

**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-06 (A.16-09-005))**

**Date Requested: July 20, 2017**

**Date of Partial Response (Excluding Question 3): August 9, 2017**

**Date of Supplemental Response (Including Question 3): August 17, 2017**

**Date of 1<sup>st</sup> Amended Response: September 8, 2017**

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**QUESTION 1:**

In regards to ORA DR-05, for components of the request that SCG/SDG&E are unable to provide or that would be very burdensome to provide, provide a written explanation along the lines of what we discussed during our July 20, 2017 phone call as to why this is the case, the current state of the relevant records, and how far back “searchability” or digitization goes.

**RESPONSE 1:**

SoCalGas and SDG&E objected to portions of ORA DR-05 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 withdrew the following subparts of ORA DR-05:

- K. Segment class location at the time of installation
- L. Segment class location as of January 1, 1970
- 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

As explained by SoCalGas during the meet-and-confer, the High Pressure Pipeline Database (HPPD) contains recent class location and Maximum Allowable Operating Pressure (MAOP) information for transmission pipelines in the SoCalGas/SDG&E system. The historical class location and MAOP information requested by ORA is not readily available in the format requested. In general, historic records were created and stored in paper format. Although some have since been scanned into PDF format, the PDF file itself is not easily searchable. Providing the information requested in the manner requested would be manually intensive, as it would require SoCalGas to assign personnel to physically review all the historic records, which

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are voluminous, to search for this information. SoCalGas did offer to make this database, and all of the records, available for review and inspection by ORA onsite, since the volume is to enormous to transmit electronically.

See also, the response for ORA-06 Question 2, which provides further detail regarding documentation currently available with respect to Class Location.

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**QUESTION 2:**

In regards to ORA DR-05, in place of part N (asking for all class location changes), please provide the most recent class location change record if there is one, or state if there is not. From our discussion on July 20, 2017, I gleaned that it could be the case that finding class locations changes before a certain date could be very labor intensive; if this is the case, please state as such and explain why that date is the divider (earlier records not digitized, first-hand knowledge among staff not available, etc.)

**RESPONSE 2:**

During the 2007 to 2008 timeframe, SoCalGas began evaluating class location information using third-party specialty software that was built specifically to manage class and HCA information by modeling building structures and well-defined gathering places along the pipeline right-of-way (i.e., a Geographic Information System or GIS) on pipelines that are identified as transmission under Department of Transportation regulations. The results were integrated with pipe segment information within the high-pressure pipeline database (HPPD) and are considered readily available. The attached table identifies the date a class location change occurred within each project, or states 'no change' if no changes have occurred since SoCalGas began performing these evaluations in GIS. The reported change may be for the entire project or a portion of the project length.

Prior to the 2007 to 2008 time period, class location maintenance records were kept in both paper format and various digital formats that are not readily extractable in their current archived state. Thus, while SoCalGas currently has the ability to integrate class information with pipe segment detail, information documented prior to the 2007/2008 system enhancement does not lend itself to providing the type of change reports requested in this data request. See the response to ORA DR-06 Q.1 above regarding the availability of historical records.

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**QUESTION 3:**

In regards to ORA DR-05, add a column to the DR supporting spreadsheet categorizing each segment in this application as test (T), replace (R), abandon (A), derate (D), or other (O).

**RESPONSE 3:**

The attached supporting document includes Confidential and Protected Information pursuant to PUC Section 583, GO 66-C, and D.16-08-024. See column AB within attached spreadsheet originally provided on August 17, 2017 and amended on September 8, 2017.

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**QUESTION 4:**

In regards to ORA DR-05, for non-replacement segments, state whether SCG/SDG&E are relying on the grandfather clause (49 CFR Section 192.619(c)) in order to determine MAOP.

**RESPONSE 4:**

SoCalGas and SDG&E are not relying on the grandfather clause for the segments identified in ORA DR-06, given that the lines have been tested.

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**QUESTION 5:**

In regards to ORA DR-05, for segments where SCG/SDG&E are relying on the grandfather clause to determine MAOP, indicate whether the underlying supporting document is a pressure test record showing the actual operating pressure. The actual records can be provided later as we understand it may take some time to gather and prepare those.

**RESPONSE 5:**

Not applicable.

**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:

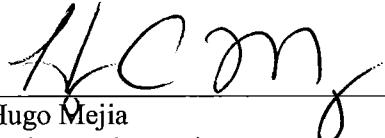
1. I am a Project and Execution Manager in the Major Programs & Project Controls for San Diego Gas & Electric Company (“SDG&E”) and Southern California Gas Company (“SoCalGas”) designated by Jimmie Cho, Senior Vice President, Gas Operations and System Integrity for SDG&E and SoCalGas. I have been delegated authority to sign this declaration by Mr. Cho. I have reviewed the Response of SoCalGas and SDG&E to the Sixth 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 Sixth 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 Sixth 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 17<sup>th</sup> day of August, 2017, at Los Angeles, California.

  
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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 Sixth 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 Sixth 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&amp;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 Q3.01 Tab: Sheet 1 - Column: S, T, U &amp; V.</p>