SOUTHERN CALIFORNIA GAS COMPANY
SAN DIEGO GAS & ELECTRIC COMPANY

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)

(4TH DATA REQUEST FROM TURN-SCGC)

Date Requested: June 19, 2017
Date Responded: July 11, 2017

QUESTION 4.1:

4.1. **These questions are directed at the workpapers regarding the Line 2000 West Hydrotest Project.**

4.1.1. With respect to the statement on page WP-III-A79: "Included in this project was 4.116 miles of pipe accelerated Phase 2B. The accelerated mileage was included to realize efficiencies and enhance project constructability."

4.1.1.1. Please confirm that the accelerated pipe corresponds to the pipe that is colored green in Figure 3.

4.1.1.2. Please state in detail the basis for including the pipe in the Line 2000 West hydrotest project.

4.1.1.3. Please demonstrate that there were cost savings achieved by including the 4.116 miles of pipe in the project by showing the cost estimates including and excluding this length of pipe.

RESPONSE 4.1:

4.1.1.1 The accelerated pipe is depicted in Figure 3 as a blue-dotted line. A high-resolution copy of Figure 3 is provided in the attachment folder. The overlay of the blue-dotted line over the yellow colored hydrotested pipe may have created an unintended green color.

4.1.1.2 As stated in Direct Testimony Chapter 2 (Phillips) at p. 9, accelerated miles are miles that otherwise would be addressed in a later phase of PSEP under the approved prioritization process, but are advanced to Phase 1A to realize operating and cost efficiencies. SoCalGas maximized efficiencies by addressing these 4.116 miles of Phase 2B pipe while the pipeline was taken out of service and thereby eliminated the need for five future Phase 2B projects and the associated costs.

4.1.1.3 At the time of evaluation, the cost to test 21,859 feet was approximately $4.269 million, whereas the cost to replace 416 feet (the five Category 4 Segments combined) was estimated to be approximately $4.391 million.

SoCalGas and SDG&E did not prepare a cost estimate to compare the cost of pressure testing solely the 416 feet of Category 4 pipe versus pressure testing the entire 21,859 feet. Based on operator knowledge and experience, not including the accelerated mileage would require six separate hydrotests for each short segment of Phase 1A pipe to be planned and executed in a future PSEP phase, which in turn would duplicate the activities and expenses undertaken in the Seven Stage Review Process for this project. Included in these activities and expenses are engineering and design, material procurement, and related construction activities. Including the accelerated segments now also avoids future system impact of taking the pipeline out of service again at a later time. Note, this question appears to assume it would have been feasible to exclude the entire 4.116 miles of pipe from the scope of this project, however, additional footage on each side of a hydrotest project is required to complete construction.

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(4TH DATA REQUEST FROM TURN-SCGC)

Date Requested: June 19, 2017
Date Responded: July 11, 2017

QUESTION 4.1.2:

4.1.2. With respect to the statement on page WP-III-A85: "The test mileage was laid out to include multiple noncontiguous Category 4 segments in one hydrotest as a cost savings measure to save construction time in the field, reduce mobilization and demobilization costs, minimize impacts to the community and accelerate Phase 2 pipe."

4.1.2.1. Did SoCalGas consider the cost to perform the test in two shorter segments rather than one long segment?
4.1.2.2. If the answer is "yes," please provide the cost estimate that was associated with each of the two alternative approaches to hydrotesting.
4.1.2.3. If the answer to the question prior to the previous question is "no," please explain why SoCalGas did not examine alternate approaches to dividing up the hydrotesting activities.
4.1.2.4. Did SoCalGas consider the cost of replacing each of the four segments?
4.1.2.5. If the answer is "yes," please provide the cost estimate that was associated with replacing each segment.
4.1.2.6. If the answer to the question prior to the previous question is "no," please explain why SoCalGas did not examine alternate approaches to dividing up the hydrotesting activities.

RESPONSE 4.1.2:

4.1.2.1. No.

4.1.2.2. Not applicable.

4.1.2.3 If the test were performed in two shorter segments, additional activities potentially would have included (but not be limited to): one to two additional excavations, additional material and labor to fabricate hydrotest test heads and isolation caps, additional material and labor associated with cutting and prepping existing pipe for an additional hydrotest, additional labor and materials to fabricate one to two more additional tie-in spools, and additional labor associated with a hydrotest. An additional hydrotest also would have extended the construction time in the field and prolonged impacts on the community.

4.1.2.4. Yes.

4.1.2.5. See Response TURN-SCGC DR-04 Q4.1.1.3.

4.1.2.6. Not applicable.

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(4TH DATA REQUEST FROM TURN-SCGC)

Date Requested: June 19, 2017
Date Responded: July 11, 2017

QUESTION 4.1.3:

4.1.3. With respect to the Schedule presented on WP-III-A92:

4.1.3.1. Why did the project require nearly five months from the construction start date to the NOP date?

4.1.3.2. Please account for all factors that prevented the starting of each stage of the hydrotest and identify the number of days delay associated with each factor.

RESPONSE 4.1.3:

4.1.3.1 The project required nearly five months from the construction start date to the Notice of Operation (NOP) date because all three sections of the hydrotest, totaling 14.571 miles, were performed during that time.

4.1.3.2. It is unclear what is meant by the phrase "all factors that prevented the starting of each stage of the hydrotest." The Line 2000-West Construction Milestone completion dates are as follows:

Factors	Whittier-1		Pico Rivera-2		Commerce-3	
	Actual	**Original**	**Actual**	**Original**	**Actual**	**Original**
Mobilization	7/30/14	7/30/14	9/26/14	9/24/14	9/9/2014	9/3/14
Excavations	8/28/14	8/14/14	10/23/14	10/4/14	10/4/2014	9/20/14
Isolation	12/5/14	8/20/14	10/21/14	10/16/14	11/5/2014	10/10/14
Hydrotest Prep	12/13/14	8/29/14	10/25/14	10/27/14	11/15/2014	10/16/14
Hydrotest	12/11/14	8/30/14	10/27/14	10/28/14	11/11/2017	10/17/14
Tie-in Complete	12/17/14	9/10/14	10/31/14	11/6/14	11/17/2014	10/27/14
Backfill & Restore	1/22/15	9/30/14	12/17/14	12/4/14	1/2/15	11/15/14

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(4TH DATA REQUEST FROM TURN-SCGC)

Date Requested: June 19, 2017
Date Responded: July 11, 2017

QUESTION 4.1.4:

4.1.4. With respect to the statement on WP-III-A92 and WP-III-A93 regarding Whittier-1:

- **"Use of a Lake tank (see Figure 9) required the addition of 24-hour security and the addition of light towers.**
- **Additional excavation was required to replace a wrinkle bend, increasing the length of construction.**
- **Addition of a Pressure Control fitting to provide continued service.**
- **Headwall had to be replaced when it was damaged during removal of the wrinkle bend.**
- **Isolation of a supply line required installation of a pressure control fitting and expanded excavation to minimize customer impacts and supply line gas blow off.**
- **Inclement weather caused two construction stoppages for safety reasons.**
- **Engineering integrity assessments required that the bell hole be expanded."**

4.1.4.1. Please identify the period of delay associated with each of these events and the time that it occurred.

4.1.4.2. Please identify the cost increase associated with each of these events.

4.1.4.3. 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.

4.1.4.4. 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 4.1.4:

4.1.4.1 There was no delay to the overall construction completion date as a result of these activities; scheduled hydrotest and tie-in dates were met as multiple crews were deployed and worked concurrently with other crews. The periods of time associated with these activities are as follows:

- Lake tank: 8/14/14 to 1/28/15 + Light towers: 8/18/14 to 1/11/15
- Wrinkle bend: 9/8/14 to 12/6/14
- Pressure control fitting: 11/12/14 to 12/7/14
- Head-wall: 1/5/15 to 1/15/15
- Weather: 12/16/14 to 12/17/14

- Expanded excavation and Bell holes: 8/23/14 to 8/25/14 (first time period), 8/23/14 to 12/13/14 (second time period).

4.1.4.2. The Construction Contractor Change Order costs are as follows:

- Lake tank: $67,954 + Light towers: $32,928
- Wrinkle bend: $65,055
- Pressure control fitting: $43,239
- Head-wall: $45,346
- Weather: $37,691
- Expanded excavation and Bell holes: $9,242 (first time period) + $51,641 (second time period)

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.

4.1.4.3-4 The attached supporting documents include Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024. Copies of the Construction Contractor's and SoCalGas' correspondence, change orders, and Requests for Information (RFI) are provided in the attachment folder.

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(4TH DATA REQUEST FROM TURN-SCGC)

Date Requested: June 19, 2017
Date Responded: July 11, 2017

QUESTION 4.1.5:

4.1.5. With respect to the statement on WP-III-A93 regarding Pio Rivera-2:

- **"To meet the Peaker Plant outage dates the construction schedule had to be accelerated. This required expanded working hours, as well as the removal of the Santa Fe Springs Station Redesign scope which modified installation plans.**
- **SoCalGas potholed to identify existing substructures. Although best practices were followed, not all substructures were identified. To remediate the congestion of the underground substructures, project scope was expanded and installation plans were redesigned.**
- **Railroad ROW required the hiring of flagging services for contractor safety.**
- **Multiple tap locations required expanded excavations to locate taps."**

4.1.5.1. Please identify the period of delay associated with each of these events and the time that it occurred.
4.1.5.2. Please identify the cost increase associated with each of these events.
4.1.5.3. 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.
4.1.5.4. 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 4.1.5:

4.1.5.1 There was no delay to the overall construction completion date as a result of these activities; scheduled hydrotest and tie-in dates were met as multiple crews were deployed and worked concurrently with other crews. The time periods associated with each of the activities are as follows:

- Peaker plant: 10/1/14 to 11/19/14 (first time period), 10/18/14 to 10/30/14 (second time period)
- Substructures: 10/15/2014
- Rail ROW flagger: 9/9/14 to 11/09/14
- Expanded tap excavations: 10/13/14 to 10/14/14 (first time period), 10/16/2014 (second period – one day)

4.1.5.2. The Construction Contractor Change Order costs are as follows:

- Peaker plant: $96,358 (first time period) + $61,008 (second time period)
- Substructures: $8,867
- Rail ROW flagger: $12,483
- Expanded tap excavations: $21,256 (first time period) + $10,321 (second period – one day)

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.

4.1.5.3-4. The attached supporting documents include Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024. Copies of the Construction Contractor's and SoCalGas' correspondence, change orders, and Requests for Information (RFI) are provided in the attachment folder.

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(4TH DATA REQUEST FROM TURN-SCGC)

Date Requested: June 19, 2017
Date Responded: July 11, 2017

QUESTION 4.1.6:

4.1.6. With respect to the statement on WP-III-A94 regarding Commerce-3:

- **"A schedule acceleration was required to meet TRE agreement with Home Depot parking lot requirements to demobilize from the lot by the end of October. The acceleration required expanded working hours, including night work.**
- **Multiple pipeline features required further excavation to locate for planned work.**
- **Modifications to multiple supply line isolation plans were required for design constructability and minimization of customer impacts. These modifications required increased depth of excavation (including the removal of a vault), and the additional installation of a pressure control fitting.**
- **SoCalGas potholed to identify existing substructures. Although best practices were followed, not all substructures were identified. To remediate the congestion of the underground substructures, project scope was expanded and installation plans were redesigned."**

4.1.6.1. Please identify the period of delay associated with each of these events and the time that it occurred.
4.1.6.2. Please identify the cost increase associated with each of these events.
4.1.6.3. 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.
4.1.6.4. 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 4.1.6:

4.1.6.1 There was no delay to the overall construction completion date as a result of these activities; scheduled hydrotest and tie-in dates were met as multiple crews were deployed and worked concurrently with other crews. The time periods associated with the activities are as follows:

- Home Depot: 9/30/14 to 12/14/14
- Expanded excavations: 11/10/14 to 12/18/14 (first time period), 10/13/14 to 10/14/14 (second time period)
- Supply line isolations and modifications: 9/22/14 to 9/25/14

- Substructures: 10/13/14 to 10/14/14

4.1.6.2. The Construction Contractor Change Order costs are as follows.

- Home Depot: $125,338
- Expanded excavations: $123,278 (first time period) + 18,283 (second time period)
- Supply line isolations and modifications: $49,364

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.

4.1.6.3-4. The attached supporting documents include Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024. Copies of the Construction Contractor's and SoCalGas' correspondence, change orders, and Requests for Information (RFI) are provided in the attachment folder.

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(4TH DATA REQUEST FROM TURN-SCGC)

Date Requested: June 19, 2017
Date Responded: July 11, 2017

QUESTION 4.1.7:

4.1.7. With respect to Table 4 on WP-III-A96:

4.1.7.1. Please break apart the table into four separate tables using the same column and row labels as shown in the current version of the table, but showing separately the costs for each project segment listed below:

4.1.7.1.1. Whittier-1
4.1.7.1.2. Pico Rivera-2
4.1.7.1.3. Commerce-3
4.1.7.1.4. Santa Fe Springs Station Redesign

RESPONSE 4.1.7.1-4:

Because the costs of the Line 2000 West hydrotest project were documented and tracked as a single project, Table 4: L-2000W Phase 2 WOA and Actual Costs (WP-III-A96) cannot be separated into four project sections without making after-the-fact assumptions about how the total project costs could be allocated among the four hydrotest sections. Furthermore, Work Order Authorization Forms (WOAs) are initiated at Stage 1 (initial scoping cost estimate) and updated at Stage 3 (Phase 2 WOA) to capture estimated project costs for pipeline projects that require test or replacement. WOAs may include one or more hydrotest sections, but it is not a general practice to initiate separate WOAs for each individual hydrotest section for the same pipeline unless circumstances, such as construction schedule or design approach, warrant separate tracking mechanisms for sections within the same asset. Therefore, the Phase 2 WOA column cannot be broken out between the sections of the hydrotest project without making after-the-fact assumptions about how the total WOA amount could be allocated among the four hydrotest sections.

Similarly, it is not feasible to separate the O&M (actual) and Capital (actual) Costs among the four hydrotest sections of this project. PSEP projects are planned and designed to comply with the Commission's directive in a cost effective manner, while minimizing impacts to customers and the community. In order to achieve these goals, the engineering and design work, as well as construction activity, was tracked for the entire project and not tracked separately for each hydrotest section. Separately tracking multiple portions of this project would have increased the administrative burdens and costs of the project without providing a commensurate safety enhancement benefit for customers.

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(4TH DATA REQUEST FROM TURN-SCGC)

Date Requested: June 19, 2017
Date Responded: July 11, 2017

QUESTION 4.1.8:

4.1.8. With respect to the statement on WP-III-A97: "For this hydrotest project, SoCalGas and SDG&E has identified a total of 324 feet of pipe as being installed post 1955 and lacking pressure test records that provide the minimum information to demonstrate compliance with industry standards or regulatory strength testing and recordkeeping requirements then applicable."

4.1.8.1. Please show how much of the 324 feet of pipe corresponds to the Whittier-1 subproject.
4.1.8.2. Please show how much of the 324 feet of pipe corresponds to the Pico Rivera-2 subproject.
4.1.8.3. Please show how much of the 324 feet of pipe corresponds to the Commerce-3 subproject.

RESPONSE 4.1.8:

4.1.8.1. 185 feet corresponds to Whittier-1.

4.1.8.2. 33 feet corresponds to Pico Rivera-2.

4.1.8.3. 106 feet corresponds to Commerce-3.

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(4TH DATA REQUEST FROM TURN-SCGC)

Date Requested: June 19, 2017
Date Responded: July 11, 2017

QUESTION 4.2:

4.2. These questions are directed at the workpapers regarding the Line 2001 West A (Sections 15 and 16) Replacement Project.

4.2.1. **With respect to Table 2 on WP-III-A100, which states that Section 15 is made up of 7 feet of criteria mileage and 1 foot of incidental mileage and Section 16 is made up of 8 feet of criteria mileage and 14 feet of incidental mileage:**

4.2.1.1. Please state in detail the basis for including the 1 foot of incidental mileage pipe in Section 15 of the Line 2001 West A replacement project.

4.2.1.2. Please demonstrate that there were cost savings achieved by including the 1 foot of pipe in the project by showing the cost estimates including and excluding this length of pipe.

4.2.1.3. Please state in detail the basis for including the 14 feet of incidental mileage pipe in Section 16 of the Line 2001 West A replacement project.

4.2.1.4. Please demonstrate that there were cost savings achieved by including the 14 feet of pipe in the project by showing the cost estimates including and excluding this length of pipe.

RESPONSE 4.2:

4.2.1.1 The basis for including the one foot of incidental pipe was to remove a wedding band installed at the same time as the Phase 1A pipe, thereby further enhancing the integrity of the pipeline by removing an appurtenance that is no longer is needed. Note, this question appears to assume it would have been feasible to exclude the one-foot of pipe from the scope of the project, however, additional footage on each side of a replacement project is required to complete construction.

4.2.1.2 SoCalGas and SDG&E did not prepare a cost estimate to compare the cost of including this one foot of pipe within the scope of the project, versus excluding this one foot of pipe. As mentioned in Response TURN-SCGC DR-04 Q4.2.1.1, the inclusion of the one-foot segment further enhanced the integrity of the pipeline by removing an appurtenance that no longer is needed. Further, this question appears to assume it would have been feasible to exclude the one-foot of pipe from the scope of the project, however, additional footage on each side of a replacement project is required to complete construction.

4.2.1.3 The 14 feet of incidental pipe were included in the scope of the project for constructability; it was necessary to include the 14 feet of incidental pipe to extend the tie-in location in order to avoid an existing concrete vault.

4.2.1.4 SoCalGas and SDG&E did not prepare a cost estimate to compare the cost of including these 14 feet of pipe within the scope of the project, versus excluding the 14 feet of pipe within the scope of the project. Based on operator knowledge and experience, the potential costs and impacts to remove an existing concrete vault would be expected to exceed the cost of adding 14 feet of pipe to the scope of the project.

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(4TH DATA REQUEST FROM TURN-SCGC)

Date Requested: June 19, 2017
Date Responded: July 11, 2017

QUESTION 4.2.2:

4.2.2. With respect to the statement on page WP-III-A107: "Coal tar wrap was discovered in the trenches during excavation. The coal tar wrap was assumed to be on the pipe and was not anticipated to be in the surrounding soil. This delayed the project by three and half weeks because of the need for environmental cleanup."

4.2.2.1. Did SoCalGas anticipate the use of coal tar wrap?

4.2.2.2. If the answer to the previous question is "no," why did SoCalGas not anticipate the use of coal tar wrap given the age of the pipeline?

4.2.2.3. Does SoCalGas have data that demonstrates that a substantial portion of its pipelines that were installed in the 1947 to 1955 did not use coal tar wraps?

4.2.2.4. If the answer to the previous question is "yes," please provide the data.

4.2.2.5. If SoCalGas had discovered coal tar wrap without leakage into the soil at the site, would that have required any mitigation?

4.2.2.6. If the answer to the previous question is "yes," please explain what mitigation would have been required and how long it would have taken.

4.2.2.7. 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 discovery of leakage from the coal tar wrap described above in the cited quotation.

4.2.2.8. 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 4.2.2:

4.2.2.1. Yes.

4.2.2.2. Not applicable.

4.2.2.3. Yes.

4.2.2.4. Historically, as a matter of practice, coating information was captured in hard copy construction records and was identified as coated or non-coated pipe for regulatory reporting purposes. SoCalGas has been working to compile coating information from hard copy records into company databases to make it more readily accessible.

As of the date of this response, SoCalGas and SDG&E's review of records indicated there are approximately 415 miles of SoCalGas transmission pipe identified as having coal tar coating.

	1947-1955/Transmission	
Company Name	**Coating Type**	**Mileage**
SoCalGas	Coal Tar	414.83
	Other*	340.39
	Total	**755.23**
*Other includes bare, asphalt, epoxy, mastic, tape, unknown, etc.		

4.2.2.5. Yes.

4.2.2.6. Abatement of coal tar wrap would have required wet abatement methods by a licensed, Company-approved abatement contractor accompanied by Industrial Hygienist oversight. Barring unforeseen conditions or circumstances, SoCalGas and SDG&E would anticipate such abatement activity to take approximately one day.

4.2.2.7-8 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 Request for Information (RFI) is provided in the attachment folder.

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(4TH DATA REQUEST FROM TURN-SCGC)

Date Requested: June 19, 2017
Date Responded: July 11, 2017

QUESTION 4.2.3:

4.2.3. With respect to the statement on page WP-III-A107: "The tie-in points were extended to remove wedding bands. The revised lengths for both sections are as follows:

- **Section 15 was extended by less than one foot.**
- **Section 16 was extended to 23 feet."**

4.2.3.1. Please explain the function of the "wedding bands."
4.2.3.2. Please explain in detail why it was necessary to replace the existing wedding bands.
4.2.3.3. Please explain in detail why it took extra pipe footage to accomplish the replacement of the wedding bands.
4.2.3.4. Please provide a copy of all Change Order materials or other notices or nce provided to SoCalGas' PSEP management team by its contractor that are related to the delay or added cost created by the replacement of the wedding bands described above in the cited quotation.
4.2.3.5. 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 4.2.3:

4.2.3.1. Refer to WP-G-10 and response to TURN-SCGC DR-03 Q3.1.4.1.

4.2.3.2 As explained in response to TURN-SCGC DR-03 Q3.1.4.2, the 23 feet of pipe was included to complete construction and to take advantage of the pipe being taken out of service to remove a wedding band (from the 23-foot segment) installed at the same time as the Phase 1A pipe, further enhancing the integrity of the pipeline by removing appurtenances that no longer are necessary.

4.2.3.3 Additional pipe was added to the scope of the project to replace the wedding bands for constructability purposes, thereby further enhancing the integrity of the pipeline by removing appurtenances that are no longer needed. Note, standard purchased pipe lengths are 20 or 40 feet, and most of the pipe purchased for PSEP projects is received from the manufacturer in 40 foot lengths. Purchased pipe is cut to size in the field during construction. For constructability purposes, the 40-foot pipe may be cut so as to include additional footage on either side of

Category 4 pipe to eliminate fittings, welds or other appurtenances on existing pipe. The key construction activity in this process is the cutting of the existing pipe while it is out of service. SoCalGas and SDG&E select a safe and practical location for the cutting equipment, which may entail adding additional footage and generally does not create additional cost.

4.2.3.4-5. 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 Request for Information (RFI) is provided in the attachment folder.

SOUTHERN CALIFORNIA GAS COMPANY
SAN DIEGO GAS & ELECTRIC COMPANY

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)

(4TH DATA REQUEST FROM TURN-SCGC)

Date Requested: June 19, 2017
Date Responded: July 11, 2017

QUESTION 4.2.4:

4.2.4. With respect to Table 4 on WP-III-A108:

4.2.4.1. Why does the category "Contract Costs" have a value of $650,000 in the "Phase 2 WOA" column while it has a value of $229,211 in the "Capital" column?
4.2.4.2. Why does the category "Other Directs" have $2,600 in the "Phase 2 WOA" column while it has a value of $440,126 in the "Capital" column?
4.2.4.3. What types of materials, services, or other costs are included in the "Other Direct" cost in this project?

RESPONSE 4.2.4:

4.2.4.1-3. The estimated costs in the Phase 2 WOA Contract Costs column for Line 2001 W A include all estimated contracted services for both design and construction activities, while the Contract Costs in the "Capital" costs in the Contract Cost column include all construction related actual expenses only. Actual engineering and design costs are Other Direct Costs under the "Capital" column. Examples of the types of costs that were grouped in the estimate categories and the actual categories are in the table below:

Cost Categories	Estimated Costs (Phase 2 WOA)	Actual Costs (Capital)
CONTRACT COSTS	• Construction Contractor • Construction Management Services • Environmental Abatement Services • Engineering Services • Survey and Mapping • Land Use and Permits	• Construction Contractor • Construction Management Services • Environmental Abatement Services
OTHER DIRECT COSTS	• Other / Miscellaneous	• Engineering Services • Survey and Mapping • Land Use and Permits • Other / Miscellaneous

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(4TH DATA REQUEST FROM TURN-SCGC)

Date Requested: June 19, 2017
Date Responded: July 11, 2017

QUESTION 4.3:

4.3. These questions are directed at the workpapers regarding the Line 2001 West B Sections 10, 11 & 14 Replacement and Hydrotest Project.

4.3.1. **With respect to the statement on page WP-III-A112: "PSEP work on Section 10 was coordinated with an operating district project and the PSEP Valve Team that was immediately adjacent to this PSEP project. As part of the Banning Valve Bundle Project, a new MLV was identified as necessary to meet the isolation objectives of the PSEP Valve Enhancement Plan.1 Separate cost accounts were established for the PSEP pipeline work, PSEP valve automation work, and operating district work.1" Footnote 1 reads: "The installation and automation of this valve (MLV 2001-193.31-0) is part of the Banning Valve Bundle and will be submitted in a future reasonableness review application."**

4.3.1.1. Please describe in detail the "operating district project" that was "coordinated" with the PSEP work on Section 10.

4.3.1.2. Please identify the transmission facilities including valves that were involved in the district project using unique identification numbers or other identifiers.

4.3.1.3. What was the date that construction for the operating district project was initiated?

4.3.1.4. What was the date that construction for the operating district project was completed?

4.3.1.5. What was the date that construction for the installation of the valve MLV 2001-193.31-0 was initiated?

4.3.1.6. What was the date that construction for the installation of the valve MLV 2001-193.31-0 was completed?

4.3.1.7. Was the cost of the valve installation booked into the valve automation account?

4.3.1.8. If the answer to the previous question is "no," please state which account the valve installation cost was booked into.

4.3.1.9. Who at SoCalGas determined which costs were booked into the various accounts? Please identify at least the job title associated with each individual who was responsible for this effort and which part of the PSEP or district organization that the individual(s) work.

4.3.1.10. To the extent that the same contractor was used for the three jobs, who among the contractor's staff determined which costs were associated with the various projects? Please identify at least the job title associated with each individual who was responsible for this effort.

4.3.1.11. What criteria were used to determine whether a cost was associated with the operating district project, the PSEP project Section 10, or the PSEP valve automation project?

RESPONSE 4.3:

4.3.1.1 The operating district project scope included a 1,091-foot replacement and a new mainline valve on Line 2001 West to address a change in class location. The 1,091-foot replacement was located east of the Section 10 hydrotest and was managed by the operating district. The mainline valve was installed as part of the PSEP project, but was funded by the operating district.

4.3.1.2 The transmission assets included in the operating district project scope were a 1,091-foot replacement from STA 760+30 to STA 771+21 and a new mainline valve that is now MLV 2001-139.76-0 on Line 2001 West.

4.3.1.3 Construction on the operating district project was initiated on May 1, 2014.

4.3.1.4 Construction on the operating district project was completed on December 15, 2014.

4.3.1.5. The MLV installation was mobilized with Section 10 on August 18, 2014.

4.3.1.6. MLV installation demobilized with Section 10 on February 27, 2015.

4.3.1.7. No.

4.3.1.8. The valve installation is booked into sub-account number 91060.000, and funded by the operating district.

4.3.1.9. Costs were evaluated and then allocated based on the scope of work provided by PSEP pipeline project managers, PSEP valve project managers and Transmission Technical Services project managers.

4.3.1.10. The same construction contractor was used for all three jobs, and the work for each job was performed under a separate contract. Therefore, costs for each project were segregated.

4.3.1.11 The criteria were based on the individual components of the overall scope of work (i.e. Transmission replacement, mainline valve installation, PSEP hydrotest, PSEP valve automation).

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(4TH DATA REQUEST FROM TURN-SCGC)

Date Requested: June 19, 2017
Date Responded: July 11, 2017

QUESTION 4.3.2:

4.3.2. With respect to the statement on page WP-III-A113: "Included in this project was 15 feet of pipe accelerated from SoCalGas and SDG&E's PSEP Phase 2B. This Phase 2B footage was included to realize efficiencies and to enhance project constructability." Table 2 also shows that 823 feet of incidental mileage was included as part of the project. Table 2 also shows the breakdown of mileage among the three sections of the project.

4.3.2.1. Please identify in Figure 5 the location of the 816 feet of incidental mileage pipe included as part of the Section 11 project.

4.3.2.2. Please state in detail the basis for including the 816 feet of incidental mileage pipe in Section 11 of the project.

4.3.2.3. Please demonstrate that there were cost savings achieved by including the 816 feet of pipe in the Section 11 of the project by showing the cost estimates including and excluding this length of pipe.

4.3.2.4. Please identify in Figure 7 the location of the 15 feet of accelerated mileage pipe included as part of the Section 14 project.

4.3.2.5. Please state in detail the basis for including the 15 feet of accelerated mileage pipe in Section 14 of the project.

4.3.2.6. Please demonstrate that there were cost savings achieved by including the 15 feet of pipe in the Section 14 of the project by showing the cost estimates including and excluding this length of pipe.

4.3.2.7. Please identify in Figure 7 the location of the 7 feet of incidental mileage pipe included as part of the Section 14 project.

4.3.2.8. Please state in detail the basis for including the 7 feet of incidental mileage pipe in Section 14 of the project.

4.3.2.9. Please demonstrate that there were cost savings achieved by including the 7 feet of pipe in the Section 14 of the project by showing the cost estimates including and excluding this length of pipe.

RESPONSE 4.3.2:

4.3.2.1. The 816 feet of incidental pipe is reflected with pink hash marks on Figure 5, within the hydrotested pipeline (shown in yellow), 279 feet on the east side and 537 feet on the west side. A high-resolution copy of a corrected version of Figure 5 is provided in the attachment folder. SoCalGas and SDG&E discovered a coding error in the workpaper for this project while preparing this response and will prepare and submit a corrected Figure 5 to address this inadvertent error.

4.3.2.2. The 816 feet of incidental pipe in Section 11 were included in order to support constructability. Without including these sections, the pipe tie-ins at the east and west locations would have fallen in the middle of busy intersections which would have caused traffic control issues and increased costs. Additionally, on the west side, a portion of the incidental pipeline was included to reach a location where the pipe was on the same side of the street as the laydown yard to avoid having construction on both sides of the street.

4.3.2.3. SoCalGas and SDG&E did not prepare a cost estimate to compare the cost of including this 816-foot of pipe within the scope of this Phase 1A project versus excluding the 816 feet of pipe. Based on operator experience and knowledge, avoiding both the presence of test heads in a busy intersection and construction on both sides of the street was the more prudent approach to completing this project.

4.3.2.4. The 15 feet of accelerated pipe are reflected as the blue dotted marks on Figure 7, within the replaced pipeline (shown in green). A high-resolution copy of Figure 7 is provided in the attachment folder.

4.3.2.5. The basis for including the 15 feet of incidental pipe was to remove a wedding band and fire control fitting installed at the same time as the Phase 1A pipe, thereby further enhancing the integrity of the pipeline by removing appurtenances that are no longer needed. Note, standard purchased pipe lengths are 20 or 40 feet, and most of the pipe purchased for PSEP projects is received from the manufacturer in 40 foot lengths. Purchased pipe is cut to size in the field during construction. For constructability purposes, the 40-foot pipe may be cut so as to include additional footage on either side of Category 4 pipe to eliminate fittings,

welds or other appurtenances on existing pipe. The key construction activity in this process is the cutting of the existing pipe while it is out of service. SoCalGas and SDG&E select a safe and practical location for the cutting equipment, which may entail adding additional footage and generally does not create additional cost. This question appears to assume it would have been feasible to exclude the entire 15 feet of pipe from the scope of the project, however, additional footage on each side of a replacement project is required to complete construction.

4.3.2.6. SoCalGas and SDG&E did not prepare a cost estimate to compare the cost of including the 15-feet of pipe within the scope of the project, versus excluding the 15 feet of pipe. As mentioned in Response TURN-SCGC DR-04 Q4.2.1.1, the inclusion of the 15-foot segment further enhanced the integrity of the pipeline by removing appurtenances that are no longer needed. Further, this question appears to assume it would have been feasible to exclude the entire 15 feet of pipe from the scope of the project, however, additional footage on each side of a replacement project is required to complete construction.

4.3.2.7. The seven feet of incidental pipe are reflected with pink hash marks on Figure 7, within the replaced pipeline (shown in green). A high-resolution copy of Figure 7 is provided in the attachment folder.

4.3.2.8. The seven feet of incidental pipe were included in Section 14 in order to support constructability. During project design, one wedding band and a wrinkle bend were identified as being located near the tie-in location. The seven feet were included to remove the wedding band and to allow for a tie-in location that would not be near the existing wedding band.

4.3.2.9. SoCalGas and SDG&E did not prepare a cost estimate to compare the cost of including the seven feet of pipe within the scope of this Phase 1A project versus excluding the 7 feet. Based on operator knowledge and experience, the removal of unnecessary wedding bands and having a tie-in location that would not be near existing wedding bands was the more prudent approach to completing the project.

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(4TH DATA REQUEST FROM TURN-SCGC)

Date Requested: June 19, 2017
Date Responded: July 11, 2017

QUESTION 4.3.3:

4.3.3. With respect to Table 4 on WP-III-A121 and WP-III-A122:

4.3.3.1. What types of materials, services, or other costs are included in the "Other Direct" cost for Section 10 of the project?
4.3.3.2. What types of materials, services, or other costs are included in the "Other Direct" cost for Section 11 of the project?

RESPONSE 4.3.3.1:

4.3.3.1-2. With respect to Table 4: L-2001 W B Stage 3 Direct Cost Estimate (WP-III-A121 – 122), estimated and actual costs were apportioned between Contract and Other Direct costs as follows:

Cost Categories	Estimated Costs (Phase 2 WOA)	Actual Costs (Capital)
CONTRACT COSTS	• Construction Contractor	• Construction Contractor • Construction Management Services • Environmental Abatement Services
OTHER DIRECT COSTS	• Construction Management & Support Services • Environmental Abatement Services • Environmental - Planning • Engineering & Design • Permits & ROW • Project Management and Project Services • Other / Miscellaneous	• Engineering Services • Survey and Mapping • Land Use and Permits • Other / Miscellaneous

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QUESTION 4.3.4:

4.3.4. With respect to the statement on page WP-III-A123: "During Stage 4, detailed design and material procurement was completed in order to provide a construction ready packet to the construction contractor to execute the planned project scope."

4.3.4.1. Please provide the date that the Phase 4 work commenced for Section 10.
4.3.4.2. Please provide the date that the construction ready packet for Section 10 was provided to the construction contractor.
4.3.4.3. Please provide the date that the Phase 4 work commenced for Section 11.
4.3.4.4. Please provide the date that the construction ready packet for Section 11 was provided to the construction contractor.
4.3.4.5. Please provide the date that the Phase 4 work commenced for Section 14.
4.3.4.6. Please provide the date that the construction ready packet for Section 14 was provided to the construction contractor.

RESPONSE 4.3.4:

SoCalGas and SDG&E interpret Phase 4 to mean Stage 4.

4.3.4.1. July 14, 2014.

4.3.4.2. August 18, 2014

4.3.4.3. August 5, 2014.

4.3.4.4. October 27, 2014.

4.3.4.5. July 24, 2014.

4.3.4.6. October 13, 2014.

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(4TH DATA REQUEST FROM TURN-SCGC)

Date Requested: June 19, 2017
Date Responded: July 11, 2017

QUESTION 4.3.5:

4.3.5. With respect to the statement on page WP-III-A123: "Section 10: The City of Banning planned a future roadway on the existing pipeline easement requiring the valve to be placed underground in a vault (see figure 7) with traffic rated lids. This created extensive redesign which impacted the construction schedule. Vault cover was determined to be a long-lead item."

4.3.5.1. Please identify by number the valve that was to be place underground in a vault.
4.3.5.2. What valve station is this valve associated with?
4.3.5.3. Is this number a unique number?
4.3.5.4. If the answer to the previous question is "no," please provide sufficient additional identifiers to make the number a unique number.
4.3.5.5. Was this valve intended to be automated as part of the PSEP Valve Enhancement Plan?
4.3.5.6. Please state the date upon which SoCalGas learned that the City planned a future roadway on the existing pipeline easement requiring the valve to be placed underground in a vault.
4.3.5.7. Was this information uncovered during Stage 3 of the project?
4.3.5.8. If the answer to the previous question is "no," why wasn't the issue uncovered during the Stage 3 work?
4.3.5.9. Please state the date that the extensive redesign work, referred to in the description above, commenced.
4.3.5.10. Please state the date that the extensive redesign work was completed.
4.3.5.11. What was the incremental cost associated with the change in the project design resulting from the extensive redesign work?
4.3.5.12. What was the estimated construction time required in order to complete the newly designed project?
4.3.5.13. What was the estimated construction time required in order to complete the previous project design?
4.3.5.14. What was the estimated construction cost for completing the newly designed project?

4.3.5.15. What was the estimated construction cost for completing the previous project design?

4.3.5.16. Was the redesigned project reflected in the construction ready packet for Section 10 that was sent to the contractor?

4.3.5.17. If the answer to the previous question is "no," please explain why the redesigned project was not reflected in the construction ready packet.

RESPONSE 4.3.5:

4.3.5.1. 2001-139.76-0.

4.3.5.2. There is no valve station associated with this valve.

4.3.5.3. Yes, this is a unique number.

4.3.5.4. Not applicable.

4.3.5.5. This valve was not identified in the 2011 filing of the PSEP Valve Enhancement Plan, but upon installation, it fell within the scope of the Valve Enhancement Plan. See response TURN-SCGC DR-04 Q4.3.1.1.

4.3.5.6. SoCalGas was notified of the City's plans on September, 19, 2014.

4.3.5.7. No, this information was uncovered during Stage 5 (construction) which commenced August 18, 2014.

4.3.5.8. It was not discovered during Stage 3 because the plan was to install the valve above ground on private property. During Stage 4, approximately the first week of August 2014, the property owner declined to grant SoCalGas and SDG&E an above ground easement. The project was redesigned to put the valve and related equipment below grade, in the existing easement.

4.3.5.9. On August 15, 2014, SoCalGas and SDG&E commenced the redesign work.

4.3.5.10. October 16, 2014.

4.3.5.11. The increased Design Contractor's cost was $40,214 for the redesign. 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 change in project design.

4.3.5.12. The time to complete the newly designed project was 68 days, which includes awaiting the vault lid from 11/12/14 to 2/13/15.

4.3.5.13. The estimated construction time required to complete the previous project design was 17 days, from 10/14/14 to 11/5/14.

4.3.5.14. The increased Construction Contractor's cost was $620,416. 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 moving the valve into the vault.

4.3.5.15. The estimated construction cost for the previous design was $1,240,810.

4.3.5.16. No.

4.3.5.17. At the time of mobilization, the plan was to install the valve aboveground on private property.

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(4TH DATA REQUEST FROM TURN-SCGC)

Date Requested: June 19, 2017
Date Responded: July 11, 2017

QUESTION 4.3.6:

4.3.6. With respect to the statement on page WP-III-A123: "Section 11: The planned tie-in location on the east end had to be moved because of an obstruction with the storm drain; because the storm drain was not were the as-built showed it to be which caused an obstruction and caused the tie-in location to be moved. Land rights for the planned west end laydown yard could not be secured. The city provided access for our Baker tanks and associated construction equipment in the street, which resulted in the reduction of working hours to accommodate a bike race and a holiday moratorium. The west tie-in location was moved in order to not be in an intersection. Engineering review showed the need to provide service to a regulator station that was fed off of line 2001. A near-by supply line was tapped to provide a permanent feed into the existing regulator station."

4.3.6.1. Please state the date that SoCalGas discovered that the planned tie-in location on the east end had to be moved.

4.3.6.2. Please state the date that SoCalGas discovered that the land rights for the planned west end laydown yard could not secured.

4.3.6.3. Please state the date that SoCalGas was able to obtain access from the city for the Baker tanks and other equipment in the street.

4.3.6.4. Please explain why the Stage 3 design would have located the west tie-in location in an intersection?

4.3.6.5. Please state the date that SoCalGas realized that the west tie-in location had to be moved.

4.3.6.6. Please state the date that engineering review showed the need to use a nearby supply line to provide service to a regulator station associated with the Section 11 project.

4.3.6.7. Please explain why the Stage 3 design would have failed to identify this issue?

4.3.6.8. Was the redesigned project that reflected all of the limitations described above, that is, relocated east-end tie-in, relocated west-end tie-in, public access for Baker tanks and equipment, and need to feed supply from nearby supply line, reflected in the construction ready packet for Section 11 that was sent to the contractor?

4.3.6.9. If the answer to the previous question is "no," please explain why the redesigned project was not reflected in the construction ready packet.

RESPONSE 4.3.6:

4.3.6.1. October 30, 2014.

4.3.6.2. August 5, 2014.

4.3.6.3. October 27, 2014.

4.3.6.4. Workpapers misidentified the “east” tie-in location as the “west” tie-in location. The west tie-in location is not located in an intersection. SoCalGas identified this inadvertent error in responding to this data request and will prepare and submit a corrected workpaper. The east tie-in location was designed to be in the intersection. The design minimized the impact on the intersection, and it was a less traveled intersection.

4.3.6.5. Not applicable. See Response TURN-SCGC DR-04 Q4.3.6.4.

4.3.6.6. November 14, 2013.

4.3.6.7. Not applicable. See Response TURN-SCGC DR-04 Q4.3.6.4.

4.3.6.8. No, some of the redesign was in the construction ready packet for Section 11. It included the west-end tie-in location and the need to feed supply from nearby supply line.

4.3.6.9. The need to relocate the east-end tie-in arose during construction upon discovery of a storm drain.

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(4TH DATA REQUEST FROM TURN-SCGC)

Date Requested: June 19, 2017
Date Responded: July 11, 2017

QUESTION 4.3.7:

4.3.7. With respect to the statement on page WP-III-A126: "The hydrotest of Section 10 was executed with 2.0288 miles of pipe that parallels Wilson Street in the City of Banning. The construction lasted 28 weeks from mobilization to demobilization instead of the planned 9 weeks. The 2001 W B Section 10 MLV installation and shoring work is shown in Figure 7."

4.3.7.1. Please break down the 28 weeks into the following categories of time using dates or day numbers counting from the stated construction start date to indicate clearly when events took place:
4.3.7.1.1. Contractor mobilization
4.3.7.1.2. Contractor activity, listing separately each period of activity
4.3.7.1.3. Contractor inactivity, listing separately each period of inactivity
4.3.7.1.4. Contractor demobilization

RESPONSE 4.3.7:

4.3.7.1.1. August 18, 2014.

4.3.7.1.2.

- Final delivery date of material to perform Hydrotest: 8/25/14 to 10/9/14.
- Hydrotest date: 11/5/14 to 11/11/14.
- Tap disconnect date along with CNG Hook-up: 10/27/14 to 12/10/14.
- MLV Civil work actual start & end date: 11/12/14 to 2/13/15.
- 4-Inch Tap disconnect: 9/24/14 to 2/12/15

4.3.7.1.3. No Contractor inactivity.

4.3.7.1.4. February 27, 2015.

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(4TH DATA REQUEST FROM TURN-SCGC)

Date Requested: June 19, 2017
Date Responded: July 11, 2017

QUESTION 4.3.8:

4.3.8. **With respect to the statement on page WP-III-A126: "The hydrotest of Section 11 was executed with 0.906 miles of pipe in the City of Beaumont. The construction lasted 26 weeks from mobilization to demobilization instead of the planned 9 weeks."**

4.3.8.1. Please break down the 26 weeks into the following categories of time using dates or day numbers counting from the stated construction start date to indicate clearly when events took place:
4.3.8.1.1. Contractor mobilization
4.3.8.1.2. Contractor activity, listing separately each period of activity
4.3.8.1.3. Contractor inactivity, listing separately each period of inactivity
4.3.8.1.4. Contractor demobilization

RESPONSE 4.3.8:

4.3.8.1.1. October 27, 2014.

4.3.8.1.2. Contractor re-mobilization & Site Prep: 2/3/15 to 2/6/15
Prep for Hydrotest: 2/4/15 to 3/6/15
Restoration: 3/30/15 to 4/24/15

4.3.8.1.3 Contractor inactivity Demobilization #1: 11/27/14 to 2/3/15

4.3.8.1.4. April 24, 2015.

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(4TH DATA REQUEST FROM TURN-SCGC)

Date Requested: June 19, 2017
Date Responded: July 11, 2017

QUESTION 4.3.9:

4.3.9. With respect to the statement on page WP-III-A127: "Construction consisted of replacement of 24 feet of 30 in diameter pipe at Valve Station 21A in Beaumont, MLV 2001-193.31-0. The construction lasted 18 weeks from mobilization to demobilization instead of the planned 9 weeks"

4.3.9.1. Please break down the 18 weeks into the following categories of time using dates or day numbers counting from the stated construction start date to indicate clearly when events took place:
4.3.9.1.1. Contractor mobilization
4.3.9.1.2. Contractor activity, listing separately each period of activity
4.3.9.1.3. Contractor inactivity, listing separately each period of inactivity
4.3.9.1.4. Contractor demobilization
4.3.9.2. Is the valve number MLV 2001-193.31-0 referenced in the above quotation a unique number?
4.3.9.3. If the answer to the previous question is "no," please provide additional identifiers sufficient to provide a unique number to be associated with the valve.

RESPONSE 4.3.9:

4.3.9.1.1. October 13, 2014.

4.3.9.1.2. Prep for Hydrotest: 10/15/14 to 10/24/14
Isolation Complete: 1/3/15
Hydrotest Complete: 1/6/15
Tie-In Complete: 1/22/15

4.3.9.1.3. Contractor inactivity: Nov 27, 2014 to January 5, 2015.

4.3.9.1.4. February 13, 2015.

4.3.9.2. Yes.

4.3.9.3. Not applicable.

SOUTHERN CALIFORNIA GAS COMPANY
SAN DIEGO GAS & ELECTRIC COMPANY

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)

(4TH DATA REQUEST FROM TURN-SCGC)

Date Requested: June 19, 2017
Date Responded: July 11, 2017

QUESTION 4.3.10:

4.3.10. With respect to the statement on page WP-III-A127: "A permanent easement was needed for the original MLV design, but could not be acquired from the landowner. This required a design change and delayed the MLV installation. The only viable alternative was in the city owned property that was to be paved. This changed the scope from an above ground to underground MLV in a vault."

4.3.10.1. Please identify the MLV the is referenced in the above quote using a unique identifier.
4.3.10.2. Please provide the date that SoCalGas was informed by the landowner that the permanent easement could not be acquired.
4.3.10.3. Please identify the period of delay associated with this redesign work.
4.3.10.4. Did the delay take place after the construction site was mobilized?
4.3.10.5. Please identify the cost increase associated with the redesign work.
4.3.10.6. 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.
4.3.10.7. 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 4.3.10:

4.3.10.1. 2001-139.76-0.

4.3.10.2. September 9, 2014.

4.3.10.3. The period of delay was 2 months. The total project delay due to the MLV redesign was 1 month. The redesign took place from August 15 to October 16, 2014.

4.3.10.4. Yes.

4.3.10.5. See response to TURN-SCGC DR-04 Q4.3.5.14.

SOUTHERN CALIFORNIA GAS COMPANY
SAN DIEGO GAS & ELECTRIC COMPANY

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)

(4TH DATA REQUEST FROM TURN-SCGC)

Date Requested: June 19, 2017
Date Responded: July 11, 2017

4.3.10.6-7 The attached supporting documents include Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024. Copies of change orders, Requests for Information (RFIs) and Contract Amendments are provided in the attachment folder.

SOUTHERN CALIFORNIA GAS COMPANY
SAN DIEGO GAS & ELECTRIC COMPANY

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)

(4TH DATA REQUEST FROM TURN-SCGC)

Date Requested: June 19, 2017
Date Responded: July 11, 2017

QUESTION 4.3.11:

4.3.11. **With respect to the statement on page WP-III-A127: "The feed for SL41-167 was changed to outside the limits of the hydrotest on Section 10 in order to provide a continue supply of gas to customers. During construction a simpler design was developed in order to avoid dead end piping. This resulted in an additional delay for redesign and procurement of new materials.**

4.3.11.1. Is SL41-167 the line segment that was being pressure tested?
4.3.11.2. If the answer to the previous question is "no," please identify the location and function of SL41-167 relative to the line being pressure tested.
4.3.11.3. Provide a detailed explanation of the pipe or other equipment that is addressed by the statement: "a simpler design was developed in order to avoid dead end piping."
4.3.11.4. Why wasn't this simpler design identified in Phase 3 or Phase 4 of the project?
4.3.11.5. Please identify the period of delay associated with this redesign work and procurement of new materials.
4.3.11.6. Did the delay take place after the construction site was mobilized?
4.3.11.7. Please identify the cost increase associated with the redesign work and of new materials.
4.3.11.8. 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.
4.3.11.9. 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.

SOUTHERN CALIFORNIA GAS COMPANY
SAN DIEGO GAS & ELECTRIC COMPANY

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)

(4TH DATA REQUEST FROM TURN-SCGC)

Date Requested: June 19, 2017
Date Responded: July 11, 2017

RESPONSE 4.3.11:

4.3.11.1. No.

4.3.11.2. Supply Line 41-167 is fed by transmission line 2001 West via a tap near the intersection of Wilson Street and Hathaway Street. It is an alternate feed to the regulator station. In order to facilitate the strength test of Line 2001 West, the tap valve to Supply Line 41-167 needed to be closed and the existing line needed to be isolated from the test.

4.3.11.3. During construction, the decision was made to alter the tie-in from a tee to an elbow in order to remove the "dead-end piping."

4.3.11.4. The scope during design was to tie into the active line, but during construction, District Operations identified that the line was dead-end piping that could be abandoned, further enhancing safety.

4.3.11.5. The period of delay associated with this redesign work was from 10/3/2014 to 10/13/2014.

4.3.11.6. Yes.

4.3.11.7. The increased Construction Contractor's cost was $51,362. 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 redesign.

4.3.11.8-9 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 Request for Information (RFI) and Contract Amendment are provided in the attachment folder.

SOUTHERN CALIFORNIA GAS COMPANY
SAN DIEGO GAS & ELECTRIC COMPANY

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)

(4TH DATA REQUEST FROM TURN-SCGC)

Date Requested: June 19, 2017
Date Responded: July 11, 2017

QUESTION 4.3.12:

4.3.12. With respect to the statement on page WP-III-A127: "Due to gas transmission system capacity constraints, the hydrotest was postponed and demobilized on 11/27/14. The project was not able to remobilize until the late spring. The City of Beaumont required SoCalGas to backfill the excavation and pave the street due to the delay before remobilizing the construction site."

4.3.12.1. Given the expected timeframe for completing Section 11 of the project was nine weeks, why was the Section 11 project mobilized on October 27 when nine weeks would include the month of December, which is typically the coldest month on SoCalGas' system and cold weather would be reasonably be expected to result in transmission system capacity constraints?

4.3.12.2. What was the incremental cost of demobilizing Section 11 of the project on November 27?

4.3.12.3. What was the incremental cost of backfilling the excavation and paving the street to meet the City of Beaumont's requirements after demobilization?

4.3.12.4. What was the incremental cost of remobilizing Section 11 of the project in the late spring of the following year?

4.3.12.5. 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 demobilization, remobilization, backfilling and paving activities described above in the cited quotation.

4.3.12.6. 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.

SOUTHERN CALIFORNIA GAS COMPANY
SAN DIEGO GAS & ELECTRIC COMPANY

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)

(4TH DATA REQUEST FROM TURN-SCGC)

Date Requested: June 19, 2017
Date Responded: July 11, 2017

RESPONSE 4.3.12:

4.3.12.1. The decision to mobilize before these materials were received was based on the Commission's direction to test or replace PSEP pipeline segments "as soon as practicable," and the construction sequencing of when these materials were anticipated to be required.

4.3.12.2. The incremental cost of demobilizing, backfilling, paving and remobilizing was not estimated by the Construction Contractor. The Construction Contractor re-estimated the amount to complete the project, less milestones already paid.

The increased Construction Contractor's cost was $297,061. 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.

4.3.12.3. See Response TURN-SCGC DR-04 Q4.3.12.2.

4.3.12.4. See Response TURN-SCGC DR-04 Q4.3.12.2.

4.3.12.5-6 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 Request for Information (RFI) and Contract Amendment are provided in the attachment folder.

SOUTHERN CALIFORNIA GAS COMPANY
SAN DIEGO GAS & ELECTRIC COMPANY

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)

(4TH DATA REQUEST FROM TURN-SCGC)

Date Requested: June 19, 2017
Date Responded: July 11, 2017

QUESTION 4.3.13:

4.3.13. With respect to the statement on page WP-III-A128: "The laydown yard was located 6.4 miles away from the construction site due to the inability to secure a TRE closer. Section 10's laydown yard was utilized; however, this added logistical complexities with the transport of heavy equipment and materials."

4.3.13.1. What was the estimated cost associated with the TRE that SoCalGas expected to obtain to support the Section 11 project?

4.3.13.2. What is estimated delay or increased cost that occurred because the Section 10 and Section 11 projects shared the same laydown yard?

4.3.13.3. 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 sharing of the laydown yard between the Section 10 and Section 11 projects as described above in the cited quotation.

4.3.13.4. 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 4.3.13:

4.3.13.1 SoCalGas and SDG&E did not prepare an estimated cost for the temporary right-of-entry (TRE). The landowner rejected the TRE before an offer was extended.

4.3.13.2. None.

4.3.13.3-4 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 Request for Information (RFI) and Contract Amendment are provided in the attachment folder.

SOUTHERN CALIFORNIA GAS COMPANY
SAN DIEGO GAS & ELECTRIC COMPANY

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)

(4TH DATA REQUEST FROM TURN-SCGC)

Date Requested: June 19, 2017
Date Responded: July 11, 2017

QUESTION 4.3.14:

4.3.14. With respect to the statement on page WP-III-A128: "Footage was added in order to secure an accessible location for the test heads. The tie in point was moved to avoid impacts to an existing culvert, unknown during design, which added additional footage."

4.3.14.1. Why didn't the Phase 3 and Phase 4 work result in the identification of a feasible location for the test heads?

4.3.14.2. Did the identification of the problem with the test head access point take place prior to or after the construction site had been mobilized?

4.3.14.3. Did the movement of the location for the test heads in this situation result in the addition of 816 feet of incidental mileage to the project?

4.3.14.4. What was the incremental cost associated with the movement of the test head access point which resulted in an 816-foot increase in testing mileage?

4.3.14.5. What was the incremental delay in the Section 11 project associated with the movement of the test head access point?

4.3.14.6. 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 movement of the test head access point as described above in the cited quotation.

4.3.14.7. 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 4.3.14:

4.3.14.1. The Stage 3 and 4 design identified a location for the test heads that proved unworkable because the culvert that was not discovered until Stage 5 (Construction).

4.3.14.2. The identification of the culvert occurred after the construction site had been mobilized, during construction.

4.3.14.3. No. Approximately 100 feet of the 816 feet of incidental pipe is attributable to the movement of the east test head following identification of the culvert.

4.3.14.4. See Response TURN-SCGC DR-04 Q4.3.14.3. The incremental cost of moving the test head was not estimated by the Construction Contractor. The Construction Contractor re-estimated the amount to complete the project, less milestones already paid. The Contractor Change Order cost was $297,061; this cost included demobilization, restoration, remobilization, re-excavation, relocating the east tie-in and installing the tap. 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 the movement of this test head.

4.3.14.5. There was no project delay associated with moving the test head.

4.3.14.6-7 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 Request for Information (RFI) and Contract Amendment are provided in the attachment folder.

SOUTHERN CALIFORNIA GAS COMPANY
SAN DIEGO GAS & ELECTRIC COMPANY

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)

(4TH DATA REQUEST FROM TURN-SCGC)

Date Requested: June 19, 2017
Date Responded: July 11, 2017

QUESTION 4.3.15:

4.3.15. With respect to the statement on page WP-III-A128: "To support water conservation, the test water was reused for the two hydrotests."

4.3.15.1. What was the estimated cost associated with the water that SoCalGas expected to obtain to support the Section 11 project?
4.3.15.2. Was there any cost associated with using the Section 10 water in the Section 11 hydrotest?
4.3.15.3. If the answer to the previous question is "yes," please identify how much cost was associated with the sharing of water between the Section 10 and Section 11 projects.
4.3.15.4. Did the sharing of the water for the two hydrotests cause any delay in either project?
4.3.15.5. If the answer to the previous question is "yes," please identify how much delay was associated with the sharing of water between the Section 10 and Section 11 projects.

RESPONSE 4.3.15:

4.3.15.1. The cost estimate assumed sharing water between Sections 10 and 11; therefore, no separate estimate was developed for the water acquisition for Section 11.

4.3.15.2 Yes, additional sampling of the water was required to ensure the water met SoCalGas Pipeline Integrity corrosion standards.

4.3.15.3. The increased Construction Contractor's cost was $716. 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 the sharing of water.

4.3.15.4. No.

4.3.15.5. Not applicable.

SOUTHERN CALIFORNIA GAS COMPANY
SAN DIEGO GAS & ELECTRIC COMPANY

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)

(4TH DATA REQUEST FROM TURN-SCGC)

Date Requested: June 19, 2017
Date Responded: July 11, 2017

QUESTION 4.3.16:

4.3.16. With respect to the statement on page WP-III-A128: "Section 14: Due to system capacity constraints, the hydrotest was postponed and demobilized on 11/27/14. The project was not able to remobilize until the late spring."

4.3.16.1. Is this a correct statement given that the Section 14 project was a replacement rather than a hydrotest project?

4.3.16.2. Given the expected timeframe for completing Section 14 of the project was nine weeks, why was the Section 14 project mobilized on October 13 when nine weeks would include half of the month of December, which is typically the coldest month on SoCalGas' system and cold weather would be reasonably be expected to result in transmission system capacity constraints?

4.3.16.3. What was the incremental cost of demobilizing Section 14 of the project on November 27?

4.3.16.4. What was the incremental cost of remobilizing Section 14 of the project in the late spring of the following year?

4.3.16.5. 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 demobilization, remobilization, backfilling and paving activities described above in the cited quotation.

4.3.16.6. 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 4.3.16:

4.3.16.1. Yes. Replacement pipe is pressure tested prior to being placed in service.

4.3.16.2. The decision to mobilize before these materials were received was based on the Commission's direction to test or replace PSEP pipeline segments "as soon as practicable," and the construction sequencing of when these materials were anticipated to be required.

4.3.16.3. The increased Construction Contractor's cost was $68,167. 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.

4.3.16.4. See Response TURN-SCGC DR-04 Q4.3.16.3

4.3.16.5-6 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 Request for Information (RFI) and Contract Amendment are provided in the attachment folder.

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

DECLARATION OF JEFFERY SALAZAR REGARDING CONFIDENTIALITY OF CERTAIN DATA/DOCUMENTS PURSUANT TO D.16-08-024

I, Jeffery Salazar, do declare as follows:

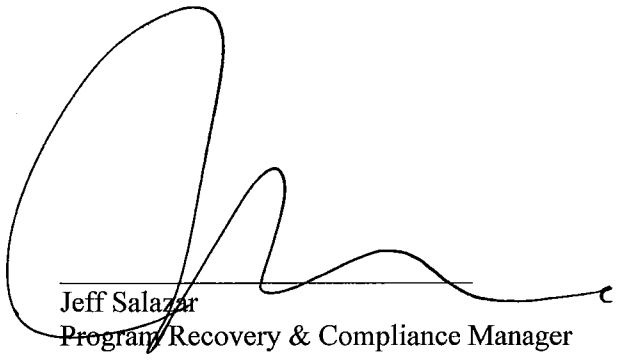
1. I am a Program Recovery & Compliance Manager in the Major Programs & Project Controls for San Diego Gas & Electric Company ("SDG&E") and Southern California Gas Company ("SoCalGas") designated by Jimmie Cho, Senior Vice President, Gas Operations and System Integrity for SDG&E and SoCalGas. I have been delegated authority to sign this declaration by Mr. Cho. I have reviewed the Response of SoCalGas and SDG&E to the Fourth 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 Fourth 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 Fourth 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 3rd day of July, 2017, at Los Angeles, California.



Jeff Salazar
Program Recovery & Compliance Manager

ATTACHMENT A

SoCalGas and SDG&E Request Confidential Treatment of the Following Information in Their Response to TURN-SCGC's Fourth 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 Fourth 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 Fourth 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). The yellow highlighted portions on the pages identified in the table below fall within the category of employee identifying information. The yellow highlighted portions on the pages identified in the table below fall within the category of employee identifying information.

DATA / INFORMATION	JUSTIFICATION FOR CONFIDENTIALITY	ATTACHMENTS
Pipeline attribute (i.e. diameter, pressure, and location)	This information has been identified as confidential protected information as this data constitutes sensitive critical energy infrastructure information that is not currently published by the PHMSA and, if made publicly available, could present a risk to the security of the SoCalGas and SDG&E pipeline system and California's critical energy infrastructure. CEII: 18 CFR §388.113(c); FERC Orders 630, 643, 649, 662, 683, and 702 (defining CEII). Critical Infrastructure Information: 6 U.S.C. §§131(3), 133(a)(1)(E); 6 CFR §§ 29.2(b), 29.8 (defining CII and restricting its disclosure). Gov't Code § 6254(e) ("Geological and geophysical data, plant production data, and similar information relating to utility systems development, or market or crop reports, that are obtained in confidence from any person.") Gov't Code § 6254 (ab) ("Critical infrastructure information, as defined in Section 131(3) of Title 6 of the United States Code, that is voluntarily submitted to the Office of Emergency Services for use by that office")	Q4.1.04.3-4 CONFIDENTIAL Line 2000 W Whittier_CO_980035: pp.2 Q4.1.04.3-4 CONFIDENTIAL Line 2000 W Whittier_CO_980036: pp.2 Q4.1.04.3-4 CONFIDENTIAL Line 2000 W Whittier_CO_980046: pp.2 Q4.1.05.3-4 CONFIDENTIAL Line 2000 W Pico Rivera_CO_980004: pp.2 Q4.1.05.3-4 CONFIDENTIAL Line 2000 W Pico Rivera_CO_980006: pp.2 Q4.1.05.3-4 CONFIDENTIAL Line 2000 W Pico Rivera_CO_980008: pp.2 Q4.1.06.3-4 CONFIDENTIAL Line 2000 W Commerce_CO_980002: pp.1-2,4 Q4.1.06.3-4 CONFIDENTIAL Line 2000 W Commerce_CO_980005: pp.2 Q4.1.06.3-4 CONFIDENTIAL Line 2000 W Commerce_CO_980010: pp.2 Q4.2.02.7-8 CONFIDENTIAL Line 2001 W A_Section 15 16_RFI 1: pp.2 Q4.2.03.4-5 CONFIDENTIAL Line 2001 W A_Section 15 16 RFI 1: pp.2 Q4.3.10.6-7 CONFIDENTIAL L-2001 W B_RFIs: pp.1, 5, 7 Q4.3.11.8-9 CONFIDENTIAL Line 2001 W B_Section 10_RFI No. 3: pp.1 Q4.3.12.5-6 CONFIDENTIAL Line 2001 W B_Section 11_RFI 1: pp.1 Q4.3.12.5-6 CONFIDENTIAL Line 2001 W B_WA3_EX 031815: pp.2 Q4.3.13.3-4 CONFIDENTIAL Line 2001 W B_Section 11_RFI 1: pp.1 Q4.3.13.3-4 CONFIDENTIAL Line 2001 W B_WA3_EX 031815: pp.2 Q4.3.14.6-7 CONFIDENTIAL Line 2001 W B_Section 11_RFI 1: pp.1 Q4.3.14.6-7 CONFIDENTIAL Line 2001 W B_WA3_EX 031815: pp.2
Vendor information	Vendor names, bid and pricing information have been marked as confidential protected information as publicly disclosing this information could lead to a competitive disadvantage and potential loss of market share for those vendors. *See, e.g.*, D.11-01-36, 2011 WL 660568 (2011) GO 66-C Sections 2.2(b), 2.8 Gov't Code § 6254.15 (disclosure not required for	Q4.1.04.3-4 CONFIDENTIAL Line 2000 W Whittier_CO_980033: pp.1-3 Q4.1.04.3-4 CONFIDENTIAL Line 2000 W Whittier_CO_980002: pp.1-3 Q4.1.04.3-4 CONFIDENTIAL Line 2000 W Whittier_CO980022: pp.1-3 Q4.1.04.3-4 CONFIDENTIAL Line 2000 W Whittier_CO_980035: pp.1-3 Q4.1.04.3-4 CONFIDENTIAL Line 2000 W Whittier_CO_980036: pp.1-3 Q4.1.04.3-4 CONFIDENTIAL Line 2000 W Whittier_CO_980046: pp.1-2 Q4.1.04.3-4 CONFIDENTIAL Line 2000 W Whittier_CO_980049: pp.1-2 Q4.1.04.3-4 CONFIDENTIAL Line 2000 W Whittier_CO_980050: pp.1-3 Q4.1.05.3-4 CONFIDENTIAL Line 2000 W Pico Rivera_CO_980001: pp.1-2 Q4.1.05.3-4 CONFIDENTIAL Line 2000 W Pico Rivera_CO_980003: pp.1-3 Q4.1.05.3-4 CONFIDENTIAL Line 2000 W Pico Rivera_CO_980004: pp.1-3

	"corporate financial records, corporate proprietary information including trade secrets, and information relating to siting within the state furnished to a government agency by a private company for the purpose of permitting the agency to work with the company in retaining, locating, or expanding a facility within California") Gov't Code §6254.7(d) (relating to trade secrets) Gov't Code § 6254(k); Evid. Code §1060; Civil Code §3426	Q4.1.05.3-4 CONFIDENTIAL Line 2000 W Pico Rivera_CO_980006: pp.1-3 Q4.1.05.3-4 CONFIDENTIAL Line 2000 W Pico Rivera_CO_980008: pp.1-3 Q4.1.05.3-4 CONFIDENTIAL Line 2000 W Pico Rivera_CO_980010: pp.1-3 Q4.1.06.3-4 CONFIDENTIAL Line 2000 W Commerce_CO_980002: pp.1-4 Q4.1.06.3-4 CONFIDENTIAL Line 2000 W Commerce_CO_980005: pp.1-2 Q4.1.06.3-4 CONFIDENTIAL Line 2000 W Commerce_CO_980010: pp.1-3 Q4.1.06.3-4 CONFIDENTIAL Line 2000 W Commerce_CO_980011: pp.1-3 Q4.2.02.7-8 CONFIDENTIAL Line 2001 W A_Section 15 16_RFI 1: pp.1-2 Q4.2.03.4-5 CONFIDENTIAL Line 2001 W A_Section 15 16 RFI 1: pp.1-2 Q4.3.10.6-7 CONFIDENTIAL L-2001 W B_CO 82-107: pp.1-2 Q4.3.10.6-7 CONFIDENTIAL L-2001 W B_RFIs: pp.1-8 Q4.3.10.6-7 CONFIDENTIAL Line 2001 W B_WA5_EX 121615: pp.1,3 Q4.3.11.8-9 CONFIDENTIAL Line 2001 W B_Section 10_RFI No. 3: pp.1-2 Q4.3.11.8-9 CONFIDENTIAL Line 2001 W B_WA4_EX 100715: pp.1-2 Q4.3.12.5-6 CONFIDENTIAL Line 2001 W B_Section 11_RFI 1: pp.1-2 Q4.3.12.5-6 CONFIDENTIAL Line 2001 W B_WA3_EX 031815: pp.1,3 Q4.3.13.3-4 CONFIDENTIAL Line 2001 W B_Section 11_RFI 1: pp.1-2 Q4.3.13.3-4 CONFIDENTIAL Line 2001 W B_WA3_EX 031815: pp.1,3 Q4.3.14.6-7 CONFIDENTIAL Line 2001 W B_Section 11_RFI 1: pp.1-2 Q4.3.14.6-7 CONFIDENTIAL Line 2001 W B_WA3_EX 031815: pp.1,3 Q4.3.16.5-6 CONFIDENTIAL Line 2001 W B_Section 14_RFI No. 2: pp.1-2 Q4.3.16.5-6 CONFIDENTIAL Line 2001 W B_WA3_EX 111715: pp.1-2
Employee identifying information (e.i. names, signatures, other contact information)	Public disclosure of staff level employee names, signatures, and other contact information is being prevented to protect against privacy, employee security, identity theft, and cyber-security risks. Gov't Code § 6254(c); Gov't Code 6255; Civil Code §§ 1798.3 & 1798.24 (the California Information Practices Act); Cal. Const., Art. I, § 1 (California constitutional right to privacy).	Q4.1.04.3-4 CONFIDENTIAL Line 2000 W Whittier_CO_980033: pp.3 Q4.1.04.3-4 CONFIDENTIAL Line 2000 W Whittier_CO_980002: pp.2-3 Q4.1.04.3-4 CONFIDENTIAL Line 2000 W Whittier_CO980022: pp.2-3 Q4.1.04.3-4 CONFIDENTIAL Line 2000 W Whittier_CO_980035: pp.2-3 Q4.1.04.3-4 CONFIDENTIAL Line 2000 W Whittier_CO_980036: pp.2-3 Q4.1.05.3-4 CONFIDENTIAL Line 2000 W Pico Rivera_CO_980001: pp.2 Q4.1.05.3-4 CONFIDENTIAL Line 2000 W Pico Rivera_CO_980003: pp.2-3 Q4.1.05.3-4 CONFIDENTIAL Line 2000 W Pico Rivera_CO_980004: pp.3 Q4.1.05.3-4 CONFIDENTIAL Line 2000 W Pico Rivera_CO_980006: pp.3 Q4.1.05.3-4 CONFIDENTIAL Line 2000 W Pico Rivera_CO_980008: pp.2-3 Q4.1.06.3-4 CONFIDENTIAL Line 2000 W Commerce_CO_980002: pp.3 Q4.1.06.3-4 CONFIDENTIAL Line 2000 W Commerce_CO_980005: pp.2 Q4.1.06.3-4 CONFIDENTIAL Line 2000 W Commerce_CO_980010: pp.3 Q4.1.06.3-4 CONFIDENTIAL Line 2000 W Commerce_CO_980011: pp.2-3 Q4.2.02.7-8 CONFIDENTIAL Line 2001 W A_Section 15 16_RFI 1: pp.2 Q4.2.03.4-5 CONFIDENTIAL Line 2001 W A_Section 15 16 RFI 1: pp.2 Q4.3.10.6-7 CONFIDENTIAL L-2001 W B_CO 82-107: pp.1-2 Q4.3.10.6-7 CONFIDENTIAL L-2001 W B_RFIs: pp.1-2, 4-8

		Q4.3.10.6-7 CONFIDENTIAL Line 2001 W B_WA5_EX 121615: pp.1,3 Q4.3.11.8-9 CONFIDENTIAL Line 2001 W B_Section 10_RFI No. 3: pp.1-2 Q4.3.11.8-9 CONFIDENTIAL Line 2001 W B_WA4_EX 100715: pp.1-2 Q4.3.12.5-6 CONFIDENTIAL Line 2001 W B_Section 11_RFI 1: pp.2 Q4.3.12.5-6 CONFIDENTIAL Line 2001 W B_WA3_EX 031815: pp.1,3 Q4.3.13.3-4 CONFIDENTIAL Line 2001 W B_Section 11_RFI 1: pp.2 Q4.3.13.3-4 CONFIDENTIAL Line 2001 W B_WA3_EX 031815: pp.1,3 Q4.3.14.6-7 CONFIDENTIAL Line 2001 W B_Section 11_RFI 1: pp.2 Q4.3.14.6-7 CONFIDENTIAL Line 2001 W B_WA3_EX 031815: pp.1,3 Q4.3.16.5-6 CONFIDENTIAL Line 2001 W B_Section 14_RFI No. 2: pp.2 Q4.3.16.5-6 CONFIDENTIAL Line 2001 W B_WA3_EX 111715: pp.1-2