



A  Sempra Energy utility

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Kenneth A. Harris, Jr.
Oil and Gas Supervisor
Department of Conservation
Division of Oil, Gas, and Geothermal Resources
801 K Street – MS 18-05
Sacramento, CA 95814

RE: Confidentiality Request Letter – Documents Responsive to CPUC/DOGGR October 21, 2016 Checklist (*Attachment B*)

Dear Mr. Harris:

Pursuant to the October 21, 2016 letter from the California Public Utilities Commission (CPUC) and Division of Oil, Gas, and Geothermal Resources (DOGGR), Southern California Gas Company (SoCalGas) submits *Attachment B* in response to the CPUC and DOGGR Checklist for Pre-Injection Safety Assurances. SoCalGas designates the following documents as confidential based on federal and California statutes and regulations, and FERC orders:

- **Checklist #4 –Updated Aliso Canyon Emergency Binder (October 2016)**
 - The map and schematic constitute confidential interpretive data exempt from disclosure under Cal. Code Regs, tit. 14, § 1996.4. In addition, the map and schematic constitute critical energy infrastructure information (“CEII”) pursuant to 18 CFR § 388.113(c), 6 CFR §§ 29.2(b), 29.8, and 6 U.S.C. §§ 131(3), 133(a)(1)(E) because the map and schematic constitute specific engineering, vulnerability, or detailed design information about proposed or existing critical infrastructure. For the same reasons, the maps and schematics should be maintained as confidential CEII pursuant to FERC Orders 630, 643, 649, 662, 683, and 702.
 - The enclosed personnel information and telephone numbers constitute confidential personnel records exempt from disclosure under Cal. Gov’t Code § 6254(c) because the disclosure of such personnel records would constitute an unwarranted invasion of privacy.
- **Checklist #6 –Appendix A: Root Cause Analysis of Pinhole Leak in Ward 3A Withdrawal Pipeline**
 - Pipe size and diameter is a specific engineering design value depicting an attribute of a proposed or existing critical infrastructure that could be used to determine the criticality of a gas facility and identify vulnerabilities of the gas delivery network. The value can be used to identify the volume of gas present in an area and ascertain the relative potential consequences

of intentional acts against the gas transportation and distribution network. Because of the critical nature of the attribute, it has been identified by PHMSA to be a restricted pipeline attribute in the Federal Register Vol 81, pg. 40764 published on 6/22/2016.

- Pipe size and diameter information constitutes critical energy infrastructure information (“CEII”) pursuant to 18 CFR § 388.113(c), 6 CFR §§ 29.2(b), 29.8, and 6 U.S.C. §§ 131(3), 133(a)(1)(E) because the information constitutes specific engineering, vulnerability, or detailed design information about proposed or existing critical infrastructure. For the same reasons, the pipe size and diameter information should be maintained confidential CEII pursuant to FERC Orders 630, 643, 649, 662, 683, and 702.
- In addition, under 2011 TSA Pipeline Security Guidelines, natural gas distribution pipelines are considered to be within scope for when developing Corporate Security programs.

• **Checklist #21 –Aliso Canyon Rig Schedule**

- The Aliso Canyon Rig Schedule is market sensitive information exempt from public disclosure per PUC § 583 and GO 66-C(2)(b), that if revealed would place SoCalGas at an unfair business disadvantage because it provides market sensitive information regarding the operational status of the Aliso Canyon Storage Field.

Specifically, SoCalGas believes the following submitted materials are confidential and protected from disclosure under the California Public Records Act:

Checklist #4 –Updated Aliso Canyon Emergency Binder (October 2016):

Location of Data	Confidential PDF Page No.	Description of Data	Applicable Confidentiality Provisions
Checklist #4 – Updated Aliso Canyon Emergency Binder (October 2016)	Pg. 105	Map	Cal. Code Regs, tit. 14, § 1996.4; 18 CFR § 388.113(c), 6 CFR §§ 29.2(b), 29.8, and 6 U.S.C. §§ 131(3), 133(a)(1)(E); FERC Orders 630, 643, 649, 662, 683, 702
Checklist #4 – Updated Aliso Canyon Emergency Binder (October 2016)	Pg. 317	Schematic	Cal. Code Regs, tit. 14, § 1996.4; 18 CFR § 388.113(c), 6 CFR §§ 29.2(b), 29.8, and 6 U.S.C. §§ 131(3), 133(a)(1)(E); FERC Orders 630, 643, 649, 662, 683, 702
Checklist #4 – Updated Aliso Canyon Emergency Binder (October 2016)	Pgs. 8-18, 21-22, 26, 30, 34, 42-44, 54, 62-65, 69, 75, 78, 85, 94-96, 101-104, 109, 113, 117,	Personnel Information/Telephone Numbers	Cal. Gov’t Code § 6254(c)

	120, 126-127, 133, 139, 148, 152, 157, 163, 170, 174, 184, 187, 195, 199, 203, 206, 210, 216, 224-225, 232-242, 244, 253-261, 265, 277, 280, 300, 314, 319, 332, 338, 348, 357, 369, 372, 387, 421, 427, 433, 437, 447, 458, 461, 467, 474, 513, 530, 569-571, 602-605, 607, 609, 612, 613		
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Checklist #6 –Appendix A - Root Cause Analysis of Pinhole in Ward 3A Withdrawal Pipeline:

Location of Data	Confidential PDF Page No.	Description of Data	Applicable Confidentiality Provisions
Checklist #6 –Appendix A – Root Cause Analysis of Pinhole in Ward 3A Withdrawal Pipeline	Pgs. 1-8	Pipe Size or Diameter	<p>The Pipeline Hazardous Materials Safety Administration’s (PHMSA) Guidelines in the Federal Register, Vol 81, pg. 40764, published on 06/22/2016</p> <p>U.S. Department of Homeland Security Transportation Security Administration (TSA) Guidelines</p> <p>18 CFR § 388.113(c), 6 CFR §§ 29.2(b), 29.8, and 6 U.S.C. §§ 131(3), 133(a)(1)(E); FERC Orders 630, 643, 649, 662, 683, 702</p>

Checklist #21 –Aliso Canyon Rig Schedule:

Location of Data	Confidential PDF Page No.	Description of Data	Applicable Confidentiality Provisions
Checklist #21 –Rig Schedule	Pg. 1	Rig Schedule	GO 66-C(2)(b) PUC § 583

For the reasons stated in this letter, SoCalGas believes the submitted materials, as identified in the table above, are confidential and protected from disclosure under the California Public Records Act. Such information if disclosed to the public could adversely affect the safety and security of critical infrastructure, the privacy of various personnel, and the normal conduct of business operations. In the event that DOGGR considers disclosing any of the information to the public, we request that DOGGR notify the company at least 30 days before any disclosure.

Please feel free to contact me if you have any questions.

Sincerely,



Rodger R. Schwecke
Vice President, Gas Transmission and Storage

cc: Alan Walker, DOGGR
Rachael Tadlock, DOGGR