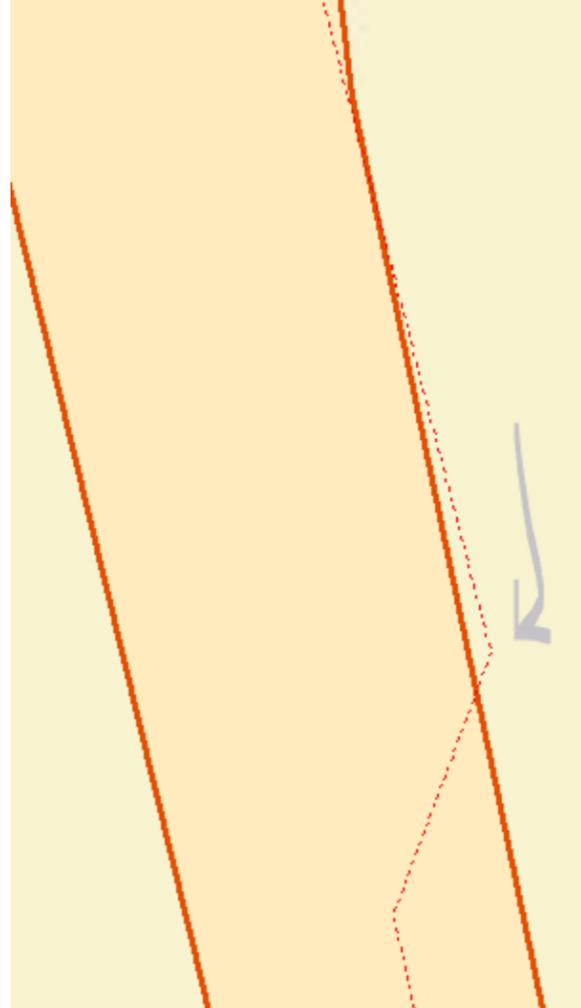
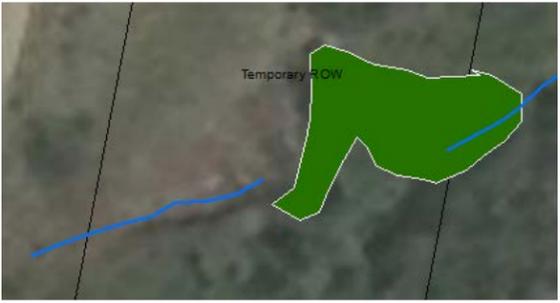


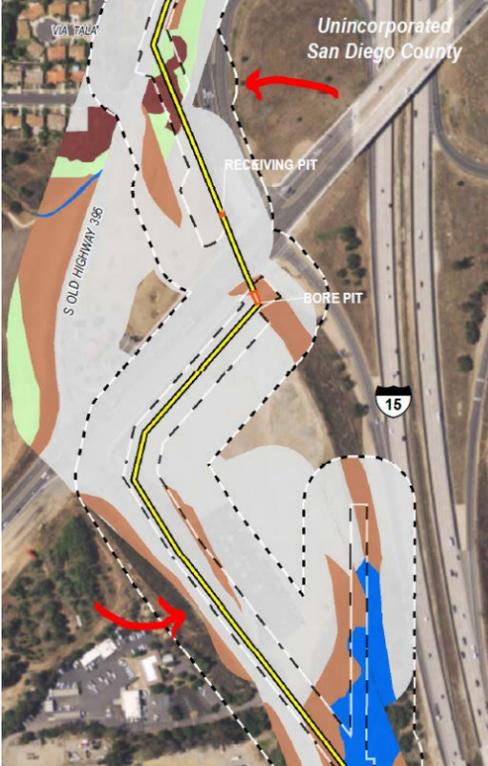
**San Diego Gas & Electric Company (SDG&E) and Southern California Gas Company (SoCalGas) Responses  
A.15-09-013 Pipeline Safety & Reliability Project (PSRP or Proposed Project)  
California Public Utilities Commission (CPUC) Data Request No. 04 – September 12, 2017**

DG#	Resource Area/Topic	Source/ Proponent's Environmental Assessment (PEA) Page	Data Gap (DG) Question	CPUC's Notes	Response
2-7 Follow-up 1	Project Description	Project description data included in the 6-23-2017 "PSRP_Facilities" and the 6-23-2017 "PSRP_ImpactLayer" layers	<p>At MP27.5, the centerline of L3602 (dotted red line) appears to leave the construction workspace (temporary ROW) (solid red line) as shown below.</p> <p>1) confirm if this is correct and explain why temporary workspace would not be needed around the centerline at this MP, or</p> <p>2) provide an updated centerline and/or impacts file to correct this.</p> 		<p>As part of the Post-PEA Minor Design Refinements provided to the CPUC on January 31, 2017, the centerline was shifted slightly at this location, but the workspace was not corrected to accommodate the change. Revised shapefiles with the workspace adjusted are included as Confidential Exhibit AA: Revised Workspace and Impact Layer Shapefiles, which includes <b>confidential information provided pursuant to California Public Utilities Code (P.U. Code) § 583, General Order (G.O.) 66-C, Decision (D.) 16-08-024, and the accompanying declaration.</b></p>

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2-9	Project Description	PEA, Project Description, Section 3.6.19 Night Work	Description of construction activities occurring at night does not include any work at staging/laydown yards. Is it correct to assume no work will occur in staging/laydown areas at night? If this assumption is not correct, describe the activities that would occur and their expected frequency		As described in PEA Chapter 3, Section 3.6.19 Night Work, different scenarios could require night work. Depending on the activity, a staging yard for personal vehicle parking and use of office trailers may be needed to support night work. Because of the uncertainty of night work requirements (i.e., traffic control permits that could require night work in some areas), it should be assumed that any activity described in PEA Section 3.5.1 Staging Areas could occur at night as long as it is consistent with Applicants-Proposed Measure NOI-01. Other activities that may occur in staging areas at night include pipe fabrication and testing, equipment maintenance and refueling, material handling and delivery (inbound/outbound), pre-testing pipe joints, and other work to support construction.
3-14	Alternatives	No Project Alternative	<p>Status Report on Line 1600 and the Southernmost 4.7 Miles of Line 1600 (South of Kearney Station [3011/2010 Crosstie] within MCAS Miramar)</p> <ol style="list-style-type: none"> <li>1. What is the current MAOP of Line 1600 (all 49.7 miles)?                             <ol style="list-style-type: none"> <li>i. If the Applicants believe that the current MAOP for all 49.7 miles of Line 1600 is greater than 512 PSIG, please explain with reference to Resolution SED-1 and provide all written communications with the CPUC's Safety Enforcement Division about this matter. See also the attached letter from the Applicants to the CPUC Executive Director at p. 2, "SDG&amp;E will follow up with SED to discuss the calculation and the establishment of MAOP. The Maximum Operating Pressure (MOP) has been reduced to 512 psig.</li> </ol> </li> <li>2. Explain why the southernmost 4.7 miles of Line 1600 are not part of the proposed PSRP (Proposed Project) with reference in the discussion to the overall safety of Line 1600 in its entirety.</li> <li>3. Provide a status report for the 4.7 miles of Line 1600 that are not part of the Proposed Project. Within the report, describe the following, at minimum:                             <ol style="list-style-type: none"> <li>a. Has the 4.7 mile segment (a) been pressure tested, or (b) will it be pressure tested and when (month and year estimate). We assume that SDG&amp;E/SoCalGas will comply with their adopted Pipeline Safety Enhance Plan as soon as practicable. Explain why full compliance is or is not immediately achievable for the 4.7 miles in the coming months. Explain why compliance has not already been achieved for the 4.7-mile segment.</li> <li>b. What is the current MOP of the 4.7-mile segment?</li> <li>c. What is the current MAOP of the 4.7-mile segment?</li> <li>d. When did SDG&amp;E/SoCalGas last inspect the entire 4.7-mile segment and with what methods?</li> <li>e. Describe any safety issues based on the most recent inspections.</li> </ol> </li> </ol> <p><b>NOTE:</b> If the responses to any of these questions is considered confidential by the Applicants, provide both redacted and confidential versions of the response, and explain why the information was marked confidential.</p>	See also attached letter from the Applicants to the CPUC Executive Director (7/14/16)	<p><b>This response contains confidential information (shaded in gray) provided pursuant to P.U. Code § 583, G.O. 66-C, D.16-08-024, and the accompanying declaration.</b></p> <ol style="list-style-type: none"> <li>1. On July 9, 2016, SDG&amp;E and SoCalGas (Applicants) reduced the maximum operating pressure (MOP) of Line 1600 to 512 psig in compliance with the CPUC's July 8, 2016 Executive Director Emergency Order, which was ratified in Resolution SED-1. Currently, the MAOP of Line 1600 is 512 psig.</li> <li>2. As discussed throughout this proceeding, in the Application, supporting testimony, and various discovery responses, Applicants have proposed building a new 36-inch diameter natural gas transmission line (Line 3602) from the Rainbow Pressure Limiting Station in the north to a point approximately 47 miles to the south where the proposed line would interconnect with existing transmission pipeline Line 2010. This new line is intended to replace the transmission function of the northern 45 miles of Line 1600 between Rainbow in the north and Kearny Villa Station in the south, allowing those 45 miles to be de-rated and repurposed as a distribution line. Expanding the scope of the Proposed Project to include the southern 4.7 miles of Line 1600 would not substantially improve the safety, reliability, and operational benefits that the Proposed Project provides to the entire SDG&amp;E system, and so were not included in this Application. This proceeding has involved an in-depth review of Line 1600 including safety considerations, most of which apply to the entire length of Line 1600. Applicants are looking to the Commission's findings regarding Line 1600 within this Application as guidance and direction that the Applicants will use in developing a plan that addresses the southernmost 4.7 miles of Line 1600. If the Commission approves the Proposed Project and the northern 45 miles of Line 1600 are de-rated to 320 psig and repurposed as a distribution pipeline, then it is likely that the southern 4.7 miles would also be de-rated to 320 psig and operated as a distribution pipeline. If the Commission denies Applicants' Application, Applicants will consider the Commission's findings and develop a plan for addressing the southernmost 4.7 miles of Line 1600.</li> <li>3. Status Report                             <ol style="list-style-type: none"> <li>a. The majority of the referenced 4.7 mile segment of Line 1600 has not been pressure tested. Please see the response to 2 above for the overarching path being pursued by the Applicants for this segment. Applicants have taken steps to confirm the current fitness for service of the line, including in-line inspection and reducing the MAOP of the pipeline to 512 psig, during the period when the future of the northerly 45 miles of Line 1600 is determined as part of this Application. Given the matters being discussed in this Application and the close involvement of the CPUC, including the Safety &amp; Enforcement Division, Applicants believe this is a reasonable and prudent course of action to pursue for the remaining southerly 4.7 miles.</li> <li>b. 512 psig.</li> <li>c. The MAOP of the 4.7 mile segment is 512 psig.</li> <li>d. The last inline inspection (ILI) for the entire 4.7 mile segment of Line 1600 was performed on [REDACTED]. In addition, a leak survey and encroachment patrol was completed on August 15, 2017, a cathodic protection survey of pipe to soil readings was completed on July 28, 2017, and a cathodic protection survey of rectifier potentials was completed on July 15, 2017.</li> <li>e. [REDACTED] 4.7 mile segment of Line 1600.</li> </ol> </li> </ol>

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3-15	Alternatives	Amended Application, VII. Procedural Requirements	Are there alternatives that would allow SDG&E and SoCalGas to meet the Commission-mandated design standards for reliability (1-in-10 year cold day) until 2023, if Line 1600 was de-rated now? If so, provide a list and description of these alternatives.		<p>De-rating Line 1600 is part of Applicants' Proposed Project, along with constructing proposed Line 3602 to replace Line 1600's transmission function, and the CPUC has not completed its review of the Proposed Project, potential alternatives and potential mitigation measures under the California Environmental Quality Act (CEQA). The response provided below presumes that this question is asking whether, following an approval of the Proposed Project or an alternative (other than the No Project Alternative), Line 1600 could be de-rated before the Proposed Project or alternative is implemented. That would depend, in part, upon the 1-in-10 year cold day forecast at that time, and whether Line 1600 could be de-rated without violating the CPUC design criteria. Subject to the above assumption, Applicants respond as follows:</p> <p>There are no physical system improvements that could be planned, designed, permitted, constructed, tested, and placed into service that could meet the Commission's 1-in-10 year cold day design standard through 2023 if Line 1600 were de-rated "now" or any time before an alternative source of gas is available to SDG&amp;E's system, unless SDG&amp;E's 1-in-10 year cold day forecast changes. Supply contracts at Otay Mesa are an alternative in theory, however, as discussed in greater detail in the February 21, 2017 Updated Prepared Direct Testimony of Paul Borkovich (at Section III), February 21, 2017 Supplemental Testimony of SDG&amp;E and SoCalGas (at Chapter 4), and June 12, 2017 Rebuttal Testimony of SDG&amp;E and SoCalGas (at Chapter 5), there are issues associated with the feasibility of such Otay Mesa alternatives even as a "bridge" to meet the Commission's 1-in-10 year cold day design standard. Further, Applicants' Scoping Comments submitted to Energy Division on June 12, 2017 provide substantial evidence that the Otay Mesa alternatives are infeasible as project alternatives under CEQA.</p>
3-16	Alternatives		<p>Provide all anticipated tie-in locations for each of these alternatives:</p> <ol style="list-style-type: none"> <li>1. Blythe to Santee Alternative 1</li> <li>2. Blythe to Santee Alternative 2</li> <li>3. Cactus City to San Diego</li> <li>4. South Orange County Coastal</li> </ol> <ul style="list-style-type: none"> <li>• Provide shapefiles for all tie-in locations for each alternative and the additional routing that would be needed to reach the associated tie-in locations.</li> <li>• Include the system, pipeline name, and diameter of the infrastructure that the routes would tie-into.</li> </ul>		<p><b>This response contains confidential information (shaded in gray) provided pursuant to P.U. Code § 583, G.O. 66-C, D.16-08-024, and the accompanying declaration.</b></p> <p>The anticipated tie-in locations for the following alternatives are as follows:</p> <ol style="list-style-type: none"> <li>1. Blythe to Santee Alternative 1 – At the northeast interconnection point, this alternative would tie-in to the SoCalGas/SDG&amp;E integrated gas transmission system at Lines [REDACTED], [REDACTED] and [REDACTED]. Line [REDACTED] and [REDACTED] are [REDACTED]-inch diameter pipelines. Line [REDACTED] is a [REDACTED]-inch diameter pipeline. At the southwestern terminus, this alternative would tie in to the SoCalGas/SDG&amp;E integrated gas transmission system at Line [REDACTED] which is [REDACTED]-inches in diameter.</li> <li>2. Blythe to Santee Alternative 2 – At the northeast interconnection point, this alternative would tie-in to the SoCalGas/SDG&amp;E integrated gas transmission system at Lines [REDACTED], [REDACTED] and [REDACTED]. Line [REDACTED] and [REDACTED] are [REDACTED]-inch diameter pipelines. Line [REDACTED] is a [REDACTED]-inch diameter pipeline. At the southwestern terminus, this alternative would tie-in to the SoCalGas/SDG&amp;E integrated gas transmission system at Line [REDACTED], which is [REDACTED]-inches in diameter.</li> <li>3. Cactus City to San Diego – At the northeast interconnection point, this alternative would tie-in to the SoCalGas/SDG&amp;E integrated gas transmission system at Lines [REDACTED] and [REDACTED]. Line [REDACTED] and [REDACTED] are [REDACTED]-inch diameter pipelines. At the southwestern terminus, this alternative would tie-in to the SoCalGas/SDG&amp;E integrated gas transmission system at Line [REDACTED], which is [REDACTED]-inches in diameter.</li> <li>4. South Orange County Coastal Alternative – At the northern interconnection point, this alternative would tie-in to Line [REDACTED], a [REDACTED]-inch diameter pipeline, at the Dana Point Station in the community of Dana Point, California. At the southern terminus, this alternative would tie-in to SDG&amp;E Line [REDACTED], which is a [REDACTED]-inch line located in the Torrey Pines area of San Diego, California.</li> </ol> <p>Shapefiles for all tie-in locations for the alternatives discussed above are provided in Confidential Exhibit BB: Alternative Tie-In Location Shapefiles, which <b>contains confidential information provided pursuant to P.U. Code § 583, G.O. 66-C, D.16-08-024, and the accompanying declaration.</b></p>

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4.1-2 Follow-up	Aesthetics		<p>Based on this response, it's our understanding that small to medium height shrubs (up to about 4-6 feet height) would be permissible to plant and maintain within the ROW in overland areas provided two-track access for maintenance vehicles within or adjacent to the ROW is maintained; the five-foot buffers around valve stations can contain vegetation, providing the vegetation does not inhibit access to valve facilities or cause employee safety concerns; and SDG&amp;E may occasionally clear or trim vegetation to maintain visible pipeline markers along the ROW. Confirm that our understanding of this response is correct or further clarify constraints pertaining to vegetation maintenance and management in the pipeline ROW and around valve facilities during operation and maintenance.</p> <p>In addition, we understand that no trees would be planted or allowed to grow within the pipeline ROW due to the potential for tree roots to cause coating damage. However, the visual simulation for Avenue of Nations (KOP 4) appears to show trees growing in the ROW three to five years after completion of construction and Item 1.4.1-3 of Request No. 3, dated Aug 11, 2016, describes "eucalyptus saplings" growing in the ROW. Confirm that it would not be permissible for the trees as shown and described to be growing in the ROW. Provide a revised description of the ROW in the vicinity of Avenue of Nations three to five years after construction that correctly describes the character and appearance of vegetation that would occur and the presence of a two-track road. Provide a revised visual simulation that more accurately depicts the character and appearance of vegetation and the two-track access road that would occur in the ROW three to five years after construction.</p>		<p>Small- to medium-height shrubs (up to about four to six feet height) would be permissible to reestablish within the right-of-way (ROW) in areas that had shrubbery prior to construction. In the few areas that require a permanent pipeline patrol road, the road will be maintained to 12 feet wide and kept free of vegetation. Two-track roads are not proposed. A more detailed description of the permanent patrol roads can be found in the Post-PEA Minor Design Refinements provided to the CPUC on January 31, 2017 on page A-12 in Attachment A: Minor Design Refinements.</p> <p>The five-foot buffers will be maintained free of vegetation and are considered permanent impacts. While some vegetation could establish, the intent is to keep it low lying so that the buffer is conspicuous. A more detailed description of the buffers can be found in the Post-PEA Minor Design Refinements on page A-6 in Attachment A: Minor Design Refinements.</p> <p>In responding to Energy Division's PEA Data Request 03, it was determined that allowing trees to grow within the ROW conflicts with SDG&amp;E's Transmission Pipeline Encroachment Procedures. Therefore, except in limited circumstances, it would not be permissible for trees to be growing in the ROW. As a result, the Avenue of Nations visual simulation is being revised. Eucalyptus saplings will be removed and replaced with shrubs that would be anticipated to grow in three to five years. The revised simulation will be provided to the CPUC by September 14, 2017.</p>
4.4-1 Follow-up	Biological Resources	Wetlands Delineation Report submitted 2/10/17	<p><b>Please provide GIS data for formal wetland delineation.</b> The GIS data provided in October of 2015 does not match the figures attached to the 2017 Wetland Delineation Report. See screenshots below. The first image represents the wetland data that was submitted 10-1-2015, in the "Wetlands_Waters.shp" file. The second image is from the February 2017 Wetland Delineation Report.</p> 		<p>The data provided in October 2015 was associated with the Preliminary Wetland and Waters Assessment dated September 2015. At that time, potential wetlands were mapped, but not delineated. The mapping was primarily based on wetland indicators, such as hydrophytic vegetation, but did not look at the soils or hydrology. The data in the Wetland Delineation Report dated February 2017 is based on a wetland delineation and would be considered more accurate than the preliminary assessment.</p> <p>Typically, the preliminary assessment and the wetland delineation mapping are very close. In this case, it is not because the wetland is located in a highly-disturbed area. The ROW follows a fire break to take advantage of previously disturbed land. During the 2015 field surveys, the fire break was recently mowed, so some of the wetland indicators were likely not present and were therefore not mapped. During the wetland delineation, soils, hydrology, and plants were assessed and the boundaries of the wetland were expanded.</p>

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4.4-10	Biological Resources		<p><b>Provide updated vegetation data for the current route.</b> Vegetation data provided in January 2017 did not account for route changes. The Biological Resources Survey Area (BRS) as defined in the PEA includes all proposed project components, plus approximately 150-foot buffer on each side of these components. When the current workspace is buffered by 150 feet, 74.8 acres of survey area are not accounted for. Workspace area that will be impacted has 5.4 acres of unaccounted for vegetation data. See screenshot below for an example of this situation. The dashed, black and white line represents the BRS (150 foot buffer of the workspace).</p> 		<p>The approximately 150-foot buffer on either side of the Proposed Project components (i.e., temporary workspaces) was established to collect more data than necessary to allow Project components to move or shift during the design phase without having to go back and resurvey. The BRS is not a post-processing buffer, but rather a limit of the survey area that was actually surveyed or evaluated in the field. The area between the edge of the workspace and the limits of the BRS is not used for any impact calculations and therefore was not resurveyed.</p> <p>The alignment of the State Route 76 crossing shown shifted as a result of consultations with the California Department of Transportation; however, because the shift was within the BRS, no additional surveys were conducted.</p>