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. 07 – March 6, 2018

<table>
<tr><th>Data Gap (DG)#</th><th>Resource Area/Topic</th><th>Source/ Proponent's Environmental Assessment (PEA) Page</th><th>DG Question</th><th>Response</th></tr>
<tr><td>2-12</td><td>Project Description</td><td>PEA Attachment 4-8B, Safety Study</td><td>The potential individual and societal risks associated with the operation of Line 3602 natural gas pipeline and any inadvertent release of pressurized natural gas was evaluated in a 2015 Safety Study and report by Enercon Services, Inc., titled "Safety Study for the San Diego Natural Gas and Southern California Gas Company Pipeline Safety & Reliability Project." The Enercon Study primarily addresses individual and societal risk of fatalities and offers little evaluation of injuries, property damage and financial loss associated with the consequence of inadvertent release of natural gas during operation of the proposed project.

Based upon an independent consulting review by Quest Consulting Inc., the Enercon Safety Study requires additional references, clarification and needs to address injuries, property damage and financial loss in addition to fatalities, to be useful in the evaluation of the CEQA Hazards and Hazardous Materials criterion (b).

*As a result, we are proceeding with an independent Safety and Risk of Upset Study of the proposed project, including the proposed Line 3602, and de-rating of existing Line 1600. In order to complete the analysis, provide the following information: Flow rate (MMCFD) for Line 3602, Line 1600 as currently operating, and Line 1600 once de-rated.</td><td>The Enercon Safety Study submitted with SDG&E and SoCalGas' (the Applicants) Proponent's Environmental Assessment (PEA) fully complies with the requirements of the California Environmental Quality Act (CEQA) and is consistent with the Applicants' review of CPUC safety study precedent. As applicable here, CEQA Appendix G defines a significant hazards effect as one in which the project creates a significant hazard "to the public or the environment" through the transport, use, or disposal of hazardous materials or through reasonably foreseeable upset and accident conditions involving a release of hazardous materials. Financial loss and property damage are not required to be considered as part of the hazards significance determination.

While such factors are typically considered in determining an applicable baseline incident rate to be applied in a risk assessment due to the definition of "incident" in the Code of Federal Regulations (CFR) (as was done by Enercon), the Applicants are not aware of any risk of upset/safety studies for CPUC projects that consider financial loss or property damage as components of the CEQA hazards significance criteria. Instead, the most commonly used significance criteria for individual risk is 1 x 10-6 fatalities/year (1 in a million years.) (See, e.g., Central Valley Gas Storage Project (CPUC), Final IS/ MND, Appendix D, Risk of Upset and System Safety, EDM Services, Inc. (2010); Sacramento Natural Gas Storage Project (CPUC), Final EIR, Appendix B-1 and B2, System Safety and Risk of Upset, EDM Services, Inc. (2009) [also evaluating societal risk (with the Netherlands criteria) as part of the significance determination].)

The Applicants object to this question as vague and ambiguous. The flow rate through any pipeline in the SDG&E system will be a function of the SDG&E total demand and available supply, which both vary. Further, as stated in the Applicants' Amended Application Volume I in this proceeding (at 40), the Applicants do not forecast throughput for any individual pipelines on its system. Subject to and without waiving this objection, the Applicants respond as follows:

The nominal capacity of proposed Line 3602 operating as part of the SDG&E natural gas transmission system as proposed by the Applicants in this Application is 500 MMcfd.

The nominal capacity of Line 1600 as currently operating as part of the SDG&E transmission system is 65 MMcfd.

If Line 1600 is de-rated as proposed by the Applicants in this proceeding, please refer to the Applicants' response to Energy Division Data Request 2 this proceeding, which states "At 320 psig, Line 1600 does not contribute to the SDG&E system throughput and serves only as a distribution supply line."</td></tr>
<tr><td>2-13</td><td>Project Description</td><td>PEA Attachment 4-8B, Safety Study</td><td>We are proceeding with an independent Safety and Risk of Upset Study. In order to complete the analysis, the following information is requested: Provide DOT classifications (1 through 4) for the entirety of Line 3602 and the entirety of Line 1600 (49.7 miles). Provide in the following format:

<table>
<tr><th>Pipeline</th><th>Milepost Range</th><th>DOT Class (by Pipe ID)</th><th>DOT Class (by existing population)</th></tr>
<tr><td>Line 1600</td><td>MP X –MP X</td><td></td><td></td></tr>
<tr><td>Line 3602</td><td>MP X –MP X</td><td></td><td></td></tr>
</table>

Clarification from Energy Division on 2/23:

In response to your question, the intent of the data request is to identify DOT</td><td>Please refer to Exhibit TT: DOT Class Locations for information regarding the class location used for design purposes at the time of installation for Line 1600 or at the time of the proposed construction of Line 3602 and the class based upon existing population along the pipeline route. The underlying data relied upon is from the Applicants' most recent class location evaluation and pipe segment information available to date and may vary slightly with previous submittals due to ongoing changes that are incorporated into the GIS as part of routine maintenance and construction reporting activities.

Please also refer to the Updated Prepared Testimony of Deanna Haines submitted in this proceeding (Application 15-09-013) for a description of how proposed Line 3602 meets or exceeds applicable federal and state safety regulation, rules and requirements. Also described in this testimony are the management procedures and processes that will provide for public and worker safety during all phases of the Proposed Project including, but not limited to, trenching, construction/fabrication, testing, and initial operation.</td></tr>
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			classification for all segments of each line, as proposed by the Applicants. The two columns are intended to reflect any difference between the applicant's planned Class of pipe for each section, vs. the DOT classification that would be required for that segment. For example, if DOT requirements indicate the need for a given class of pipe based on current population proximity or other factors, but the applicants were planning to construct a more protective class of pipe than required, to provide a greater margin of safety, this table would reflect that for the given section of pipe. Feel free to use labels for the columns that are clear to your team that capture the information above. Please let me know if further clarification is needed.	
2-14	Project Description	PEA Attachment 4-8B, Safety Study	We are proceeding with an independent Safety and Risk of Upset Study. In order to complete the analysis, the following information is requested: Provide a pipeline isolation and shutdown emergency response plan, or equivalent, for Line 1600 as currently operating.	The Applicants object to this question as vague and ambiguous. The isolation of Line 1600 would depend on the type and location of the emergency condition. Subject to and without waiving this objection, the Applicants respond as follows: Transmission pipeline operations are monitored 24 hours per day by SoCalGas' Gas Control Center. Line 1600 is equipped with mainline valves spaced approximately five miles apart on average. Any incident on Line 1600 may be isolated by closing the upstream and downstream mainline valve, either automatically, remotely, or manually.
2-15	Project Description	PEA Attachment 4-8B, Safety Study	We are proceeding with an independent Safety and Risk of Upset Study. In order to complete the analysis, the following information is requested: Provide the composition of the natural gas, or range of natural gas composition that would flow through Line 3602 and that flows through Line 1600.	Gas delivered to the SoCalGas and SDG&E system must comply with the gas quality standards specified in SoCalGas Rule No. 30 and SDG&E Gas Rule No. 30. For further detail, please refer to these Commission-approved tariffs, which may be obtained here: https://www.socalgas.com/regulatory/tariffs/tm2/pdf/30.pdf (SoCalGas) http://regarchive.sdge.com/tm2/pdf/GAS_GAS-RULES_GRULE30.pdf (SDG&E)
2-16	Project Description	PEA Attachment 4-8B, Safety Study	We are proceeding with an independent Safety and Risk of Upset Study. In order to complete the analysis, the following information is requested: Provide GIS data for any aboveground and below ground equipment that handles natural gas (e.g., valve stations or compressor stations) located along the entire Line 1600 (49.7 miles) from its inception at the Rainbow Metering Station to its terminus in the community of Mission Valley, San Diego, California. If compressor stations exist along any portion of Line 1600, provide suction and discharge pressure and temperature at each compression station.	A response, which will contain confidential and protected material pursuant to P.U. Code § 583, GO 66-D, and D.17-09-023, will be provided by no later than March 15, 2018.
2-17	ALJ Proceeding		Provide all Safety and Enforcement Division (SED) data request responses throughout the ALJ proceeding to date or, if it is easier, provide login information for an FTP site where all the SED data request responses are posted. *Include all responses that may have been marked confidential.	The Applicants' responses to SED data requests propounded in this proceeding, which reflect the latest version of the submission and do not include previous versions that were subsequently amended, may be obtained here: https://www.sdge.com/regulatory-filing/15786/pipeline-safety-reliability-project The responses that contain confidential and protected material pursuant to P.U. Code § 583, GO 66-D, and D.17-09-023 are being made available on the Project's FTP site. The login information will be provided under separate cover. Please note, the response to SED DR 5 was provided in person during SED's audit review in San Diego on August 9-11, 2017.
DG 4.5-3, DG 4.5-4, DG 4.5-6, DG 4.5-7, DG 4.5-8, DG 4.5-9 Follow Ups	Cultural Resources	Cultural Resource Survey Report for the San Diego Gas & Electric Company and Southern California Gas Company Pipeline Safety & Reliability Project, San	Provide the "addendum report" referenced in responses to DG 4.5-3, DG 4.5-4, DG 4.5-5, DG 4.5-6, DG 4.5-7, DG 4.5-8, and DG 4.5-9 that was "to be completed before the end of 2017".	In response to data gap items in Energy Division PEA Data Request No. 3 (DG 4.5-3, DG 4.5-4, DG 4.5-5, DG 4.5-6, DG 4.5-7, DG 4.5-8, and DG 4.5-9), regarding California Register of Historic Resources (CRHR)/National Register of Historic Places (NRHP) evaluation of historic built environment resources, the Applicants estimated it would take three-months to complete a draft report of findings to address the data gap items. ASM began the evaluations on September 29, 2017, with an approximate completion date by the end of December 2017. However, due to the large area of potential effect (APE) and complexities of evaluating Highway 395 (which was found to historically have had two divergent alignments across San Diego County), the evaluation has taken longer than expected. Additional attention was made to ensure the report meets both (CEQA) and National Environmental Policy Act (NEPA)/National Historic Preservation Act (NHPA) compliance and incorporate "lessons learned" as a result of similar studies (that included long roadways) that have gone through State Historic Preservation Officer (SHPO) review in the past few months. A draft of the formal NRHP, CRHR and/or Local Listing eligibility evaluations for all built environment resources along the Applicants' proposed alignment is now complete and is provided as Exhibit RR: Historic Resources Evaluation Report so that the resources' significance and potential impacts by the Proposed Project can be assessed. As stated previously, the evaluation is being

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		Diego County, California – September 2015 (Revised February 2016) submitted as Exhibit LL-C, Response to Deficiency 1.4.5-1 and Indirect Visual Impact Assessment Survey for the Proposed Pipeline Safety and Reliability Project, San Diego County, California – February 12, 2016		submitted as an Addendum Study for the Proposed Project and will include Department of Parks and Recreation (DPR) Updates and GIS files as requested in Energy Division PEA Data Requests Nos. 3 and 6. The DPR Updates and GIS files are provided separately as Confidential Exhibit SS: Historic Resources Evaluation Report Appendices 4.5-3, which contains confidential and protected materials provided pursuant to P.U. Code § 583, GO 66-D, and D.17-09-023.