

Exhibit FF: Response to 1.5-22**Significant Irreversible Environmental Change**

Pursuant to Section 15126.2(c) of the California Environmental Quality Act Guidelines, if an Environmental Impact Report is prepared, it must address significant irreversible and irretrievable environmental changes that would be caused by the Pipeline Safety & Reliability Project (Proposed Project). These changes include uses of non-renewable resources during construction and operation, long-term or permanent access to previously inaccessible areas, and irreversible damages that may result from Proposed Project-related accidents.

Resources that are irreversibly or irretrievably committed to a project are those that are used on a long-term or permanent basis, such as the use of non-renewable resources (e.g., metal and fuel) and other natural or cultural resources. These resources are irretrievable in that they would be used for the Proposed Project when they could be used for other purposes. Human labor is also considered an irretrievable resource. The unavoidable destruction of natural resources that could limit the range of potential uses of that particular environment is another factor that should be considered when evaluating a project's irreversible and irretrievable commitment of resources.

For the construction and operation and maintenance of the Proposed Project, most impacts are short-term and temporary in nature, and areas that are temporarily disturbed during construction will be cleaned up and restored. Building materials, fuel for construction vehicles and equipment, and other resources will not be reversible or retrievable. Construction of the Proposed Project will result in the temporary removal of habitat; however, the majority of the Proposed Project is located within roads or the adjacent, disturbed road shoulder. Only approximately 13 percent (approximately six miles) of the Proposed Project will be installed cross-country. Implementation of the Proposed Project will not result in the destruction of environmental resources, such that the range of potential uses of the environment will be limited. With the exception of the Line 1601, Line 1600, and Line 2010 cross-ties, all of the aboveground facilities will be located within the approximately 50-foot permanent easement or on property owned by San Diego Gas & Electric Company (SDG&E) and Southern California Gas Company (SoCalGas)—hereinafter referred to as “the Applicants.” Total permanent impacts resulting from the Proposed Project will be approximately 1.8 acres, of which approximately 0.6 acre is urban/developed land. While implementation of the Proposed Project will have short-term effects on natural resources—including agricultural, biological, and hydrological resources—it will not permanently convert farmland to non-agricultural use, adversely affect the biodiversity in the area, or permanently alter existing drainage patterns. Construction of the Proposed Project could potentially impact unknown cultural or paleontological resources; however, Applicants-proposed measures will be implemented during construction to avoid and/or reduce potential impacts. Construction of the Proposed Project will impact vegetation communities; however, as previously discussed, all areas that are temporarily distributed during construction will be cleaned up and restored, and following the completion of construction activities, the Proposed Project will not result in any long-term impacts to vegetation communities that support special-status species. In addition, although implementation of the Proposed Project will require the use of minimal amounts of non-renewable and depletable resources, the Applicants will attempt to

minimize the irreversible or irretrievable commitment of resources through implementation of energy efficiency programs, as described in the paragraph that follows.

In accordance with the California Public Utilities Commission's (CPUC's) Energy Action Plan (as updated in 2008), the Applicants have implemented several programs designed to encourage energy conservation, promote the use of distributed generation, and reduce peak demand through demand response technologies. The Applicants' energy efficiency programs significantly contributed to California's goal of reducing greenhouse gas emissions. The results of these programs are described in the Applicants' Energy Efficiency Programs Annual Reports. In 2014, SDG&E's efforts resulted in savings of over 237 million kilowatt-hours, reduced energy demand by approximately 42 megawatts, and saved over 2.1 million therms. SoCalGas's efforts resulted in savings of nearly 27.1 million therms.

Future energy conservation initiatives and increases in renewable energy uses will not be preempted by the additional natural gas capacity that will be available in the 36-inch pipeline. Energy conservation initiatives are driven by the CPUC's Energy Action Plan and SDG&E's commitment to energy efficiency and helping customers manage their energy costs as a trusted energy advisor. Renewable energy use is driven by regulatory requirements, including California's Renewable Portfolio Standard, Senate Bill 350: Clean Energy and Pollution Reduction Act, and Assembly Bill 32: California Global Warming Solutions Act of 2006. The Proposed Project will support increases in renewable energy uses by providing a form of backup power when renewable energy output drops at night or when the wind is not blowing to meet fluctuating power demands.

References:

- SDG&E. 2015. San Diego Gas & Electric Company's Energy Efficiency Programs Annual Report: 2014 Results. Online.
<http://eestats.cpuc.ca.gov/EEGA2010Files/SDGE/AnnualReport/SDGE.AnnualNarrative.2014.2.pdf>. Site visited November 12, 2015.
- SoCalGas. 2015. Southern California Gas Company (U904 G) Energy Efficiency Programs Annual Report: 2014 Results. Online.
<http://eestats.cpuc.ca.gov/EEGA2010Files/SCG/AnnualReport/SCG.AnnualNarrative.2014.1.zip>. Site visited November 12, 2015.