

**TURN DATA REQUEST-069**  
**SDG&E-SOCALGAS 2019 GRC – A.17-10-007/8**  
**SDG&E\_SOCALGAS RESPONSE**  
**DATE RECEIVED: JUNE 12, 2018**  
**DATE RESPONDED: JUNE 22, 2018**

1. Re. SCG-14, p. 24-25 (VIPP):

- a. Re. p. 25, lines 22-23 – Is it correct that the 78 miles of “mains and associated services” scheduled for annual replacement includes both main and service mileage? If yes, please forecast separately the number of miles of main and services.
- b. Re p. 24, line 24 – please explain whether the 8,200 miles includes main and services. If both, please provide the mileage separately by main and service mileage. If only mains, please provide the mileage of Aldyl-A services present on the system.
- c. Please explain whether the “78 miles” of annual replacement corresponds to the “8,200 miles” of total pipe (in other words, is the 78 miles entirely a portion of the 8,200).
- d. Is the cost of replacing Aldyl-A mains and services similar on a per foot basis? If not, please explain and quantify any difference.
- e. Does SCG believe that services made of Aldyl-A plastic pipe represent the same risk for failure or cracking as mains made of Aldyl-A pipe? Please explain fully.

**Utility Response 1:**

- a. Yes, the 78 miles includes both main and service mileage. While detailed planning for future annual replacements are not available now, a high level estimate has been provided below using historical averages to forecast the miles of services (Plastic) replaced per mile of main (Plastic) replaced. It should be noted that this ratio, miles of services replaced per mile of main replaced, will vary from project to project caused by such factors as: parcel sizes, street widths, services already replaced with state of the art materials, etc. As the existence and significance of these factors can vary from project to project, and year to year, variations in the miles of services replaced per mile of mains replaced is expected. For these reasons, it is expected that the numbers listed below are dynamic and will change over the GRC cycle. The table below combined all “early vintage plastic” as being pre-1986.

<b>Early Vintage Plastic (Pre-1986)</b>	<b>Estimated 2019-2022</b>
<b>Mains</b>	22 miles
<b>Services</b>	56 miles
<b>Total</b>	<b>78 miles</b>

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**Utility Response 1 Continued:**

- b. The 8,200 miles includes only mains. The table below shows the number of all “early vintage plastic” services as being pre-1986.

<b>Early Vintage Plastic Services (Pre-1986)</b>
1,122,920 (count)
*12,760 (estimated miles)

\* calculated based on average service length of 60 ft

- c. No, only a portion of the “78 miles” of annual replacement corresponds to the “8,200 miles” of total pipe.
- d. The average cost per foot used in SoCalGas’ estimate of \$250/ft is derived using historical years 2014 to 2017 and includes mains and services.
- e. SoCalGas evaluates all diameters of pipe when determining probability of failure, incorporating past performance and material vintage. The manufacturing process which caused the susceptibility to brittle-like cracking has not been limited to certain diameters by PHMSA as part of the various bulletins (ADB-99-01, ADB-99-02, and ADB-07-01); therefore, mains and services are viewed as having the same risk of failures and are evaluated by SoCalGas equally. SoCalGas through monitoring of performance metrics will continually evaluate the need to focus and adapt the program on a specific family of early vintage plastic pipe that may be demonstrating a higher risk.