

**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)**

(CalPA Data Request-20)

Date Requested: April 02, 2019

Date Responded (Questions 3 thru 6): April 16, 2019

Date Responded (Questions 1-2 and 7-8): May 2, 2019

QUESTION 01:

Please fill out the attached template, with the file name "CONFIDENTIAL - DR-020 Q01" (template) in order to properly respond to this question.

Under the portion of the template showing as orange from columns V through AV, please list all of the segment attributes requested in the template, that were provided by SoCalGas/SDG&E in Response to Data Request 12 in this Reasonableness Review. (This will be referred to as Data Set 1.)

Under the portion of the template showing as red from columns AW through BZ, please list all of the segment attributes requested in the template, that were provided by SoCalGas/SDG&E in Response to Public Advocates Office's Data Request 1, dated August 14, 2018 (Data Response 1). Please note that Data Response 1 contains information identified that corresponds to cumulative stations. The data in the template under columns AW through BZ should have the matching data that corresponds to cumulative stations. This Data Response is attached for ease of reference. (This will be referred to as Data Set 2.)

Please fill in template columns D through U in the following fashion. Those columns are intended to show whether there are discrepancies in the attributes when comparing Data Set 1 and Data Set 2 (hereafter called, discrepancies).

Specifically, template Columns G through K ask about discrepancies related to pipeline diameter; template columns L through P ask about discrepancies related to pipeline wall thickness; and template columns Q through U ask about discrepancies related to Specified Minimum Yield Strength (SMYS). With this instruction in mind, please do the following:

Please make sure that all values are referencing attributes based upon SoCalGas/SDG&E's cumulative stations. After comparing those sets of values, please do the following:

- a. In columns G, L, and Q identify all discrepancies that SoCalGas/SDG&E observe for each Project segment related to diameter (column G), wall thickness (column L), and SMYS (column Q).
- b. In columns H, M, and R, identify the values from Data Set 1 and Data Set 2 for each Project segment related to diameter (column H), wall thickness (column M), and SMYS (column R).
- c. In each case when SoCalGas/SDG&E identify a discrepancy in columns G, L and Q, please identify in columns I (diameter), N (wall thickness), and S (SMYS), which value is accurate.
- d. In each case when SoCalGas/SDG&E identify a discrepancy in columns G, L, and Q, please explain the reason for the discrepancy in columns J (diameter), O (wall thickness), and T (SMYS).

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- e. In each case where SoCalGas/SDG&E identify a discrepancy in columns G, L, and Q, please explain in columns K (diameter), P (wall thickness), and U (SMYS) why SoCalGas/SDG&E is asserting one value is accurate over the other.
- f. Under column AW of the template, identify each segment where there were segment attribute values were provided in Data Set 1, but no corresponding values were provided in Data Set 2.
- g. Under columns AX through BZ of the template, fill out the requested missing attributes (shown in each column heading) as they appear in the High-Pressure Pipeline Database at the time of the August 14, 2018 data response.

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RESPONSE 01:

The attachment includes 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.

SoCalGas and SDG&E object to the term “discrepancy.” Public Advocates Office directed SoCalGas and SDG&E to prepare a conglomeration of data pulled from a dynamic database as of various different points in time. Because the database is dynamic, differences in data as of various points in time are to be expected; SoCalGas and SDG&E do not characterize these differences as “discrepancies.”

The parties held a telephonic meet-and-confer on April 9, 2019. At that time, SoCalGas and SDG&E explained that they could provide the date of the most recent snapshot of data. SoCalGas and SDG&E further explained that, because the database from which the requested data was pulled is dynamic, and Public Advocates Office directed SoCalGas and SDG&E to compile data as of various different points in time, there may be instances where SoCalGas and SDG&E cannot line up stationing that existed at one point in time to stationing that exists at a subsequent time. SoCalGas and SDG&E explained that it could pull together the stationing data and identify the number of segments where the stationing cannot be lined up exactly across the two snapshots in time, as requested.

a-g. Please see the attached file.

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QUESTION 02:

Please explain in detail why SoCalGas/SDG&E provided segment attribute values in response to Data Request 12, but did not provide attribute values for the same segments in the August 14, 2018 Data Response. In other words, please explain the basis for the entries under column AW of the template.

RESPONSE 02:

See SoCalGas/SDG&E's response to CalPA DR 23, Question 1.

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QUESTION 03:

The following questions (3 - 6) pertain to SoCalGas' and SDG&E's response to Cal PA's data request CalPA-SCG-18 ("CalPA-SCG-18"). In CalPA-SCG-18, Public Advocates Office asked SoCalGas/SDG&E to list the sources of the pipeline records and information provided in the Excel Spreadsheet and the attachment SoCalGas and SDG&E provided in response to data request CalPA-SCG-03. In response to this question in CalPA-SCG-18, SoCalGas/SDG&E stated "*The original SMYS and % MAOP of pressure test were calculations based on historical pre-PSEP pipeline information. The sources for the most recent pressure tests are Design Data Sheets, Test Charts, Pressure Test Logs, Drawings or other historical documents. The sources for engineering stationing are engineering drawings and supporting construction documents.*"

- A. Please identify and list all sources of "*historical pre-PSEP pipeline information.*"
- B. Please be sure to name the repository that contains "*historical pre-PSEP pipeline information.*" If the repository is a database, please say so, and identify the name of the database. Please use names that are currently used within SoCalGas/SDG&E System.
- C. What does "*most recent pressure tests*" mean?

RESPONSE 03:

- a. The sources of historical pre-PSEP pipeline information can include Design Data Sheets, Test Charts, Pressure Test Logs, Drawings, Strength Test Procedures, Pipeline Purchase Orders, Material Invoices, and/or Field Reports. Note, historical documents dating back as far as the early 20th century may contain similar information but have different names. The list above is intended to capture the types of documentation that are reviewed.
- b. The historical pre-PSEP pipeline information consists of hard copies that are retained by various business units within SoCalGas/SDG&E and a third-party archival vendor. Some of the documents have also been retained as electronic copies in Pipeline Document Management System (PDMS).
- c. As stated in SoCalGas/SDG&E's response to CalPA DR-02 Question 1, during a Meet and Confer when SoCalGas requested clarification of that phrase, Cal Advocates defined "most recent pressure test" as the pressure test conducted prior to the PSEP pressure test.

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QUESTION 04:

Were SMYS and % MAOP (Maximum Allowable Operating Pressure) recorded at the time of each pressure test provided within the application based upon information that was input into the High-Pressure Pipeline Database at the time SoCalGas/SDG&E submitted this application to the Commission? If not, why not?

RESPONSE 04:

SoCalGas and SDG&E has interpreted the terms in the question to refer to % SMYS and Maximum Allowable Operating Pressure (MAOP). The preparation of the application occurred over many months prior to the filing date, and the new (or post construction) % SMYS and MAOP values as stated in Table 1 of the workpapers may or may not have been updated in High-Pressure Pipeline Database (HPPD) at the time of the application. SoCalGas/SDG&E migrated HPPD data to a new platform and from July 2018 to December 2018, SoCalGas had limited access to update the database. Therefore, at the time the application was filed in November 2018, not all of the project data had been completely updated in HPPD. The SMYS and MAOP values in the workpapers were taken from the Design Data Sheet, Completion Drawing, and Strength Test Report. As part of the closeout process for each project presented in the application, the SMYS and MAOP values are compiled with other project information and submitted to the Pipeline Integrity organization for updating in the HPPD.

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QUESTION 05:

Were the sources for the “most recent pressure tests” (*i.e. Design Data Sheets, Test Charts, Pressure Test Logs, Drawings or other historical documents*) input into the High-Pressure Pipeline Database at the time SoCalGas/SDG&E submitted this application to the Commission? If not, why not?

RESPONSE 05:

See above response to Question 4.

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QUESTION 06:

Were “the sources for engineering stationing” (*i.e. engineering drawings and supporting construction documents*) input into the High-Pressure Pipeline Database at the time SoCalGas/SDG&E submitted this application to the Commission? If not, why not?

RESPONSE 06:

See above response to Question 4.

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QUESTION 07:

Regarding pipeline segments included in SoCalGas/SDG&E's instant application, have there been any updates to the information related to those segments in the High-Pressure Pipeline Database since SoCalGas/SDG&E provided it to the Public Advocates office on August 14, 2018? If yes, please provide the following for each update in any value:

- a. Date of the update to the database.
- b. Whether the change was made to match a change to the physical system, or not.
- c. If the change was made to the High-Pressure Pipeline Database for reasons other than to match a change in the physical system, what was the reason for the change?
- d. If the change was made to match a change to the physical system, please provide date the change to the physical system was completed.
- e. Segment cumulative station start point or cumulative engineering start point (foot).
- f. Segment cumulative station end point or cumulative engineering end point (foot).
- g. Old value of the data point immediately prior to the change in the High-Pressure Pipeline Database.
- h. New value of the data point immediately following the change in the High-Pressure Pipeline Database.

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RESPONSE 07:

The parties held a telephonic meet-and-confer on April 9, 2019. At that time SoCalGas and SDG&E explained that the database from which the requested data was pulled cannot query all changes over a period.

This is due to a technology limitation. GIS is composed of attributes that are maintained in various feature classes.

The GIS system will date stamp at the feature class level whenever an add, modify or retire action is taken on an attribute. The date stamp on the feature class is updated upon each change and only the last modified date is recorded. The corresponding attribute change associated with the modified date stamp is not identified.

For the period between August 2018 to the date of this data response, there is no systematic way to identify the changes. A manual daily reconciliation could theoretically be performed for each day since August 2018 if there was an archived version of the HPPD available for each day, however no such archived data is available.

Furthermore, the complexity of reconciliation would be significant as changes would need to be evaluated on both the spatial and relational side of the GIS due to interdependencies between feature classes. Also, it would be expected that non-construction changes, like new aerial imagery, centerline change from GPS surveys, field reports, calibration updates and various system maintenance would also affect the feature class content and structure. Thus, the creation of a master change list is technologically challenging, if not infeasible.

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QUESTION 08:

- a. Were the values provided in response to DR-012 used to inform SoCalGas/SDG&E's decision to test or replace?
- b. Were the values in response to DR-012 used to calculate MAOP in compliance with any requirement under 49 CFR Section 192.619?
- c. If the answer to question 8b is yes, which specific requirement under 49 CFR Section 192.619 was followed in order to calculate MAOP?
- d. If the answer to Question 8a is no, then provide the values that SoCalGas/SDG&E used to inform their decisions to test or replace the pipe segments identified in response to Question DR-012.
- e. If the answer to Question 8b is no, then provide the values SoCalGas/SDG&E used under 49 CFR Section 192.619 to calculate the MAOP of the segments that were provided in response to DR-012.
- f. If the answer to Question 8a is no, then explain why the values that informed SoCalGas/SDG&E's decision to test or replace those pipe segments identified in response to DR-012 were not provided in response to DR-012.
- g. If the answer to Question 8b is no, then explain why the values that SoCalGas/SDG&E used to calculate MAOP of the pipe segments identified in response to DR-012 in compliance with portions of 49 CFR Section 192.619 were not provided in response to DR-012.

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RESPONSE 08:

The parties held a telephonic meet-and-confer on April 9, 2019. At that time, and subsequently in a written email from Public Advocates Office dated April 10, 2019, Public Advocates Office asked that SoCalGas and SDG&E respond to an additional question: "SoCalGas/SDG&E to explain whether they used High Pressure Pipeline Database data in response to Cal Public Advocates Data Request 1, dated August 14th, 2018 to inform decisions to test or replace segments within A.18-11-010." SoCalGas and SDG&E agreed to respond, as encompassed in (a) below.

- a) As stated in testimony (Chapter II Rick Phillips, pages 14-16) and as summarized specifically for each project in the individual project workpapers, the decision tree analysis considers many factors to arrive at the execution option that is most beneficial to customers. In addition to the pipeline MAOP and the % SMYS as recorded in HPPD, other data was factored into the analysis that led to the decision to test or replace the pipeline sections such as, customer and community impacts, system impacts, pipe vintage, pipe piggability, pipe history, etc.
- b) MAOP is not a calculated value but was established in accordance with 49 Code of Federal Regulations (CFR) 192.619. It is an operating pressure, which is determined when the pipeline is put into service.
- c) Not applicable.
- d) Not applicable.
- e) Not applicable.
- f) Not applicable.
- g) Not applicable.