

Application: A.25-08-XXX
Exhibit No.: SCG/Lakeside-01
Witness: J. Lucas

Application of Southern California Gas
Company (U 904 G) and Lakeside Pipeline
LLC to Initiate Reasonableness Review and
Recovery of Lakeside Maas Energy Works
Dairy Biomethane Pilot Project Costs.

A.25-08-XXX

CHAPTER 1
PREPARED DIRECT TESTIMONY OF
JIM LUCAS
ON BEHALF OF SOUTHERN CALIFORNIA GAS COMPANY

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

August 15, 2025

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**PREPARED DIRECT TESTIMONY OF
JIM LUCAS
(POLICY AND OVERVIEW)**

I. PURPOSE AND SUMMARY

The purpose of this testimony on behalf of Southern California Gas Company (SoCalGas) is to initiate a SB 1383 Dairy Biomethane Pilot Project reasonableness review of the Lakeside: Maas Energy Works Dairy Biomethane Pilot Project (Project) costs of \$6,691,208 incurred by Lakeside Pipeline LLC over its bid amount for the Project and \$7,831,000 incurred by SoCalGas over the authorized amount for the Project. The California Public Utilities Commission (CPUC or Commission) Decision (D.) 17-12-004 permits both the biomethane producer and SoCalGas to pursue recovery of costs above the CPUC approved amount.¹

In SoCalGas's 2024 General Rate Case, testimony was given as part of a reasonableness review of Senate Bill (SB) 1383 Dairy Pilot Program capital costs in compliance with D.17-12-004.² The Commission's final decision in the recent SoCalGas General Rate Case did not authorize cost recovery for the Dairy Pilot Program's capital expenditures on the grounds that SoCalGas did not demonstrate how the large cost overruns were reasonable and directed SoCalGas to re-file its applications.³ In response to the Commission's prior concerns, this application provides detailed workpapers, cost breakdowns by category, and a thorough explanation of each cost variance with supporting data.

This chapter provides an overview of the legislative and regulatory history, the cost recovery mechanism for the costs incurred over the bid amount approved for the Project, and an overview of the Project.

In Chapter 2 (Prepared Direct Testimony of Daryl Maas), Maas Energy Works (MEW) will provide an overview of the budget estimation process it used to develop its bid and a description of factors beyond the control of MEW which resulted in costs incurred over the CPUC approved bid amount.

In Chapter 3 (Prepared Direct Testimony of Maritza Pacheco), SoCalGas will provide a detailed project description, outline the limitations that contributed to the preliminary cost

¹ D.17-12-004 at 9-10.

² A.22-05-015, SCG-08 Prepared Direct Testimony of Bill G. Kostelnik.

³ D.24-12-074 at 970 (Conclusions of Law 65).

1 estimate and justify the project cost components that led to expenditures exceeding the CPUC-
2 approved bid amount.

3 In Chapter 4 (Prepared Direct Testimony of Rae Marie Yu and Marjorie A. Schmidt-
4 Pines), SoCalGas will present the total revenue requirement proposed for recovery and the
5 SoCalGas customer rate impacts of incorporating the proposed costs into gas rates.

6 **II. BACKGROUND**

7 **A. Senate Bill (SB) 1383 Dairy Biomethane Pilot Project Regulatory History**

8 On September 19, 2016, Senate Bill (SB) 1383 was signed into law and “require[s] the
9 state board, no later than January 1, 2018, to approve and begin implementing that
10 comprehensive strategy to reduce emissions of short-lived climate pollutants to achieve a
11 reduction in methane by 40 percent, and anthropogenic black carbon by 50 percent below 2013
12 levels by 2030. The bill also establishes targets for reducing organic waste in landfills.”⁴ In
13 addition, SB 1383 directed the CPUC to “implement not less than five dairy biomethane pilot
14 projects to demonstrate interconnection to the common carrier pipeline system.”⁵

15 On June 22, 2017, the Commission issued Rulemaking (R.) 17-06-015 to implement the
16 provisions of Senate Bill 1383 through the development of a framework “to direct gas
17 corporations to implement not less than five dairy biomethane pilot projects to demonstrate
18 interconnection to the common carrier pipeline system and allow for rate recovery of reasonable
19 infrastructure costs.”⁶

20 On December 18, 2017, the Commission issued Decision (D.) 17-12-004, which
21 established the implementation and selection framework to implement the dairy biomethane
22 pilots required by SB 1383. D.17-12-004 encapsulated the primary components of a dairy
23 biomethane pilot, broken down into six (6) lanes, in the following Figure 1:

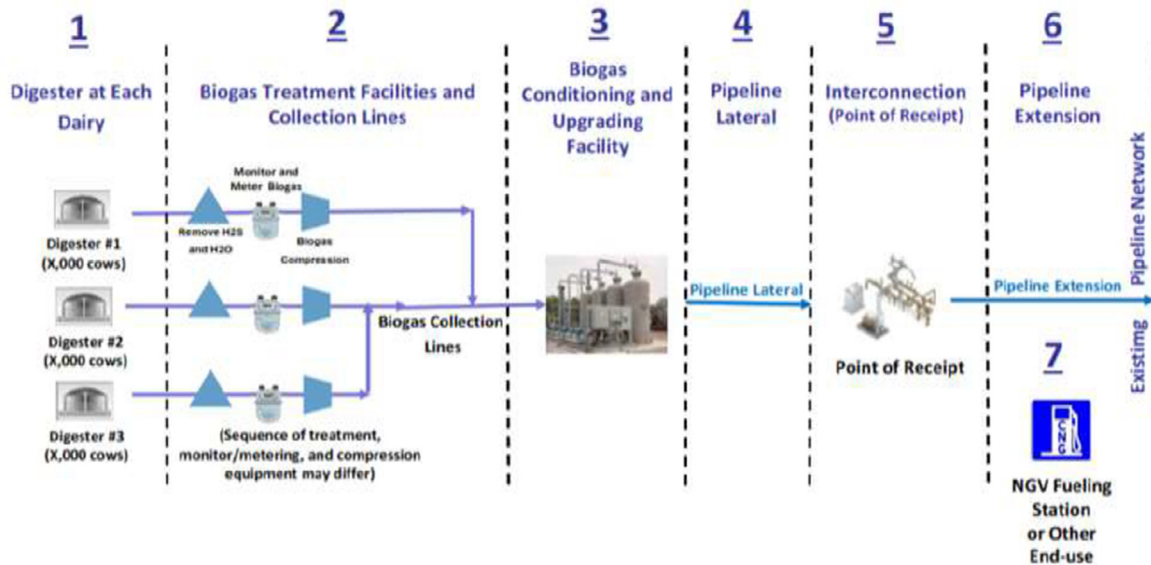
⁴ SB 1383 (Lara, 2016), *available at*:
https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB1383.

⁵ *Id.*

⁶ *See* R.17-06-015, Order Instituting Rulemaking (OIR) to Implement Dairy Biomethane Pilot Projects to Demonstrate Interconnection to the Common Carrier Pipeline System in Compliance with Senate Bill 1383 (June 22, 2017) at 2, *available at*:
<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M191/K136/191136501.PDF>.

1
2

Figure 1^{7,8}
Dairy Biomethane Pilot Primary Components



3

4 D.17-12-004 also established the funding and cost recovery framework for each of the lanes in

5 Figure 1.⁹ Relevant for this application, D.17-12-004 provided that:

6 Biogas collection lines (also known as gathering lines) transport dairy biogas
7 from each dairy digester to a central biogas conditioning facility. Dairy biogas
8 may undergo dehydration and removal of hydrogen sulfide prior to being injected
9 into the gathering line. Treatment equipment for dehydration and removal of
10 hydrogen sulfide, compression, and monitoring and measurement equipment may
11 be included as part of the biogas collection lines.¹⁰

12 Biogas collection lines and treatment facilities (for treating gas prior to entry in
13 collection lines) will be owned by the biomethane producers, not the utility.
14 Biomethane producers shall receive reimbursement from the utility for treatment
15 facility and gathering line costs, and those costs should be recorded as an
16 operational expense in a utility balancing account up to the bid amount for these
17 components. Costs above the bid amount for the collection lines will be subject
18 to reasonableness review.¹¹

⁷ D.17-12-004 at 16.

⁸ Lane 4 consists of both the pipeline lateral and compression and are eligible for funding in the dairy biomethane pilot implementation framework, *Id.*, Appendix A at 1.

⁹ *Id.*, Appendix A at 9-13.

¹⁰ *Id.*, Appendix A at 8.

¹¹ *Id.*, Appendix A at 10-11.

1 The cost of pipeline laterals, the points of receipt, and pipeline extensions should
2 be recorded by the utility in a memorandum account as capital expense. The
3 memorandum account will capture operation and maintenance costs and capital-
4 related project costs (depreciation, return, and taxes) associated with the selected
5 Dairy Pilots. Disposition of the balance recorded in these new regulatory accounts
6 should be reviewed in connection with the relevant utility natural gas transmission
7 rate case. Ultimately, the utilities are allowed to record and include these expenses
8 in their transmission rates.¹²

9 Further, D.17-12-004 permits both the biomethane producer and SoCalGas to pursue recovery of
10 costs above the CPUC approved amount:

11 [t]o ensure only reasonable and verified costs of pipeline infrastructure developed
12 pursuant to the Dairy Pilots are collected from ratepayers, biomethane producer-owned
13 pipeline infrastructure costs should be recorded in a balancing account and any costs
14 above the bid amount should be subject to reasonableness review.¹³
15

16 The CPUC has the discretion to modify the cost estimation submitted by the applicants
17 and determine the final cost of the chosen pilots, which will become the authorized
18 revenue requirement. Any expenditure above the authorized amount is subject to a
19 reasonableness review in the appropriate transmission rate case.¹⁴
20

21 The authorized amount will be reviewed for the utility's prudent administration of the
22 project, but otherwise will be considered per se reasonable. Review of expenditures
23 consistent with the authorized amount is primarily to determine that costs qualify
24 properly as recoverable rather than to question the overall amounts spent. Any
25 expenditure above the authorized amount is subject to a reasonableness review in the
26 appropriate transmission rate case.¹⁵

27 On December 3, 2018, the Selection Committee consisting of the CPUC, Air Resources
28 Board, and California Department of Food and Agriculture issued a press release identifying the
29 selected six Dairy Biomethane Pilot Projects. Of the six selected projects, four are in
30 SoCalGas's service territory: (1) CalBioGas Buttonwillow LLC; (2) CalBioGas North Visalia
31 LLC; (3) CalBioGas South Tulare LLC; and (4) Lakeside Pipeline LLC. As a result, SoCalGas
32 negotiated contracts with these four projects. On December 13, 2018, SoCalGas filed Advice
33 Letter 5398 to establish the Dairy Biomethane Pilot Balancing Account (DBPBA) to record

¹² *Id.*, Appendix A at 11.

¹³ D.17-12-004 at 22 (Conclusions of Law (COL) 11).

¹⁴ *Id.*, at 9-10.

¹⁵ *Id.*, Appendix A at 12.

1 expenditures for biogas collection lines and facilities for treatment, monitoring, metering and
2 compression of biogas before it enters the collection lines (Lane 2) and a Dairy Biomethane Pilot
3 Memorandum Account (DBPMA) to record costs associated with compressors and pipeline
4 laterals (Lane 4), point of receipts (Lane 5) and pipeline extensions (Lane 6),¹⁶ which was
5 approved on February 14, 2019 with an effective date of January 14, 2019.¹⁷

6 On March 5, 2019, SoCalGas submitted Advice No. 5432, Establishment of Contracts
7 with the Selected Dairy Biomethane Pilot Projects pursuant to OP 6 of D.17-12- 004. The
8 executed contracts, including the contract with Lakeside Pipeline LLC, were approved by the
9 CPUC on April 30, 2019, with an effective date of as April 4, 2019.¹⁸

10 **B. Alignment with the California’s Climate Policies**

11 Short-lived climate pollutants (SLCP) represent a critical challenge and opportunity in
12 California’s campaign to reduce greenhouse gas emissions (GHG). Because SLCP is more
13 effective in trapping heat than carbon dioxide, California has specifically prioritized the
14 reduction of SLCPs as key strategy in reducing the state’s overall GHG emissions.¹⁹ Renewable
15 natural gas (RNG) is an important component of California’s strategy to reduce GHG emission
16 and achieve climate goals.

17 SB 1383 outlined provisions to address SLCP in California and established the SLCP
18 Strategy. California’s organic waste streams are responsible for approximately half of the State’s
19 methane emissions and represent a valuable energy and soil-enhancing resource.²⁰ Effectively

¹⁶ D.17-12-004 at 24 (Ordering Paragraph (OP) 5) and Appendix A at 1-2.

¹⁷ SoCalGas Advice Letter (AL) 5398-G, Establishment of Balancing and Memorandum Accounts for SB 1383 Pilot Program Pursuant to D.17-12-004, *available at*: <https://tariffsprd.socalgas.com/view/filing/?utilId=SCG&bookId=GAS&flngKey=3484&flngId=5398&flngStatusCd=Approved>.

¹⁸ SoCalGas AL 5432-G, Establishment of Contracts with the Selected Dairy Biomethane Pilot Projects, Pursuant to D.17-12-004, *available at*: <https://tariffsprd.socalgas.com/view/filing/?utilId=SCG&bookId=GAS&flngKey=3546&flngId=5432&flngStatusCd=Approved>.

¹⁹ California Energy Commission (CEC), *2017 Integrated Energy Policy Report* (2017 IEPR) (March 29, 2018) at 243, *available at*: <https://www.energy.ca.gov/publications/2018/2017-integrated-energy-policy-report>.

²⁰ California Air Resources Board (CARB), *Short-Lived Climate Pollutant Reduction Strategy* (March 2017) at 28, *available at*: https://ww2.arb.ca.gov/sites/default/files/2020-07/final_SLCP_strategy.pdf.

1 implementing the measures described in this SLCP Strategy will not only reduce methane
2 emissions but provide many other benefits as well, including cutting emissions of CO2 and
3 boosting economic growth in agricultural and rural communities.²¹ California possesses
4 significant, diverse waste streams and residues that can be used to produce RNG.²²

5 End uses for RNG in the most commercial-ready applications include but are not limited
6 to electricity generation, natural gas vehicle fuel replacement, and pipeline natural gas
7 displacement. The end-use application of RNG aligns with additional California climate
8 policies, including Renewable Portfolio Standard,²³ Advanced Clean Fleets,²⁴ Low Carbon Fuel
9 Standard,²⁵ and California Cap-and-Trade Program.²⁶ These programs support the development
10 and integration of RNG into the state’s energy system.

11 **III. LAKESIDE MAAS ENERGY WORKS SB 1383 DAIRY PILOT PROJECT**

12 **A. Scope of Work**

13 The Project was selected as one of the six projects in the “Solicitation for SB 1383 Dairy
14 Pilot Projects” by the Selection Committee. The project design includes a digester (Lane 1) and
15 a biogas treatment facility at each dairy (Lane 2). The biogas is then transported through biogas
16 collection lines (Lane 2) to a centralized gas conditioning/upgrading facility (Lane 3). The
17 biomethane is compressed by Utility owned compressors and connected to the pipeline network
18 through SoCalGas’s Point of Receipt and Pipeline Extension facilities (Lanes 4-6).

²¹ *Id.*

²² California Energy Commission (CEC), *2017 Integrated Energy Policy Report* (2017 IEPR) (March 29, 2018) at 245, available at: <https://www.energy.ca.gov/publications/2018/2017-integrated-energy-policy-report>.

²³ CEC, *Developing Guidelines for the 50 Percent Renewables Portfolio Standard* (RPS Guidebook) (April 27, 2017) at 4-13, available at: <https://efiling.energy.ca.gov/getdocument.aspx?tn=217317>.

²⁴ CARB, *Appendix A-2 – Final Regulation Order Advanced Clean Fleets Regulation, High Priority and Federal Fleets Requirements* (2022) at A-2-27, available at: <https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2022/acf22/ac/acffro21.pdf>.

²⁵ CARB, *Low Carbon Fuel Standard* (2020) at 28, available at: <https://ww2.arb.ca.gov/sites/default/files/2020-09/basics-notes.pdf>.

²⁶ Cal. Code Regs. Tit. 17, §95852. For the unofficial version of the complete 2018 regulation prepared by CARB Staff, see CARB, *Unofficial electronic version of the Regulation for the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms* (April 2019) at 130-134, available at: https://ww2.arb.ca.gov/sites/default/files/2021-02/ct_reg_unofficial.pdf.

1 For the Project, Lakeside Pipeline LLC’s scope of work included the design,
2 procurement, and construction of the facilities shown in Lanes 1-3 in Figure 1 above. The
3 facilities in Lane 2 (biogas treatment facilities and biogas collection lines) are eligible costs for
4 reimbursement under D.17-12-004.²⁷ SoCalGas’s scope of work included the design,
5 construction, and commissioning of the facilities shown in Lanes 4-6 in Figure 1 above. The
6 Lane 6 pipeline facilities include both the: 1) pipeline connecting the point of receipt to the
7 existing pipeline system, and 2) pressure betterment enhancements²⁸ to provide sufficient
8 takeaway capacity for the pilot project.

9 For the Project, as approved by the disposition letter for Advice Letter 5398,²⁹ the
10 Commission-approved costs for Lane 2 was \$9,327,295 as provided by Lakeside Pipeline LLC
11 in their bid response to the Solicitation for SB 1383 Dairy Pilot Projects. This amount is
12 included as a not to exceed cost in the executed Dairy Pilot Project Funding Agreement. The
13 disposition letter also authorized \$10,844,000 in costs for SoCalGas related to Lanes 4-6.

14 **B. Project Funding Agreement**

15 On December 3, 2018, the CPUC’s Selection Committee selected six dairy pilot projects.
16 Lakeside: Maas Energy Works Project is one of the selected projects. As required under D.17-
17 12-004, on March 5, 2019, SoCalGas filed Advice Letter 5432³⁰ to establish California Producer
18 Interconnection Agreement (CPIA), California Producer Interconnect Collectible System
19 Upgrade Agreement (CPICSUA), and California Producer Operational Balancing Agreement
20 (CPOBA). SoCalGas also developed the SB 1383 Dairy Pilot Project Funding Agreement to
21 address several requirements of D.17-12-004 which are not included in a typical Rule No. 39

²⁷ D.17-12-004, Appendix A at 1. As stated, the costs of digesters (Lane 1) and biogas conditioning and upgrading facilities (Lane 3) are not eligible for funding.

²⁸ Enhancements were necessary to provide sufficient receipt capacity for the RNG volumes and were included in the cost estimate submitted to the Selection Committee as part of the solicitation process.

²⁹ SoCalGas Advice Letter (AL) 5398-G, Establishment of Balancing and Memorandum Accounts for SB 1383 Pilot Program Pursuant to D.17-12-004, *available at*:
<https://tariffsprd.socalgas.com/view/filing/?utilId=SCG&bookId=GAS&flngKey=3484&flngId=5398&flngStatusCd=Approved>.

³⁰ SoCalGas AL 5432-G, Establishment of Contracts with the Selected Dairy Biomethane Pilot Projects, Pursuant to D.17-12-004, *available at*:
<https://tariffsprd.socalgas.com/view/filing/?utilId=SCG&bookId=GAS&flngKey=3546&flngId=5432&flngStatusCd=Approved>.

1 interconnection project including, but not limited to, payment terms, provisions for biogas
2 treatment facilities and collection lines, submittal of a Safety Action Plan, demonstration of
3 project readiness, and record keeping. AL 5432 was approved by the CPUC with an effective
4 date of April 4, 2019.

5 **C. Milestone Payments for Lakeside Pipeline LLC**

6 The milestone payment mechanism set forth in the Solicitation for SB 1383 Dairy Pilot
7 Projects³¹ was incorporated into the SB1383 Dairy Pilot Project Funding Agreements and
8 provided the following milestone payment structure:³²

- 9 • **Milestone Payment 1:** When the Project spends 35% of the Agreement Total
10 amount for Project Owner Owned Pipeline Infrastructure, Project Owner may
11 seek reimbursement of those costs by providing detailed vendor invoices and
12 proof of payment(s) for materials/services provided to SoCalGas for approval.
13 The amount of reimbursement may not exceed the costs reflected by the invoices
14 and proof of payment(s).
- 15 • **Milestone Payment 2:** When the Project spends 70% of the Agreement Total
16 amount for Project Owner Owned Pipeline Infrastructure, Project Owner may
17 seek reimbursement of those costs by providing detailed vendor invoices and
18 proof of payment(s) for materials/services provided to SoCalGas for approval.
19 The amount of reimbursement may not exceed the costs reflected by the invoices
20 and proof of payment(s).
- 21 • **Milestone Payment 3:** Reimbursement payment up to 15% of the Agreement
22 Total amount for Project Owner Owned Pipeline Infrastructure will be provided
23 to Project Owner after meeting the 30 out of 40 days flow requirement for the
24 Pilot Project Capacity (as defined in CPIA) as follows: Project Owner must
25 produce biomethane flow for 30 out of 40 days within the minimum and
26 maximum measurement range of SoCalGas's meter. Project Owner must declare

³¹ CPUC, *Solicitation for SB 1383 Dairy Pilot Projects by Selection Committee* (March 7, 2018) at E-16 to E-17, available at: https://www.cpuc.ca.gov/-/media/cpuc-website/files/uploadedfiles/cpuc_website/content/utilities_and_industries/energy/energy_programs/gas/natural_gas_market/dairypilotssolicitation.pdf.

³² SoCalGas SB 1383 Dairy Pilot Project Funding Agreement at 34-35.

1 in a written notice to the Utility at least two business days in advance, the specific
2 start and end date of this 40 day testing period. The 30 out of 40 day requirement
3 is extended 1 day for each day that the Project Owner is unable to produce flow
4 because of an interruption of delivery as set forth in SoCalGas Tariff Rule No. 23.
5 Project Owner may elect to restart the 40 day testing period by providing a new
6 written notice declaring the new start and end dates at least two business days in
7 advance of when the new 40 day testing period is to begin. Once the 30 out of 40
8 days flow requirement is met, the Project Owner must provide SoCalGas with
9 detailed vendor invoices and proof of payment(s) for materials/services provided
10 not to exceed 15% of the Agreement Total amount for Project Owner Owned
11 Pipeline Infrastructure for approval. The amount of reimbursement may not
12 exceed the costs reflected by the invoices and proof of payment(s).

- 13 • **Milestone Payment 4:** The final reimbursement payment of up to 15% of the
14 Agreement Total amount for the Project Owner Owned Pipeline Infrastructure
15 will be provided to Project Owner after meeting the forecasted renewable natural
16 gas production volume of one thousand three hundred ninety-six (1,396) thousand
17 standard cubic feet per day (MScfD). Once this requirement is met, the Project
18 Owner must provide detailed vendor invoices and proof of payment(s) for
19 materials/services provided not to exceed the Agreement Total amount for Project
20 Owner Owned Pipeline Infrastructure to SoCalGas for approval. The amount of
21 reimbursement may not exceed the costs reflected by the invoices and proof of
22 payment(s). The final reimbursement payment will be available for 2 years,
23 starting from the date the 30 out of 40 days flow requirement is met.

24 SoCalGas reviewed and verified each invoice and supporting documentation submitted
25 by Lakeside Pipeline LLC for each of the milestone payments. Each invoice submitted to
26 SoCalGas is required to contain: (1) contact information; (2) the correct amount invoiced
27 (matches milestone payment percentage or up to the percentage); (3) reference to PO Number;
28 and (4) reference to maximum contract amount. In addition to the invoices, Lakeside Pipeline
29 LLC was required to provide supporting documentation, including: (1) invoices from vendors
30 with description of work completed and/or material ordered; (2) proof of payments provided to

1 vendors; (3) map/photo showing what has been installed to date; and (4) milestone passed, when
2 applicable.

3 Upon receipt of the invoices and supporting documents, SoCalGas reviewed the invoices’
4 description of work completed and/or material ordered, proof of payments matches invoice, and
5 Lakeside Pipeline LLC’s description of how work provided for each invoice supports the scope
6 of work for biogas treatment or collection lines (Lane 2). SoCalGas also reviewed the invoice
7 dates, invoice amounts, and names of the sub-contractors provided on actual invoices and
8 summary spreadsheets to confirm no duplicated invoices are included. To the extent SoCalGas
9 had questions on the documentation submitted, SoCalGas would request clarification from
10 Lakeside Pipeline LLC. For example, SoCalGas requested additional information when the
11 documentation was missing proof of payment, an attachment, or a map/photo or if there are
12 discrepancies in invoice amount or number of hours worked.

13 As of the date of this Application, SoCalGas has reimbursed Lakeside Pipeline LLC for
14 costs up to the \$9,327,295 amount approved by CPUC. SoCalGas made the last payment on
15 June 2, 2022. There remains \$6,691,208 in unreimbursed costs outstanding representing the total
16 amount over the bid amount.

17 **D. Cost Overages and Drivers for the Project**

18 **1. Lakeside Pipeline LLC**

19 Lakeside Pipeline LLC incurred cost of \$6,691,208 above the initial \$9,327,295 estimate
20 submitted to the Selection Committee. These costs above the initially-submitted estimated
21 amount were incurred due to a variety of factors and unforeseen circumstances, including final
22 engineering and design of the Project; environmental mitigations and other permitting agency
23 requirements; project labor agreements; and pandemic-related inflation. In Chapter 2 testimony,
24 MEW provides a description of factors beyond the control of MEW which resulted in costs
25 incurred over the CPUC approved bid amount.

26 **2. SoCalGas**

27 SoCalGas incurred costs of \$7,831,000 above the authorized amount of \$10,844,000.³³
28 Chapter 3 (Prepared Direct Testimony of Maritza Pacheco) provides a detailed breakdown of

³³ Costs are fully loaded and includes both direct and indirect costs (*i.e.* overheads, Allowance for Funds Used During Construction (AFUDC), and ad valorem taxes).

1 contributing factors for overages in (1) Engineering; (2) Equipment and Materials;
2 (3) Construction; (4) Company Labor; and (5) Other Construction Management Costs.
3 Authorized costs (up to \$10.844M) have been or will be recovered through the annual regulatory
4 account update, and only the \$7.831M above the authorized cap is subject to this Application.

5 The cost variances resulted primarily from scope changes identified during the detailed
6 design, compressed regulatory timelines, and first-of-its-kind technical requirements. As
7 explained in Chapter 3 testimony, these additional costs were incurred prudently and should be
8 approved for recovery.

9 This concludes my prepared direct testimony.

1 **IV. QUALIFICATIONS**

2 My name is James (Jim) Lucas. My business address is 555 West Fifth Street, Los
3 Angeles, California. I am currently employed by SoCalGas as a Manager, Clean Energy
4 Business Development. Since starting with SoCalGas over 30 years ago, I have held various
5 positions of increasing responsibility in the areas of Business Development, Product
6 Development, Project Management, Energy Efficiency, Financial Analysis, Pipeline Operations
7 and Engineering. I received my Bachelor of Science degree in Mechanical Engineering from the
8 University of California at Santa Barbara and Masters of Business Administration from
9 California State University, Fullerton. I am a registered Professional Mechanical Engineer in the
10 State of California. As a result of my position, experience, and expertise, I have personal
11 knowledge of the facts and representations herein and, if called upon to testify, could and would
12 do so, except for those facts expressly stated to be based upon information and belief, and to
13 those matters, I believe them to be true.

14 I have previously provided testimony before the Commission.