Application No:	A. 11-11-002
Exhibit No.:	
Date:	June 4, 2012
Witness:	Douglas M. Schneider and
	David L. Buczkowski

In the Matter of the Application of San Diego Gas &) Electric Company (U 902 G) and Southern California) Gas Company (U 904 G) for Authority to Revise) Their Rates Effective January 1, 2013, in Their) Triennial Cost Allocation Proceeding.)

A.11-11-002 (Filed November 1, 2011)

PREPARED SUPPLEMENTAL DIRECT TESTIMONY OF

DOUGLAS M. SCHNEIDER AND DAVID L. BUCZKOWSKI

IN SUPPORT OF THE PIPELINE SAFETY ENHANCEMENT PLAN OF

SOUTHERN CALIFORNIA GAS COMPANY AND

SAN DIEGO GAS & ELECTRIC COMPANY

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

June 4, 2012

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PREPARED SUPPLEMENTAL DIRECT TESTIMONY OF DOUGLAS M. SCHNEIDER AND DAVID L. BUCZKOWSKI

I. PURPOSE

In Decision (D.)11-06-017, the Commission directed California's natural gas pipeline operators to "file and serve a proposed Natural Gas Transmission Pipeline Comprehensive Pressure Testing Implementation Plan (Plan) to comply with the requirement that all in-service natural gas *transmission* pipeline in California has been pressure tested in accordance with 49 CFR 192.619, excluding subsection 49 CFR 192.619 (c)."¹ The purpose of this Supplemental Direct Testimony is to address the fact that Southern California Gas Company (SoCalGas) and San Diego Gas & Electric Company (SDG&E) have included some portions of pipeline defined as "distribution" per federal regulations in the Pipeline Safety Enhancement Plan (Plan) submitted on August 26, 2011 in Rulemaking (R.)11-02-019.² As explained below, inclusion of these distribution segments in our Plan is reasonable.³

II. SOME DISTRIBUTION SEGMENTS ARE CURRENTLY INCLUDED IN OUR PLAN

Since we initially filed our proposed Plan in August of 2011, it has come to the attention of

17 SoCalGas and SDG&E that some segments included in the Plan are categorized as distribution

18 line segments per 49 CFR 192. As such, this pipe technically does not fall within the

- 19 Commission's directive in D.11-06-017 to propose an implementation plan to address
- 20 transmission lines.⁴ The length of the distribution pipe included in our proposed Plan accounts for

⁴ See D.11-06-017, mimeo, at 31 (Ordering Paragraph No. 4).

D.11-06-017, mimeo, at 31 (Ordering Paragraph No. 4).

² Consideration of this Pipeline Safety Enhancement Plan was transferred to this proceeding by the Commission in D.12-04-010.

³ David L. Buczkowski is sponsoring the portion of this testimony that pertains to the potential cost impact associated with the small distribution portions of pipelines included within our Proposed Pipeline Safety Enhancement Plan. Douglas M. Schneider is sponsoring the remainder of this testimony.

approximately 4.3% of the Phase 1A scope for pressure test and replacement, totals approximately
 28 miles, and is generally interspersed among the transmission lines included in the Plan.

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III. THESE DISTRIBUTION SEGMENTS SHOULD STAY IN THE PLAN

Even though the Commission's directive applies to transmission lines, SoCalGas and SDG&E believe that the relatively small amount of distribution pipe currently included in our proposed Plan should remain in the Plan. The distribution pipe included in the Plan is generally located adjacent to or in between transmission lines that are scheduled to be replaced or tested in Phase 1A in accordance with the Plan. Because these distribution segments are intimately interrelated with the Phase 1A transmission segments, we believe that it is more practical to continue to include these distribution segments within the scope of our proposed Phase 1A work. For example, replacement may require a new route and abandonment of all pipe between the start and stop location, including any distribution segments. In other cases, the replacement may require starting before, or stopping after, the Phase 1A identified station start and stop points to a more practical and cost-effective point to connect to the existing pipeline. Similarly, a pressure test of an entire continuous length of pipeline is likely to be more cost effective than the performance of multiple pressure tests to exclude small portions of a pipeline classified as distribution.

The majority of the distribution pipe included within the scope of Phase 1A of our proposed Plan is adjacent to, or sandwiched between, transmission segments identified for action in Phase 1A. This particular distribution pipe is described below in Table 1.

Non- TransmissionTotal Project Mileage4040.1837.8010110.385.1430-021.112.8330-180.412.5830-321.253.3931-095.1712.8132-210.6810.2333-1200.631.2535-20-A0.081.3236-10060.630.7336-10320.133.0936-9-060.007.9236-909 North0.0216.0237-044.509.0337-180.194.1637-490.271.0938-5124.514.7838-5520.207.9938-9590.0015.6041-050.012.7841-170.013.5741-190.000.0141-25-A0.044.8241-300.003.9541-84-A0.000.2342-46-F0.221.8042-66-20.000.0343-1211.114.4143-340.883.2945-120XO10.000.0149-260.012.62		Table 1	
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41-170.013.5741-190.000.0141-25-A0.044.8241-300.003.9541-84-A0.000.2342-460.271.4742-46-F0.221.8042-66-20.000.0343-1211.114.4143-340.883.2945-1200.024.3045-120XO10.000.0149-140.302.4549-153.266.9149-260.012.62	41-05	0.01	2.78
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41-25-A0.044.8241-300.003.9541-84-A0.000.2342-460.271.4742-46-F0.221.8042-66-20.000.0343-1211.114.4143-340.883.2945-1200.024.3045-120XO10.000.0149-140.302.4549-153.266.9149-260.012.62	41-19	0.00	0.01
41-300.003.9541-84-A0.000.2342-460.271.4742-46-F0.221.8042-66-20.000.0343-1211.114.4143-340.883.2945-1200.024.3045-120XO10.000.0149-140.302.4549-153.266.9149-260.012.62	41-25-A	0.04	4.82
41-84-A0.000.2342-460.271.4742-46-F0.221.8042-66-20.000.0343-1211.114.4143-340.883.2945-1200.024.3045-120XO10.000.0149-140.302.4549-153.266.9149-260.012.62	41-30	0.00	3.95
42-46 0.27 1.47 42-46-F 0.22 1.80 42-66-2 0.00 0.03 43-121 1.11 4.41 43-34 0.88 3.29 45-120 0.02 4.30 45-120XO1 0.00 0.01 49-14 0.30 2.45 49-26 0.01 2.62	41-84-A	0.00	0.23
42-46-F 0.22 1.80 42-66-2 0.00 0.03 43-121 1.11 4.41 43-34 0.88 3.29 45-120 0.02 4.30 45-120XO1 0.00 0.01 49-14 0.30 2.45 49-15 3.26 6.91 49-26 0.01 2.62	42-46	0.27	1.47
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43-121 1.11 4.41 43-34 0.88 3.29 45-120 0.02 4.30 45-120XO1 0.00 0.01 49-14 0.30 2.45 49-15 3.26 6.91 49-26 0.01 2.62	42-66-2	0.00	0.03
43-34 0.88 3.29 45-120 0.02 4.30 45-120XO1 0.00 0.01 49-14 0.30 2.45 49-15 3.26 6.91 49-26 0.01 2.62	43-121	1.11	4.41
45-120 0.02 4.30 45-120XO1 0.00 0.01 49-14 0.30 2.45 49-15 3.26 6.91 49-26 0.01 2.62	43-34	0.88	3.29
45-120XO1 0.00 0.01 49-14 0.30 2.45 49-15 3.26 6.91 49-26 0.01 2.62	45-120	0.02	4,30
49-14 0.30 2.45 49-15 3.26 6.91 49-26 0.01 2.62	45-120XO1	0.00	0.01
49-15 3.26 6.91 49-26 0.01 2.62	49-14	0.30	2 4 5
49-26 0.01 2.62	49-15	3 26	6.91
0.01 2.02	49-26	0.01	2.62
49-28 1.21 / 80	49-28	1 21	4 80
Total 27.70 4.09	Total	1.2 I 27 70	100 07

SoCalGas and SDG&E cannot make a final determination with respect to the ultimate cost effectiveness on a segment-by-segment basis of including or excluding this distribution pipe in Phase 1A until after the detailed engineering, design and project execution planning for these projects is completed. Once that work is complete, a determination with respect to the potential testing or replacement of each distribution segment identified above will be completed, and testing or replacement of each of a particular segment in Phase 1A will only be performed if including it within the scope of work is projected to be more cost effective than excluding it. The final Phase 1A scope of work will be specific to completing the testing or replacement of transmission segments and will not include unnecessary or unassociated distribution pipe. Accordingly, SoCalGas and SDG&E believe that it is both reasonable and appropriate to continue to include these distribution segments in the proposed Plan until such a final determination can be made.

In addition to the distribution pipe identified above, there are also a small number of distribution segments included in the plan that are not adjacent to or sandwiched between transmission segments identified for action in Phase 1A, and are listed in Table 2. These distribution segments can be separated from the Phase 1A scope of work since they are not adjacent to or sandwiched between transmission segments. The planning scope did include these distribution segments and they were subsequently assigned recommended actions as though they were transmission segments. Table 2 includes an estimated direct cost reduction for the exclusion of these distribution segments. A simple proration methodology was used to develop the cost estimate for individual segments of distribution line that did not have separate costs available in our existing workpapers.

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	Non-	Total	Total	
	Transmission	Project	Estimated Cost	
Pipeline	Mileage	Mileage	(Capital)	
1172BP2ST2	0.00	0.00	\$	140,600
169	0.01	0.01	\$	203,100
30-02	0.00	2.83	\$	7,081
33-120	0.01	1.25	\$	57,535
36-8-06	0.04	0.62	\$	228,700
41-19	0.01	0.01	\$	244,916
41-141	0.01	0.01	\$	143,400
45-120	0.00	4.30	\$	4,725
Total	0.08	9.03	\$	1,030,057

The distribution segments included in the Plan that are not adjacent to or sandwiched between transmission segments represent only .01% of the total pipe identified for pressure testing or replacement in Phase 1A. When detailed engineering, design and execution planning is completed, SoCalGas and SDG&E will evaluate whether these particular distribution segments can be deleted from the Plan. Until that time, SoCalGas and SDG&E believe that it remains reasonable to continue to include the distribution segments identified in Table 2 in Phase 1A. This concludes our Prepared Supplemental Direct Testimony.

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QUALIFICATIONS OF DAVID L. BUCZKOWSKI

My name is David L. Buczkowski. I am employed by Southern California Gas Company (SoCalGas) as the Director of Planning and Project Development. My business address is 555 West Fifth Street, Los Angeles, California 90013-1011.

I graduated from the University of Illinois in 1989 with a Bachelor of Science degree in Mechanical Engineering. I have over 21 years of domestic and international experience in various energy industries.

I have been employed by SoCalGas as the Director of Planning & Project Development since May of 2011. In this position, my responsibilities include overseeing the project management and project execution of major capital and expense gas infrastructure projects for SoCalGas and SDG&E.

Prior to joining SoCalGas, I served as a project manager on several multi-billion dollar mega-projects. Through my career my roles have included project management, engineering management, start-up, and O&M engineering for projects in refineries, oil and gas processing facilities, biofuels, and petrochemical plants. Project scopes included conceptual engineering, basic engineering, front-end engineering, program management, and detailed engineering and design, procurement and construction efforts. From 2001 to 2011, I worked for Fluor in various project management positions of increasing responsibility, ultimately serving in the role of Project Director. In that role, I had overall responsibility for project cost, schedule, and execution, including engineering/design, procurement, contracts, and construction of large capital projects.

From 1997 to 2001, I was employed by Parsons Corporation, first as a Project Engineer, then in various project management positions of increasing responsibility. From 1990 to 1995, I was employed by Shell Oil Company, first as an Operations Support Engineer and subsequently in various roles of increasing responsibility, including project management of major refinery projects and ultimately ascended to the position of Start-Up Engineer for the Shell Refinery Expansion and Clean Fuels megaproject.

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I have not previously testified before the California Public Utilities Commission.