

**SOUTHERN CALIFORNIA GAS COMPANY  
SAN DIEGO GAS & ELECTRIC COMPANY**

**APPLICATION FOR REVIEW OF COSTS INCURRED IN EXECUTING  
PIPELINE SAFETY ENHANCEMENT PLAN (PSEP) (A.18-11-010)**

**(CalPA Data Request-13)**

**Date Requested: February 25, 2019**

**Date Responded: March 11, 2019**

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**QUESTION 01:**

Public Advocates Office's Data Request 3 (DR-03) asks, *"Please find the attached excel worksheet DR03-Q1 in which the Public Advocates Office is requesting the following data:*

- *Column E: The date of the most recent pressure test prior to PSEP conducted on the respective segment presented in Column B.*
- *Column K: The percentage of the Maximum Allowable Operating Pressure (MAOP) the segment was tested to for the pressure test dated in Column E. When calculating this percent, divide the pressure the pipe was tested at corresponding to the date in Column E, by the MAOP at the time when Sempra determined the segment qualified for PSEP."*

In the response to DR-03, SoCalGas/SDG&E filled in a spreadsheet with columns showing different attributes associated with the various projects in SoCalGas/SDG&E's application. In particular, please focus on two columns in this table entitled, "Date of the last pressure test prior to PSEP" (Column E) and "% of MAOP of the pressure test" (Column K). For rows where Column E has a date identified, but Column K has no value shown, please do the following:

- a. Confirm that SoCalGas/SDG&E have no value to fill in Column K.
- b. Provide reasoning as to why no value is shown where there is no such value.

**RESPONSE 01:**

- a. As explained in response to CalPA DR-02, question 1, "SoCalGas/SDG&E and CalPA held a telephonic conference on December 4, 2018 to discuss this data request. The parties agreed that: (1) this request seeks information with respect to those segments operating over 30 percent Specified Minimum Yield Strength (SMYS); (2) subparts (B) and (C) request the date of the most recent pressure test conducted prior to the PSEP pressure test."

As explained in response to CalPA DR-03, question 1, SoCalGas and SDG&E provided data in response to CalPA DR-03 that met the following criteria: "1. The most recent pressure test date (Column E) is between January 1, 1956 and June 30, 1961; 2. Duration of the most recent pressure test (Column F) is greater than 1 hour; and 3. The Original % SMYS (Column D) is greater than or equal to 30%."

In order to be responsive to the specific request from CalPA to provide data in the format prescribed, SoCalGas and SDG&E left the data in field K blank, if the data did not satisfy the three conditions above (i.e., the test was not conducted between January 1, 1956 and June 30, 1961, or the duration of the most recent pressure test is less than one hour, or the original % SMYS is less than 30%). As such, a blank in Column K does not necessarily indicate that SoCalGas and SDG&E do not have record of a % of MAOP of a pressure test. Rather, a blank

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in Column K indicates SoCalGas and SDG&E do not have a % of MAOP of a pressure test that meets the three specific criteria established by CalPA for the data requests.

- b. See response to Question 1a.

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**QUESTION 02:**

Public Advocates Office's Data Request 12 (DR-012) asks, "Please fill in the following columns appended to the Excel Attachment in the attachment titled *Attch\_DR-12\_Q2\_Confidential.xlsx*, for each pipe section:

- *Column Q: The vintage year for each pipe section. Please list each distinctive year as a separate row, even if the differing years are part of the same pipe section."*

In response to DR-012, SoCalGas/SDG&E filled in a spreadsheet including columns entitled "Year of last Pressure Test", and "Pipe Segment Vintage". An excerpt of that spreadsheet is shown below in this question. As shown in this excerpt, certain rows show a section of pipe that had the year of last pressure test several years or more prior to the pipe segment vintage. Please provide the reason for this.

#	Project	Type	Year of last Pressure Test	Pipe Segment Vintage	Δ Years (Vintage - PT)
4	32-21 Section 1	T	1970	1973	3
5	32-21 Section 2	T	1969	1973	4
45	2001 West-B	T	1949	1960	11

**RESPONSE 02:**

For the segments on Line 32-21 Section 1 and 2, portions of the historical (pre-PSEP) project were tested in-place in 1970 and 1969, respectively, but the final portion of the project was not put into service until 1973.

Due to a manual cut and pasting error, the vintage data for 2001 West-B provided in response to CalPA Data Request 12 contained an erroneous value. The correct pipe segment vintage is 1949. SoCalGas and SDG&E are concurrently amending CalPA Data Request-12 and CalPA Data Request-03 Amendment 2 to address this and other cutting and pasting errors identified in the prior response.

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**QUESTION 03:**

Please explain what is SoCalGas/SDG&E understanding of the term "Pipe Segment Vintage" in the column title shown in response to DR-012.

**RESPONSE 03:**

In reviewing historic pipeline construction records, SoCalGas and SDG&E interpreted pipe segment vintage to be either the date the pipe was installed, the date construction concluded or the date the pipeline was placed into service.

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**QUESTION 04:**

For pipe that has been tested or replaced and is within the scope of A.18-11-010:

- a. Have SoCalGas/SDG&E reused in their system any section of pipe that was previously used in another part of their system?
- b. Have SoCalGas/SDG&E reused in their system any section of pipe that was previously used in another system?
- c. If the answer to question a, question b, or both questions is yes, please identify all such pieces of pipe.

**RESPONSE 04:**

The response contains Confidential and Protected Materials provided pursuant to PUC Section 583, GO 66-D, D.17-09-023, the accompanying declaration, and/or non-disclosure agreement.

- a. SoCalGas and SDG&E construe this request as asking whether SoCalGas and SDG&E have identified records indicating that pipeline tested or replaced as part of PSEP was previously used in another part of the SoCalGas/SDG&E pipeline system. Subject to that understanding, SoCalGas and SDG&E respond as follows: Yes.
- b. SoCalGas and SDG&E construe this request as asking whether SoCalGas and SDG&E have identified records indicating that pipeline tested or replaced as part of PSEP was previously used in another operator's pipeline system. Subject to that understanding, SoCalGas and SDG&E respond as follows: No.
- c. SoCalGas/SDG&E did not reuse pipe for any of the replacement projects included in the scope of A.18-11-010.

The following three projects within the scope of A.18-11-010 replaced pre-existing pipe for which historic pipeline records indicate the pipe may have been reused from another part of the SoCalGas/SDG&E system:

- o **Line 38-200** contained 0.28 miles of [REDACTED] reused pipe.
- o **Line 38-514** contained 2.93 miles of [REDACTED] reused pipe.
- o **Line 41-6000-2** contained 20.07 miles of [REDACTED] and [REDACTED] reused pipe.