

**ORA DATA REQUEST
ORA-SCG-014-DAO
SOCALGAS 2019 GRC – A.17-10-008
SOCALGAS RESPONSE
DATE RECEIVED: NOVEMBER 16, 2017
DATE RESPONDED: NOVEMBER 04, 2017**

Exhibit Reference: SCG-04 Testimony and Workpapers

Subject: Gas Distribution O&M—Cathodic Protection

Please provide the following:

1. Referring to SCG’s workpapers, pages 46 to 48, please provide the following:
 - a. A breakdown of the total expenses incurred each year from 2012-2016, and the 2019 forecast, by each of the factors discussed on page 46 under the “Forecast Explanations” heading: (i) aging infrastructure, (ii) municipality requirements, and (iii) material degradation.
 - b. For each year from 2012-2016, please provide the amount incurred for cathodic protection each year to mitigate medium pressure pipeline failure.
 - c. Identify the unit of work for cathodic protection (packages? miles?), and provide the recorded units of work for each year from 2012-2016.

SoCalGas Response 1:

- a. SoCalGas does not separately track expenses incurred for cathodic protection using the factors of aging infrastructure, municipality requirements, and material degradation. These factors describe the major reasons to maintain or replace cathodic protection facilities, and often interact together in such a manner that they are not exclusive.
- b. For purposes of this question, SoCalGas interprets “medium-pressure pipelines” to mean 60 pounds per square inch (psi) and below. SoCalGas Gas Distribution maintains both medium- and high-pressure steel pipelines. SoCalGas tracks cathodic protection costs for all gas distribution pipes under one cost category and therefore a break-down between medium and high pressure is not available. Approximately 80% of the steel pipe that Gas Distribution operates is medium pressure. The table below provides the costs Gas Distribution incurred annually from 2012 through 2016 for cathodic protection.

In Thousands of 2016 dollars	2012	2013	2014	2015	2016
Total	\$9,658	\$9,898	\$12,231	\$12,640	\$14,403

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SoCalGas Response 1:

- c. The table below contains the historical number of Cathodic Protection (CP) areas and read points.

	2012	2013	2014	2015	2016
Number of CP Areas / Packages	20,099	20,044	20,073	20,072	19,963
Number of CP Area Read Points	44,142	44,145	44,328	44,632	44,697
Miles of Pipe under CP¹	17,624	18,112	18,282	18,183	18,198

¹ This number excludes DOT-defined Transmission lines.

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2. Please provide a copy of SCG's annual performance measure report on its Integrity Management program and pipeline infrastructure as required by Code of Federal Regulations (CFR) 49 Subpart P 192.1007(C4.g) of the US Department of Transportation's Pipeline Hazardous Materials and Safety Administration (PHMSA) from 2012-2016.

SoCalGas Response 2:

The Distribution Integrity Management Program (DIMP), referenced in 49 CFR Subpart P 192.1007, is represented in this GRC by Maria Martinez, who sponsors Exhibit SCG-14; future data requests regarding DIMP may be referred to her.

The relevant portions of the reports are shown in the accompanying file ORA-SCG-014-DAO Q2_(PHMSA) EOY 2012-2016 as images copied from the larger reports.

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3. Provide the annual recorded expenses for cathodic protection as part of the Distribution Integrity Management Program (DIMP) spending from 2012-2016.

SoCalGas Response 3:

SoCalGas' Distribution Integrity Management Program (DIMP) does not have recorded expenses regarding cathodic protection from years 2012-2016, as this item is not tracked by DIMP. The DIMP is represented in this GRC by Maria Martinez, who sponsors Exhibit SCG-14; future data requests regarding DIMP may be referred to her.

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4. What is the DIMP forecast for cathodic protection for 2019? Please provide a reference to SCG's testimony and workpapers regarding this request.

SoCalGas Response 4:

Cathodic protection expenses are not forecasted as part of the Distribution Integrity Management Program (DIMP), as this item is not tracked by DIMP. Thus, there is no forecast in 2019 for cathodic protection under DIMP. The DIMP is represented in this GRC by Maria Martinez, who sponsors Exhibit SCG-14; future data requests regarding DIMP may be referred to her.