

TURN DATA REQUEST-030
SDG&E-SOCALGAS 2019 GRC – A.17-11-007/8
SDG&E_SOCALGAS RESPONSE
DATE RECEIVED: MARCH 15, 2018
DATE RESPONDED: MARCH 29, 2018

1. Re. SCG-18, p. GRM-39:

- a. When did the DOT inspection requirements (§ 192.481) become effective?
- b. Is SCG claiming that inspection requirements have changed since 2012? If yes, please explain in detail how the requirements have changed.
- c. Please explain exactly if and how the actual MSA inspection work performed by staff of the CS-F MSA Inspection Organization differs from the inspection of MSAs previously performed by meter readers.

Utility Response 01:

- 1.a. SoCalGas objects to this request under Rule 10.1 of the Commission’s Rules of Practice and Procedure on the grounds that the timeframe encompassed in this request is not relevant to the subject matter involved in the pending proceeding, and therefore, the burden, expense and intrusiveness of this request outweighs the likelihood that the information sought will lead to the discovery of relevant and admissible evidence. In particular, to the extent that this request seeks information prior to 2012, such information is outside the scope of the relevant time period used by SoCalGas in developing its forecasts. Subject to and without waiving the foregoing objection, SoCalGas responds to Question 1.a. as follows: SoCalGas is not aware of when 49 CFR §192.481 initially became effective; however, the regulation has been effective at least since 2012, which is the time period relevant for this proceeding.
- 1.b. No, SoCalGas is not claiming that the inspection requirements as stated in CFR §192.481 have changed since 2012.
- 1.c. SoCalGas has been performing a more comprehensive inspection since 2016. A general discussion of how the MSA inspection work performed by the CS-F MSA Inspection Organization differs from the inspections performed by meter readers, was previously discussed during the 2016 General Rate Case Application (A.14-11-004) in the testimony of S. Franke, Exhibit SCG-10.

The differences are as follows: 1) As stated on page SAF-20 of Exhibit SCG-10, “given the heightened natural gas pipeline safety concerns, coupled with the fact that meter readers will no longer be at customer premises to visually see and read meters each month, SoCalGas proposes to complete a more comprehensive inspection of each MSA every three years.” Meter readers performed the DOT-required MSA inspections in conjunction with obtaining meter reads at customer’s facilities each month for billing purposes. With the implementation of AMI and elimination of most meter readers, MSA Inspection Representatives visit the customer’s facility once every three years to perform the more comprehensive inspections; 2) It is also stated on page SAF-20 that “FSAs, who are Operator Qualified in more elements and higher skilled than meter readers, will

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Utility Response 01 Continued:

be required to thoroughly inspect all aspects of the MSA, including the gas riser, all piping, the regulator and the meter, from all directions and angles, *while physically present at each MSA.*” Meter readers did not have to be physically present at the meter to obtain the read and perform the visual inspection; and 3) Table SAF-14 on page SAF-21 of Exhibit SCG-10 provided a summary of the twenty inspection elements that were performed by meter readers and listed the seven proposed MSA inspection elements added to enhance the inspections historically performed by meter readers.