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-10)

Date Requested: July 3, 2017 Date Responded: August 2, 2017

QUESTION 10.1:

These questions are directed at the workpapers regarding the Line 41-30-A Replacement Project.

10.1.1. With respect to the statement on page WP-III-A327: "Followed RER recommendation to install xxxx pipe rather than replace kind for kind with xxxx pipe." Why did SoCalGas believe that was reasonable to substitute the smaller pipe for the larger pipe?

RESPONSE 10.1.1:

Per the Request for Engineering Review (RER) Analysis and Evaluation conducted by Southeast Region Operations, the proposed four-inch pipe replacement would maintain approximately the same operating pressure as the existing ten-inch pipe under the same Proposed Peak Winter Condition (PPWC) analysis.

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-10)

Date Requested: July 3, 2017 Date Responded: August 2, 2017

QUESTION 10.1.2:

With respect to the statement on page WP-III-A328: "SoCalGas' Distribution Operating Region had previously selected a Single Source contractor from a competitively bid Master Service Agreement (MSA) to perform work for the region. PSEP used the same contractor at comparable rates to complete this project.

The Construction Contractor's estimate for time and material was \$xxxx, which was \$xxxx more than the Construction Management System's direct estimate of \$xxxx that was used to develop the Phase 2 WOA estimate.

- 10.1.2.1. Please provide a copy of the agreement under which the contractor operated for this project.
- 10.1.2.2. Please provide a copy of the contractor's "estimate for time and material."
- 10.1.2.3. Did SoCalGas guarantee that the contractor would recover all of the time and materials expended for the project regardless of whether the total cost exceeded the contractor's estimate?
- 10.1.2.4. If the answer to the previous question is "yes," please explain why SoCalGas determined that a time and materials approach was reasonable for this project.
- 10.1.2.5. Please reconcile the third redacted cost figure with the contract cost figure in Table 3, indicating which figure is correct.

RESPONSE 10.1.2:

- 10.1.2.1. 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 contractor agreement is provided in the attachment folder.
- 10.1.2.2. 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 contractor's time and material estimate is provided in the attachment folder.
- 10.1.2.3. No, there was no guarantee. Please refer to the appended contract at page 1. .

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(DATA REQUEST TURN-SCGC-10)

Date Requested: July 3, 2017 Date Responded: August 2, 2017

10.1.2.4. Not applicable.

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

Line 41-30-A - Estimated Contractor Cost Reconciliation (Phase 2 WOA)		
Cost Element	Contra Cost	
Construction Contractor CMS (WP-III-A328)		
Adjustment – paving included in Other Directs	(
TOTAL ESTIMATED CONTRACT COST (WP-III-A328, Table 3)		

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(DATA REQUEST TURN-SCGC-10)

Date Requested: July 3, 2017 Date Responded: August 2, 2017

QUESTION 10.1.3:

With respect to Table 4:

- 10.1.3.1. Please identify nature of the costs that are included in the other directs row.
- 10.1.3.2. Please identify the major cost categories that are included in the other directs cost.
- 10.1.3.3. Please divide up the other direct cost amount shown in the Phase 2 WOA column into those major cost categories.
- 10.1.3.4. Please divide up the other direct cost amount shown in the Capital column into those major cost categories.

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-10)

Date Requested: July 3, 2017 Date Responded: August 2, 2017

RESPONSE 10.1.3.1:

10.1.3.1. In SoCalGas and SDG&E's 2016 Reasonableness Review workpapers, the major cost categories are consistently grouped under Actual Costs for Contract and Other Direct Costs in all Table 4 cost models. The estimated cost categories in the Phase 2 WOAs were not grouped in a standard fashion across projects (see WP-Intro-6) and therefore, vary from project to project. The below response pertains to the categorization of Estimated and Actual Other Direct costs for Line 41-30-A only.

The **Phase 2 WOA Other Directs row** reflects unloaded paving costs, permits, purchased services and other miscellaneous costs.

The **Capital (Actual) Other Directs row** reflects unloaded planning and design costs, as described in the Workpaper Introduction (WP-Intro-9-10): "Other Direct Costs: reflect planning and design services, engineering, environmental services, land use and permitting fees, and project support, such as survey, mapping and miscellaneous expenses."

- 10.1.3.2. The major Actual Capital cost categories for Other Direct costs for Line 41-30-A include the following:
 - Environmental Planning Services
 - Engineering & Design Services
 - Permits & ROW
 - Project Management and Project Services
 - Other

The major Estimated (Phase 2 WOA) cost categories for Other Direct costs for Line 41-30-A include the following:

- Construction Contractor (paving costs only)
- Construction Management & Support
- Environmental Abatement & IH Services
- Environmental Planning Services
- Engineering & Design Services
- Permits & ROW
- Project Management and Project Services
- Other

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-10)

Date Requested: July 3, 2017 Date Responded: August 2, 2017

10.1.3.3-4. The attached supporting document includes Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024. A copy of Table 4: Supply Line 41-30-A Phase 2 WOA Estimate and Actual Costs, divided by major cost categories, 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-10)

Date Requested: July 3, 2017 Date Responded: August 2, 2017

QUESTION 10.2:

- 10.2. <u>These questions are directed at the workpapers regarding the Line 45-120 Section 1 Replacement Project.</u>
- 10.2.1. With respect to the 0.021 miles of incidental pipe that is shown in Table 2:
- 10.2.1.1. Please describe in specific terms what pipe corresponds to the 0.021 miles of pipe that is considered incidental mileage for the Section 1 project and show the location of the pipe in Figures 1 and 2.
- 10.2.1.2. Please state in detail the basis for including the pipe in the Section 1 replacement project.
- 10.2.1.3. Please demonstrate that there were cost savings achieved by including the 0.021 miles of incidental pipe in the Section 1 project by showing the cost estimates including and excluding this length of pipe.

RESPONSE 10.2.1:

- 10.2.1.1. The 0.021 miles of incidental pipe is reflected by pink hash marks throughout the replaced pipeline (shown in green); most of the incidental pipe is concentrated toward the southern end of the section. The .021 miles of incidental pipe consists of four segments of Category 1, post -1970 pipe: 0.004 miles towards the center of the section, 0.003 miles further east, 0.003 miles further east toward the end of the section, and the final 0.011 miles at the east end of the section. A high-resolution copy of Figure 1 is provided in the attachment folder.
- 10.2.1.2: The 0.010 miles of incidental pipe were included in the scope of the project for constructability; it was necessary to include the 0.010 miles of incidental pipe because it was located between Category 4 segments that required remediation. By including the incidental pipe, additional tie-in points were avoided. The remaining 0.011 miles of the incidental pipeline on the east end of the section was included to find a suitable tie-in location.
- 10.2.1.3 SoCalGas and SDG&E did not prepare a cost estimate to compare the cost of conducting a single hydrotest project versus conducting four separate hydrotest

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(DATA REQUEST TURN-SCGC-10)

Date Requested: July 3, 2017 Date Responded: August 2, 2017

projects to avoid 0.021 miles of incidental pipe. Based on operator experience and knowledge, conducting four hydrotests instead of one would have increased costs and would have required the original pipeline to be out of service for a longer period of time, which would have greater impacts on the system and community.

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-10)

Date Requested: July 3, 2017 Date Responded: August 2, 2017

QUESTION 10.2.2:

With respect to the statement on WP-III-A336: "SL 45-120 Section 1 required additional incidental mileage to accommodate the tie-ins." Please explain this statement in detail identifying how much additional incidental mileage was required and demonstrating why this was the case.

RESPONSE 10.2.2:

The 58 feet of the incidental footage was included to accommodate a location at the east tie-in that would minimize traffic impacts and enhance safety for the public and construction personnel.

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(DATA REQUEST TURN-SCGC-10)

Date Requested: July 3, 2017 Date Responded: August 2, 2017

QUESTION 10.2.3:

With respect to the statement on WP-III-A337: "It was determined that a 55 foot portion of pipe at the west end of SL-45-120 and not in the original scope of Section 1, was initially determined to have been installed in the 1990s was, in fact installed in the 1930s. This additional footage required the project design to add 55 ft extending the replacement into Newhall Station."

- 10.2.3.1. Please locate the 55-foot portion of pipe on Figures 1 and 2.
- 10.2.3.2. Was this 55-foot portion of pipe considered to be part of the criteria mileage?
- 10.2.3.3. If the answer to the previous question is "yes," please explain the basis for including this mileage as part of the criteria mileage.
- 10.2.3.4. If the pipe was not considered part of the criteria mileage, please explain why it was included as part of the incidental mileage for the project.
- 10.2.3.5. Please demonstrate that there were cost savings achieved by including the 55-foot section of pipe as incidental pipe in the Section 1 project by showing the cost estimates including and excluding this length of pipe.

RESPONSE 10.2.3:

- 10.2.3.1. The 55-foot portion is on the west end of the section; it is the segment of pipe that is perpendicular to the rest of the test section in Figure 1.
- 10.2.3.2. Yes.
- 10.2.3.3. This 55-foot portion was originally installed under the same 1930 construction work order that was the predominant scope within this project. This 55-foot portion was designated as Category 4 Criteria mileage, since it is in a Class 3 location and over 20% SMYS.
- 10.2.3.4. Not applicable.
- 10.2.3.5. Not applicable because the 55-foot portion is not incidental pipe.

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(DATA REQUEST TURN-SCGC-10)

Date Requested: July 3, 2017 Date Responded: August 2, 2017

QUESTION 10.2.4:

With respect to the statement on WP-III-A339: "The construction contractor was selected through a competitive solicitation process. Six qualified contractors participated in the solicitation. A contractor was selected based on price, schedule, work experience, and commercial factors.

The Construction Contractor's 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 estimate."

- 10.2.4.1. Please provide the bid documents submitted by the various contractors in this competitive solicitation process.
- 10.2.4.2. Please provide SoCalGas' bid solicitation documents and materials produced as part of the bid evaluation process.
- 10.2.4.3. Please reconcile the redacted construction contractor direct estimate to Table 3. Is the contract cost assumed to be subsumed within the other direct costs category?
- 10.2.4.4. If the answer to previous question is "yes," please break apart the other direct costs to separate out of construction contractor costs versus other direct costs.

RESPONSE 10.2.4.1:

- 10.2.4.1. 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 bid documents is provided in the attachment folder.
- 10.2.4.2. 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 bid evaluation materials is provided in the attachment folder.
- 10.2.4.3. Yes.

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

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(DATA REQUEST TURN-SCGC-10)

Date Requested: July 3, 2017 Date Responded: August 2, 2017

Line 45-120 Section 1 Estimated Contractor Cost Reconciliation (Phase 2 WOA)		
Cost Element	Contract Cost	
Construction Contractor - TIC (WP-III-A339)		
Construction Contractor Contingency		
Other Contracted Services		
TOTAL ESTIMATED OTHER DIRECT COST (WP-III-A338)		

10.2.4.4. The following response includes Confidential and Protected Information Pursuant to PUC Section 583, GO 66-C, and D.16-08-024. See response to TURN-SCGC Q10.2.4.3 and the table below.

Line 45-120 Section 1 Estimated Contractor Other Direct Detail (Phase 2 WOA)		
Cost Element	Contract Cost	
Construction Contractor - TIC (WP-III-A339)		
Construction Contractor Contingency		
Construction Management & Support		
Environmental - Abatement		
Environmental - Planning Services		
Engineering & Design Services		
Permits & ROW		
Project Management and Project Services		
Other		
TOTAL ESTIMATED OTHER DIRECT COST (WP-III-A338)		

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(DATA REQUEST TURN-SCGC-10)

Date Requested: July 3, 2017 Date Responded: August 2, 2017

QUESTION 10.2.5:

With respect to the statement on WP-III-A340 and WP-III-A341:

"Substructure: Several unknown utilities were encountered within the alignment of the project. As a result, SoCalGas made several realignments. Included in the unknown utilities were an abandoned water line and a false trench line (non-native soil) around a storm drain. These conflicts caused modifications and pipe footage changes to be made to alignment and installation activities which also impacted the schedule. Permit Conditions: The City of Santa Clarita inspector restricted the working area to 500 feet of plating at a time. This unanticipated restriction increased construction duration. The City of Santa Clarita also added restrictions to work hours, requiring night work for certain portions of the project. Night work decreased productivity because of limited visibility.

Utility Coordination: It was assumed that SoCalGas would not be in conflict with other agencies' projects. However, the City of Santa Clarita was coordinating work for many utilities in the area. As a result, activities previously planned to be executed in parallel were no longer feasible because of the city's direction and this ultimately impacted the construction schedule."

How many realignments did SoCalGas make to the project? 10.2.5.1. 10.2.5.2. Were the realignments made at the same time or at different times? 10.2.5.3. If the realignments were made at different times, why weren't they made at the same time so as to minimize disruption to the project schedule? 10.2.5.4. Please describe each realignment to the project identifying the modifications and pipe footage changes that were made to the alignment and installation activities. 10.2.5.5. What was the incremental cost associated with each of the realignments? 10.2.5.6 How much delay was caused by each realignment? 10.2.5.7. What was the incremental cost associated with the inspectors' restriction of the

working area to 500 feet of plating at a time?

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(DATA REQUEST TURN-SCGC-10)

Date Requested: July 3, 2017 Date Responded: August 2, 2017

10.2.5.8.	What was the incremental cost associated with the City's requirement for work hour restrictions?
10.2.5.9.	Was there a delay caused by either of the City's restrictions?
10.2.5.10.	If the answer to the previous question is "yes," please identify the amount of the delay.
10.2.5.11.	What was the incremental cost associated with the City's coordination of work associated with multiple utilities?
10.2.5.12.	What was the delay imposed in the schedule that arose from the City's coordination of work associated with multiple utilities?
10.2.5.13.	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 each of the events described above in the cited quotation.
10.2.5.14.	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 10.2.5:

- 10.2.5.1. Nine total realignments were made, consisting of both horizontal and vertical adjustments from the Issued for Construction package.
- 10.2.5.2. Seven of the realignments were made at different times.
- 10.2.5.3. The realignments were necessary to address several unknown and unanticipated substructures that were encountered at different times and stages during construction. Trench length limitations restrict visibility of substructures at any given time.

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(DATA REQUEST TURN-SCGC-10)

Date Requested: July 3, 2017 Date Responded: August 2, 2017

10.2.5.4:

Realignment	Description
4+26 pipe adjusted 3.5 feet deeper	Adjustment was made due to substructure proximity
6+49 45 degree elbow placed, 14 feet west adjustment	Adjustment was made due to substructure proximity
7+28 added 45 degree elbow	Adjustment was made to eliminate traffic control setup and minimize impact on local commuters
7+28 pipe adjusted 5.4 feet north for 207 feet tapering back to proposed route	Adjustment was made due to substructure proximity.
7+57 added 45 degree elbow	Adjustment was made to get back to original alignment
9+32 pipe adjusted 2.7 feet deeper	Adjustment was made due to substructure proximity
11+80 pipe raised 2.7 feet in elevation for 434 feet	Adjustment was made due to substructure proximity
21+69 pipe raised 4 feet in elevation for 269 feet	Adjustment was made due to substructure proximity
28+00 alignment adjusted 1.2 feet Southwest for 42 feet	Adjustment was made due to substructure proximity

- 10.2.5.5. The increased Contractor's cost was \$90,189 for the realignments. In addition to these direct costs, there may be additional costs for SoCalGas/SDG&E labor and non-construction costs for activities, such as project management and inspection services, that were not tracked and reported separately for this specific delay.
- 10.2.5.6. Three days for all realignment activities.
- 10.2.5.7. Although there were no Contractor Change Orders for the restricted plating requirement, the restrictive conditions contributed to the construction duration being longer than planned. In addition, there may be costs for SoCalGas/SDG&E labor and non-construction costs for activities, such as project management and inspection services, that were not tracked and reported separately for this specific delay.

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10.2.5.8. None. Although there were no Contractor Change Orders for the restricted plating requirement, the restrictive conditions contributed to the construction duration being longer than planned. In addition, there may be costs for SoCalGas/SDG&E labor and non-construction costs for activities, such as project management and inspection services, that were not tracked and reported separately for this specific delay.

- 10.2.5.9. Yes.
- 10.2.5.10 The delay was not tracked, however, it impacted the schedule because the construction duration was longer than planned.
- 10.2.5.11. None.
- 10.2.5.12. While there was no construction delay associated with the coordination of work, the sequence of construction work was impacted.
- 10.2.5.13-14 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 contractor change order and Requests for Information (RFI) 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-10)

Date Requested: July 3, 2017 Date Responded: August 2, 2017

QUESTION 10.2.6:

With respect to Table 4:

- 10.2.6.1. Please identify nature of the costs that are included in the other directs row.
- 10.2.6.2. Please identify the major cost categories that are included in the other directs cost.
- 10.2.6.3. Please divide up the other direct cost amount shown in the Phase 2 WOA column into those major cost categories.
- 10.2.6.4. Please divide up the other direct cost amount shown in the Capital column into those major cost categories.

RESPONSE 10.2.6.1:

10.2.6.1. In SoCalGas and SDG&E's 2016 Reasonableness Review workpapers, the major cost categories are consistently grouped under Actual Costs for Contract and Other Direct Costs in all Table 4 cost models. The estimated cost categories in the Phase 2 WOAs were not grouped in a standard fashion across projects (see WP-Intro-6) and therefore, vary from project to project. The below response pertains to the categorization of Estimated and Actual Other Direct costs for Line 45-120 Section 1 only.

The **Phase 2 WOA Other Directs row** reflects unloaded paving costs, permits, purchased services and other miscellaneous costs.

The **Capital (Actual) Other Directs row** reflects unloaded planning and design costs, as described in the Workpaper Introduction (WP-Intro-9-10): "Other Direct Costs: reflect planning and design services, engineering, environmental services, land use and permitting fees, and project support, such as survey, mapping and miscellaneous expenses."

- 10.2.6.2. The major Actual Capital cost categories for Other Direct costs for Line 45-120 Section 1 include the following:
 - Environmental Planning Services

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Engineering & Design Services

- Project Management and Project Services
- Other

The major Estimated (Phase 2 WOA) cost categories for Other Direct costs for Line 45-120 Section 1 include the following:

- Construction Contractor
- Construction Management & Support
- Environmental Abatement & IH Services
- Environmental Planning Services
- Engineering & Design Services
- Permits & ROW
- Project Management and Project Services
- Other

10.2.6.3-4. The attached supporting document includes Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024. A copy of Table 4: Supply Line 45-120 Section 1 Phase 2 WOA Estimate and Actual Costs, divided by its major cost categories, is provided in the attachment folder.

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(DATA REQUEST TURN-SCGC-10)

Date Requested: July 3, 2017 Date Responded: August 2, 2017

QUESTION 10.3:

These questions are directed at the workpapers regarding the Line 45-120XO1 Replacement Project.

- 10.3.1. With respect to the statement on WP-III-A346: "In an effort to address projects as soon as practicable SoCalGas and SDG&E parceled out pipeline to different teams. The teams could not start planning on all projects at the same time. The precise limits of the work to be done on the pipelines are not determined until Stage 3 (Planning). The later projects did not know that their project would impact the earlier projects."
- 10.3.1.1. Before Line 45-120XO1 was replaced, what was its total length?
- 10.3.1.2. Did the entirety of Line 45-120XO1 before its replacement consist of a connection between Lines 85 and 45-120?
- 10.3.1.3. If the answer to the previous question is "no," please explain using figures shown on WP-III-A365 through WP-III-A367 where Line 45-120XO1 existed other than between Lines 85 and 45-120.
- 10.3.1.4. Please identify the date(s) that the Applicants parceled out the three pipelines, Line 45-120XO1, Line 45-120, and Line 85, to different teams.
- 10.3.1.5. At the time(s) that the Applicants parceled out pipelines to different teams, had criteria mileage on Lines 85 and 45-120 adjacent to Line 45-120XO1 been identified?
- 10.3.1.6. If the answer to the previous question is "yes," please provide, using figures shown on WP-III-A365 through WP-III-A367, a detailed description of the criteria mileage identified on Lines 85 and 45-120 adjacent to Line 45-120XO1 as of the date that the Applicants parceled out pipelines to different teams.
- 10.3.1.7. If the criteria mileage on Lines 85 and 45-120 adjacent to Line 45-120XO1 had not yet been identified when the pipelines were parceled out, please identify the date

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when the criteria mileage was identified and please provide, using figures shown on WP-III-A365 through WP-III-A367, a detailed description of the criteria mileage identified at that later date on Lines 85 and 45-120 adjacent to Line 45-120XO1.

- 10.3.1.8. Who was responsible for parceling out the pipelines to different teams? Please identify the individual(s) by title and organizational unit.
- 10.3.1.9. Why didn't this individual recognize the potential for interaction between PSEP projects addressing two pipelines that each terminate at a station and the third pipeline that interconnects them?
- 10.3.1.10. Why didn't this individual instruct each planning team to coordinate its efforts with the planning for the other pipelines?
- 10.3.1.11. Who was responsible for the PSEP program at the time the pipelines were parceled out? Please identify the individual(s) by title and organizational unit.

RESPONSE 10.3.1:

- 10.3.1.1. 47 feet.
- 10.3.1.2. Yes.
- 10.3.1.3. Not applicable.
- 10.3.1.4.

Line 45-120XO1: Prior to December 2012 Line 45-120 Section 1: March 22, 2013

Line 85: September 18, 2014

Stage 3 start date:

Line 45-120XO1: March 8, 2013

Line 45-120 Section 1: November 21, 2013

Line 85: November 21, 2014

Construction start date:

Line 45-120XO1: September 9, 2013 Line 45-120 Section 1: March 25, 2014

Line 85: December 16, 2014

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-10)

Date Requested: July 3, 2017 Date Responded: August 2, 2017

- 10.3.1.5. Line 45-120 Category 4 Criteria footage was identified when Line 45-120XO1 Category 4 Criteria footage was identified, but Line 85 Category 4 Criteria footage had not yet been identified.
- 10.3.1.6. The Category 4 Criteria footage on Line 45-120 is shown in green on the Workpaper for Line 45-120 (WP-III-A334). The elbow at the north end of Line 45-120 Section 1 corresponds to the elbow on Line 45-120 in Figure 3 on WP-III-A357.
- 10.3.1.7. Category 4 Criteria footage was identified on Line 85 in September 2014, and is shown on Figure 5, WP-III-A361.
- 10.3.1.8. Project Execution Manager (PSEP) and Senior Director (PSEP).
- 10.3.1.9. At the outset, it was assumed that one project would simply tie into the endpoint of the other project. Not until after the detailed design of the second project was completed and site conditions were identified through excavation, was it determined that costs for customers could be minimized if the second project was designed to partially abandon the first project.
- 10.3.1.10. All other projects were either standalone projects or were provided to the same portfolio team for execution. This situation was unique in that the first project was one of the very first PSEP projects and was assigned to the Operating Region prior to fully staffing the Project Execution team within the PSEP Organization, to respond to the Commission's directive to begin implementing PSEP "as soon as practicable." The second project was assigned to a portfolio team within the PSEP Organization, once the PSEP Project Execution team was sufficiently staffed. The scope of the third project was identified through ongoing records review after the first and second projects were substantially complete.
- 10.3.1.11. Project Execution Manager (PSEP) and Senior Director (PSEP).

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-10)

Date Requested: July 3, 2017 Date Responded: August 2, 2017

QUESTION 10.3.2:

With respect to the statement on WP-III-A352: "The construction contractor's fixed bid was \$xxxx which was \$xxxx more than the Stage 3 construction contract direct estimate of \$xxxx that was used to develop the Phase 2 WOA."

- 10.3.2.1. Please reconcile the third redacted cost figure with the contract costs figure in the Phase 2 WOA 10/22/12 column in Table 3.
- 10.3.2.2. Please reconcile the first redacted cost figure with the contract costs figure in the Reauthorized WOA 9/3/13 column in Table 3.

RESPONSE 10.3.2:

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

Line 45-120 XO1 Estimated Contractor Cost Reconciliation (10/22/12 Phase 2 WOA)	
Cost Element	Contract Cost
Construction Contractor CMS (WP-III-A352)	
Other Contracted Services	
TOTAL ESTIMATED CONTRACT COST (WP-III-A352)	

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-10)

Date Requested: July 3, 2017 Date Responded: August 2, 2017

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

Line 45-120 XO1 Estimated Contractor Cost Reconciliation (Reauthorized Phase 2 WOA)	
Cost Element	Contract Cost
Construction Contractor Bid (WP-III-A352)	
Other Contracted Services	
TOTAL ESTIMATED CONTRACT COST (WP-III-A352)	

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-10)

Date Requested: July 3, 2017 Date Responded: August 2, 2017

QUESTION 10.3.3:

With respect to the statement on WP-III-A353: "Conditions were encountered in the field that were not anticipated during design and planning that had to be addressed or mitigated. The following conditions impacted the project scope and schedule: Site Conditions: Additional time and equipment were required to complete excavation because the construction area was composed of two-sack slurry rather than sand. Permitting Issues: The City of Santa Clarita required additional repairs to paving/asphalt. Constructability: Tie-in was planned to be a 12-hour hot tie-in but took 34 hours to complete because the section of pipe could not be joined by a butt weld because of alignment issues. As a result the fit up took much longer than planned. Twelve feet of accelerated Category 4 Criteria pipe was added to the overall SL-45-120XO1 scope for constructability purposes. SL-45-120XO1 ends in a tee and tie-ing in to a tee is problematic. Therefore a new tee with pre-welded short sections of pipe on all three legs of the tee was used, creating an additional 12 feet of pipeline."

- 10.3.3.1. Please explain why the site inspections normally conducted as part of the planning/design stages of the project including activities such as pot-holing would have failed to reveal the construction area was composed of two-sack slurry rather than sand.
- 10.3.3.2. Since Line 45-120XO1 ties into to two pipes, please explain why the site inspections normally conducted as part of the planning/design stages of the project failed to reveal that there were or could be alignment issues associated with the tie-in of the pipe.
- 10.3.3.3. Please identify the incremental cost associated with the additional time and equipment that were required to complete excavation because the construction area was composed of two-sack slurry rather than sand.
- 10.3.3.4. Please identify the incremental project delay associated with the additional time and equipment that were required to complete excavation because the construction area was composed of two-sack slurry rather than sand.

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-10)

Date Requested: July 3, 2017 Date Responded: August 2, 2017

- 10.3.3.5. Please identify the incremental cost associated with the City of Santa Clarita requiring additional repairs to paving/asphalt.

 10.3.3.6. Please identify the incremental project delay associated with the City of Santa Clarita requiring additional repairs to paving/asphalt.
- 10.3.3.7. Please identify the incremental cost associated with the tie-in that was planned to be a 12-hour hot tie-in but took 34 hours to complete.
- 10.3.3.8. Please identify the incremental project delay associated with the tie-in that was planned to be a 12-hour hot tie-in but took 34 hours to complete.

RESPONSE 10.3.3.1:

- 10.3.3.1. It is not unusual for relatively small projects such as this one to forego the time and expense of potholing and instead make the low-cost assumption (sand conditions); if conditions are found to be different once in construction, the additional costs are handled through a change order.
- 10.3.3.2. Alignment issues cannot always be identified during planning stages. They can arise during construction. When the pipe is exposed and cut, the pipe can move out of alignment.
- 10.3.3.3. The increased Contractor's cost was \$6,465 for the additional time and equipment to complete excavation. In addition to these direct costs, there may be additional costs for SoCalGas/SDG&E labor and non-construction costs for activities, such as project management and inspection services, that were not tracked and reported separately for this specific delay.
- 10.3.3.4. Nine hours.
- 10.3.3.5. The increased Contractor's cost was \$4,758 for the additional repairs to paving/asphalt. In addition to these direct costs, there may be additional costs for SoCalGas/SDG&E labor and non-construction costs for activities, such as project management and inspection services, that were not tracked and reported separately for this specific delay.
- 10.3.3.6. 22 hours.

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-10)

Date Requested: July 3, 2017 Date Responded: August 2, 2017

- 10.3.3.7. The increased Contractor's cost was \$37,408 for the additional hours to complete the tie-in. In addition to these direct costs, there may be additional costs for SoCalGas/SDG&E labor and non-construction costs for activities, such as project management and inspection services, that were not tracked and reported separately for this specific delay.
- 10.3.3.8. 22-hour schedule delay.

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-10)

Date Requested: July 3, 2017 Date Responded: August 2, 2017

QUESTION 10.3.4:

With respect to Table 4:

- 10.3.4.1. Was the dollar amount of \$857,395 identified as the actual cost for the Line 45-120XO1 project, the cost of the 2013 project to replace Line 45-120XO1 in place?
- 10.3.4.2. If the answer to the previous question is "no," please describe in detail what project the dollar amount corresponds to.

RESPONSE 10.3.4:

- 10.3.4.1. Yes.
- 10.3.4.2. 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-10)

Date Requested: July 3, 2017 Date Responded: August 2, 2017

QUESTION 10.3.5:

With respect to Figure 3 and the statement on WP-III-A357: "As mentioned, SL- 45-120 and Line 85 are connected to either end of SL- 45-120XO1, and both lines had PSEP Criteria pipe adjacent to SL- 45-120XO1. As part of the SL- 45-120 and Line 85 PSEP work, SL- 45-120XO1 was abandoned to be sure to replace all Criteria pipeline."

- 10.3.5.1. Please identify the dates in which the Phase 1, Phase 2, Phase 3, Phase 4 work, or their equivalents, was completed.
- 10.3.5.2. From the context of the timeframe during which the Line 45-120XO1 replacement project was designed, please identify all of the criteria mileage that falls within Figure 3 and identify which pipeline the criteria mileage is associated with.
- 10.3.5.3. Please identify the date(s) at which the criteria mileage identified in the response to the previous question was identified.
- 10.3.5.4. Referring to the PSEP plan that the Applicants filed in I.11-02-019 in August 2011, including any revisions, please identify the criteria mileage on Figure 3 and identify which of the pipelines the criteria mileage is associated with.

RESPONSE 10.3.5:

- 10.3.5.1. Not applicable. The project was planned by the Operating Region, and the seven stage process was implemented by the PSEP Organization, not by the Operating Regions; the equivalent date that can be associated with completing stages one through four was September 6, 2013.
- 10.3.5.2. During planning for the Line 45-120XO1 project, no Category 4 Criteria pipe was identified on 85 South. On Figure 3, the portion of Line 45-120 that is shown in blue is Category 4 Criteria pipe.
- 10.3.5.3. Category 4 Criteria pipe was identified on Line 45-120 when project scoping began in March 2013. Category 4 Criteria pipe was identified on Line 85 in September 2014.

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-10)

Date Requested: July 3, 2017 Date Responded: August 2, 2017

10.3.5.4. The Category 4 Criteria mileage on Line 45-120XO1 at the time of the filing was 0.002 mi (nine feet) and is the west portion of the 45-ft replacement in 2013. The Category 4 Criteria mileage on Line 45-120 is shown in blue.

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-10)

Date Requested: July 3, 2017 Date Responded: August 2, 2017

QUESTION 10.3.6:

With respect to the statement on WP-III-A358: "Line 45-120 is a 5-mile pipeline that begins at Newhall Station. As the PSEP organization ramped up, the project team initiated a project to address Line 45-120. During Stage 1, the pipeline was reviewed for sufficient records of a pressure test. As the Line 45-120 project progressed into Stage 2, the PSEP project team determined, in accordance with the PSEP Decision Tree, that the 1930-vintage, non-piggable pipe should be replaced. During the Stage 3 design phase, in June 2013, it was determined that a segment of Line 45-120 without sufficient record of a pressure test abutted the pipe that was part of the Line 45-120XO1 replacement project."

- 10.3.6.1. Please identify the date that Stage 1 of the Line 45-120 project was completed.
- 10.3.6.2. Please identify the date that Stage 2 of the Line 45-120 project was completed.
- 10.3.6.3. Please identify the date that Stage 3 of the Line 45-120 project was completed.

RESPONSE 10.3.6:

- 10.3.6.1. April 29, 2013.
- 10.3.6.2. June 13, 2013.
- 10.3.6.3. November 21, 2013.

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-10)

Date Requested: July 3, 2017 Date Responded: August 2, 2017

QUESTION 10.3.7:

With respect to the statement on WP-III-A358: "In order to tie the newly installed pipeline into the existing line, an "S" configuration was designed to route the new Line 45-120 pipe over the 27.5 feet to Line 45-120XO1. Additionally, the design needed to be tied in directly to a pipeline that extends out of Newhall Station. Because of this design requirement, 46 feet of the Line 45-120XO1 project installed in 2013 was abandoned."

- 10.3.7.1. Please identify the cost of installing the "S" configuration over the 27.5 feet to Line 45-120XO1.
- 10.3.7.2. Please identify the date that the installation of the "S' configuration and the subsequent abandonment of Line 45-120XO1 was completed.
- 10.3.7.3. Please identify in Figure 3 the portion of the 2013 Line 45-120XO1 replacement pipe (46 feet) that was abandoned during the 2014 replacement work on Line 45-120.

RESPONSE 10.3.7.1:

- 10.3.7.1. This was not an itemized cost on the estimate. It was part of the overall design and construction cost for Supply Line 45-120 Section 1.
- 10.3.7.2. July 13, 2014.
- 10.3.7.3. As shown in Figure 4, the abandoned portion is on the east side of Line 45-120XO1, shown in purple.

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-10)

Date Requested: July 3, 2017 Date Responded: August 2, 2017

QUESTION 10.3.8:

With respect to the statement on WP-III-A359 to WP-III-A360: "In August 2014, the PSEP team initiated a project to address Line 85. During the Stage 1 review, the team reviewed pipeline records to determine pipe segments without sufficient evidence of a pressure test to at least 1.25 x MAOP. In researching the various pipelines within Newhall station, the project team determined that a 91-foot segment of pipe on Line 85 lacked sufficient records of a pressure test to at least 1.25 x MAOP. This pipe segment connected to Line 45-120XO1. Further research showed that an additional 312 feet of station piping was also without sufficient record of a pressure test."

10.3.8.1. When was the portion of Line 85 terminating in Newhall station constructed? 10.3.8.2. When was Line 85 first identified as containing criteria mileage? 10.3.8.3. When did the team determined that a 91-foot segment of pipe on Line 85 lacked sufficient records of a pressure test to at least 1.25 x MAOP? 10.3.8.4. Is all of the criteria mileage on Line 85 included in the 91 feet located adjacent to Line 45-120XO1? 10.3.8.5. Was Line 85 addressed in the Applicants' PSEP filing made in I.11-02-019 in August 2011? 10.3.8.6. If the answer to the previous question is "no," why was it not included? 10.3.8.7. When was the 312 feet of station piping first identified as lacking sufficient record of a pressure test?

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-10)

Date Requested: July 3, 2017 Date Responded: August 2, 2017

RESPONSE 10.3.8.1:

10.3.8.1.	Line 85 began construction on December 16, 2014, demobilized on March 20, 2015, and has an NOP date of March 13, 2015.
10.3.8.2.	September 18, 2014.
10.3.8.3.	September 18, 2014.
10.3.8.4.	Yes.
10.3.8.5.	Yes.

10.3.8.7. September 18, 2014.

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-10)

Date Requested: July 3, 2017 Date Responded: August 2, 2017

QUESTION 10.3.9:

With respect to the statement on WP-III-A360: "As the team planned how best to address the 91-foot section of pipe and the other segments of station piping, a plan was developed that would have the beneficial results of eliminating the pipe that was without sufficient records of a pressure test and moving a valve from the street outside Newhall Station (refer to Figures 5 and 6) to within the station. This design resulted in completing the abandonment of Line 45-120XO1 and a portion of Line 85. This new design, while calling for abandonment of the recently installed segment of Line 45-120XO1, resulted in a safer design by placing the valve inside the station and out of the street."

- 10.3.9.1. Did the new design result in the abandonment of Line 45-120XO1 replacement footage that had been installed in 2013 so that there was no replacement footage remaining? 10.3.9.2. Did the new design result in the abandonment of Line 45-120XO1 footage that had been installed in 2014 so that there was no replacement footage remaining? 10.3.9.3. Did the new design result in a complete elimination of Line 45-120XO1 or was there new pipe installed that was designated Line 45-120XO1? 10.3.9.4. How much pipe from Line 85 was abandoned under the new design? 10.3.9.5. Did the new design eliminate all of the criteria mileage on Line 85? 10.3.9.6. How much station pipe other than Line 85 and Line 45-120XO1 was abandoned under the new design?
- 10.3.9.7. How did SoCalGas determine that the movement of the valve inside the station and out of the street improved safety?
- 10.3.9.8. Please explain the criteria that SoCalGas used to identify the risk associated with having the valve located in the street and the risk associated with having the valve located in the station.

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-10)

Date Requested: July 3, 2017 Date Responded: August 2, 2017

10.3.9.9. Please provide the risk scoring associated with the use of these criteria used to determine that safety was enhanced by moving the valve from the street into the station.

RESPONSE 10.3.9.

- 10.3.9.1. Yes.
- 10.3.9.2. The 3.33 feet of Line 45-120XO1 installed in 2014 remained. A high-resolution copy of a corrected version of Figure 5 is provided in the attachment folder. SoCalGas and SDG&E identified a coding error in Figure 5 while preparing this response and will prepare and submit a corrected workpaper to address this inadvertent error.
- 10.3.9.3. No. The new design did not result in complete elimination of Line 45-120XO1. The 3.33 feet of Line 45-120XO1 installed in 2014 remained. There was also new 24-inch pipe installed that was designated as Line 45-120XO1. Refer to Figure 6 in WP-III-A362.
- 10.3.9.4. 131.17 feet.
- 10.3.9.5. Yes.
- 10.3.9.6. 65.92 feet.
- 10.3.9.7. Based on operator knowledge and experience, moving a valve out of a major thoroughfare and onto fenced Company property improves both employee and public safety, by eliminating traffic control issues for periodic maintenance and emergency use of the valve.

In addition, pipeline safety is enhanced by replacing a smaller diameter valve with a larger valve that allows Line 85 to be in-line inspected into the station, consistent with the Commission's direction in D.11-06-017 "to address retrofitting pipeline to allow for in-line inspection."

- 10.3.9.8. See the response to TURN-SCGC Q.10.3.9.7.
- 10.3.9.9. Not applicable.

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 Projects, Regulatory Compliance and Controls 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 Tenth 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 Tenth 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 Tenth 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 2nd day of August, 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 Tenth 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 Tenth 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 Tenth 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
INFORMATION		
Pipeline attribute (i.e.	This information has been identified as confidential	Q10.1.02.1 CONFIDENTIAL 5660040231-4130A-SWADM-R.pdf: pp.4
diameter, pressure, and	protected information as this data constitutes	Q10.1.02.2 L41-30A CONFIDENTIAL Cost Breakdown: pp.1
location)	sensitive critical energy infrastructure information	Q10.1.03.3-4 CONFIDENTIAL L41-30-A Cost Table.pdf: pp.1
·	that is not currently published by the PHMSA and, if	Q10.2.04.1A CONFIDENTIAL Bid_Submittal_Key_Personnel.pdf: pp.1-7
	made publicly available, could present a risk to the	Q10.2.04.1A CONFIDENTIAL L45-120 Sec 1 Bid_Submittal_Add 1.pdf: pp.1-2
	security of the SoCalGas and SDG&E pipeline	Q10.2.04.1A CONFIDENTIAL L45-120 Sec 1 Bid_Sub_Const_Sched.pdf: pp.1-2
	system and California's critical energy	Q10.2.04.1B CONFIDENTIAL Bid_Submittal_Resume Project_Manager.pdf: pp.2-4
	infrastructure.	Q10.2.04.1B CONFIDENTIAL L45-120 Bid_Submittal_RFP.pdf: pp.1-2
		Q10.2.04.1B CONFIDENTIAL L45-120 Bid_Submittal_Schedule.pdf: pp.1
	<u>CEII</u> : 18 CFR §388.113(c); FERC Orders 630, 643,	Q10.2.04.1C CONFIDENTIAL L45-120 Bid_Submittal.pdf: pp.5-6,9
	649, 662, 683, and 702 (defining CEII).	Q10.2.04.1D CONFIDENTIAL L45-120 Bid_Submittal_RFP.pdf: pp.1-2
		Q10.2.04.1D CONFIDENTIAL L45-120 Bid_Sub_Stat_of_Resources.pdf: pp.5,8
	<u>Critical Infrastructure Information</u> :	Q10.2.04.2 CONFIDENTIAL L45-120 Sec 1 Bid_Pkg RFP.pdf: pp.1,16
	6 U.S.C. §§131(3), 133(a)(1)(E); 6 CFR §§ 29.2(b),	Q10.2.04.2 CONFIDENTIAL BidPkg_Add 2_X130116_PHTABREPSUPP.pdf: pp.1
	29.8 (defining CII and restricting its disclosure).	Q10.2.04.2 CONFIDENTIAL BidPkg_Add 2_X130116_PH_TAB_REP.pdf: pp.1-8
		Q10.2.04.2 CONFIDENTIAL BidPkg_Add 2.pdf: pp.1
	Gov't Code § 6254(e) ("Geological and geophysical	Q10.2.04.2 CONFIDENTIAL BidPkg_PH_Report.pdf: pp.3-21,22-71
	data, plant production data, and similar information	Q10.2.04.2 CONFIDENTIAL L45-120 Sec 1 BidPkg Add 1_BidWalkMin.pdf: pp.1
	relating to utility systems development, or market or	Q10.2.04.2 CONFIDENTIAL L45-120 Sec 1 BidPkg Re-IFB_RevE.pdf: pp.1-27
	crop reports, that are obtained in confidence from	Q10.2.04.2 CONFIDENTIAL L45-120 Sec 1 BidPkg_Add 1 Updated.pdf: pp.1-3
	any person.")	Q10.2.04.2 CONFIDENTIAL L45-120 Sec 1 BidPkg_Add 2 CP_Add.pdf: pp.1-4,6-7
		Q10.2.04.2 CONFIDENTIAL L45-120 Sec 1 BidPkg_Add 3 HyExRevA.PDF: pp.1-5
	Gov't Code § 6254 (ab) ("Critical infrastructure	Q10.2.04.2 CONFIDENTIAL L45-120 Sec 1 Bid_Pkg_Add 3 Re-IFB.pdf: pp.1-4
	information, as defined in Section 131(3) of Title 6	Q10.2.04.2 CONFIDENTIAL L45-120 Sec 1 BidPkg SantaClarita_ExPer.pdf: pp.1
	of the United States Code, that is voluntarily	Q10.2.04.2 CONFIDENTIAL L45-120 Sec 1 BidPkg_TrafCtrlPlans.pdf: pp.1-30
	submitted to the Office of Emergency Services for	Q10.2.05.13-14 CONFIDENTIAL L45-120 Sec 1 CCO 13.pdf: pp.1-4
	use by that office")	Q10.2.05.13-14 CONFIDENTIAL L45-120 Sec 1 CCO 2.pdf: pp.1-2
		Q10.2.05.13-14 CONFIDENTIAL L45-120 Sec 1 CCO 5.pdf: pp.1-2
Vendor information	Vendor names, bid and pricing information have	Data Request Response to Question 10.1.2.5, 10.2.4.3, 10.2.4.4, 10.3.2.1, and 10.3.2.2.
	been marked as confidential protected information as	Q10.1.02.1 CONFIDENTIAL 5660040231-4130A-SWADM-R.pdf: pp.1,3,9-14
	publicly disclosing this information could lead to a	Q10.1.02.2 L41-30A CONFIDENTIAL Cost Breakdown: pp.1
	competitive disadvantage and potential loss of	Q10.1.03.3-4 CONFIDENTIAL L41-30-A Cost Table.pdf: pp.1
	market share for those vendors.	Q10.2.04.1A CONFIDENTIAL Bid_Sub_DBE_Commitment_Schedule.pdf: pp.1-8
	G D 11 01 26 2011 WH 660560 (2011)	Q10.2.04.1A CONFIDENTIAL Bid_Submittal_Equip_Rates.pdf: pp.1
	See, e.g., D.11-01-36, 2011 WL 660568 (2011)	Q10.2.04.1A CONFIDENTIAL Bid_Submittal_Key_Personnel.pdf: pp.1-7
	GO ((G G , .;	Q10.2.04.1A CONFIDENTIAL Bid_Submittal_Labor_Rates.pdf: pp.1
	GO 66-C Sections 2.2(b), 2.8	Q10.2.04.1A CONFIDENTIAL Bid_Submittal_Statement_of_Resources.pdf: pp.1-2
		Q10.2.04.1A CONFIDENTIAL Bid_Submittal_Sustainability_Questions.pdf: pp.1-6

	Gov't Code § 6254.15 (disclosure not required for	Q10.2.04.1A CONFIDENTIAL L45-120 Bid_Submittal_Intent_to_Bid.pdf: pp.1
	"corporate financial records, corporate proprietary	Q10.2.04.1A CONFIDENTIAL L45-120 Sec 1 Bid_Submittal_Add 1.pdf: pp.1-4
	information including trade secrets, and information	Q10.2.04.1B CONFIDENTIAL Bid_Submittal_Job_Safety.pdf: pp.1-2
	relating to siting within the state furnished to a	Q10.2.04.1B CONFIDENTIAL Bid_Submittal_Resume Project_Controls.pdf: pp.1-4
	government agency by a private company for the	Q10.2.04.1B CONFIDENTIAL Bid_Submittal_Resume Project_Manager.pdf: pp.1-4
	purpose of permitting the agency to work with the	Q10.2.04.1B CONFIDENTIAL Bid_Submittal_Resume Safety.pdf: pp.1-3
	company in retaining, locating, or expanding a	Q10.2.04.1B CONFIDENTIAL Bid_Submittal_Resume Superintendent.pdf: pp.1-4
	facility within California")	Q10.2.04.1B CONFIDENTIAL L45-120 Bid_Submittal_Assumptions.pdf: pp.1
	,	Q10.2.04.1B CONFIDENTIAL L45-120 Bid_Submittal_DBE.pdf: pp.4
	Gov't Code §6254.7(d) (relating to trade secrets)	Q10.2.04.1B CONFIDENTIAL L45-120 Bid_Submittal_Intent_to_Bid.pdf: pp.1
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	Gov't Code § 6254(k); Evid. Code §1060; Civil	Q10.2.04.1B CONFIDENTIAL L45-120 Bid_Sub_Stat_of_Resources.pdf: pp.1-2
	Code §3426	Q10.2.04.1C CONFIDENTIAL L45-120 Bid_Submittal.pdf: pp.1-11,15-20,22-24
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		Q10.2.04.1D CONFIDENTIAL L45-120 Bid_Submittal.pdf: pp.1
		Q10.2.04.1D CONFIDENTIAL L45-120 Bid_Submittal_Commitment.pdf: pp.1-6
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		Q10.2.04.2 CONFIDENTIAL L45-120 Sec 1 BidPkg SantaClarita_ExPer.pdf: pp.1
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		Q10.2.06.3 CONFIDENTIAL L45-120 Sec 1 Cost Table.pdf: pp.1
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		Q10.3.03.7 CONFIDENTIAL L45-120X01 CN 0257.pdf: pp.1
Employee identifying	Public disclosure of staff level employee names,	Q10.1.02.1 CONFIDENTIAL 5660040231-4130A-SWADM-R.pdf: pp.1-3,6,15
zmprojec rachtri jing	1 dente discussare of sault level employee numes,	2 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -

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information	signatures, and other contact information is being	Q10.1.02.2 L41-30A CONFIDENTIAL Cost Breakdown: pp.1
(e.i. names,	prevented to protect against privacy, employee	Q10.2.04.1A CONFIDENTIAL Bid_Sub_DBE_Commitment_Schedule.pdf: pp.2,8
signatures, other	security, identity theft, and cyber-security risks.	Q10.2.04.1A CONFIDENTIAL L45-120 Bid_Submittal_Intent_to_Bid.pdf: pp.1
contact information)		Q10.2.04.1B CONFIDENTIAL L45-120 Bid_Submittal_DBE.pdf: pp.2,6
	Gov't Code § 6254(c); Gov't Code 6255;	Q10.2.04.1B CONFIDENTIAL L45-120 Bid_Submittal_Intent_to_Bid.pdf: pp.1
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	Civil Code §§ 1798.3 & 1798.24 (the California	Q10.2.04.1D CONFIDENTIAL L45-120 Bid_Sub_Intent_to_Submit_Prop.pdf: pp.1
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		Q10.2.04.2 CONFIDENTIAL L45-120 Sec 1 BidPkg Re-IFB_RevE.pdf: pp.1-27
		Q10.2.04.2 CONFIDENTIAL L45-120 Sec 1 BidPkg_Add 1 Updated.pdf: pp.1-3
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		Q10.2.04.2 CONFIDENTIAL L45-120 Sec 1 BidPkg SantaClarita_ExPer.pdf: pp.1
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		Q10.2.05.13-14 CONFIDENTIAL L45-120 Sec 1 CCO 13.pdf: pp.1-2,4
		Q10.2.05.13-14 CONFIDENTIAL L45-120 Sec 1 CCO 2.pdf: pp.1-2
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