

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

**APPLICATION FOR REVIEW OF COSTS INCURRED IN EXECUTING  
PIPELINE SAFETY ENHANCEMENT PLAN (PSEP)  
(A.18-11-010)**

**(Cal PA Data Request-08)**

**Date Requested: January 25, 2019**

**Date Responded: February 8, 2019**

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The following questions are in reference to SoCalGas/SDG&E's Line 2000-C Hydrotest Project presented in A.18-11-010 for reasonableness review.

**QUESTION 01:**

Please explain the chain of events that led to the pipe rupture on Test Section 14.

**RESPONSE 01:**

The attached supporting documents include Confidential and Protected Materials provided pursuant to PUC Section 583, GO 66-D, D.17-09-023, the accompanying declaration, and/or non-disclosure agreement.

**Time/Activity**

7:00 am – Test start

7:18 am – Hold at 510 psig for leak check on test equipment fittings

7:34 am – Begin pressure up

7:59 am – Recorded: 783 psig

8:00 am – Pressure dropped to zero psig, indicating test failure

Attached is a copy of the CPUC's Pressure Test Leak Report.

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**QUESTION 02:**

Please provide a detailed explanation of the remediation steps taken to address the pipe rupture.

**RESPONSE 02:**

Immediately following the pressure drop, pumps were shut off and the hydro-test was stopped. Once it was confirmed there had been a rupture, the hydrotest failure mitigation plan was implemented. The following activities occurred:

<b>Date</b>	<b>Activity</b>
4/8/17 (Sat)	Test failure, initiate Hydrotest Failure Mitigation Plan
4/10/17 (Mon)	Excavate 70 feet of pipeline around failure
4/11/17 (Tues)	Dewater bulk of remaining test water
4/12/17 (Weds)	Cut out and haul off failure section to Company Engineering Analysis Center, begin replacement install
4/13/17 (Thurs)	Complete installation of replacement section, rinse line
4/14/17 (Fri)	Rinse line again for sand/rocks, remove pigs used to clean line and prep for re-test
4/17/17 (Mon)	Cleaning run, fill for test
4/18/17 (Tues)	Successful re-test

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**QUESTION 03:**

Was an investigation performed to assess the pipe rupture cause? If yes, please provide any relevant report/documentation gathered as a result of such an investigation.

**RESPONSE 03:**

The attached supporting documents include Confidential and Protected Materials provided pursuant to PUC Section 583, GO 66-D, D.17-09-023, the accompanying declaration, and/or non-disclosure agreement.

Yes. Attached is a copy of the Metallurgical Analysis Report for L2000 Hydrotest.

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**QUESTION 04:**

Is it possible that there are other integrity weaknesses along Line 2000-C that may lead to future failed hydrotests/pipe ruptures?

**RESPONSE 04:**

As stated in workpapers at page WP-III-A800, Line 2000-C was ultimately hydrotested successfully, indicating no other defects were discovered in the section that was hydro-tested. The SoCalGas/SDG&E Transmission Integrity Management Program (TIMP) performs prescribed assessments and takes appropriate actions to reduce the risk of a pipeline failure on all transmission pipelines.

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**QUESTION 05:**

If an ILI was performed and concluded that the pipe was able to be pressure tested, what is the reason that the ILI did not predict the pipe rupture.

**RESPONSE 05:**

The feature that resulted in the pressure test failure was not identified in the report submitted to SoCalGas by the ILI vendor.

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**QUESTION 06:**

If the ILI identified a pipe rupture risk, would SoCalGas/SDG&E have opted for replacement of the pipe rather than pressure test?

**RESPONSE 06:**

If an anomaly is reported with a predicted failure pressure less than the planned test pressure range, SoCalGas would repair the segment prior to performing the pressure test.

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**QUESTION 07:**

Please provide a detailed breakdown of the costs incurred due to the failed hydrotest and any remediation actions to address the pipe rupture.

**RESPONSE 07:**

The approximate costs incurred to remediate the pipe rupture are detailed below:

<b>Direct Costs (\$000)</b>	
Company Labor	\$ 37
Materials (Construction)	\$ 13
Construction Contractor	\$ 237
Construction Management & Support	\$ 216
Environmental	\$ 203
Engineering & Design	\$ 10
Project Management & Services	\$12
ROW	-
GMA	\$ 82
Overheads	\$ 74
AFUDC	\$ 1
Property Taxes	-
<b>TOTAL</b>	<b>\$ 885</b>

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**QUESTION 08:**

Has SoCalGas/SDG&E developed any precautionary activities to avoid such a pipe rupture in the future?

**RESPONSE 08:**

New pipe manufactured for gas receives a pressure test at the mill by the manufacturer to identify and remove injurious manufacturing defects. Furthermore, they complete both non-destructive examination and some destructive tests to confirm quality and composition requirements are met based upon pipe specification.

SoCalGas/SDG&E also coordinates with its approved vendors to perform mill inspections to confirm adherence to pipe manufacturing specifications.

Once pipe is received, SoCalGas/SDG&E have established quality control inspection instructions. QC personnel will check for weld and body defects, markings, certifications and will also randomly sample incoming product for adherence to dimension tolerances. When material is received at the job site, checks are performed to confirm that the material delivered is appropriate. Furthermore, upon receipt and throughout the installation process, visual checks are performed to look for handling damage and other injurious condition along with x-rays of weld joints per company standards.

Once in operation, as part of its ongoing Transmission Integrity Management Program (TIMP), SoCalGas and SDG&E conduct periodic pipeline integrity assessments to identify critical features (i.e. corrosion, dents, etc.) that require repair. During the project planning stage, any available ILI data is reviewed to identify and repair anomalies that may fail during a pressure test. These activities are all performed in an effort to minimize the risk of rupture; the pressure test is intended to expose any critically sized integrity conditions not detected by the aforementioned activities.