PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

SENT BY E-MAIL

November 21, 2017

Estela de Llanos
San Diego Gas and Electric Company
Director, Major Project Development
8330 Century Park Court, CP31D
San Diego, CA 92123
edellanos@semprautilities.com

RE: Data Request for the San Diego Gas & Electric (SDG&E) and Southern California Gas Company (SoCalGas) Pipeline Safety and Reliability Project (PSRP) – New Natural Gas Line 3602 and De-Rating Line 1600

Dear Ms. de Llanos:

Upon further review of SDG&E's and SoCalGas's Proponent's Environmental Assessment (PEA) for the Pipeline Safety and Reliability Project (PSRP) – New Natural Gas Line 3602 and De-Rating Line 1600 Project, the Energy Division requests the information contained in Attachment 1 to this letter. One set of responses should be submitted to the Energy Division and another to Ecology and Environment in hard copy and electronic format. Please direct the hard copy for Ecology and Environment to Aileen Cole at 505 Sansome St, San Francisco, CA 94111.

We request that SDG&E respond to this data request by **December 5, 2017**. Inform us as soon as possible if you cannot provide specific responses by this date. Delays in responding to this data request may cause delays in the CEQA Review process.

Direct questions to Rob Peterson at (916) 823-4748 or by e-mail (address below). Please copy the CPUC's consultant, Eric White, Ecology & Environment, Inc., on all communications (ewhite@ene.com). Energy Division reserves the right to request additional information at any point during the proceeding and subsequently during project construction and restoration should the CPCN application be approved.

Sincerely,

Rob Peterson
Project Manager, Energy Division, Infrastructure Permitting and CEQA
Robert.Peterson@cpuc.ca.gov

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cc:

Edalia Olivo-Gomez, project team member, SDG&E
Rich Quasarano, project team member, SDG&E
Kirstie Raagas, project team member, SDG&E
Yvonne Mejia Pena, project team member, SoCalGas and SDG&E
Lonn Maier, Supervisor, Infrastructure Permitting and CEQA
Jonathan Koltz, CPUC Attorney
Eric White, Project Manager, Ecology and Environment, Inc.
Janice Gardner, Deputy Project Manager, Ecology and Environment, Inc.
Amy DiCarlantonio, Deputy Project Manager, Ecology and Environment, Inc.

Attachments

Data Request No. 6 (November 21, 2017): San Diego Gas & Electric Company (SDG&E) and Southern California Gas Company (SoCalGas) Pipeline Safety and Reliability Project (PSRP) – New Natural Gas Line 3602 and De-rating Line 1600

DG #	Resource Area / Topic	Source / PEA Page	Deficiency Item / Data Gap Question	Request Date	Reply Date	Status	Notes
Data Request No. 6							
Project Description							
DG 2-8 Follow Up 1	Project Description	PEA AQ	The CPUC has determined that truck trips to transport the Line 3602 pipe from a rail yard to the proposed project area will be a project-specific activity, since truck trips will be made for the sole purpose of delivering pipes for project use. Even though the shipping and delivery of the Line 3602 pipe will depend on the bidding and contracting process for acquisition of the proposed project materials, for the purposes of the EIR analysis, impacts associated with such truck trips between a railyard and the staging areas identified in Response to DR 2-8 (Boulder Knolls Road Yard, Lake Hodges West Yard, Rainbow Creek Yard, and Montiel Yard, as well as the pipeline ROW), will be treated as impacts of the proposed project. Based on publicly existing information, the following rail yards located in Southern California have been identified as potential delivery points of the Line 3602 pipe: • Burlington Northern Santa Fe, LLC (BNSF) San Diego • BNSF Kaiser Yard (Fontana) • Dolores and Intermodal Container Transfer Facility (ICTF) (Carson/Long Beach) • BNSF Watson/Wilmington • Union Pacific City of Industry • BNSF San Bernardino • Union Pacific Colton • Union Pacific Mira Loma Provide: • Potential railyard locations that could be selected during the bidding and contracting process for acquisition of the Line 3602 proposed project materials; • Potential transportation routes associated with these potential railyard locations, and • An estimate of the peak daily and total truck trips associated with the delivery of pipe from the potential rail yard/s to the staging areas identified for pipe storage: Boulder Knolls Road Yard, Lake Hodges West Yard, Rainbow Creek Yard, and Montiel Yard, as well as the pipeline ROW.	11/21/17			
DG 2-10	Project Description	PEA September 2015, Page 3-27	Provide a description that includes the estimated diameter and height of all of the aboveground facilities at the proposed Rainbow Pressure-Limiting Station. Provide a description of the equipment or facilities needed at the Rainbow Pressure-Limiting Station to allow for a blowdown. Provide dimensions of any equipment or facilities needed and location on site plan.	11/21/17			
DG 2-11	Project Description	PEA September 2015, 3.8 Operations and Maintenance, Page 3-66	Describe day-to-day operations and maintenance activities for Lines 3602 and 1600 after construction is complete. Would pipeline operations and pressure be monitored via computer?	11/21/17			
Alternatives							
DG 3-16	Alternatives		**Regarding the proposed 2020/2021 Moreno Compressor Station upgrade identified in the 2017 SDG&E/SoCalGas General Rate Case filing at the CPUC, provide the following:** 1. Description of the proposed upgrade. 2. Estimated date the upgrade is expected to be operational.	11/21/17			

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Data Request No. 6							
			3. Explain what ways and to what extent the upgrade would augment the proposed Line 3602's ability to service the SDG&E service area. Provide details on how the upgrade would impact the reliability, redundancy, and operational flexibility of the existing system. 4. The PEA (September 2015) reported that a 200 MMcfd increase would occur with implementation of the proposed project. Discuss how the upgrade could affect the transmission capacities of Line 3602 and Line 3010. 5. In the Applicant's best professional opinion, with the Moreno Compressor Station upgrade and the correct equipment installations at Rainbow Pressure-Limiting Station and other areas within the SDG&E and SoCalGas systems, at what pressure could Line 3602 safely run?				
DG 3-17	Alternatives	CEA page 12 (Alternative H2: Smaller-Scale Battery Storage)	**Provide the following information regarding the Smaller-Scale Battery Storage Alternative:** 1. Provide the calculations and assumptions used to arrive at the estimated 11,200 MWh storage requirement for 4 hours of service. 2. At what MW value was installation proposed for the resulting estimate (11,200 MWh for 4 hours of service)? 3. Regarding the MWh calculation, what Btu/cf value was used? 4. How much gas was expected to be replaced with this smaller-scale battery storage alternative? 5. Was a conventional power generation efficiency factor used to convert gas Btu to the amount of electrical power that a solar plant will need to provide? If so, what efficiency factor was used (it can vary from 0.3 to 0.6 depending on type of gas fired plant)? 6. What power systems were considered when developing this alternative (i.e., Tesla 50KW/210KWH, the 30 MW currently in place in SDG&E service area, the 100 MW system planned in Australia, or others)? 7. How many small scale battery installations would be needed to provide the 11,200 MWh of storage? 8. How much land (acres) will be needed for each battery location in order to provide 11,200 MWh of storage? Include a typical site plan and/or specifications for a small scale battery location (e.g., El Cajon or Escondido installation examples). 9. Provide all assumptions used to calculate land use and power rating of the small-scale battery alternative. NOTE: Please provide a full response to this data request even if any of the above questions were responded to or partially responded to in previous data responses. If prior responses were applicable in some way to these questions, provide a fully updated response based on the best data available at this time.	11/21/17			
DG 3-18	Alternatives	CEA page 11 (Alternative H1: Grid-Scale Battery Storage)	**Provide the following information pertaining the Grid-Scale Battery Storage Alternative:** 1. Provide calculations for Grid-Scale Battery Storage which show how the capacity was determined. Include the facility size (number of MWs) considered when developing this alternative. 2. How much gas was expected to be replaced with this grid-scale battery storage alternative? 3. Provide the proposed/theoretical capacity, in MWh, and the power rating for the Grid-Scale Battery Alternative. 4. Provide a typical site plan and/or specifications for the theoretical grid-scale battery location (e.g., El Cajon or Escondido installation examples). 5. Provide the assumptions used to determine that the Grid-Scale Battery Alternative would require 100 acres of land.	11/21/17			

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Data Request No. 6							
			NOTE: Please provide a full response to this data request even if any of the above questions were responded to or partially responded to in previous data responses. If prior responses were applicable in some way to these questions, provide a fully updated response based on the best data available at this time.				
DG 3-19	Alternatives	Evidentiary Hearing Application 15-09-013 ALJ Kersten Reporters Transcript September 27, 2017 Volume 6, Pages 873-1050	**Provide the following clarifications pertaining to Line 2010:** 1. In order to determine the required size/capacity of the proposed Line 2010 loop, provide the capacity of Line 2010 under the current design configuration. Also, provide the capacity of the loop which would result in a total operating capacity of 570 MMCFD for both lines combined. 2. Provide the standard operating pressure, maximum allowable operating pressure (MAOP), and the maximum/minimum/average flow rate and pressure of Line 2010. 3. Provide figures of existing tie-ins, receipts, and delivery points along Line 2010. 4. Confirm that Line 2010 is located entirely within an API Class 4 location. If not, provide a class delineation map of Line 2010. 5. Are there any wetland/waterbody crossings, HDD segments, railroad crossings, highway crossings, sensitive habitats, sensitive species, critical habitats, preserved lands, cultural resource sites, parks, fire-hazard rating, or known hazardous material sites along Line 2010 that construction and operation of a new loop has the potential to affect? Provide a detailed list of such locations and/or crossings. 6. Provide the width of the existing permanent ROW for Line 2010, and the depth of cover on Line 2010. Does the existing permanent ROW for Line 2010 allow for the installation of additional pipeline(s)? 7. Would Line 2010 remain in service during the tie-in of the loop line with the existing infrastructure? If so, will the pressure of Line 2010 be reduced during tie-in activities? 8. Can Line 2010 be shut down independently of the rest of the SDG&E system if required? 9. Provide the length (miles) of looping and where construction would begin and end, as well as GIS data depicting the loop necessary to increase southern system capacity from 400 MMCFD to 570 MMCFD, as discussed in the CPUC formal proceeding on 9-27-2017. Provide the nearest cross streets, GIS data, and location information where the system tie-ins would be located (i.e., Kearny Villa Pressure Limiting Station, at the tie in of L3600 and L2010, etc.).	11/21/17			
DG 3-20	Alternatives	Evidentiary Hearing Application 15-09-013 ALJ Kersten Reporters Transcript September 27, 2017 Volume 6, Pages 873-1050	**Provide the following information pertaining to the Otay Mesa Gas Receipt Point:** 1. **C**onfirm that the current capacity of Otay Mesa meter station is 400 MMCFD. 2. Describe and itemize any modifications that would need to be made to the Otay Mesa Receipt Point that would allow its receipt capacity to be increased to 570 MMcfd. 3. Would the existing capacity of the Mexican gas transmission systems that tie into the Otay Mesa Receipt Point be able to accommodate the increase to 570 MMCFD? 4. Gas flowing through Otay Mesa will have to flow north to provide reliability and capacity for the reduction in	11/21/17			

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		-and- SDGE-12 A.15-09-013 Supplemental Testimony of SDGE and SoCalGas	SDG&E system flow due to the derating of Line 1600. How would the direction of the Otay Mesa gas flow affect customers on line 1600?				
DG 3-21	Alternatives	Evidentiary Hearing Application 15-09-013 ALJ Kersten Reporters Transcript September 27, 2017 Volume 6, Pages 873-1050	**Provide the following information related to the SDG&E System:** 1. Provide the transmission capacities (in MMcfd) of a. Line 3600 b. Line 3012 2. Will gas customers on Line 1600 be supplemented by gas from Line 3010 if Line 1600 is derated? What modifications would be necessary to supply Line 3010 gas to Line 1600 customers? What additional costs would be associated with these modifications?	11/21/17			
DG 3-22	Alternatives	SDGE-12 A.15-09-013 Supplemental Testimony of SDGE and SoCalGas	In regards to looping Line 2010 or the other gas purchase alternatives identified in the PEA, has SDG&E had conversations with the Department of Defense (DoD) in San Diego County, as a customer of SDG&E, to ensure that the DoD would be willing to be dependent on infrastructure and a gas supply sourced from a foreign country? If so please provide transcripts, call notes, emails, letters, etc.	11/21/17			
DG 3-23	Alternatives	PEA, September 2015, Pages 5-24 and 5-25 CEA, February 2017, Page 12 Evidentiary Hearing Application 15-09-013 ALJ Kersten Reporters Transcript September 27, 2017 Volume 6, Pages 873-1050	Provide descriptions of the construction activities and aboveground facilities (infrastructure) needed at the tie-in of each the following potential alternatives: 1. Rainbow to Santee Non-Miramar 2. Rainbow – El Norte Parkway – Santee 3. Line 2010 Looping (where it would need to be tied in order to increase total system capacity to 570 MMcfd [as discussed during 9/27/17 in the evidentiary hearing transcript]) Proposed Route, Alternate Diameter Pipeline (10- to 30-inch) Alternative	11/21/17			
Cultural Resources							

DG #	Resource Area / Topic	Source / PEA Page	Deficiency Item / Data Gap Question	Request Date	Reply Date	Status	Notes
Data Request No. 6							
DG 4.5-5-1 Follow-up to Data Request 3	Cultural Resources	See data gap question for information on sources.	FINAL PSRP Attach 4_5-A Confidential CRTR -Cultural Resource Survey Report for the San Diego Gas & Electric Company and Southern California Gas Company Pipeline Safety & Reliability Project, San Diego County, California - September 2015 - J Provide the original site record for TL-1600-S-1. J Provide the GIS shapefiles and site records (if available) for the 21 historic addresses on Miramar. Exhibit R_1-4-5_Attach 2 Indirect APE Survey_CONFIDENTIAL - Indirect Visual Impact Assessment Survey for the Proposed Pipeline Safety and Reliability Project, San Diego County, California - December 2015 J Provide site records for the following addresses within the APE: o 2356-261-17 123 W Felicita Ave., Escondido o 236-260-11 145 W Felicita Ave., Escondido o 236-061-17 502 W 11TH Ave., Escondido o 233-032-07 509 W 2ND Ave., Escondido o 233-022-08 510 W 2ND Ave., Escondido o 233-341-09 733 S Pine St., Escondido Exhibit YY Response to 1-4-5-5 Cultural Report_Confidential - Cultural Resource Survey Report for Distribution Systems Modifications on the San Diego Gas & Electric Company and Southern California Gas Company Pipeline Safety & Reliability Project, San Diego County, California - July 2016 J Provide the GIS shapefiles for the 187 cultural resources, including the two isolates within the APE (Appendix B). Please ensure that the GIS shapefiles include the following attributes: Pnumber, Trinomial, OtherID, Description, SiteType (Historic, Prehistoric, Built environment), resource code (ex. AP16), Location (“In” APE or “Out”). J Provide the site records for all cultural resources that fall within 150-feet of either side of the pipeline centerline (i.e., Line 3602 and connecting pipelines) and within one-parcel of the above-ground facilities (e.g., regulator stations – replacements and new).				
DG 4.5-5 -3 Follow-up to Data Request 3	Cultural Resources	See DG 4.5-5-1	Were the GIS shapefiles received in response to Data Request DG 4.5-5 on August 22, 2017 provided by a California Information Center or were the previously recorded site boundaries/locations digitized or created by the Applicant or another party? If both methods were used, provide a list of sites/historic addresses/records that were digitized and/or created. Please note any sites/historic addresses/records that were digitized and/or created for the GIS shapefiles to be provided as part of Data Request DG 4.5-5-1 (above), if not already provided (e.g., Miramar addresses; pipeline	11/21/17			

DG #	Resource Area / Topic	Source / PEA Page	Deficiency Item / Data Gap Question	Request Date	Reply Date	Status	Notes
Data Request No. 6							
			modifications system locations).				
DG-4.5-18	Cultural Resources	DR #3 Items 4-5-3, 4.5-4, 4.5-6 CRTR for Alternatives Vol 1 (09-28-17)	Provide GIS shapefiles of the sites listed in the following tables included in the survey report completed for the alternative routes (Cultural Resource Report for the Spring Canyon Firebreak, Rainbow to Santee Non-Miramar, West Aqueduct Road, and Kearny Villa Road Alternatives for the San Diego Gas & Electric and Southern California Gas Company Pipeline Safety & Reliability Project, San Diego County, California): • Table 5: Previously Recorded Cultural Resources within the Kearny Villa Road Alternative APE and 1-mi. Record Search Radius • Table 6: Previously Recorded Cultural Resources within the West Aqueduct Road Alternative APE and 1-mi. Record Search Radius • Table 7: Previously Recorded Cultural Resources within the Spring Canyon Alternative APE and 1-mi. Record Search Radius • Table 8: Previously Recorded Cultural Resources within the Rainbow to Santee Non-Miramar Alternative APE and 1-mi. Record Search Radius • Table 9. Previously Recorded Historic Addresses within the Kearny Villa Road Alternative APE and 1-mi. Record Search Radius • Table 10. Previously Recorded Historic Addresses within the Spring Canyon Alternative APE and 1-mi. Record Search Radius • Table 11. Previously Recorded Historic Addresses within the Rainbow to Santee Non-Miramar Alternative APE and 1-mi. Record Search Radius • Newly identified Site 22500_JL_S_1. Please ensure that the GIS shapefiles include the following attributes: Pnumber, Trinomial, OtherID, Description, SiteType (Historic, Prehistoric, Built environment), resource code (ex. AP16), Location (“In” APE or “Out”). Provide the site records for the sites located within 150 feet of either side of the centerline for each alternative and within one-parcel of the above-ground facilities for each alternative.	11/21/17			