

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

**APPLICATION TO RECOVER COSTS RECORDED IN THE
PIPELINE SAFETY AND RELIABILITY MEMORANDUM ACCOUNTS,
THE SAFETY ENHANCEMENT EXPENSE BALANCING ACCOUNTS, AND
THE SAFETY ENHANCEMENT CAPITAL COST BALANCING ACCOUNTS
(A.16-09-005)**

(DATA REQUEST TURN-01)

Date Requested (Original): February 3, 2017

Date Requested (Revised): February 10, 2017

Date Responded: February 17, 2017

QUESTION 1:

Please confirm that SDG&E and SoCalGas did not include in its showing in either the direct testimony or workpapers accompanying that testimony any comparisons of the costs requested in this application to the costs for other regulated utilities to perform the same activities.

- a. If this statement is not correct, please provide a citation to each place in the testimony and workpapers in which applicants present such a comparison.

RESPONSE 1:

SDG&E and SoCalGas object on the grounds of vagueness and ambiguity to the phrase “the same activities.”

Incorporating the foregoing objection, SDG&E and SoCalGas respond as follows: No comparisons were provided in the 2016 Reasonableness Review testimony or workpapers of SDG&E’s and SoCalGas’ projects to the projects of other regulated utilities. Consistent with SDG&E’s and SoCalGas’ positions in the prior reasonableness review proceeding, there are no two “same activities” due to a number of factors – including, but not limited to, field conditions, classification of the area where the work is performed, geographic region, terrain, customer impacts, permits, environmental & land use requirements, water availability, and site restoration – and thus comparisons of “same activities” simply are not possible. Each project is unique in terms of its scope and complexity, so the costs of addressing and mitigating these conditions are equally varied and unique.

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

**APPLICATION TO RECOVER COSTS RECORDED IN THE
PIPELINE SAFETY AND RELIABILITY MEMORANDUM ACCOUNTS,
THE SAFETY ENHANCEMENT EXPENSE BALANCING ACCOUNTS, AND
THE SAFETY ENHANCEMENT CAPITAL COST BALANCING ACCOUNTS
(A.16-09-005)**

(DATA REQUEST TURN-01)

Date Requested (Original): February 3, 2017

Date Requested (Revised): February 10, 2017

Date Responded: February 17, 2017

QUESTION 2:

Please explain what SDG&E/SoCalGas means by the term “best practices” where it is used in the workpapers (see, for example, WP-III-A93, A94, and WP-III-A269).

RESPONSE 2:

The term “best practices” mentioned in the workpaper pages WP-III-A93, WP-III-A94, and WP-III-A269 refers to the SDG&E and SoCalGas process to identify substructures prior to construction. The process is based on the American Society of Civil Engineers 38-02 Subsurface Utility Engineering Guidelines to locate and map subsurface utilities and structures.

At a high level, SDG&E and SoCalGas perform the following tasks:

- 1) Research: This includes researching engineering departments of public agencies that provide utilities/substructure plans.
- 2) Survey: Surveyors to locate all visible surface indications of subsurface utilities.
- 3) Pothole: Strategic potholing of congested areas to identify and verify substructures.

The attached supporting documents include Confidential and Protected Information pursuant to PUC Section 583, GO 66-C, and D. 16-08-024, and the accompanying declaration. For additional detail and outline of our process, please refer to Q02 attachments.

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

**APPLICATION TO RECOVER COSTS RECORDED IN THE
PIPELINE SAFETY AND RELIABILITY MEMORANDUM ACCOUNTS,
THE SAFETY ENHANCEMENT EXPENSE BALANCING ACCOUNTS, AND
THE SAFETY ENHANCEMENT CAPITAL COST BALANCING ACCOUNTS
(A.16-09-005)**

(DATA REQUEST TURN-01)

Date Requested (Original): February 3, 2017

Date Requested (Revised): February 10, 2017

Date Responded: February 17, 2017

QUESTION 3:

For the projects listed in Table 1 of page WP-Intro-2 of the workpapers, please expand the table and provide the total cost per project line and diameter of the line that was tested or replaced. For projects that involved different diameters of lines, please provide the diameter and length of line for each diameter.

RESPONSE 3:

The attached supporting documents include Confidential and Protected Information pursuant to PUC Section 583, GO 66-C, and D. 16-08-024, and the accompanying declaration. Please refer to the Q03 attachment for the expanded Table 1.