# **DRA DATA REQUEST** DRA-SCG-145-DAO

### SOCALGAS 2012 GRC – A.10-12-006 **SOCALGAS RESPONSE**

DATE RECEIVED: NOVEMBER 8, 2011 DATE RESPONDED: NOVEMBER 16, 2011

**Exhibit Reference:** SCG-203

**Subject:** Gas Transmission

## Please provide the following:

1. Referring to SCG-203, page JLD-3, please provide the following:

- a. On lines 17-18, SCG states, "DRA recognizes SoCalGas' increase in the number of landowner requests for pipeline removal as received by SoCalGas between 2005 and 2010." Please provide a citation to DRA's testimony wherein DRA "recognizes" the increase in the number of pipeline removal requests.
- b. Please provide the annual expenses incurred for pipeline removal for each year from 2005-2010.
- c. Referring to lines 22-23, please provide a citation to DRA's testimony wherein ... "DRA acknowledges here that SoCalGas recorded additional expenses amounting to \$493,000 in 2010 for the removal of 6,000 feet of pipe..."

#### **SoCalGas Response:**

- 1. Referring to DRA-44, Witness: Dao Phan:
  - a. Page 97, lines 18/19, DRA states, "SoCalGas received one request in 2008, two in 2009, and two in 2010".

Additionally, at page 98, lines 3 - 6, DRA states, "DRA's recommendation is for approximately twice the level of activities and funding compared to previous levels and corresponds with the level of increase in the number of requests for pipeline removal that SoCalGas experienced in 2009 and 2010".



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b. Recorded expense for removal of prior abandonments for the period of 2005 through 2008 is zero.

Recorded expense for the activity in 2009 is \$91,087; Recorded expense for the activity in 2010 is \$492,607 (2009 \$'s).

c. Upon further review of DRA's testimony (DRA-44), SoCalGas stands corrected as to the characterization of DRA's knowledge of the 2010 recorded expense in the amount of \$493,000 for prior abandonment removal activity.

In SoCalGas' original review of DRA's testimony (DRA-44, Page 96, Lines 19-21), DRA cites reference (276) to SoCalGas' Exh-SCG-3, Pg JLD-10, in which SoCalGas provided (Lines 23 - 26) the following statement; "Two recent examples in which pipe removal work is required due to physical conflict are; 1) a 440 foot removal due

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**Response to Question 1 (Continued)** 

to a municipality development project involving installation of a community aquatic facility and 2) a 7,500 foot removal request due to a transportation development project involving installation of a light-rail system."

Additionally, on page 97 (Lines 14-15) DRA states; "In fact, SCG has not incurred any expense for this work activity other than the removal of one project in 2009." and cites a reference (280) to SoCalGas' response to data request DRA-55, Q10-a, in which DRA requested recorded expense for pipeline removal activity for 2010. In SoCalGas' response to that inquiry, SoCalGas did not respond that zero expense had been incurred for this activity in 2010 as DRA states in their testimony. In fact, SoCalGas' response to the inquiry was; "SoCalGas has not finalized 2010 expense data, and is therefore unable to provide the requested information at this time."

While DRA did not submit a subsequent data request for a follow-up provision of the 2010 recorded expense for the activity, DRA did have access to data request and responses that were submitted on behalf of TURN (and all other intervenor organizations), in which the subject of prior abandonment removal was similarly reviewed.

Interveners routinely use the SoCalGas website to stay abreast of GRC updates including DR responses. http://www.socalgas.com/regulatory/A1012006.shtml)

In response to TURN data request (TURN-03, Q's 2a & b), TURN requested SoCalGas provide the following;

- 2a) annual recorded expense for the activity for 2010.
- 2b) annual recorded length (in feet) of pipeline removal for 2010. SoCalGas responded that while 2010 expense data had not yet been finalized, SoCalGas had in fact recorded approximately 6,000 feet of prior abandonment removal activity in 2010.

In response to TURN's subsequent follow-up data request (TURN-26, Q1), in which TURN requested SoCalGas provide the adjusted-recorded 2010 expense for removal activity, SoCalGas responded the \$493,000 was recorded in 2010 due to pipeline removal activity.

