

**SAN DIEGO GAS & ELECTRIC COMPANY
SOUTHERN CALIFORNIA GAS COMPANY**

PIPELINE SAFETY & RELIABILITY PROJECT (PSRP)

(A.15-09-013)

(DATA REQUEST ORA-DR-05)

Date Requested: April 11, 2016

Date Responded: April 25, 2016

PRELIMINARY STATEMENT

1. These responses and objections are made without prejudice to, and are not a waiver of, SDG&E and SoCalGas' right to rely on other facts or documents in these proceedings.
2. By making the accompanying responses and objections to these requests for data, SDG&E and SoCalGas does not waive, and hereby expressly reserves, its right to assert any and all objections as to the admissibility of such responses into evidence in this action, or in any other proceedings, on any and all grounds including, but not limited to, competency, relevancy, materiality, and privilege. Further, SDG&E and SoCalGas makes the responses and objections herein without in any way implying that it considers the requests, and responses to the requests, to be relevant or material to the subject matter of this action.
3. SDG&E and SoCalGas will produce responses only to the extent that such response is based upon personal knowledge or documents in the possession, custody, or control of SDG&E and SoCalGas. SDG&E and SoCalGas possession, custody, or control does not include any constructive possession that may be conferred by SDG&E or SoCalGas' right or power to compel the production of documents or information from third parties or to request their production from other divisions of the Commission.
4. A response stating an objection shall not be deemed or construed that there are, in fact, responsive information or documents which may be applicable to the data request, or that SDG&E and SoCalGas acquiesces in the characterization of the premise, conduct or activities contained in the data request, or definitions and/or instructions applicable to the data request.
5. SDG&E and SoCalGas objects to the production of documents or information protected by the attorney-client communication privilege or the attorney work product doctrine.
6. SDG&E and SoCalGas expressly reserve the right to supplement, clarify, revise, or correct any or all of the responses and objections herein, and to assert additional objections or privileges, in one or more subsequent supplemental response(s).
7. SDG&E and SoCalGas will make available for inspection at their offices any responsive documents. Alternatively, SDG&E and SoCalGas will produce copies of the documents. SDG&E and SoCalGas will Bates-number such documents only if SDG&E and SoCalGas deem it necessary to ensure proper identification of the source of such documents.
8. Publicly available information and documents including, but not limited to, newspaper clippings, court papers, and materials available on the Internet, will not be produced.

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9. SDG&E and SoCalGas object to any assertion that the data requests are continuing in nature and will respond only upon the information and documents available after a reasonably diligent search on the date of its responses. However, SDG&E and SoCalGas will supplement its answers to include information acquired after serving its responses to the Data Requests if it obtains information upon the basis of which it learns that its response was incorrect or incomplete when made.
 10. In accordance with the CPUC's Discovery: Custom And Practice Guidelines, SDG&E and SoCalGas will endeavor to respond to ORA's data requests by the identified response date or within 10 business days. If it cannot do so, it will so inform ORA.
 11. SDG&E and SoCalGas object to any ORA contact of SDG&E and SoCalGas officers or employees, who are represented by counsel. ORA may seek to contact such persons only through counsel.
 12. SDG&E and SoCalGas objects to ORA's instruction to send copies of responses to entities other than ORA.

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QUESTION 1:

Please provide in real time any and all past and present data responses from SDG&E, SoCalGas, Sempra, and Sempra affiliates to Commission staff and all other parties. Include the data requests that prompted each data response. Treat this request as ongoing.

RESPONSE 1:

SDG&E and SoCalGas object to the “real time and ongoing” qualification of this question on the grounds that it is unreasonably burdensome. Further, SDG&E and SoCalGas object to this request to the extent the request purports to impose any requirement or discovery obligation greater than or different from those under the California Public Utilities Commission (“Commission or CPUC”) Rules of Practice and Procedure, Statutes, and the applicable Orders of the Commission. SDG&E and SoCalGas will produce responses only to the extent that such response is based upon personal knowledge or documents in the possession, custody, or control of SDG&E and/or SoCalGas, as set forth in the CPUC Rules of Practice and Procedure. SDG&E’s and SoCalGas’ possession, custody, or control does not include any constructive possession that may be conferred by SDG&E’s and SoCalGas’ right or power to compel the production of documents or information from third parties or to request their production from other divisions of the Commission. Specifically, SDG&E and SoCalGas object to providing Sempra and Sempra affiliate data responses due to affiliate compliance rules. Without waiving this objection, and subject thereto, SDG&E and SoCalGas respond as follows:

SDG&E and SoCalGas are not the makers of the Sempra and Sempra affiliates data responses in this proceeding. Sempra Energy, based in San Diego, is a Fortune 500 energy services holding company. Sempra Energy’s California regulated utilities, SDG&E and SoCalGas, are separate legal entities with detached accountability.

Data responses to intervening parties in this proceeding will be posted on SDG&E’s and SoCalGas’ respective webpages.

<http://www.sdge.com/regulatory-filing/15786/pipeline-safety-reliability-project>

<https://www.socalgas.com/regulatory/A15-09-013.shtml>

Data responses with attachments or confidential data provided as of April 22, 2016 will be sent via Electronic Data Transfer due to size. Please note that some of the information provided contains **confidential information provided pursuant to G.O. 66-C and Cal. Pub. Util. Code §583.**