this proceeding. Pursuant to a telephonic meet-and-confer between ORA and SoCalGas/SDG&E on July 19, 2017, and subsequent email from Nils Stannik dated July 20, 2017, ORA has withdrawn this request.
- R. SoCalGas and SDG&E object to this request under CPUC Rule of Practice and Procedure 10.1 on the grounds that the burden and expense of responding to the request outweigh the likelihood that the information sought will lead to the discovery of admissible evidence in this proceeding. Pursuant to a telephonic meet-and-confer between ORA and SoCalGas/SDG&E on July 19, 2017, and subsequent email from Nils Stannik dated July 20, 2017, ORA has withdrawn this request.
- S. See spreadsheet. **The attached supporting documents include Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024.**
- T. See spreadsheet. **The attached supporting documents include Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024.**
- U. See spreadsheet. **The attached supporting documents include Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024.**
- V. See spreadsheet. **The attached supporting documents include Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024.**
- W. See spreadsheet.
- X. See spreadsheet.
- Y. See Column D of "Sheet 2" of spreadsheet. Note, this information is not tracked by segment and is provided at the project level.
- Z. See Column E of "Sheet 2" of spreadsheet. Note, this information is not tracked by segment and is provided at the project level.
- AA. *[calculation column]*
- AB. See spreadsheet.

**BEFORE THE PUBLIC UTILITIES
COMMISSION OF THE STATE OF CALIFORNIA**

**DECLARATION OF HUGO MEJIA
REGARDING CONFIDENTIALITY OF CERTAIN DATA/DOCUMENTS
PURSUANT TO D.16-08-024**

I, Hugo Mejia, do declare as follows:


1. I am a Project and Execution Manager in the Major Programs & Project Controls for San Diego Gas & Electric Company (“SDG&E”) and Southern California Gas Company (“SoCalGas”) designated by Jimmie Cho, Senior Vice President, Gas Operations and System Integrity for SDG&E and SoCalGas. I have been delegated authority to sign this declaration by Mr. Cho. I have reviewed the Response of SoCalGas and SDG&E to the Fifth Data Request of the Office of Ratepayer Advocates (ORA) of the California Public Utilities Commission (CPUC) in the Pipeline Safety and Enhancement Plan (PSEP) 2016 Reasonableness Review A.16-09-005 proceeding, submitted concurrently herewith (Response to ORA’s Fifth Data Request). I personally am familiar with the facts and representations in this Declaration, except where stated as based upon my information and belief. If called upon to testify, I could and would testify to the following based upon my personal knowledge and/or information and belief.

2. I hereby provide this Declaration in accordance with Decision (D.) 16-08-024 to demonstrate that the confidential information (Protected Information) provided in the Response to ORA’s Fifth Data Request is within the scope of data protected as confidential under applicable law and pursuant to Public Utilities Code (“PUC”) § 583 and General Order (“GO”) 66-C, as further described in Attachment A.

3. In accordance with the legal authority described herein, the Protected Information should be protected from public disclosure.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed this 18th day of July, 2017, at Los Angeles, California.



Hugo Mejia
Project and Execution Manager

ATTACHMENT A

SoCalGas and SDG&E Request Confidential Treatment of the Following Information in Their Response to ORA's Fifth Data Request in A.16-09-005, Application to Recover Costs Recorded in Pipeline Safety & Reliability Memorandum Accounts, Safety Enhancement Capital Costs Balancing Accounts, and Safety Enhancement Expense Balancing Accounts

SDG&E and SoCalGas designated the combination of the pipeline diameter attribute and location data as confidential in their response to ORA's Fifth Data Request in A.16-09-005, Application to Recover Costs Recorded in Pipeline Safety & Reliability Memorandum Accounts, the Safety Enhancement Expense Balancing Accounts, and the Safety Enhancement Capital Cost Balancing Accounts, because:

- (1) This data is sensitive critical energy infrastructure information that is not currently published by PHMSA and, if made publicly available, could present a risk to the security of California's critical energy infrastructure. SoCalGas' and SDG&E's assessment of the risks associated with critical energy infrastructure data will continue to evolve as the sophistication, frequency and volume of security threats increase. In light of certain events, such as the attack on Pacific Gas & Electric Company's Metcalf Substation in 2013, SoCalGas and SDG&E believe pipeline diameter data must be treated as confidential. SoCalGas and SDG&E designate this pipeline diameter data as confidential pursuant to 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. The yellow highlighted portions on the pages identified in the table below fall within the category of sensitive critical energy infrastructure.

DATA / INFORMATION	JUSTIFICATION FOR CONFIDENTIALITY	ATTACHMENTS
<p>Pipeline attribute (i.e. diameter, pressure, and location)</p>	<p>This information has been identified as confidential protected information as this data constitutes sensitive critical energy infrastructure information that is not currently published by the PHMSA and, if made publicly available, could present a risk to the security of the SoCalGas and SDG&E pipeline system and California’s critical energy infrastructure.</p> <p><u>CEII</u>: 18 CFR §388.113(c); FERC Orders 630, 643, 649, 662, 683, and 702 (defining CEII).</p> <p><u>Critical Infrastructure Information</u>: 6 U.S.C. §§131(3), 133(a)(1)(E); 6 CFR §§ 29.2(b), 29.8 (defining CII and restricting its disclosure).</p> <p>Gov’t Code § 6254(e) (“Geological and geophysical data, plant production data, and similar information relating to utility systems development, or market or crop reports, that are obtained in confidence from any person.”)</p> <p>Gov’t Code § 6254 (ab) (“Critical infrastructure information, as defined in Section 131(3) of Title 6 of the United States Code, that is voluntarily submitted to the Office of Emergency Services for use by that office”)</p>	<p>Attachment Q5.01 Tab: Sheet 1 - Column: S, T, U & V.</p>