## 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-SCGC-09)

Date Requested: June 26, 2017 Date Responded: July 27, 2017

# QUESTION 9.1:

# These questions are directed at the workpapers regarding the L-406 Replacement and Hydrotest Project.

- 9.1.1. With respect to the accelerated and incidental mileage shown in Table 2 by project section on page WP-III-A278:
- 9.1.1.1. Please show the location of the 0.809 miles of accelerated mileage and 16 feet of incidental mileage included in the Section 2 hydrotest on Figures 5 and 6.
- 9.1.1.2. Please explain the coloration of the pipeline on Figure 5 which seems to be a blend of green and yellow rather than one or the other. What does this signify? The project is ostensibly a hydrotest project.
- 9.1.1.3. Please show the location of the 5 feet of incidental mileage relative to the 31 feet of accelerated mileage already indicated on Figures 7 and 8.
- 9.1.1.4. Please provide a map and satellite image that shows both Sections 2 and 2A but none of the other sections of the project. (Note that Figures 1 and 2 are virtually unreadable.)
- 9.1.1.5. Please show the location of the 2 feet of incidental mileage that was included in the Section 4 replacement as well as the location of the "planned Pipeline Integrity replacement project" work that was stated as being adjacent to the Section 4 replacement on Figures 9 and 10. If the "planned Pipeline Integrity replacement project" work does not appear on Figures 9 and 10, please expand the scope of the figures until the "planned Pipeline Integrity replacement project" work does appear in them.
- 9.1.1.6. Please show the location of the 30 feet of incidental mileage included in the Section 5 replacement on Figures 11 and 12.

## 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-SCGC-09)

## Date Requested: June 26, 2017 Date Responded: July 27, 2017

## RESPONSE 9.1.1:

- 9.1.1.1 The 0.809 miles of accelerated pipe is reflected by the blue dotted marks within the tested pipeline (shown in yellow) on Figure 5. The 16 feet of incidental mileage is reflected with a single pink hash mark at the southernmost part of the section within the tested pipeline (shown in yellow) on Figure 5. A high-resolution copy of a corrected version of Figure 5 is provided in the attachment folder.
- 9.1.1.2 The pipeline is completely yellow to reflect that the pipeline was hydrotested, with blue dotted marks to represent the accelerated mileage.
- 9.1.1.3 The 31 feet of accelerated mileage is reflected by the blue dotted marks within the replaced pipeline (shown in green) on Figure 7. The five feet of incidental mileage is not reflected on Figures 7 or 8 due to a coding error. A high-resolution copy of a corrected version of Figure 7 is provided in the attachment folder. SoCalGas and SDG&E identified the coding error in the workpaper for this project while preparing this response and will prepare and submit a corrected Figure 7 to address this inadvertent error.
- 9.1.1.4 See response TURN-SCGC Q9.1.1.3 and the overview maps provided in the attachment folder.
- 9.1.1.5 The two feet of incidental pipe is reflected with a single pink hash mark at the western-most part of the section within the replaced pipeline (shown in green) on Figure 9. A high-resolution copy of Figure 9 is provided in the attachment folder.

As requested, a second map has been provided to illustrate the Pipeline Integrity (PI) replacement project. The PI project is reflected in pink in the upper right-hand corner of the map.

9.1.1.6 The 30 feet of incidental pipe is reflected with pink hash marks within the replaced pipeline (shown in green) on Figure 11. A high-resolution copy of Figure 11 is provided in the attachment folder.

# QUESTION 9.1.2:

## 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-SCGC-09)

Date Requested: June 26, 2017 Date Responded: July 27, 2017

With respect to the statement on WP-III-A286: "Section 4 was adjacent to a planned Pipeline Integrity replacement project which could be cost effectively expanded to include this section of PSEP pipe."

- 9.1.2.1. Please provide a detailed description of the "planned Pipeline Integrity replacement project" that was adjacent to Section 4.
- 9.1.2.2. Please provide a detailed description of the ratemaking treatment that this "planned Pipeline Integrity replacement project" was subject to.
- 9.1.2.3. Please explain how absent any type of cost estimation process, SoCalGas could be assured that the incremental cost of adding the Section 4 work to the "planned Pipeline Integrity replacement project" would be reasonable.
- 9.1.2.4. Did SoCalGas develop any type of estimate of the potential cost?
- 9.1.2.5. Did SoCalGas obtain any type of estimate of the incremental contract costs from the contractor ahead of directing the contractor to complete the Phase 4 work?
- 9.1.2.6. Was the Section 4 work done on a time and materials basis?
- 9.1.2.7. Please demonstrate that there were cost savings by delineating the level and type of costs that were avoided by combining the Section 4 work with the "planned Pipeline Integrity replacement project" work.

## RESPONSE 9.1.2:

## 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-SCGC-09)

- 9.1.2.1 The PI project adjacent to Line 406 Section 4 was a planned reassessment of Line 406. An in-line inspection (ILI) tool was being run from Ventura Station to Burbank Blvd. and Lindley Ave. As part of this work, a receiver was installed at Burbank Blvd. and Lindley Ave, which is where the PSEP Category 4 pipe was located.
- 9.1.2.2 The ratemaking treatment for TIMP costs was established by the Commission in Decision 16-06-054 and Attachment 5 thereto. *See, e.g.*, Finding of Fact No. 198 ("As discussed in the SoCalGas capital expenditures section for engineering, the capital expenditures for TIMP and DIMP of \$51.155 million for 2014, \$48.637 million for 2015, and \$125.184 million for 2016, are reasonable."), Conclusion of Law No. 76 ("The provision in SoCalGas' Attachment 5 Settlement Agreement to continue to maintain separate two-way balancing accounts for the TIMP and DIMP expenditures, and the agreed on the process for recovery of undercollected amounts, should be approved."), and page 27, summarizing Attachment 5 ("The advice letter process for recovery of any TIMP or DIMP undercollections will be limited to undercollection amounts up to 35% of the 2016 GRC cycle total revenue requirement for that program and will require a Tier 3 advice letter. Any amounts above the 35% will be subject to a separate application procedure")
- 9.1.2.3 Based on operator knowledge and experience, not including the 45 feet in the Pipeline Integrity project would require a separate project to be planned and executed as part of PSEP, which would duplicate permit acquisition, traffic control, mobilization and demobilization of a laydown yard, mobilization and demobilization of a construction contractor, and mobilization and demobilization of nonconstruction contractor personnel. Inclusion of the PSEP scope of work within the scope of this PI project also avoids future community and system impacts associated with taking a pipeline out of service a second time and completing construction in or near a busy intersection.
- 9.1.2.4 No, SoCalGas and SDG&E did not prepare a separate estimate of the potential cost of completing the PSEP project separately. See Response to TURN-SCGC Q.9.1.2.6.
- 9.1.2.5 Yes. The attached supporting documents include Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024. An estimate of the incremental contract cost is provided in the attachment folder.

## 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-SCGC-09)

- 9.1.2.6 No. The scope of work for the PSEP portion of work was included as a separate item in the Request for Proposal (RFP) solicited by Pipeline Integrity from multiple bidders. The attached supporting documents include Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024. See attachment 9.1.2.6 and item 3 on page 17 of 30 of the TURN-SCGC Q9.1.2.5 attachment.
- 9.1.2.7 SoCalGas and SDG&E did not prepare a cost estimate to compare the costs of including the PSEP scope of work within the scope of the PI project. As explained in response to TURN-SCGC Q.9.1.2.3, based on operator knowledge and experience, not including the 45 feet in the Pipeline Integrity project would require a separate project to be planned and executed as part of PSEP, which would duplicate permit acquisition, traffic control, mobilization and demobilization of a laydown yard, mobilization and demobilization of a construction contractor, and mobilization and demobilization of non-construction contractor personnel. Inclusion of the PSEP scope of work within the scope of this PI project also avoids future community and system impacts associated with taking a pipeline out of service a second time and completing construction in or near a busy intersection.

## 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-SCGC-09)

Date Requested: June 26, 2017 Date Responded: July 27, 2017

## **QUESTION 9.1.3:**

With respect to the statement on WP-III-A287: "Criteria mileage within Section 2 was 888 feet. However, there was Category 4 noncriteria pipe adjacent to the 888 feet that would need to be addressed in Phase 2. The project was expanded to include the accelerated mileage and create one long hydrotest, eliminate one gas blowdown, and reduce PSEP program costs."

Please demonstrate that there were cost savings achieved by including the 0.809 miles of pipe in the project by showing the cost estimates including and excluding this length of pipe.

# RESPONSE 9.1.3:

SoCalGas and SDG&E did not prepare a cost estimate to compare the costs of including the 0.809 miles of accelerated pipe within the scope of this Phase 1A project versus excluding this pipe and addressing the segment in a later project. Based on operator knowledge and experience, it was prudent to address the 0.809 miles of accelerated pipe in this project to eliminate this section from work in a future phase. The 0.809 miles fell within the blown down section (i.e., the portion of pipe taken out of service to address the Category 4 Criteria pipe), and the test was extended to the furthest point possible before an elevation change necessitated a separate hydrotest.

## 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-SCGC-09)

Date Requested: June 26, 2017 Date Responded: July 27, 2017

## QUESTION 9.1.4:

With respect to the statement on WP-III-A289: "A short segment of Phase 2 Category 4 pipe was identified within the shut-in and gas blow down limits for Section 2, thus Section 2A was replaced during this shut-in to eliminate a future blowdown and shut-in. Sections 2 and 2A are over 1-mile away from each other." Please demonstrate that there were cost savings achieved by including the Phase 2A project within the shut-in period for Phase 2 work by providing cost estimates for a separate shut-in for Phase 2A.

# RESPONSE 9.1.4:

SoCalGas and SDG&E did not prepare a cost estimate to compare the costs of including this short segment within the scope of this Phase 1A project versus excluding this short segment and addressing the segment in a later project. The pipe in between Section 2 and Section 2A fell within the blown down section of pipeline. Based on operator knowledge and experience, not including this short segment in this project would require a separate project to be planned and executed in a future PSEP phase which would duplicate the activities and expenses undertaken in the Seven Stage Review Process. Included in these activities and expenses are engineering and design, material procurement, and related construction activities. Inclusion now also avoids future community and system impacts associated with releasing gas to atmosphere and taking the pipeline out of service a second time.

## 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-SCGC-09)

Date Requested: June 26, 2017 Date Responded: July 27, 2017

## **QUESTION 9.1.5:**

With respect to the statement on WP-III-A290: "Section 4 was initiated earlier as it was immediately adjacent to a Pipeline Integrity (PI) ILI project which was easily expandable to include the PSEP scope of 43 ft. of Category 4 mileage. This allowed PSEP to complete this project with significant cost savings and the reduced community and system impact of a second construction project."

- 9.1.5.1. The characterization of the Pipeline Integrity work as a "Pipeline Integrity (PI) ILI project" in this statement is quite different than the characterization of the Pipeline Integrity work as "planned Pipeline Integrity replacement project" in the statement quoted above from WP-III-A286. Which is the correct characterization of the Pipeline Integrity work that was adjacent to Phase 4 of the project?
- 9.1.5.2. If the Pipeline Integrity work is correct characterized as a "Pipeline Integrity (PI) ILI project," how could SoCalGas be confident that replacement work could simply be added to an ILI project?
- 9.1.5.3. Would a contractor performing ILI work be reasonably be expected to have the necessary materials and equipment required to complete the Phase 4 replacement project work?
- 9.1.5.4. Please explain how absent any type of cost estimation process, SoCalGas could be assured that the incremental cost of adding the Section 4 work to the "Pipeline Integrity (PI) ILI project" would be reasonable.
- 9.1.5.5. Did SoCalGas develop any type of estimate of the potential cost?
- 9.1.5.6. Did SoCalGas obtain any type of estimate of the incremental contract costs from the contractor ahead of directing the contractor to complete the Phase 4 work?
- 9.1.5.7. Was the Section 4 work done on a time and materials basis?

## 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-SCGC-09)

## Date Requested: June 26, 2017 Date Responded: July 27, 2017

- 9.1.5.8. Please demonstrate that there were cost savings by delineating the level and type of costs that were avoided by combining the Section 4 work with the "Pipeline Integrity (PI) ILI project" work.
- 9.1.5.9. Please provide a detailed description of the ratemaking treatment that this "Pipeline Integrity (PI) ILI project" was subject to.

## RESPONSE 9.1.5:

- 9.1.5.1 Pipeline Integrity ILI project.
- 9.1.5.2 As explained in response to TURN-SCGC Q.9.1.2.1, the ILI work required a receiver to be installed. This required an excavation.
- 9.1.5.3 Yes.
- 9.1.5.4 See response TURN-SCGC Q.9.1.2.7.
- 9.1.5.5 No, SoCalGas and SDG&E did not prepare a separate estimate of the potential cost of completing the PSEP project separately. See Response to TURN-SCGC Q.9.1.2.7.
- 9.1.5.6 Yes.
- 9.1.5.7 No.
- 9.1.5.8 See response TURN-SCGC Q.9.1.2.7.
- 9.1.5.9 See response TURN-SCGC Q.9.1.2.2.

## 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-SCGC-09)

Date Requested: June 26, 2017 Date Responded: July 27, 2017

# **QUESTION 9.1.6:**

# With respect to Table 4 on WP-III-A291:

- 9.1.6.1. Please break apart the costs shown for the combined Section 2 & 2A into separate columns for Section 2 and Section 2A.
- 9.1.6.2. Please reconcile the third redacted cost figure from the following quotation: "The Performance Partner/Construction Contractor final TPE for Sections 1, 2, 2A and 5 was \$xxxx which is \$xxxx more than the Stage 3 construction contractor direct estimate of \$xxxx that was used to develop the Phase 2 WOA estimate" from WP-III-A292 to the contract costs figure from the "Stage 3 estimate 1,2,2A, 5" column of Table 4.

# RESPONSE 9.1.6:

9.1.6.1 Because the costs of the Line 406 project were documented and tracked as a single project, Table 4 cannot be separated into four project sections without making after-the-fact assumptions about how the total project costs could be allocated among the two sections. Further, Work Order Authorization Forms (WOAs) are initiated at Stage 1 (initial scoping cost estimate) and updated at Stage 3 (Phase 2 WOA) to capture estimated project costs for pipeline projects that require testing or replacement. WOAs may include one or more sections, but it is not a general practice to initiate separate WOAs for each individual section for the same pipeline unless circumstances, such as construction schedule or design approach, warrant separate tracking mechanisms for sections within the same asset.

Similarly, it is not feasible to separate the O&M (actual) and Capital (actual) Costs among the two sections of this project. PSEP projects are planned and designed to comply with the Commission's directive in a cost effective manner while minimizing impacts to customers and the community. In furtherance of these objectives, the engineering and design work, as well as construction activity, was tracked for the entire project and not tracked separately for each section.

## 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-SCGC-09)

#### Date Requested: June 26, 2017 Date Responded: July 27, 2017

# 9.1.6.2 The following response includes Confidential and Protected Information Pursuant to PUC Section 583, GO 66-C, and D.16-08-024.

Line 406 Sections 1, 2, 2A, & 5 Estimated Contractor Cost Reconciliation (Phase 2 WOA)		
Cost Element	Contract Cost	
Construction Contractor TIC (WP-III-A292)		
Construction Contractor Contingency		
Adjustment for dewatering and water handling omission from Construction Contractor estimate		
TOTAL ESTIMATED CONTRACT COST (WP-III-A291)		

## 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-SCGC-09)

Date Requested: June 26, 2017 Date Responded: July 27, 2017

## **QUESTION 9.1.7:**

With respect to the statement on WP-III-A294 for Section 1: "Construction duration was planned for 4 weeks and actual was 22 weeks" and the statements on WP-III-A295 to WP-III-A296: "Site Conditions: A steep incline and sandy terrain at the site location prevented the allotted 4,000-gallon water truck from covering all areas on site required for dust control, fire control, and mitigation efforts. A second water truck with necessary driving capabilities (6x6, 4 wheel drive) was needed to reach all areas of site location and achieve full coverage.

Additional site security was needed for the construction areas due proximity to a highly populated location.

Constructability Issues: The original design called for a test head assembly; however, a test head was not available and a test head assembly was used instead. Construction Contractor crews modified the test head launcher and receiver to accommodate the test head, thus allowing de-water and pipe drying portion of the work to proceed on schedule. Site Restoration: Trench excavation was more extensive than planned due to instability of the steep slope and poor soil conditions.

After Section 1 work was completed, it was determined that additional land restoration was required because the amount of vegetation cleared was larger than planned to accommodate construction. Hydro-seeding and installation of erosion control took an additional 2 weeks to perform.

- 9.1.7.1. Please state if there was more than one mobilization and demobilization for the Section 1 construction site.
- 9.1.7.2. If the answer to the previous question indicates additional mobilizations/demobilizations, please list the dates for all mobilizations and demobilization for the Section 1 construction site.
- 9.1.7.3. Of the 22 weeks for the construction duration, how much time was spent with the construction crew actively working on Section 1 project activities?
- 9.1.7.4. Please provide a more detailed description of the "steep incline and sandy terrain" including the percentage of the job site that was affected by these conditions.

## 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-SCGC-09)

- 9.1.7.5. Why wasn't the presence of a steep incline and sandy terrain detected from contour maps and field survey descriptions during the planning stages for Section 1?
- 9.1.7.6. Please state the cost associated with each of the trucks used for Section 1.
- 9.1.7.7. Why didn't the Construction Contractor obtain the 6x6, 4-wheel drive truck at the outset of the Section 1 work given the steep terrain and sandy soil conditions present at the job site?
- 9.1.7.8. Was there any delay associated with obtaining the second truck mid-way through work?
- 9.1.7.9. If the answer to the previous question is "yes," please state the length of the delay.
- 9.1.7.10. How much cost is associated with the delay (if any) of the job from waiting for the second truck?
- 9.1.7.11. Please provide a more detailed description of the project site's proximity to a highly-populated location, including the distance from the site to the highly populated location.
- 9.1.7.12. Why wasn't the presence of this highly populated location and its proximity to the job site detected from maps and field surveys during the planning stages for Section 1?
- 9.1.7.13. Please state the incremental cost associated with the additional security required at the construction areas.
- 9.1.7.14. Did the need for additional security introduce any delay into the project?
- 9.1.7.15. Why wasn't the smaller test head available for the Section 1 work?
- 9.1.7.16. Did the contractor's estimate indicate that the smaller test head was available for the work?

## 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-SCGC-09)

- 9.1.7.17. Is the charge for using the larger test head greater than the charge for using the smaller test head?
- 9.1.7.18. If the answer to the previous question is "yes," please state the cost difference.
- 9.1.7.19. How much delay was introduced in the project schedule by having to wait for the Construction Contractor crews to modify the test head launcher and receiver to accommodate the larger test head?
- 9.1.7.20. What cost is associated with the above referenced delay in the project?
- 9.1.7.21. With respect to the more extensive trench excavation required for the project, how much additional time was spent excavating the trenches on the Section 1 project?
- 9.1.7.22. What was the incremental cost associated with the additional excavation?
- 9.1.7.23. Was any delay introduced in the Section 1 project because of the additional time required for excavation?
- 9.1.7.24. If the answer to the previous question is "yes," please state the number of days delay associated with waiting for the completion of the trenches and the cost associated with those days of delay.
- 9.1.7.25. With respect to the additional land restoration worked required for the Section 1 project, what was the incremental cost associated with the land restoration?
- 9.1.7.26. Was any delay introduced in the Section 1 project because of the additional time required for land restoration?
- 9.1.7.27. If the answer to the previous question is "yes," please state the number of days delay associated with waiting for the completion of the land restoration work and the cost associated with those days of delay.
- 9.1.7.28. Please provide a copy of all Change Order materials or other notices or correspondence provided to SoCalGas' PSEP management team by its contractor that are related to the delay or added cost created by the issues described above in the cited quotation.

## 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-SCGC-09)

## Date Requested: June 26, 2017 Date Responded: July 27, 2017

9.1.7.29. Please provide a copy of all of SoCalGas' PSEP management team's responses to its contractor in regards to these change order materials, notices or correspondence.

# RESPONSE 9.1.7:

- 9.1.7.1 There was one mobilization and one demobilization for the Section 1 construction site.
- 9.1.7.2 Not applicable.
- 9.1.7.3 About six weeks.
- 9.1.7.4 It is unclear what is meant by the phrase, "including the percentage of the job site that was affected by these conditions." There was an elevation change of 136 feet over the length of the project. The prevailing soil type was dry sand, requiring a sloped excavation.
- 9.1.7.5 The steepness of the terrain was known in the planning stage for Section 1. However, the full extent of the challenges associated with excavating in this sandy soil was not known until construction commenced. Field crews were required to use various benching techniques to account for the conditions.
- 9.1.7.6 The Contractor's cost was \$43,637 for each of the trucks used for Section 1.
- 9.1.7.7 As explained in response to TURN-SCGC Q.9.1.7.5, although SoCalGas and SDG&E were aware of the steep terrain and sandy soil conditions, the full extent of the challenges associated with excavating in this sandy soil was not known until construction commenced. While it was initially anticipated prior to construction that a non-4-wheel drive truck would be sufficient, the field conditions encountered during construction made the 6X6 4-wheel drive truck necessary to safely complete the work. The 6X6 4-wheel drive was not necessary until heavy excavation was underway.
- 9.1.7.8 No.
- 9.1.7.9 Not applicable.

## 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-SCGC-09)

- 9.1.7.10 Not applicable.
- 9.1.7.11 The project is less than 0.5 miles east of a residential neighborhood in the City of Ventura.
- 9.1.7.12 The highly populated location was anticipated prior to construction.
- 9.1.7.13 The Contractor's cost was \$9,521 for the additional security required at the construction areas.
- 9.1.7.14 No.
- 9.1.7.15 Prior to construction mobilization, SoCalGas and SDG&E determined it was prudent to utilize existing and available 30-inch test heads versus fabricating a 22inch test head that is less common in size in the SoCalGas/SDG&E system. While this required test piping modifications by the construction contractor, this eliminated the cost of fabricating the 22-inch test heads.
- 9.1.7.16 Yes.
- 9.1.7.17 No.
- 9.1.7.18 Not applicable.
- 9.1.7.19 Less than one day.
- 9.1.7.20 The Construction Contractor's cost was \$2,871 for the delay. In addition to these direct costs, there may be additional costs for SoCalGas/SDG&E labor and non-construction activities, such as project management and inspection services, that were not tracked and reported separately for this specific delay.
- 9.1.7.21 The additional excavation time was not recorded and is de minimus.
- 9.1.7.22 The incremental Construction Contractor's cost was \$9,228 for the additional excavation. In addition to these direct costs, there may be additional costs for SoCalGas/SDG&E labor and non-construction activities, such as project management and inspection services, that were not tracked and reported separately for this specific activity.

## 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-SCGC-09)

- 9.1.7.23 No.
- 9.1.7.24 Not applicable.
- 9.1.7.25 The Construction Contractor's cost was \$157,017 for the additional land restoration. In addition to these direct costs, there may be additional costs for SoCalGas/SDG&E labor and non-construction activities, such as project management and inspection services, that were not tracked and reported separately for this specific activity. An aerial view picture of the seven acres to be hydroseeded is provided in the attachment folder.
- 9.1.7.26 Yes.
- 9.1.7.27 The delay associated with waiting for the completion of the land restoration work was 9.5 weeks from end of construction until restoration work began and 20 business days for mobilization, site prep and land restoration activities. See response to TURN-SCGC Q9.1.7.25 for the incremental delay costs.
- 9.1.7.28-29 The attached supporting documents include Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024. Copies of Requests for Information (RFIs) and change orders are provided in the attachment folder.

## 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-SCGC-09)

Date Requested: June 26, 2017 Date Responded: July 27, 2017

## **QUESTION 9.1.8:**

With respect to the statement on WP-III-A294 for Sections 2 and 2A: "Construction duration was planned for 4 weeks and actual was 17 weeks" and the statement on WP-III-A296:

"Constructability Issues: A damaged portion of the pipeline was discovered when the pipe was exposed and needed to be replaced prior to strength testing. This resulted in lengthening the excavation to accommodate cutting out the damaged portion of the pipe. Weather: Inclement weather resulted in delays in restoration, moving off of the laydown yard, and the repair of the access road."

9.1.8.1. What date did was the damaged portion of the pipeline discovered? 9.1.8.2. Was the discovery of the damaged pipe part of the Section 2 or Section 2A work? 9.1.8.3. What was the incremental cost of replacing the damaged portion of the pipeline? 9.1.8.4. How long did it take to replace the damaged portion of the pipeline once the necessary materials and crew was in place? 9.1.8.5. What day was replacement of the damaged portion of pipe completed? 9.1.8.6. How many days were required to conduct the hydrotest of the pipeline once the pipe repair was completed? 9.1.8.7. Why was the Sections 2 and 2A work begun in late October? 9.1.8.8. How many days was the Sections 2 and 2A project delayed because of inclement weather? Please answer separately for each section. 9.1.8.9. What was the cost associated with the project delay because of inclement weather? Please answer separately for each section.

## 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-SCGC-09)

## Date Requested: June 26, 2017 Date Responded: July 27, 2017

- 9.1.8.10. Please provide a copy of all Change Order materials or other notices or correspondence provided to SoCalGas' PSEP management team by its contractor that are related to the delay or added cost created by the issues described above in the cited quotation.
- 9.1.8.11. Please provide a copy of all of SoCalGas' PSEP management team's responses to its contractor in regards to these change order materials, notices or correspondence.

# **RESPONSE 9.1.8.1:**

- 9.1.8.1 The damaged portion of the pipeline was known prior to construction, but validated on October 30, 2014.
- 9.1.8.2 Section 2.
- 9.1.8.3 The Contractor's estimated cost to replace the damaged portion of the pipe was \$50,495. As a result of negotiations between SoCalGas/SDG&E and the Performance Partner contractor, however, these costs were absorbed by the contractor and not passed along to customers.
- 9.1.8.4 One day.
- 9.1.8.5 November 21, 2014.
- 9.1.8.6 One day.
- 9.1.8.7 October 2014 was planned as the construction start date based on permitting, land owner negotiation and system capacity availability.
- 9.1.8.8 Section 2 was delayed three days and Section 2A was not delayed.
- 9.1.8.9 There were no additional contractor costs associated with the weather delay for Sections 2 and 2A. There may be additional costs for SoCalGas/SDG&E labor and non-construction activities, such as project management and inspection services, that were not tracked and reported separately for this specific delay.
- 9.1.8.10 The attached supporting documents include Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024. There are no change

## 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-SCGC-09)

## Date Requested: June 26, 2017 Date Responded: July 27, 2017

orders for this project. See the attachments submitted in response to TURN-SCGC Q.9.1.8.11 for related correspondence.

9.1.8.11 The attached supporting documents include Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024. Copies of Requests for Information (RFIs) and related correspondence are provided in the attachment folder.

## 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-SCGC-09)

Date Requested: June 26, 2017 Date Responded: July 27, 2017

# **QUESTION 9.1.9:**

## With respect to Table 5:

- 9.1.9.1. Please provide a breakdown of the actual cost figures presented in the O&M column between each of the Sections 1, 2, 2A, 4 and 5.
- 9.1.9.2. Please provide a breakdown of the actual cost figures presented in the Capital column between each of the Sections 1, 2, 2A, 4 and 5.

## RESPONSE 9.1.9:

9.1.9.1 Because the costs of the Line 406 project were documented and tracked as a single project, Table 5 cannot be separated into four project sections without making after-the-fact assumptions about how the total project costs could be allocated among the five sections. Further, Work Order Authorization Forms (WOAs) are initiated at Stage 1 (initial scoping cost estimate) and updated at Stage 3 (Phase 2 WOA) to capture estimated project costs for pipeline projects that require testing or replacement. WOAs may include one or more hydrotest and/or replacement sections, but it is not a general practice to initiate separate WOAs for each individual section for the same pipeline unless circumstances, such as construction schedule or design approach, warrant separate tracking mechanisms for sections within the same asset.

Similarly, it is not feasible to separate the O&M (actual) and Capital (actual) Costs among the five sections of this project. PSEP projects are planned and designed to comply with the Commission's directive in a cost effective manner while minimizing impacts to customers and the community. In furtherance of these objectives, the engineering and design work, as well as construction activity, was tracked for the entire project and not tracked separately for each section.

9.1.9.2 See the response to TURN-SCGC Q.9.1.9.1.

## 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-SCGC-09)

Date Requested: June 26, 2017 Date Responded: July 27, 2017

# **QUESTION 9.2:**

These questions are directed at the workpapers regarding the L-407 Hydrotest Project.

9.2.1. With respect to the statement on WP-III-A303: "Included in this project were 0.761 miles of pipe accelerated from Phase 2A and 1.160 miles of pipe accelerated from Phase 2B. The accelerated mileage was included to realize efficiencies and to enhance project constructability." The accelerated and incidental mileage was broken between the north and south sections in Table 2.

- 9.2.1.1. Please state how much of the north section accelerated mileage was Phase 2A versus Phase 2B.
- 9.2.1.2. Please demonstrate that there were cost savings achieved by including the Phase 2A and/or 2B mileage in the north section by providing cost estimates with the accelerated and incidental mileage excluded from the project as compared with the cost estimates that included the accelerated and incidental mileage.
- 9.2.1.3. Please state how much of the south section accelerated mileage was Phase 2A versus Phase 2B.
- 9.2.1.4. Please demonstrate that there were cost savings achieved by including the Phase 2A and/or 2B mileage in the south section by providing cost estimates with the accelerated and incidental mileage excluded from the project as compared with the cost estimates that included the accelerated and incidental mileage.

# RESPONSE 9.2.1:

- 9.2.1.1 Line 407 North includes 0.633 miles of Phase 2A pipe and 1.155 miles of Phase 2B pipe.
- 9.2.1.2 SoCalGas and SDG&E did not prepare a cost estimate to compare the costs of including the 1.921 miles of accelerated pipe and 208 feet of incidental pipe within the scope of this Phase 1A project versus excluding this pipe and addressing the segments in a later project.

## 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-SCGC-09)

## Date Requested: June 26, 2017 Date Responded: July 27, 2017

Line 407 North included three distinct sections of Category 4 pipeline that are surrounded by accelerated and incidental pipe sections. Performing one longer hydrotest, and including the accelerated and incidental mileage within the scope of the hydrotest, is a more cost-effective approach than performing three shorter hydrotests of only the Category 4 pipe segments. Performing three separate hydrotests would extend the construction duration and would increase costs of construction, company labor, material, and third-party contract costs. While the water acquisition and disposal costs, and the number of water storage tanks would be lessened by hydrotesting the three shorter Category 4 pipe sections, those potential cost savings are far outweighed by the other costs associated with performing three separate hydrotests.

- 9.2.1.3 Line 407 South includes 677 feet of Phase 2A pipe and 26 feet of Phase 2B pipe.
- 9.2.1.4 SoCalGas and SDG&E did not prepare a cost estimate to compare the costs of including the 703 feet of accelerated and 32 feet of incidental pipe within the scope of this Phase 1A project versus excluding this pipe.

Relocating work areas to the Category 4 pipe endpoints would have required SoCalGas and SDG&E to acquire new permits from the Army Corps of Engineers, California Department of Fish and Wildlife, and the Regional Water Quality Control Board instead of relying on existing SoCalGas permits inside Sullivan Canyon. Based on operator knowledge and experience, this would have led to an overall increase in the project schedule and costs.

## 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-SCGC-09)

Date Requested: June 26, 2017 Date Responded: July 27, 2017

# QUESTION 9.2.2:

With respect to Figures 1, 3 and 5: Does the green line marked on these figures correspond to replacement work or does it indicate accelerated mileage? Please prepare a separate answer for each figure.

# RESPONSE 9.2.2:

Figure 1 – The green line indicates pipe that was replaced. The blue dotted marks within the green indicate accelerated mileage. A high-resolution copy of Figure 1 is provided in the attachment folder.

Figure 3 – The green line indicates pipe that was replaced. The blue dotted marks within the green indicate accelerated mileage. A high-resolution copy of Figure 3 is provided in the attachment folder.

Figure 5 – The green line indicates pipe that was replaced. The blue dotted marks within the green indicate accelerated mileage. A high-resolution copy of Figure 5 is provided in the attachment folder.

## 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-SCGC-09)

Date Requested: June 26, 2017 Date Responded: July 27, 2017

# QUESTION 9.2.3:

With respect to the statement on WP-III-309: "On the southern end, 2.030 miles of accelerated pipe was added because the Category 4 mileage ended in a difficult area with limited space for staging water tanks. Where the south test endpoint was extended to San Vicente Blvd. San Vicente Blvd was considered because of work space and to include Phase 2b accelerated mileage. The driver to include this scope changed at the end of Stage 3 and there was a reduction in accelerated miles."

- 9.2.3.1. Please explain the statement "The driver to include this scope changed at the end of Stage 3 and there was a reduction in accelerated miles."
- 9.2.3.2. Does this mean that the accelerated mileage was largely eliminated even though it was added originally to address the problem with the category 4 mileage terminating in a difficult area?
- 9.2.3.3. How did the new design address the problem with the category 4 mileage terminating in a difficult area?

# RESPONSE 9.2.3:

- 9.2.3.1 While the San Vicente Blvd. option was further explored in Stage 3, several issues were identified that prompted the decision to move the test endpoint back to Queensferry Road. Extending the test section to San Vicente Blvd. would have: required over 20 additional water storage tanks; added seven intermediate work locations to disconnect taps, drip legs, and a regulator station for the hydrotest; and required City of Los Angeles permits for the San Vicente Blvd. and intermediate work locations. The San Vicente Blvd. work location did not have enough work space to accommodate the additional water storage tanks.
- 9.2.3.2 Yes, the accelerated mileage towards San Vicente Blvd. was eliminated from the scope of this project. Although both termination areas presented challenges, it was determined that Queensferry Road presented less challenges, as described further in response to TURN-SCGC Q.9.2.3.3 below.

## 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-SCGC-09)

## Date Requested: June 26, 2017 Date Responded: July 27, 2017

9.2.3.3 SoCalGas and SDG&E determined that the risks associated with the Queensferry Road location were more manageable than the additional risks (and the costs associated with managing those additional risks) associated with the San Vicente Blvd. option (described in response to TURN-SCGC Q.9.2.3.1). The three most significant challenges identified with placement of the Line 407 South endpoint at Queensferry Road were equipment access, hydrotest water availability, and impacts to the Sullivan Canyon walking trail. SoCalGas and SDG&E retained a certified arborist to perform tree trimming, which helped with equipment access to the work areas. SoCalGas and SDG&E installed temporary water piping 1,500 feet down a steep grade on Queensferry Road to obtain hydrotest water from the nearest hydrant. SoCalGas and SDG&E staged water storage tanks and equipment along the Los Angeles County Flood Control access road, which required careful planning to negotiate around a tight turn radius at the flood control catch basin, to keep the Sullivan Canyon walking trail open.

## 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-SCGC-09)

### Date Requested: June 26, 2017 Date Responded: July 27, 2017

# **QUESTION 9.2.4:**

With respect to Table 3: Please break down the cost in each cost category between the north and south sections of the project.

## RESPONSE 9.2.4:

Cost Category	L-407 North	L-407 South	Phase 2 WOA
Company Labor Costs	\$ 271,451	\$ 212,440	\$ 483,891
Contract Costs	\$ 2,705,987	\$ 2,036,979	\$ 4,742,966
Material Costs	\$ 90,669	\$ 86,043	\$ 176,712
Other Direct Costs	\$ 358,301	\$ 353,486	\$ 711,787
Total Direct Costs	\$ 3,426,408	\$ 2,688,948	\$ 6,115,356
Total Indirect Costs	NA	NA	\$ 895,596
Total Loaded Costs	NA	NA	\$ 7,010,952

## 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-SCGC-09)

Date Requested: June 26, 2017 Date Responded: July 27, 2017

# **QUESTION 9.2.5:**

With respect to the statement on WP-III-315: "Construction of the North Section started before the PSEP Performance Partnership Program was established; therefore, the construction contractor was selected through a competitive fixed-bid process." Please provide all of the bid materials submitted by the contractors as well as the materials that SoCalGas provided to the contractors as part of the bid process and the materials SoCalGas employees prepared evaluating the various bids and determining the bid award.

# RESPONSE 9.2.5:

The attached supporting documents include Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024. A copy of SoCalGas/SDG&E's and Contractor's bid materials are provided in the attachment folder.

## 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-SCGC-09)

Date Requested: June 26, 2017 Date Responded: July 27, 2017

# **QUESTION 9.2.6:**

With respect to the statements on WP-III-315: North Section—"The Construction Contractor's final bid was \$xxxx, which is \$xxxx less than the Stage 3 construction contractor direct estimate of \$xxxx that was used to develop the Phase 2 WOA." South Section—"The Performance Partner's TPE was \$xxxx, which is \$xxxx less than the Stage 3 construction contractor direct estimate of \$xxxx that was used to develop the Phase 2 WOA."

- 9.2.6.1. Please reconcile the total of the third redacted cost figure for the north section plus the third redacted cost figure for the south section with the contract cost shown in Table 3.
- 9.2.6.2. Apart from the division of the project between the north and south sections, did SoCalGas award multiple contracts for each section?
- 9.2.6.3. If the answer to the previous question is "yes," please provide a breakdown of the contract cost figure for the north section separately from the south section among the various contracts that were awarded for each section.

# RESPONSE 9.2.6:

9.2.6.1 The following response includes Confidential and Protected Information Pursuant to PUC Section 583, GO 66-C, and D.16-08-024.

Line 407 Estimated Contractor Cost Reconciliation (Phase 2 WOA)		
Cost Element by WOA/Function		
Construction Contractor - 407 North TIC (WP-III-A315)		
Construction Contractor Contingency		
Construction Contractor - 407 South TIC (WP-III-A315)		
Construction Contractor Contingency		
Other Contracted Services		
TOTAL P2 WOA CONTRACT COST (WP-III- A312)		

## 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-SCGC-09)

- 9.2.6.2 No.
- 9.2.6.3 Not applicable.

## 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-SCGC-09)

Date Requested: June 26, 2017 Date Responded: July 27, 2017

# QUESTION 9.2.7:

With respect to the statement on WP-III-317: "A xxxx pipe support on another company pipeline, exposed during excavation at Mulholland Drive, required replacement for integrity reasons."

- 9.2.7.1. What was the incremental cost associated with replacing the pipe support on the other company pipeline?
- 9.2.7.2. Was there any project delay associated with completing the repair of the pipe support?
- 9.2.7.3. If the answer to the previous question is "yes," please identify the incremental cost associated with the project delay.
- 9.2.7.4. Did SoCalGas include that incremental cost associated with the repair and/or the project delay created by the repair as part of the overall L-407 north section project costs?
- 9.2.7.5. If the answer to the previous question is "yes," please explain why SoCalGas felt it was appropriate to account for the repair of a pipe support for a non-PSEP pipe and any associated delay as part of the L-407 project cost.

# RESPONSE 9.2.7:

- 9.2.7.1 The increased Contractor cost was \$3,794 for replacing the pipe support on the other company pipeline. In addition to these direct costs, there may be additional costs for SoCalGas/SDG&E labor and non-construction activities, such as project management and inspection services, that were not tracked and reported separately. The attached supporting documents include Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024. A copy of the Requests for Information (RFI) and change order are provided in the attachment folder.
- 9.2.7.2 No.
- 9.2.7.3 Not applicable.

## 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-SCGC-09)

- 9.2.7.4 Yes.
- 9.2.7.5 The Line 407 North hydrotest project scope included excavation and isolation of a lateral connection between Line 407 and Line 3003 at Mile Post 3.16. The damaged pipe support was exposed during excavation of the lateral connection. As a prudent pipeline operator, SoCalGas and SDG&E recognized this potentially hazardous condition and directed the construction contractor to replace the pipe support.

## 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-SCGC-09)

Date Requested: June 26, 2017 Date Responded: July 27, 2017

# **QUESTION 9.2.8:**

## With respect to Table 4:

- 9.2.8.1. Please provide a breakdown of the actual cost figures presented in the O&M column between the north and south sections.
- 9.2.8.2. Please provide a breakdown of the actual cost figures presented in the Capital column between the north and south sections.

## RESPONSE 9.2.8:

9.2.8.1 Because the costs of the Line 407 hydrotest project were documented and tracked as a single project, Table 4 cannot be separated into two project sections without making after-the-fact assumptions about how the total project costs could be allocated between the two hydrotest sections. Further, Work Order Authorization Forms (WOAs) are initiated at Stage 1 (initial scoping cost estimate) and updated at Stage 3 (Phase 2 WOA) to capture estimated project costs for pipeline projects that require test or replacement. WOAs may include one or more hydrotest sections, but it is not a general practice to initiate separate WOAs for each individual hydrotest section for the same pipeline unless circumstances, such as construction schedule or design approach, warrant separate tracking mechanisms for sections within the same asset.

Similarly, it is not feasible to separate the O&M (actual) and Capital (actual) Costs among the two hydrotest sections of this project. PSEP projects are planned and designed to comply with the Commission's directive in a cost effective manner while minimizing impacts to customers and the community. In furtherance of these objectives, the engineering and design work, as well as construction activity, was tracked for the entire project and not tracked separately for each hydrotest section.

9.2.8.2 See the response to TURN-SCGC Q.9.2.8.1.

#### BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

#### DECLARATION OF HUGO MEJIA REGARDING CONFIDENTIALITY OF CERTAIN DATA/DOCUMENTS PURSUANT TO D.16-08-024

I, Hugo Mejia, do declare as follows:

1. I am a Project and Execution Manager in the Major Programs & Project Controls for San Diego Gas & Electric Company ("SDG&E") and Southern California Gas Company ("SoCalGas") designated by Jimmie Cho, Senior Vice President, Gas Operations and System Integrity for SDG&E and SoCalGas. I have been delegated authority to sign this declaration by Mr. Cho. I have reviewed the Response of SoCalGas and SDG&E to the Ninth Data Request of The Utility Reform Network (TURN) and Southern California Generation Coalition (SCGC) of the California Public Utilities Commission (CPUC) in the Pipeline Safety and Enhancement Plan (PSEP) 2016 Reasonableness Review A.16-09-005 proceeding, submitted concurrently herewith (Response to TURN-SCGC's Ninth Data Request). I personally am familiar with the facts and representations in this Declaration, except where stated as based upon my information and belief. If called upon to testify, I could and would testify to the following based upon my personal knowledge and/or information and belief.

2. I hereby provide this Declaration in accordance with Decision (D.) 16-08-024 to demonstrate that the confidential information (Protected Information) provided in the Response to TURN-SCGC's Ninth Data Request is within the scope of data protected as confidential under applicable law and pursuant to Public Utilities Code ("PUC") § 583 and General Order ("GO") 66-C, as further described in Attachment A. The intervenors in this proceeding (The Utility Reform Network, the Office of Ratepayer Advocates, and Southern California Generation Coalition) have requested that SDG&E and SoCalGas provide their responses to all data requests to all other parties; since this necessarily includes the Office of Ratepayer Advocates, this Declaration has been necessitated. 3. In accordance with the legal authority described herein, the Protected Information should be protected from public disclosure.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed this 17<sup>th</sup> day of July, 2017, at Los Angeles, California.

.

Hugo Mejia Project and Execution Manager

.

## ATTACHMENT A

## SoCalGas and SDG&E Request Confidential Treatment of the Following Information in Their Response to TURN-SCGC's Ninth Data Request in A.16-09-005, Application to Recover Costs Recorded in Pipeline Safety & Reliability Memorandum Accounts, Safety Enhancement Capital Costs Balancing Accounts, and Safety Enhancement Expense Balancing Accounts

SDG&E and SoCalGas designated the combination of the pipeline diameter attribute and location data as confidential in their response to TURN-SCGC's Ninth Data Request in A.16-09-005, Application to Recover Costs Recorded in Pipeline Safety & Reliability Memorandum Accounts, the Safety Enhancement Expense Balancing Accounts, and the Safety Enhancement Capital Cost Balancing Accounts, because:

(1) This data is sensitive critical energy infrastructure information that is not currently published by PHMSA and, if made publicly available, could present a risk to the security of California's critical energy infrastructure. SoCalGas' and SDG&E's assessment of the risks associated with critical energy infrastructure data will continue to evolve as the sophistication, frequency and volume of security threats increase. In light of certain events, such as the attack on Pacific Gas & Electric Company's Metcalf Substation in 2013, SoCalGas and SDG&E believe pipeline diameter data must be treated as confidential. SoCalGas and SDG&E designate this pipeline diameter data as confidential pursuant to several laws, regulations, and guides that seek to protect critical infrastructure information and sensitive security information from public disclosure for national security reasons. These include, but are not limited to: (i) the Protected Critical Infrastructure Information (PCII) Program; (ii) FERC Order 630 - Critical Energy Infrastructure Information (CEII); (iii) Sensitive Security Information Regulations; and (iv) the Transportation Security Administration's (TSA) Pipeline Security Guidelines. See also the Federal Register Notice on August 27, 2015 (Volume 80, Number 166) concerning PHMSA/OPS' proposed changes to the National Pipeline Mapping System (NPMS) data collection and the protection of pipeline information such as MAOP and pipe diameter. The yellow highlighted portions on the pages identified in the table below fall within the category of sensitive critical energy infrastructure.

SDG&E and SoCalGas designated the vendor bid and pricing information (including rates and invoices) as confidential in their response to TURN-SCGC's Ninth Data Request in A.16-09-005, Application to Recover Costs Recorded in Pipeline Safety & Reliability Memorandum Accounts, the Safety Enhancement Expense Balancing Accounts, and the Safety Enhancement Capital Cost Balancing Accounts because:

(2) This data is market-sensitive information and is entitled to confidential treatment under D.11-01-36, 2011 WL 660568 (2011) GO 66-C Sections 2.2(b), 2.8. The disclosure of such information would trigger the protection of section 2.2(b) of G.O. 66-C, which protects "[r]eports, records and information requested or required by the Commission which, if revealed, would place the regulated company at an unfair business disadvantage." The yellow highlighted portions on the pages identified in the table below fall within the category of vendor identifying information.

SDG&E and SoCalGas designated their employee names as confidential because:

(3) Disclosure of this information would constitute an unwarranted invasion of personal privacy. Releasing names could put employees at risk for identity theft, personal harm, harassment or other negative outcomes. This information is exempt from public disclosure, and constitutes confidential information pursuant to Government Code § 6254(c); Gov't Code 6255; Civil Code §§ 1798.3 & 1798.24 (the California Information Practices Act); and Cal. Const., Art. I, § 1 (California constitutional right to privacy) among other relevant provisions. The yellow highlighted portions on the pages identified in the table below fall within the category of employee identifying information (e.g., names, signatures, other contact information).

DATA /	JUSTIFICATION FOR CONFIDENTIALITY	ATTACHMENTS/DATA REQUEST RESPONSES
INFORMATION		00.1.02.5 CONFIDENTIAL 1.405 Class 1 Dec. Dec. A second 1.5.15.15.15.17.20.27
Pipeline attribute (i.e.	This information has been identified as confidential	Q9.1.02.5 CONFIDENTIAL L406 Signed Doty Bros Agr: pp.1,5,15,16-17,20,27
diameter, pressure, and	protected information as this data constitutes	Q9.1.02.6 CONFIDENTIAL L406 Doty Bros Invoice Job 2200-14103: pp.1-2
location)	sensitive critical energy infrastructure information	Q9.2.05.1 A CONFIDENTIAL 01 RFP.pdf: pp.4
	that is not currently published by the PHMSA and, if	Q9.2.05.1 A CONFIDENTIAL 02 L407 N Scope of Work.pdf: pp.3-6,14
	made publicly available, could present a risk to the	Q9.2.05.1 A CONFIDENTIAL 03 Index of Tech Docs L407 N.pdf: pp.2
	security of the SoCalGas and SDG&E pipeline	Q9.2.05.1 A CONFIDENTIAL 07 L407 N Issued for Bid.pdf: pp.1-22
	system and California's critical energy	Q9.2.05.1 A CONFIDENTIAL Add 3 Pricing Exhibit B L407 N.pdf: pp.1-2
	infrastructure.	Q9.2.05.1 A CONFIDENTIAL Add 4 L407 N.pdf: pp.1
		Q9.2.05.1 A CONFIDENTIAL Add 5 Pricing Exhibit B L407 N.pdf: pp.1-2
	<u>CEII</u> : 18 CFR §388.113(c); FERC Orders 630, 643,	Q9.2.05.1 A CONFIDENTIAL Add 5 SOW Section 222 223.pdf: pp.1
	649, 662, 683, and 702 (defining CEII).	Q9.2.05.1 A CONFIDENTIAL Add L407 Pre-Bid Job Walk Notes.pdf: pp.1-2
		Q9.2.05.1 A CONFIDENTIAL Hydrostatic Test Spec L407 N.pdf: pp.2,9
	Critical Infrastructure Information:	Q9.2.05.1 A CONFIDENTIAL IFB Hydr Source Disch and Treat Matrix.pdf: pp.1
	6 U.S.C. §§131(3), 133(a)(1)(E); 6 CFR §§ 29.2(b),	Q9.2.05.1 A CONFIDENTIAL L407 N Traffic Control Plan.pdf: pp.1-4
	29.8 (defining CII and restricting its disclosure).	Q9.2.05.1 A CONFIDENTIAL L407 Permit Submittals.pdf: pp.1-2
		Q9.2.05.1 A CONFIDENTIAL SoCalGas Stormwater BMP Manual.pdf: pp.1
	Gov't Code § 6254(e) ("Geological and geophysical	Q9.2.05.1 B CONFIDENTIAL Addendum Pricing Exhibit B 407N.pdf: pp.1-2
	data, plant production data, and similar information	Q9.2.05.1 F CONFIDENTIAL Add 5 Pricing Exhibit B L407 N.pdf: pp.1-2
	relating to utility systems development, or market or	Q9.2.05.1 F CONFIDENTIAL Schedule.pdf: pp.1
	crop reports, that are obtained in confidence from	
	any person.")	
	Gov't Code § 6254 (ab) ("Critical infrastructure	
	information, as defined in Section 131(3) of Title 6	
	of the United States Code, that is voluntarily	
	submitted to the Office of Emergency Services for	
	use by that office")	
Vendor information	Vendor names, bid and pricing information have	Data Request Response to Question 9.1.6.2 and 9.2.6.1
	been marked as confidential protected information as	Q9.1.02.5 CONFIDENTIAL L406 Sign Doty Bros Agr: pp.1-4,9,16-18,20-22,25-30
	publicly disclosing this information could lead to a	Q9.1.02.6 CONFIDENTIAL L406 Doty Bros Invoice Job 2200-14103: pp.1-3
	competitive disadvantage and potential loss of	Q9.1.07.28-29 CONFIDENTIAL L406 Sec 1_RFI-002 Water Truck.pdf: pp.1-2
	market share for those vendors.	Q9.1.07.28-29 CONFIDENTIAL L406 Sec 1_RFI-003 Security Gaurd.pdf: pp.1,3
		Q9.1.07.28-29 CONFIDENTIAL L406 Sec 1_RFI-014 Dig Sand.pdf: pp.1-2
	See, e.g., D.11-01-36, 2011 WL 660568 (2011)	Q9.1.07.28-29 CONFIDENTIAL L406 Sec 1_RFI-015 Earthwork.pdf: pp.1-2
		Q9.1.07.28-29 CONFIDENTIAL L406 Sec 1_RFI-016 Testhead Mod.pdf: pp.1-2
	GO 66-C Sections 2.2(b), 2.8	Q9.1.07.28-29 CONFIDENTIAL L406 Sec 1_RFI-017 Hydr Site Rest.pdf: pp.1-4
		Q9.1.07.28-29 CONFIDENTIAL L406 Sec 2 2A_RFI-012 West Repav.pdf: pp.1-2
	Gov't Code § 6254.15 (disclosure not required for	Q9.1.07.28-29 CONFIDENTIAL L406 Sec 2_RFI-011 Road Restoration.pdf: pp.1-2

"corporate financial records, corporate proprietary	Q9.1.07.28-29 CONFIDENTIAL Q13 L406 Sec 1 Change Order No 05: pp.1
information including trade secrets, and information	Q9.1.07.28-29 CONFIDENTIAL Q13 L400 Sec 1 Change Order No 05: pp.1 Q9.1.07.28-29 CONFIDENTIAL Q20 L406 Sec 1 Change Order No 05: pp.1
relating to siting within the state furnished to a	Q9.1.07.28-29 CONFIDENTIAL Q20 L400 Sec 1 Change Order No 05: pp.1 Q9.1.07.28-29 CONFIDENTIAL Q22 L406 Sec 1 Change Order No 05: pp.1
government agency by a private company for the	Q9.1.07.28-29 CONFIDENTIAL Q22 L400 Sec 1 Change Order No 05: pp.1 Q9.1.07.28-29 CONFIDENTIAL Q25 L406 Sec 1 Change Order No 05: pp.1
purpose of permitting the agency to work with the	Q9.1.07.28-29 CONFIDENTIAL Q23 L406 Sec 1 Change Order No 05: pp.1 Q9.1.07.28-29 CONFIDENTIAL Q6 L406 Sec 1 Change Order No 05: pp.1
company in retaining, locating, or expanding a	Q9.1.08.10-11 CONFIDENTIAL L406 Sec 2 RFI-001 Repair Band.pdf: pp.1-2
facility within California")	Q9.1.08.10-11 CONFIDENTIAL L406 Sec 2 RFI-010 Tie-in Time.pdf: pp.1-2
$C_{acc}^{+} + C_{ac}^{+} + S_{ac}^{-} + S_$	Q9.1.08.10-11 CONFIDENTIAL L406 Sec 2 2A_Cert of Completion: pp.1-3
Gov't Code §6254.7(d) (relating to trade secrets)	Q9.2.05.1 A CONFIDENTIAL 01 RFP.pdf: pp.1-5,7-11
$C_{22}$ + $C_{24}$ + $C_{24}$ + $C_{24}$ + $C_{24}$ + $S_{10}$ +	Q9.2.05.1 A CONFIDENTIAL 02 L407 N Scope of Work.pdf: pp.3,5,9
Gov't Code § 6254(k); Evid. Code §1060; Civil	Q9.2.05.1 A CONFIDENTIAL 03 Index of Tech Docs L407 N.pdf: pp.1
Code §3426	Q9.2.05.1 A CONFIDENTIAL 04 Intent to Submit Bid (RFP).pdf: pp.1
	Q9.2.05.1 A CONFIDENTIAL 05 Statement of Resources.pdf: pp.1
	Q9.2.05.1 A CONFIDENTIAL 06 Technical_Exception.pdf: pp.1
	Q9.2.05.1 A CONFIDENTIAL 07 L407 N Issued for Bid.pdf: pp.1-22
	Q9.2.05.1 A CONFIDENTIAL 08 Proposal Checklist (RFP).pdf: pp.1
	Q9.2.05.1 A CONFIDENTIAL 10 DBE Subcontr Commitment Reporting.pdf: pp.2,6
	Q9.2.05.1 A CONFIDENTIAL Add L407 Pre-Bid Job Walk Notes.pdf: pp.1
	Q9.2.05.1 A CONFIDENTIAL Hazardous Matls and Spill Response Plan.pdf: pp.1
	Q9.2.05.1 A CONFIDENTIAL IFB Hydr Source Disch and Treat Matrix.pdf: pp.1
	Q9.2.05.1 A CONFIDENTIAL L407 N Traffic Control Plan.pdf: pp.1-4
	Q9.2.05.1 A CONFIDENTIAL SoCalGas Stormwater BMP Manual.pdf: pp.1
	Q9.2.05.1 A CONFIDENTIAL VDR.pdf: pp.1-3
	Q9.2.05.1 B CONFIDENTIAL Addendum Pricing Exhibit B 407N.pdf: pp.1-2
	Q9.2.05.1 B CONFIDENTIAL DBE Subcontr Commitment L407N.pdf: pp.1-9
	Q9.2.05.1 B CONFIDENTIAL Equip Rates.pdf: pp.1
	Q9.2.05.1 B CONFIDENTIAL Intent to Bid.pdf: pp.1
	Q9.2.05.1 B CONFIDENTIAL Key Personnel.pdf: pp.1-7
	Q9.2.05.1 B CONFIDENTIAL Labor Rates.pdf: pp.1
	Q9.2.05.1 B CONFIDENTIAL Prelim Sched L407 Hydrotest.pdf: pp.1
	Q9.2.05.1 B CONFIDENTIAL Statement of Resources.pdf: pp.1-2
	Q9.2.05.1 B CONFIDENTIAL Sustainability Questions.pdf: pp.1-6
	Q9.2.05.1 B CONFIDENTIAL Technical Exception.pdf: pp.1
	Q9.2.05.1 C CONFIDENTIAL L407 Intent to Submit Bid.pdf: pp.1
	Q9.2.05.1 CONFIDENTIAL L407 N RFP Evaluation.pdf: pp.1
	Q9.2.05.1 D CONFIDENTIAL Intent to Submit Bid.pdf: pp.1
	Q9.2.05.1 D CONFIDENTIAL L407 N Intent to Submit Prop.pdf: pp.1-26, 30-45
	Q9.2.05.1 E CONFIDENTIAL Intent to Submit Proposal.pdf: pp.1
	Q9.2.05.1 E CONFIDENTIAL L407 DBE Commitment.pdf: pp.1-4
	Q9.2.05.1 E CONFIDENTIAL L407 Enviro Notice.pdf: pp.1-5

		Q9.2.05.1 E CONFIDENTIAL L407 Pricing Workbook.pdf: pp.1-2
		Q9.2.05.1 E CONFIDENTIAL L407 Statement of Resources.pdf: pp.1-5
		Q9.2.05.1 E CONFIDENTIAL L407 Technical Exception.pdf: pp.1
		Q9.2.05.1 E CONFIDENTIAL Sustainability Construction.pdf: pp.3-4
		Q9.2.05.1 F CONFIDENTIAL 05 Statement of Resources.pdf: pp.1-2
		Q9.2.05.1 F CONFIDENTIAL 06 Technical Exception.pdf: pp.1
		Q9.2.05.1 F CONFIDENTIAL 10 DBE Subcontr Commit Reporting.pdf: pp.1-4
		Q9.2.05.1 F CONFIDENTIAL Add 5 Pricing Exhibit B L407 N.pdf: pp.1-2
		Q9.2.05.1 F CONFIDENTIAL Intent to Bid.pdf: pp.1
		Q9.2.05.1 F CONFIDENTIAL L407 Hydrotest.pdf: pp.1
		Q9.2.05.1 F CONFIDENTIAL Schedule.pdf: pp.1-5
		Q9.2.05.1 G CONFIDENTIAL Intent to Submit Bid (RFP).pdf: pp.1
		Q9.2.07.1 CONFIDENTIAL L407 North_RFI 018 closed: pp.1-2
		Q9.2.07.1 CONFIDENTIAL L407 Sec North_Change Order No 07: pp.1
Employee identifying	Public disclosure of staff level employee names,	Q9.1.02.5 CONFIDENTIAL L406 Signed Doty Bros Agr: pp.2-4,8-9,12
information	signatures, and other contact information is being	Q9.1.02.6 CONFIDENTIAL L406 Doty Bros Invoice Job 2200-14103: pp.1
(e.i. names,	prevented to protect against privacy, employee	Q9.1.07.28-29 CONFIDENTIAL L406 Sec 1_RFI-002 Water Truck.pdf: pp.2
signatures, other	security, identity theft, and cyber-security risks.	Q9.1.07.28-29 CONFIDENTIAL L406 Sec 1_RFI-003 Security Gaurd.pdf: pp.3
contact information)		Q9.1.07.28-29 CONFIDENTIAL L406 Sec 1_RFI-014 Dig Sand.pdf: pp.2
	Gov't Code § 6254(c); Gov't Code 6255;	Q9.1.07.28-29 CONFIDENTIAL L406 Sec 1_RFI-015 Earthwork.pdf: pp.2
		Q9.1.07.28-29 CONFIDENTIAL L406 Sec 1_RFI-016 Testhead Mod.pdf: pp.2
	Civil Code §§ 1798.3 & 1798.24 (the California	Q9.1.07.28-29 CONFIDENTIAL L406 Sec 1_RFI-017 Hydr Site Rest.pdf: pp.2
	Information Practices Act);	Q9.1.07.28-29 CONFIDENTIAL L406 Sec 2 2A_RFI-012 West Repay.pdf: pp.1-2
		Q9.1.07.28-29 CONFIDENTIAL L406 Sec 2_RFI-011 Road Restoration.pdf: pp.1-2
	Cal. Const., Art. I, § 1 (California constitutional	Q9.1.08.10-11 CONFIDENTIAL L406 Sec 2 RFI-001 Repair Band.pdf: pp.1-2
	right to privacy).	Q9.1.08.10-11 CONFIDENTIAL L406 Sec 2 RFI-010 Tie-in Time.pdf: pp.1-2
		Q9.1.08.10-11 CONFIDENTIAL L406 Sec 2 2A_Cert of Completion: pp.1-3
		Q9.2.05.1 A CONFIDENTIAL 01 RFP.pdf: pp.5
		Q9.2.05.1 A CONFIDENTIAL 07 L407 N Issued for Bid.pdf: pp.1-22
		Q9.2.05.1 A CONFIDENTIAL Add L407 Pre-Bid Job Walk Notes.pdf: pp.1
		Q9.2.05.1 A CONFIDENTIAL L407 N Traffic Control Plan.pdf: pp.1-4
		Q9.2.05.1 A CONFIDENTIAL L407 Permit Submittals.pdf: pp.1-2
		Q9.2.05.1 B CONFIDENTIAL DBE Subcontr Commitment L407N.pdf: pp.2,9
		Q9.2.05.1 D CONFIDENTIAL L407 N Intent to Submit Proposal.pdf: pp.37
		Q9.2.05.1 E CONFIDENTIAL L407 Statement of Resources.pdf: pp.2-4
		Q9.2.07.1 CONFIDENTIAL L407 North_RFI 018 closed: pp.1-2