

Application No.: A.17-03-XXX
Exhibit No: _____
Witness: H. Mejia

Application of Southern California Gas Company (U 904 G) and San Diego Gas & Electric Company (U 902 G) for (A) Approval of the Forecasted Revenue Requirement Associated with Certain Pipeline Safety Enhancement Plan Projects and Associated Rate Recovery, and (B) Authority to Modify and Create Certain Balancing Accounts

Application 17-03-____
(Filed on March 30, 2017)

CHAPTER I
PREPARED DIRECT TESTIMONY OF
HUGO MEJIA
ON BEHALF OF
SOUTHERN CALIFORNIA GAS COMPANY
AND
SAN DIEGO GAS & ELECTRIC COMPANY

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

March 30, 2017

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1 **I. PURPOSE AND OVERVIEW OF TESTIMONY**

2 The purpose of my testimony is to describe the overall scope of Phases 1B and 2A of the
3 SoCalGas and SDG&E¹ Pipeline Safety Enhancement Plan (PSEP) and to reaffirm SoCalGas’
4 and SDG&E’s commitment to proceeding expeditiously with PSEP in accordance with state and
5 federal law and Commission directives. I will describe the scope of Phases 1B and 2A projects
6 included in this Application and describe the plan for transitioning PSEP into the SoCalGas and
7 SDG&E General Rate Case (GRC) cycle as directed by the Commission in Decision (D.) 16-08-
8 003. Finally, I will describe the Phase 2A Decision Tree, which is built on the same Phase 1
9 Decision Tree principles approved by the Commission in D.14-06-007.²

10 **II. PHASES 1B AND 2A CONTINUE TO SUPPORT PSEP AND COMMISSION**
11 **OBJECTIVES**

12 SoCalGas and SDG&E present on a forecast basis for Commission approval of their
13 initial Phase 1B and Phase 2A projects, which continue the execution of PSEP in support of the
14 utilities’ and the Commission’s efforts to enhance the safety of California’s natural gas system.
15 PSEP Phases 1B and 2A will be governed by the same policies and procedures currently in place
16 for Phase 1A, including the oversight provided by the Program Management Office (PMO)
17 created specifically for PSEP. For example, the Seven Stage Review Process, as described in
18 Application (A.) 16-09-005, will continue to be utilized for the execution of all projects. Once
19 approved to proceed, these projects will utilize the Performance Partner Program or other
20 competitive sourcing method for construction contractor selection and competitive sourcing
21 strategies for material and services execution purposes, as described further in A.16-09-005.

¹ There are no Phase 1B or 2A projects outstanding for SDG&E other than that being addressed in the Pipeline Safety and Reliability Project (A.15-09-013).

² The Phase 1 Decision Tree principles approved by the Commission in D.14-06-007 are utilized for Phase 1B projects.

1 Prudent community outreach efforts will continue to keep customers, elected officials, and
2 government entities informed about projects taking place in their communities. Additionally,
3 environmental considerations will be effectively managed. These proactive measures ensure that
4 the SoCalGas and SDG&E PSEP continues to maximize the value of ratepayers' investments.

5 SoCalGas and SDG&E continue in their unwavering support of PSEP to enhance the
6 safety of natural gas infrastructure in their service territory in the near term and for decades to
7 come. From the initial Commission Rulemaking (R.) 11-02-019, to the 2011 filing of the
8 proposed PSEP, to this Application, SoCalGas and SDG&E have clearly demonstrated that
9 safety has been and will continue to be paramount for their customers, contractors and
10 employees. PSEP embodies the safety culture that is present at SoCalGas and SDG&E.

11 SoCalGas and SDG&E are particularly proud of the outstanding safety record associated with
12 PSEP projects, with an Occupational and Safety Health Administration (OSHA) incident rate of
13 0.51, well below the national oil and gas pipeline construction industry average of 1.2. A
14 thorough safety training program administered to employees and contractors has effectively
15 promoted consistency in safety procedures and, most importantly, that employees and
16 contractors return home safely at the end of each work day.

17 As of February 2017, SoCalGas and SDG&E have completed 75 replacement miles and
18 81 pressure test miles in furtherance of PSEP. PSEP projects have and will continue to meet all
19 applicable federal and state regulatory, environmental and safety requirements. Completed
20 pressure test projects have experienced no pipeline failures. Replacement projects enhance
21 system safety through the installation of modern pipe, and are manufactured and installed
22 consistent with modern standards for safety.³ Valve projects have been executed and

³ Current pressure test standards were developed and implemented in Part 192, 49 CFR Subpart J, which is recognized as the modern standard for pressure testing. D.11-06-017 requires in-service natural gas

1 successfully put into service. All PSEP projects continue to be executed while maintaining
2 service to core customers. Where commercial and industrial customers could be impacted,
3 SoCalGas and SDG&E proactively communicate with potentially impacted customers in order to
4 minimize the effects of planned outages.

5 The primary objective of PSEP is to enhance the safety of the SoCalGas and SDG&E
6 pipeline system. In reaching that objective, SoCalGas and SDG&E have been mindful of
7 maximizing customer benefits. As SoCalGas and SDG&E continue their efforts to complete this
8 massive program as soon as practicable, they are mindful of doing so in a cost-effective manner.
9 Implementation of Phases 1B and 2A continue SoCalGas' and SDG&E's stated mission to:
10 (1) enhance public safety; (2) comply with Commission directives; (3) minimize customer
11 impacts; and (4) maximize the cost-effectiveness of safety investments. SoCalGas' and
12 SDG&E's commitment to this mission is unwavering and will continue as we implement these
13 important next PSEP phases.

14 **III. BACKGROUND -- PHASE 1A**

15 SoCalGas and SDG&E anticipate completing the pipeline portion of Phase 1A, pressure
16 testing or replacing 214 miles of transmission pipelines (of which 91 miles are Category 4⁴)⁵ in
17 2018. Phase 1A encompasses approximately 173 pipeline projects. In accordance with D.14-06-
18 007, as amended by D.16-08-003, SoCalGas and SDG&E have submitted completed projects for
19 after-the-fact review and cost recovery in Reasonableness Review Applications A.14-12-016 and
20 A.16-09-005. The remaining Phase 1A projects will be included for review and cost recovery in

transmission pipeline in California to have been pressure tested in accordance with modern standards for safety (D.11-06-017, mimeo., at 18).

⁴ Pipelines located in Class 3 and 4 locations and Class 1 and 2 locations in high consequence areas that do not have sufficient documentation of a pressure test to at least 1.25 Maximum Allowable Operating Pressure (MAOP).

⁵ The remaining non-Category 4 miles are incidental or accelerated miles included to realize efficiencies or improve constructability.

1 either the 2018 Reasonableness Review Application or as part of future General Rate Case(s)
2 (GRCs).

3 Continued work on the Valve Enhancement Plan entails enhancing system safety by
4 installing and upgrading valve infrastructure to support the automatic and remote isolation, as
5 well as depressurization of the transmission pipeline system in 30 minutes or less in the event of
6 a pipeline rupture. Valve projects completed prior to 2018 will be included for cost recovery in
7 either the 2018 Reasonableness Review Application or 2022 GRC, and valve projects forecast
8 for completion between 2019-2021 will be included in the overall PSEP request in the 2019
9 GRC consistent with the transition plan outlined in D.16-08-003.

10 **IV. SCOPE OF PHASE 1B**

11 The scope of Phase 1B, as outlined in SoCalGas' and SDG&E's PSEP, is to replace non-
12 piggable pipelines installed prior to 1946⁶ with new pipe constructed using state-of-the-art
13 methods and to modern standards, including current pressure test standards. The non-piggable
14 pipelines cannot accommodate the in-line inspection tools which are critical for assessing the
15 condition of a pipeline. These pre-1946 pipelines were built using non-state-of-the-art
16 construction methods (i.e., oxy-acetylene welds that are inherently brittle) and materials (i.e.,
17 pipe manufacturers used various non-state of the art processes), were not designed to
18 accommodate a post-construction pressure test, and have an increased risk of developing leaks
19 on girth welds.

20 Table 1 depicts the various vintages of the Phase 1B pipe proposed to be replaced in this
21 Application.

⁶ The scope of Phase 1B in the SoCalGas and SDG&E Amended PSEP Application also included those pipeline segments that otherwise would be addressed in Phase 1A but cannot be addressed in the near term due to the need to construct new infrastructure to maintain service during pressure testing. The Pipeline Safety and Reliability Project (A.15-09-013) addresses this aspect of Phase 1B as defined in the Amended Application.

Table 1 – Phase 1B Projects by Vintage

<u>Year Installed</u>	<u>Miles</u>	<u>Number of Projects</u>
1920-1929	7.3	2
1930-1939	7.8	3
1940-1945	1.4	2
Total	16.5	7

Approximately 90% of the Phase 1B mileage included in this Application replace pipe that was installed in the 1920s and 1930s – over 80 years ago. Replacing these lines is consistent with the Commission’s desire to obtain the greatest amount of safety value, i.e., reducing safety risk, for ratepayer expenditures.⁷

D.14-06-007 gave SoCalGas and SDG&E the authority to file for pre-approval of specific projects.⁸ Additionally, in D.16-08-003, the Commission agreed with certain intervenors that forecast applications are the preferred means to review large projects such as the PSEP pipeline testing and replacement projects.⁹ Therefore, SoCalGas and SDG&E are filing for pre-approval of nine Phase 1B projects in this Application and the balance of Phase 1B projects in future GRCs. These projects are proposed herein in combination with some Phase 2 projects in order to file this Application (in lieu of multiple applications) as soon as possible in accordance with D.16-08-003.¹⁰ Moreover, due to the timing of approval of the Pipeline Safety Enhancement Memorandum Accounts (PSEPMAs or PSEP-P2MAs) to record pre-engineering costs for Phase 2 projects approved in D.16-08-003, SoCalGas and SDG&E had limited time and were only able to develop the scope and robust cost estimates for three Phase 2A projects

⁷ D.11-06-017, Page 22.

⁸ D.14-06-007, Page 24.

⁹ D.16-08-003, Page 12.

¹⁰ D.16-08-003, Ordering Paragraph 4, Page 16.

1 submitted for consideration herein. Including Phase 1B projects also provides parties to this
2 Application the opportunity to review these projects prior to construction and gives the
3 Commission an opportunity to provide guidance. Finally, including Phase 1B and Phase 2A
4 projects in this Application is consistent with the Commission's mandate that this important
5 safety work be commenced as soon as practicable and allows construction to commence prior to
6 a Commission decision in the 2019 GRC.

7 Safety remains a top priority at SoCalGas and SDG&E and it is important to note that
8 safety is not compromised by the inclusion of Phase 1B projects in this Application and in the
9 2019 GRC. These Phase 1B lines are subject to leak survey and pipeline patrols in accordance
10 with Company Gas Standards and any immediate conditions that are identified are resolved
11 accordingly in compliance with applicable federal and state laws and regulations.¹¹

12 **A. Alternatives To Replacement Are Always Considered**

13 As of the time of this filing, SoCalGas and SDG&E believe there are approximately 208
14 miles to be addressed as part of Phase 1B of PSEP, as compared to the 196 "as-filed" miles
15 identified in the workpapers supporting the Amended SoCalGas and SDG&E PSEP Application
16 filed in December 2011.¹² Attachment A presents a mileage reconciliation table comparing the
17 "as-filed" Phase 1B mileage¹³ with the mileage currently proposed to be addressed for the lines
18 originally included in the 2011 Amended Application.

19 SoCalGas and SDG&E have significantly reduced the scope of Phase 1B through a
20 thorough analysis during Stage 1 (Project Initiation) of the Seven Stage Review Process. This
21 due diligence has resulted in a current reduction of Phase 1B scope by approximately 38 miles at

¹¹ Category 4 lines are also subject to enhanced leak surveys and pipeline patrols.

¹² Workpapers of J.M. Rivera, Pages WP-IX-51 and WP-IX-55.

¹³ There were no Phase 2 lines and corresponding "as-filed" mileage identified in the December 2011 Amended Application.

1 an estimated avoided cost of approximately \$250 million. This descoping will be accomplished
 2 through a reduction in MAOP or abandonment of lines that are no longer required from an
 3 overall gas operating system perspective. Table 2 summarizes, by line, the Phase 1B descoped
 4 miles that have already been descoped or are included in this Application:

5 **Table 2 – Descoped Phase 1B Projects**

<u>Line</u>	<u>Miles Descoped</u>	<u>Reason</u>
33-37	2.3	De-rate
36-37	9.1	De-rate
36-37	9.2	Abandoned
36-1002	1.8	De-rate
38-278	1.7	Abandoned
38-980	8.1	Abandoned
38-981	5.4	Abandoned
Total Descoped	37.6	

6 In addition, approximately 35 additional Phase 1B miles are currently under evaluation
 7 for descoping. These miles do not pertain to the projects in this Application and will be
 8 addressed in future proceedings based on the results of the analysis.

9 Phase 1B lines are only descoped after a thorough review of the ability of adjoining lines
 10 to meet current and future load requirements and verification that there will be no customer
 11 impacts or system constraints. By way of description, included in this Application is Line 36-37,
 12 a Phase 1B pipeline with approximately 28 miles initially in scope to be replaced. SoCalGas and
 13 SDG&E undertook a segment-by-segment review of the sections of the line scheduled to be
 14 replaced, working closely with Gas Operations Region Engineering through the development of
 15 a Region Engineering Review (RER) to analyze system capacity and customer requirements.

1 This review resulted in 9 miles being abandoned and 11.4 miles de-rated (lowered in pressure to
2 below 20% System Maximum Yield Strength (SMYS)), thereby avoiding the replacement of
3 20.4 miles.

4 In the event Phase 1B pipe remains in scope after project initiation, additional validation
5 steps are taken by the project team to ensure the replacement can be accomplished in a cost-
6 effective manner for ratepayers. For example, the RER is utilized to determine if the existing
7 pipe diameter should be used for the replacement or if a smaller diameter can be utilized,
8 resulting in savings on material and construction costs. Additionally, on a case-by-case basis for
9 Phase 1B pipe segments that have a record of a pressure test and have records that demonstrate
10 the presence of seamless pipe, alternatives to replacement such as direct assessment, including
11 various Non-Destructive Examination (NDE) methods are considered. NDE refers to a
12 technique whereby radiographical or ultrasonic methods for direct assessment are utilized to
13 evaluate a pipeline without causing damage and provides an equivalent means to validate the
14 strength of a pipeline segment in a more cost-effective manner than replacement.¹⁴ Section VII
15 of Ronn Gonzalez's Chapter II prepared direct testimony includes one project (Line 127) that is a
16 candidate for NDE in lieu of replacement. By this Application, SoCalGas and SDG&E seek
17 Commission review and consideration of the cost-effective and safe NDE alternative to the
18 replacement dictated by the Decision Tree.

19 **V. SCOPE OF PHASE 2A**

20 As previously mentioned, the pipeline related-scope of Phase 1, as outlined in SoCalGas
21 and SDG&E's PSEP, is to pressure test or replace transmission pipelines in Class 3 and 4
22 locations and Class 1 and 2 locations in high consequence areas that do not have sufficient

¹⁴ PHMSA Final Report No. 15-019 on Repair/Replace Considerations for Pre-Regulation Pipelines at 40, 73-74.

1 documentation of a pressure test to at least 1.25 MAOP and the replacement of non-piggable
2 pipe installed prior to 1946.

3 Whereas Phases 1A and 1B address pipelines located in more populated areas and pre-
4 1946 non-piggable pipe, Phase 2A addresses the remaining transmission pipelines that do not
5 have sufficient documentation of a pressure test to at least 1.25 MAOP and are located in Class 1
6 and 2 non-high consequence areas. There are currently approximately 760¹⁵ miles in Phase 2A
7 that do not have sufficient documentation of a pressure test to at least 1.25 MAOP. It is
8 anticipated that approximately 90% of these miles will be pressure tested and the remaining 10%
9 will be replaced. SoCalGas and SDG&E will continue, as part of the Seven Stage Review
10 Process, to determine if miles can be descoped from PSEP through the lowering of MAOP or
11 other means that would preclude the need to pressure test or replace the pipeline segments in
12 question.

13 The Phase 2A projects submitted in this Application include the scope and robust detailed
14 estimates that were developed in a timely manner in order to file this Application expeditiously,
15 so that construction may commence prior to a decision on the 2019 GRC, as well as allow for the
16 ramp-up of resources to complete the work. SoCalGas and SDG&E plan to include in their
17 currently scheduled Test Year 2019, 2022, and 2025 GRCs the remaining Phase 2A pipelines
18 and currently anticipate completing Phase 2A in 2026.

19 The approximately 760 miles currently in the scope of Phase 2A do not include
20 approximately 1,200 miles of pipelines that have documentation of a pressure test prior to the
21 adoption of Part 192 of Title 49 of the Code of Federal Regulations (CFR) on November 12,

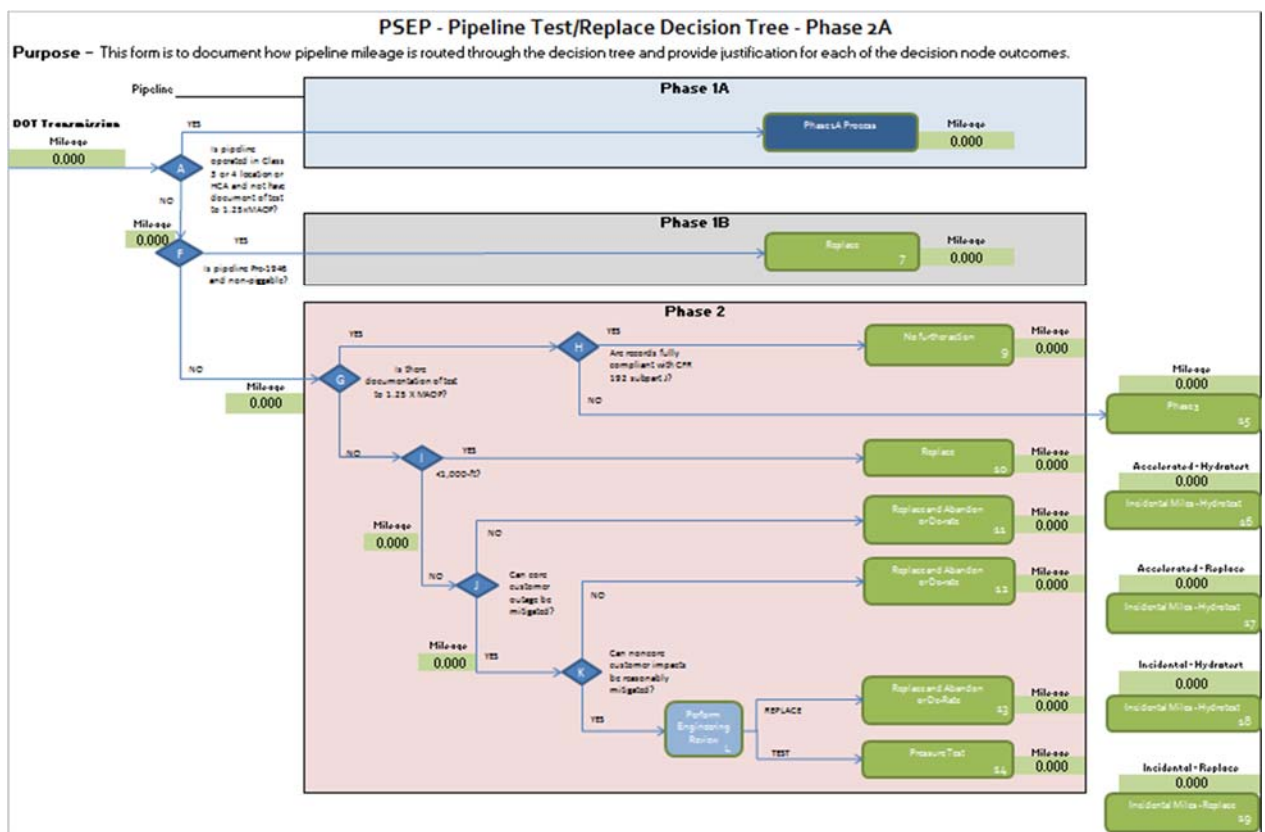
¹⁵ Mileage differs from the amount identified in A.15-06-013 due to the reclassification of certain Line 2000 and 2001 miles initially sought to be “accelerated” from Phase 2A to Phase 1A. These miles will not be accelerated and instead will be addressed in Phase 2A.

1 1970 (i.e., that which previously has been identified as Phase 2B of PSEP). These will be
 2 addressed after the completion of Phase 2A and following further Commission guidance.

3 **A. Phase 2A Decision Tree**

4 The process of determining if a Phase 2A pipe segment is to be pressure tested or
 5 replaced follows the logic of the Decision Tree principles approved by the Commission in
 6 D.14-06-007.¹⁶ Table 3 depicts a Decision Tree with the same principles as the Phase 1 Decision
 7 Tree, as applied to Phase 2A projects. For comparison purposes, Table 4 depicts the Phase 1
 8 Decision Tree approved in D.14-06-007.

9 **Table 3 - Phase 2A Decision Tree**

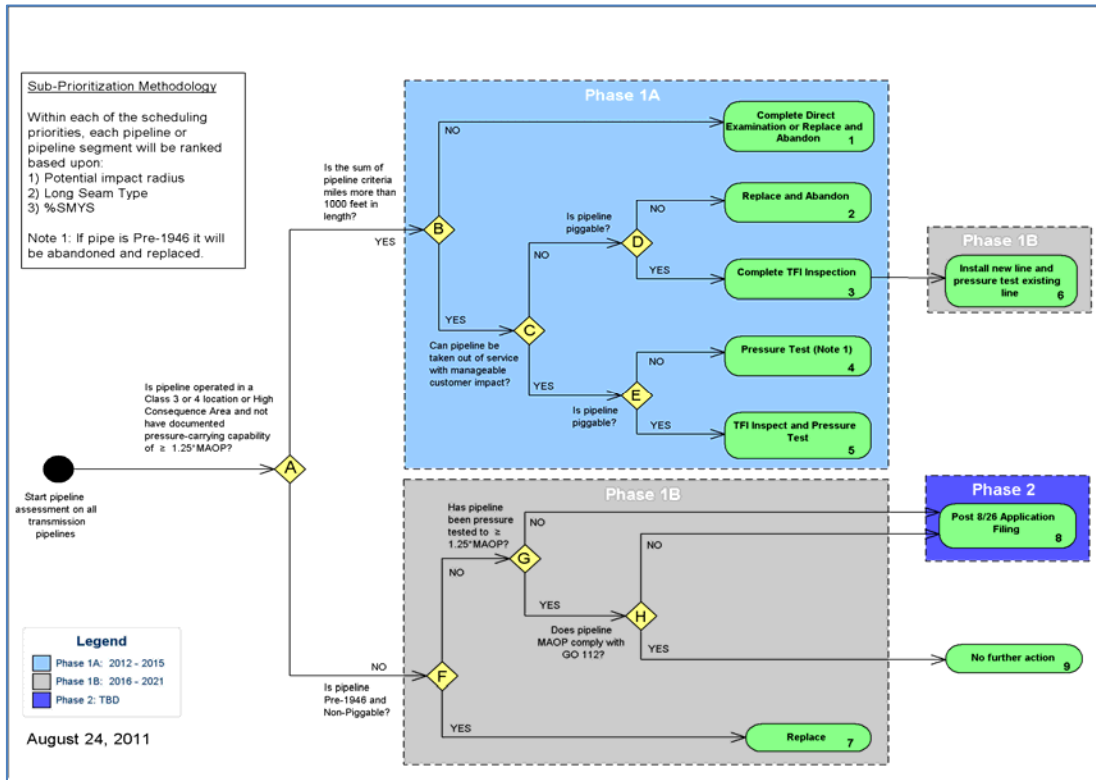


10

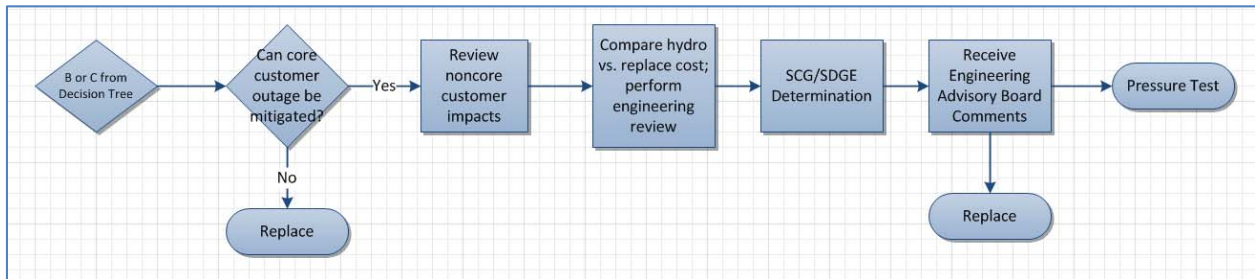
¹⁶ D.14-06-007, Ordering Paragraph 1, Page 59.

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Table 4 - Phase 1 Decision Tree



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The Phase 2A Decision Tree uses a step-by-step analysis of pipeline segments to allocate the segments into the following categories: (1) pipeline segments that are 1,000 feet or less in length; (2) pipeline segments greater than 1,000 feet in length that can be removed from service for pressure testing; and (3) pipeline segments greater than 1,000 feet in length that cannot be removed from service for pressure testing without significantly impacting customers. These pipeline categories are then further analyzed to identify other factors that may impact a determination of whether to pressure test or replace the segment. These steps are depicted in the

1 Replacement Decision Tree.¹⁷ The Replacement Decision Tree concepts were similarly adopted
2 in D.14-06-007.^{18, 19}

3 The Phase 2A Decision Tree analysis is based on certain principles used to guide the test-
4 versus-replace decision: (1) SoCalGas and SDG&E will not interrupt service to their core
5 customers in order to pressure test a pipeline; (2) SoCalGas and SDG&E will work with noncore
6 customers to determine if an extended outage is possible; (3) SoCalGas and SDG&E will, where
7 necessary, temporarily interrupt noncore customers as provided for in their tariffs; (4) SoCalGas
8 and SDG&E will work with noncore customers to plan, where possible, service interruptions
9 during scheduled maintenance, down time or off-peak seasons; and (5) SoCalGas and SDG&E
10 will consider cost and engineering factors along with the improvement of the pipeline asset.

11 These principles were explained in SoCalGas' and SDG&E's amended PSEP and at evidentiary
12 hearings in A.11-11-002. It is important to note that no industry-wide standard exists that
13 balances the risk of a pipeline failure with the cost of testing or replacing. Because of their
14 engineering expertise and knowledge of the pipelines they operate, utilities are in the best
15 position to make this determination on a project-by-project basis.

16 **B. Segments Less Than 1,000 Feet**

17 Generally, pipeline segments that are less than 1,000 feet in length are set to be replaced.
18 As embodied in the Phase 2A Decision Tree, SoCalGas and SDG&E anticipate replacing and

¹⁷ As presented in A.11-11-002 (Rebuttal Testimony of Rick Phillips) at 8.

¹⁸ D.14-06-007, mimeo., at 2 and 59 (Ordering Paragraph 1).

¹⁹ In rebuttal testimony (and as seen in the Replacement Decision Tree), SoCalGas and SDG&E proposed the formation of an Engineering Advisory Board to provide an extra level of comfort that SoCalGas and SDG&E decisions were sound (A.11-11-002: Rebuttal Testimony of Rick Phillips at 14). The Engineering Advisory Board was to be a four-member board made up of a company representative, a representative of the Commission's Safety and Enforcement Division, a representative of the Commission's Energy Division, and an outside pipeline integrity expert to be mutually agreed upon by the first three (A.11-11-002: Rebuttal Testimony of Rick Phillips at 15). D.14-06-007, however, did not adopt the advisory board concept proposed by SoCalGas and SDG&E (D.14-06-007, mimeo., at 28).

1 abandoning these short segments. As described in the original PSEP application, it will usually
2 be more cost-effective to replace these short segments. SoCalGas and SDG&E may, however,
3 engage in further review during the early planning stage to determine the most appropriate action
4 for the specific segment. For example, costs and other engineering factors may be considered
5 depending on the situation of each unique pipeline segment (e.g., the short segment is located on
6 a bridge or under a freeway, making it impractical to replace due to heightened complexity). An
7 important additional consideration is that installing new pipe -- manufactured to modern
8 standards -- further enhances the safety of the entire pipeline system.

9 **C. Segments Greater than 1,000 Feet**

10 Pipeline segments greater than 1,000 feet are further analyzed based on whether the
11 pipeline can be taken out of service per the Decision Tree. Pipeline segments that are greater
12 than 1,000 feet in length that can be removed from service for pressure testing per the Decision
13 Tree are generally pressure tested (unless the segment was installed prior to 1946 and is non-
14 piggable, or other factors indicate replacement should occur). Pipeline segments that are greater
15 than 1,000 feet in length that cannot be removed from service per the Decision Tree are replaced.
16 Ultimately, the appropriate pressure test or replace decision is based on customer impact and
17 engineering and cost analysis; i.e., an analysis that seeks to minimize customer impacts while
18 maximizing safety and cost-effectiveness.

19 As previously indicated, given that Phase 2A is located in less populated areas with a
20 relatively smaller occurrence of customer impacts, it is estimated that the vast majority of Phase
21 2A pipelines will be pressure tested rather than replaced. With respect to the Phase 2A projects
22 included in this Application, approximately 37 miles will be pressure tested and 5.6 miles will be
23 replaced.

1 **VI. PRIORITIZATION OF PROJECTS**

2 As outlined in the PSEP submittal approved in D.14-06-007, the initial priority of
3 SoCalGas and SDG&E was to test or replace pipeline without record of a pressure test to 1.25
4 MAOP located in more populated areas (i.e., Phase 1A). Work on Phase 1A is progressing and
5 is estimated to be completed in 2018.

6 The projects included in this Application were selected based on the confidence of
7 constructability, which includes completing all the necessary steps (engineering/design,
8 permitting, land rights, etc.) in order to proceed with construction in a timely manner upon
9 Commission approval and to meet the objective stated in D.16-08-003 of filing this Application
10 as soon as possible.²⁰ The relative risk between projects within Phase 1B and Phase 2A is
11 indistinguishable, and thus neither is prioritized over the other.

12 **VII. CONCLUSION**

13 My testimony provides an overview of the scope of Phase 1B and Phase 2A of
14 SoCalGas' and SDG&E's PSEP and describes the Phase 2A Decision Tree, which follows the
15 identical principles as the Decision Tree already approved by the Commission in D.14-06-007.
16 The projects proposed in this Application are in furtherance of SoCalGas' and SDG&E's
17 commitment to achieve the Commission's, Legislature's, and SoCalGas' and SDG&E's pipeline
18 safety objectives.

19 This concludes my prepared direct testimony.

²⁰ D.16-08-003, Ordering Paragraph 4, Page 16.

1 **VIII. WITNESS QUALIFICATIONS**

2 My name is Hugo Mejia. My business address is 555 West Fifth Street, Los Angeles,
3 California 90013-1011. I have been employed by Southern California Gas Company since 1990.
4 I have held various positions at SoCalGas in the Engineering, Environmental, Transmission,
5 Storage, and PSEP Organizations. These roles included working as the Engineering Analysis
6 Center Manager, Environmental Services Manager, Gas Transmission Technical Services
7 Manager, Senior Engineer in Storage Operations and PSEP Project and Execution Manager.

8 I am currently employed as the Manager in Major Programs and Project Controls. My
9 principal responsibility is managing close out activities for all PSEP projects and Phase 2
10 Implementation.

11 I received a Bachelor's Degree in Engineering from California State University,
12 Northridge and I am a Registered Mechanical Engineer in the State of California.

13 I have previously testified before the Commission.

ATTACHMENT A – PHASE 1B MILEAGE RECONCILIATION

<u>Line</u>	<u>As Filed (Miles)</u>	<u>Current Scope (Miles)</u>	<u>Current Planned Action</u>
85 North	31.07	60.40 ¹	Replace/De-rate
85 South	5.63	8.66	Replace/De-rate
103	8.53	8.64	De-rate
104	0.10	-	No longer within PSEP scope
404	4.03	2.78	Accelerated to 1A
1003	0.19	-	No longer within PSEP scope
1026	38.50	-	De-rate; no longer within PSEP scope
1031	0.78	-	No longer within PSEP scope
30-02-U	0.05	-	No longer within PSEP scope
30-18	0.14	-	Executed in Phase 1A
32-116-2	4.45	-	No longer within PSEP scope
33-37	1.05	2.333	De-rate
36-37 Sec 11&12	18.89	25.884	Replace/De-rate/Abandon ²
36-8-01	0.83	-	No longer within PSEP scope
36-8-06	1.64	-	No longer within PSEP scope
36-9-09 North	6.47	4.76	Replace
36-9-09 South	2.03	-	36-9-09 South abandoned as part of Phase 1A
36-0-09 JJ	0.34	-	36-9-09 JJ incorporated into 36-9-09 North
36-1001	0.33	0.125	Replace
36-1002	1.74	1.771	De-rate
36-1032	9.39	9.219	Replace
37-04	0.80	-	No longer within PSEP scope
37-15	0.01	-	No longer within PSEP scope
38-101	7.32	7.212	Replace/Abandon
38-143	3.94	3.048	Replace/Abandon
38-205	6.36	-	No longer within PSEP scope
38-278	1.56	1.726	Abandon
38-508	19.99	-	No longer within PSEP scope
38-603	0.17	-	No longer within PSEP scope
38-931	1.78	-	Accelerated to Phase 1A
38-959	0.46	-	No longer within PSEP scope
38-980	8.10	8.127	Abandon
38-981	5.35	5.355	Abandon
42-12	0.003	-	No longer within PSEP scope
42-46	0.57	-	No longer within PSEP scope
42-46F	0.003	-	No longer within PSEP scope
43-121	0.35	0.25	Replace
45-1001	2.67	1.104	Replace
127 ⁴	-	0.003	Replace ³

¹ Mileage increased through scope and record validation.

² 7.58 miles replaced, 9.22 miles abandoned, and 9.08 miles de-rate.

³ See Testimony of R. Gonzalez (Ch. 2) at pg. 12 for an alternative proposed action.

⁴⁻¹¹ Lines were added to Phase 1B subsequent to the Amended PSEP Filing (A.11-11-002) during scope validation.

ATTACHMENT A – PHASE 1B MILEAGE RECONCILIATION

128 ⁵	-	0.15	Replace
1004 ⁶	-	1.311	Test
7043 ⁷	-	0.001	Replace
38-514 ⁸	-	1.382	Replace
38-960 ⁹	-	6.108	Replace
38-1102 ¹⁰	-	0.0005	Replace
44-1008 ¹¹	-	48.13	Replace
TOTAL	196	208	