

TURN DATA REQUEST-029
SDG&E-SOCALGAS 2019 GRC – A.17-11-007/8
SDG&E_SOCALGAS RESPONSE
DATE RECEIVED: MARCH 15, 2018
DATE RESPONDED: MARCH 30, 2018

1. Re SCE-04-WP p. 63: Re. Damage Credits for each year 2012-2016: Please provide the top 10 (by \$) damage credit payments for each year, showing for each payment:

- a. The date of the damage incident
- b. The amount requested/estimated by SCG
- c. The amount paid by third party
- d. The date payment was made
- e. Whether SCG sued to obtain payment. If so, whether there was a court order or settlement.

Utility Response 01:

SoCalGas interprets the scope of this question to encompass only damage credits for Main Maintenance based on the Workpaper reference page 63 that precedes the request.

SoCalGas objects to this request under Rule 10.1 of the Commission’s Rules of Practice and Procedure to the extent that portions of this question regarding the means and/or methods to obtain payment seek production of information that is neither relevant to the subject matter involved in proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence, and is outside the scope of this proceeding. Subject to and without waiving the foregoing objection, SoCalGas responds as follows:

Please see the following tables in response to 1a-d.

2012 Top 10 Damage Credit Payments	Date (A)	Amount Requested/ Estimated (B)	Amount Paid by 3rd party (C)	Date Payment was made (D)
Incident – Main Damage	8/21/2010	\$101,703	\$101,703	02/14/2012
Incident – Main Damage	5/6/2010	\$16,267	\$16,000	05/30/2012
Incident – Main Damage	3/11/2010	\$13,155	\$13,155	08/03/2012
Incident – Main Damage	6/9/2011	\$10,661	\$10,661	11/28/2012
Incident – Main Damage	10/20/2010	\$11,357	\$10,221	01/10/2012
Incident – Main Damage	8/9/2011	\$9,852	\$9,852	08/22/2012
Incident – Main Damage	4/9/2009	\$18,443	\$9,222	04/27/2012
Incident – Main Damage	1/4/2010	\$10,809	\$8,841	10/24/2012
Incident – Main Damage	4/5/2011	\$7,049	\$7,049	02/09/2012
Incident – Main Damage	8/30/2011	\$7,474	\$7,045	02/22/2012

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2013 Top 10 Damage Credit Payments	Date (A)	Amount Requested/ Estimated (B)	Amount Paid by 3rd party (C)	Date Payment was made (D)
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Incident – Main Damage	7/14/2009	\$121,798	\$121,798	08/02/2013
Incident – Main Damage	4/18/2013	\$32,411	\$32,411	12/30/2013
Incident – Main Damage	2/23/2011	\$30,188	\$30,188	07/29/2013
Incident – Main Damage	10/22/2012	\$21,515	\$17,500	06/12/2013
Incident – Main Damage	1/19/2011	\$18,175	\$15,800	03/27/2013
Incident – Main Damage	3/13/2013	\$12,346	\$12,346	11/07/2013
Incident – Main Damage	10/8/2012	\$9,886	\$9,886	06/06/2013
Incident – Main Damage	9/9/2010	\$9,452	\$9,000.00	03/12/2013
Incident – Main Damage	10/9/2012	\$8,527	\$8,527	06/06/2013
Incident – Main Damage	8/5/2009	\$8,414	\$8,414	08/05/2013

2014 Top 10 Damage Credit Payments	Date (A)	Amount Requested/ Estimated (B)	Amount Paid by 3rd party (C)	Date Payment was made (D)
Incident – Main Damage	6/11/2012	\$36,804	\$36,804	05/21/2014
Incident – Main Damage	6/21/2012	\$29,286	\$29,286	04/15/2014
Incident – Main Damage	1/23/2014	\$21,320	\$21,320	06/20/2014
Incident – Main Damage	5/12/2010	\$21,073	\$20,000	10/11/2014
Incident – Main Damage	8/16/2013	\$19,116	\$19,116	03/26/2014
Incident – Main Damage	7/24/2013	\$16,611	\$16,611	04/08/2014
Incident – Main Damage	2/22/2012	\$16,284	\$16,284	09/04/2014
Incident – Main Damage	9/10/2013	\$14,703	\$14,703	10/16/2014
Incident – Main Damage	1/7/2014	\$14,319	\$14,319	11/25/2014
Incident – Main Damage	10/28/2013	\$13,038	\$13,038	03/13/2014

2015 Top 10 Damage Credit Payments	Date (A)	Amount Requested/ Estimated (B)	Amount Paid by 3rd party (C)	Date Payment was made (D)
Incident – Main Damage	4/8/2014	\$86,982	\$78,200	01/08/2015
Incident – Main Damage	11/5/2013	\$32,231	\$32,231	08/04/2015
Incident – Main Damage	8/23/2013	\$17,796	\$17,796	01/27/2015
Incident – Main Damage	2/14/2014	\$17,402	\$16,000	08/14/2015
Incident – Main Damage	5/14/2014	\$11,728	\$11,728	04/24/2015
Incident – Main Damage	8/30/2012	\$11,299	\$11,299	10/16/2015
Incident – Main Damage	2/18/2014	\$12,568	\$11,000	06/12/2015
Incident – Main Damage	1/18/2014	\$10,612	\$10,612	11/09/2015
Incident – Main Damage	1/22/2014	\$8,733	\$8,733	01/22/2015
Incident – Main Damage	8/27/2013	\$8,597	\$8,597	02/24/2015

2016 Top 10 Damage Credit Payments	Date (A)	Amount Requested/E stimated (B)	Amount Paid by 3rd party (C)	Date Payment was made (D)
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Incident – Main Damage	1/30/2015	\$74,634	\$74,634	06/30/2016
Incident – Main Damage	7/23/2014	\$24,430	\$24,400.00	10/12/2016
Incident – Main Damage	10/27/2014	\$22,312	\$22,312	05/10/2016
Incident – Main Damage	7/15/2013	\$15,997	\$15,997	09/21/2016
Incident – Main Damage	7/1/2013	\$12,798	\$12,798	12/02/2016
Incident – Main Damage	10/15/2013	\$11,071	\$11,071	04/05/2016
Incident – Main Damage	10/30/2012	\$30,053	\$10,000	05/27/2016
Incident – Main Damage	10/30/2012	\$30,053	\$10,000	05/27/2016
Incident – Main Damage	2/15/2013	\$9,995	\$9,995	12/19/2016
Incident – Main Damage	12/11/2013	\$9,334	\$9,334	04/08/2016

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2. Please provide the amount of damage credits for main maintenance recorded in each year 2007-2011.

Utility Response 02:

SoCalGas objects to this request under Rule 10.1 of the Commission’s Rules of Practice and Procedure to the extent that portions of this question requesting 2007-2011 damage credits seek production of information that is neither relevant to the subject matter involved in proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence, and is outside the scope of this proceeding. Subject to and without waiving the foregoing objection, SoCalGas responds as follows:

Please see the following table:

Damage Credits - Main Maintenance					
	2007	2008	2009	2010	2011
In thousands of nominal dollars (\$000)	(950)	(949)	(362)	(714)	(356)

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3. Re. Leak Survey and response to TURN-DR-018-10d:

- a. Please explain why SCG “proposes to apply the bi-annual leak survey requirement ... to all high-pressure lines.” Provide any supporting reports or analyses.
- b. What is the actual pressure range (min to max) of “high-pressure lines,” both as the MAOP and the % of SMYS?
- c. Are all the high-pressure lines defined as distribution pursuant to federal regulations? If not, please provide the mileage of HP lines disaggregated by T versus D.
- d. Please provide a disaggregation of the mileage of HP lines by pipeline diameter.
- e. Please provide the number of PHMSA reportable incidents occurring on HP lines each year 2012-2016. Please identify whether any of the incidents resulted in either injury or death.
- f. Please provide the number of PHMSA reportable incidents occurring on transmission lines each year 2012-2016. Please identify whether any of the incidents resulted in either injury or death.

Utility Response 03:

- a. SoCalGas is required to conduct bi-annual surveys of all its DOT-defined transmission lines. As part of its RAMP assessment, SoCalGas identified that bi-annual leak survey on all high-pressure pipe would mitigate the risk of Catastrophic Damage Involving High-Pressure Pipeline Failure. Thus, SoCalGas proposes to conduct bi-annual leak survey of all its high-pressure pipelines by TY 2019 to meet this RAMP mitigation measure. In addition, SoCalGas forecasted an increase of 55 leak repairs that would result from increasing the leak survey frequency of high-pressure pipe from annual to bi-annual.
- b. High-pressure lines are defined by Gas Standards. Gas Standard § 182.0185 defines high-pressure pipe as pressure that is greater than 60 psig. Moreover, medium-pressure pipe is defined as pressure that is equal to or greater than 10 psig, but not more than 60 psig. Thus, high-pressure pipeline includes any pipe above 60 psig. The MAOP (Maximum Allowable Operating Pressure) of a high-pressure pipeline varies from pipe to pipe, depending on its design and operating history. The current range for MAOP is from 81 to 1,000 psig. Thus, there is no specific maximum value. Similarly, the %SMYS (Specified Minimum Yield Strength) varies depending on the strength of the pipe and therefore, does not have a specific minimum or maximum value. The current range for %SMYS is from 67% to less than 1% SMYS.

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Utility Response 03-Continued:

- c. No. SoCalGas has approximately 3,900 miles of high-pressure pipe managed by Gas Distribution. This includes both DOT-defined transmission lines and distribution high-pressure pipelines that do not meet the DOT definition of transmission lines. 714 miles of the approximate 3,900 miles are DOT-defined transmission pipe.
- d. Please see the table below that displays the mileage of high-pressure pipelines by diameter, managed by Gas Distribution.

DOT-D HP Lines by Diameter	
Diameter (inches)	Length (Mileage)
1/2"	0
3/4"	13
1"	9
1 1/4"	2
1 1/2"	0
2"	291
3"	220
4"	503
6"	829
7"	0
8"	585
10"	207
12"	339
14"	9
15"	0
16"	139
18"	0
20"	43
22"	16
24"	40
26"	4
30"	13
34"	0
36"	1
Total	3263

DOT-T HP Lines by Diameter (DOT Defied Transmission Pipe)	
Diameter (inches)	Length (Mileage)
1/2"	0
3/4"	0
1"	0
1 1/4"	0
1 1/2"	0
2"	0
3"	0
4"	2
6"	31
7"	0
8"	128
10"	212
12"	121
14"	0
15"	27
16"	140
18"	0
20"	11
22"	4
24"	34
26"	4
30"	0
34"	0
36"	0
Total	714

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Utility Response 03:-Continued

- e. Please see the table below regarding the number of PHMSA reportable incidents occurring on HP lines each year from 2012-2016.

	No. of HP Distribution PHMSA Incidents	No. of either injury or death
2016	0	0
2015	0	0
2014	0	0
2013	1	0
2012	0	0

- f. Please see the table below regarding the number of PHMSA reportable incidents occurring on transmission lines each year from 2012-2016.

	No. of Transmission PHMSA Incidents	No. of either injury or death
2016	0	0
2015	0	0
2014	3	0
2013	2	0
2012	0	0

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4. Re SCG-04, Service Maintenance, p. GOM-58, lines 29: Is SCG asserting the implementation of the MSA inspection program increases the number of maintenance work orders? If yes, please explain in detail how the MSA Inspection Program has changed from prior MSA inspection work so as to drive higher maintenance work orders.

Utility Response 04:

The implementation of the more comprehensive MSA inspection program has contributed to an increase of maintenance work orders as the more comprehensive inspections identify additional follow-up activity for Gas Distribution. Please refer to TURN-DR-030-Q1.c for further details on how the program has changed from prior MSA inspection work.

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5. Re. SCG-04-WP p. 72-74.

a. Please provide for each year 2012-2016, segregated by residential and nonresidential, the number of:

i. Work orders for MSA maintenance submitted, and work orders for MSA completed;

ii. Work orders for meter guard activities submitted, and work orders for meter guard activities completed;

iii. Disconnect services performed due to chronically inaccessible MSAs.

Utility Response 05:

i. Please see the table below regarding MSA maintenance work orders.

Work Orders	2012	2013	2014	2015	2016
MSA Maintenance submitted	N/A*	14,991	17,364	21,870	40,033
MSA Maintenance completed	20,724	21,238	22,913	20,149	20,078

*Note: The year-end number for 2012 is in the legacy system and is not readily accessible. SoCalGas transitioned to electronic SAP tracking technology.

ii. Please see the table below regarding Meter Guard activity work orders.

Work Orders	2012	2013	2014	2015	2016
Meter Guards submitted	N/A*	10	78	112	132
Meter Guards completed	51	25	96	119	124

*Note: The year-end number for 2012 is in the legacy system and is not readily accessible. SoCalGas transitioned to electronic SAP tracking technology.

iii. SoCalGas objects to this request as unduly burdensome, as the information is not readily available and the information sought is unlikely to lead to the discovery of admissible evidence under Rule 10.1 of the Commission’s Rules of Practice and Procedure. Subject to and without waiving the foregoing objection, SoCalGas responds as follows:

SoCalGas Distribution does not track chronically inaccessible MSAs in the manner requested, and is therefore not readily available. SoCalGas rarely used this service disconnection process in the past. Gas Distribution crews have not historically worked a large volume of orders to cut and gap the gas service line at the service to main connection. This has been considered a miscellaneous activity and recorded under the Service Maintenance cost category with various other activities.

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6. Re. SCG-04-WP p. 76. For each year 2012-2016, please provide the top 10 (by \$) damage credit payments, showing for each payment:

- a. The date of the damage incident
- b. The amount requested/estimated by SCG
- c. The amount paid by third party
- d. The date payment was made
- e. Whether SCG sued to obtain payment. If so, whether there was a court order or settlement.

Utility Response 06:

SoCalGas interprets the scope of this question to encompass only damage credits for Main Maintenance based on the Workpaper reference page 76 that precedes the request.

SoCalGas objects to this request under Rule 10.1 of the Commission’s Rules of Practice and Procedure to the extent that portions of this question regarding the means and/or methods to obtain payment seek production of information that is neither relevant to the subject matter involved in proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence, and is outside the scope of this proceeding. Subject to and without waiving the foregoing objection, SoCalGas responds as follows:

Please see the following tables in response to 6a-d.

2012 Top 10 Damage Credit Payments	Date (A)	Amount Requested/Esti mated (B)	Amount Paid by 3rd party (C)	Date Payment was made (D)
Incident – Service Damage	7/3/2008	\$21,020	\$17,672	02/09/2012
Incident – Service Damage	3/29/2011	\$16,698	\$16,698	04/26/2012
Incident – Service Damage	8/30/2012	\$16,070	\$16,070	12/27/2012
Incident – Service Damage	2/24/2012	\$14,235	\$14,235	07/31/2012
Incident – Service Damage	12/21/2011	\$8,791	\$8,791	11/28/2012
Incident – Service Damage	5/9/2011	\$8,393	\$8,393	11/08/2012
Incident – Service Damage	12/14/2011	\$5,588	\$5,588	06/02/2012
Incident – Service Damage	11/14/2011	\$5,955	\$5,500	05/11/2012
Incident – Service Damage	11/14/2011	\$5,118	\$5,118	09/26/2012
Incident – Service Damage	7/21/2010	\$5,453	\$4,908	02/02/2012

2013 Top 10 Damage Credit Payments	Date (A)	Amount Requested/Esti mated (B)	Amount Paid by 3rd party (C)	Date Payment was made (D)
Incident – Service Damage	7/30/2012	\$9,946	\$9,946	11/14/2013

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Incident – Service Damage	4/12/2013	\$8,014	\$8,014	10/08/2013
Incident – Service Damage	1/9/2013	\$7,308	\$7,308	09/17/2013
Incident – Service Damage	9/18/2008	\$8,840	\$7,072	01/29/2013
Incident – Service Damage	12/12/2012	\$6,651	\$6,651	06/15/2013
Incident – Service Damage	10/22/2012	\$5,738	\$5,738	08/05/2013
Incident – Service Damage	10/9/2012	\$5,381	\$5,381	05/09/2013
Incident – Service Damage	5/21/2012	\$4,431	\$4,431	07/17/2013
Incident – Service Damage	5/2/2013	\$4,383	\$4,383	11/12/2013
Incident – Service Damage	9/1/2012	\$4,279	\$4,279	05/30/2013
2014 Top 10 Damage Credit Payments	Date (A)	Amount Requested/Esti mated (B)	Amount Paid by 3rd party (C)	Date Payment was made (D)
Incident – Service Damage	9/27/2010	\$25,735	\$25,000	06/18/2014
Incident – Service Damage	10/16/2013	\$22,451	\$22,451	09/02/2014
Incident – Service Damage	10/29/2011	\$11,202	\$11,202	03/03/2014
Incident – Service Damage	3/31/2011	\$7,212	\$7,212	05/01/2014
Incident – Service Damage	10/2/2013	\$6,320	\$6,165	05/29/2014
Incident – Service Damage	7/20/2012	\$6,573	\$5,915	07/21/2014
Incident – Service Damage	10/11/2012	\$5,799	\$5,799	11/18/2014
Incident – Service Damage	4/18/2012	\$5,601	\$5,000	05/22/2014
Incident – Service Damage	7/4/2012	\$4,913	\$4,913	06/12/2014
Incident – Service Damage	8/10/2013	\$4,872	\$4,522	12/26/2014

2015 Top 10 Damage Credit Payments	Date (A)	Amount Requested/Esti mated (B)	Amount Paid by 3rd party (C)	Date Payment was made (D)
Incident – Service Damage	7/12/2014	\$8,279	\$8,279	05/20/2015
Incident – Service Damage	1/9/2014	\$7,792	\$7,792	09/25/2015
Incident – Service Damage	11/3/2014	\$7,647	\$7,647	08/24/2015
Incident – Service Damage	6/18/2015	\$7,277	\$7,277	11/16/2015
Incident – Service Damage	10/15/2012	\$7,175	\$7,175	05/26/2015
Incident – Service Damage	7/24/2014	\$7,943	\$6,700	09/15/2015
Incident – Service Damage	12/20/2013	\$5,856	\$5,856	03/18/2015
Incident – Service Damage	9/30/2014	\$6,504	\$5,853	08/17/2015
Incident – Service Damage	9/25/2014	\$4,974	\$4,974	09/02/2015
Incident – Service Damage	8/7/2013	\$4,969	\$4,969	02/20/2015

2016 Top 10 Damage Credit Payments	Date (A)	Amount Requested/Esti mated (B)	Amount Paid by 3rd party (C)	Date Payment was made (D)
Incident – Service Damage	2/13/2013	\$18,734	\$18,734	08/03/2016
Incident – Service Damage	8/9/2013	\$13,637	\$13,637	10/03/2016
Incident – Service Damage	8/16/2013	\$11,125	\$11,125	10/24/2016
Incident – Service Damage	7/1/2015	\$10,617	\$10,617	07/20/2016
Incident – Service Damage	7/2/2013	\$10,381	\$10,381	06/10/2016
Incident – Service Damage	8/12/2014	\$10,072	\$10,072	11/27/2016
Incident – Service Damage	8/13/2014	\$7,489	\$7,489	06/02/2016
Incident – Service Damage	12/4/2014	\$5,796	\$5,796	12/08/2016
Incident – Service Damage	3/19/2014	\$5,328	\$5,328	04/06/2016
Incident – Service Damage	7/23/2014	\$5,230	\$5,230	04/05/2016

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7. Re. SCG-04-WP p. 76. please provide the damage credit payments for each year 2007-2011.

Utility Response 07:

SoCalGas objects to this request under Rule 10.1 of the Commission’s Rules of Practice and Procedure to the extent that portions of this question requesting 2007-2011 damage credits seek production of information that is neither relevant to the subject matter involved in proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence, and is outside the scope of this proceeding. Subject to and without waiving the foregoing objection, SoCalGas responds as follows:

Please see the following table.

Damage Credits - Service Maintenance					
	2007	2008	2009	2010	2011
In thousands of nominal dollars (\$000)	(1,652)	(1,705)	(1,331)	(1,586)	(879)

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8. Re. SCG-04-WP p. 75. Please provide the escalation factors used for each year for labor and non-labor. Please provide an example for one year showing how the escalation factors are used to calculate the “escalation to \$2016” numbers.

Utility Response 08:

The escalation factors used for each year for labor and non-labor are included in the attached worksheet TURN_DR-029-Q8, which also displays how the “escalation to \$2016” numbers are calculated. In summary, Vacation & Sick amounts are added to the Recorded-Adjusted amounts, then the sum is multiplied by the escalation factors totaling to derive the “escalation to \$2016” values.

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9. Re. Response to TURN-DR-018-13b:

a. Please explain how the inventory backlog of 5,200 orders for meter guards has developed.

b. Is the forecast of “3,500” orders in 2019 mean 3,500 would be new orders, and 1,700 would be backlog of prior orders? If no, please explain.

Utility Response 09:

- a. Pursuant to CFR § 192.481, the DOT requires each MSA be inspected every three (3) years for atmospheric corrosion. Although meter readers have historically performed this function, with the installation of automated meter reading and the significant decrease of Meter Readers, a new group, the CS-F MSA Inspection Organization, was formed in base year 2016. The CS-F MSA Inspection Organization performs physical, on-site inspections for each MSA in compliance with DOT's mandatory MSA inspections for atmospheric corrosion and identifies conditions that may require remediation, including the need to replace meter guards. SoCalGas proposes to increase the rate of meter guard replacement orders under Operations and Management (O&M) to address pending inventory generated from the MSA inspection program. Through the MSA Inspection, an inventory of work orders has been generated for maintenance follow up for locations where the existing meter guards are no longer adequate and require repair or replacement. The MSA Inspection Program is discussed in the testimony of Gwen Marelli, Exhibit SCG-18-R, Section III.B.5.
- b. SoCalGas has not forecasted a volume of 1,700 orders, but assuming that TURN has derived 1,700 by subtracting the 3,500 orders forecasted as completed in TY 2019 from the 5,200 orders forecasted as inventory, then the 3,500 and 1,700 orders are both part of the existing inventory.