

**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-23)**

**Date Requested: April 11, 2019**

**Date Responded: April 25, 2019**

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**QUESTION 01:**

As background to this question, Data Set 1 is defined as the list that SoCalGas/SDG&E provided in Response to Data Request 12. (The Response to Data Request 12 was dated February 20, 2019, and amended on March 11, 2019, and April 1, 2019.) Data Set 2 is defined as SoCalGas/SDG&E's list in their Response to Public Advocates Office's Data Request 1 (The Response to Data Request 1 dated August 14, 2018.). Data Sets 1 and 2 were both asked about in Cal PA's DR-20 Question 1.

For each segment provided in Data Set 2 that cannot be matched to the corresponding segment in Data Set 1, please state the reasons why this is the case.

**RESPONSE 01:**

As explained by SoCalGas and SDG&E during a telephonic conference held on April 9, 2019 to discuss Cal Advocates Data Request-20, because the database from which the requested data was pulled is dynamic, and Public Advocates Office directed SoCalGas and SDG&E to compile data into a single spreadsheet that was extracted as of various different points in time, there may be instances where SoCalGas and SDG&E cannot line up stationing of a segment that existed at one point in time to stationing that exists at a different time. Because the spreadsheet requested by Cal Advocates is a conglomeration of data extracted as of various points in time, there are several reasons why segment data in the spreadsheet requested by Cal Advocates in this proceeding may not match data provided in response to an independent and unrelated data request from Cal Advocates submitted in the Summer of 2018.

For clarity, in the response below, SoCalGas and SDG&E refer to their response to Cal Advocates Data Request 12 in this proceeding as PSEP Data Set 1 and SoCalGas and SDG&E's response to "Data Request ORA-Transmission DR-01, Question 2," provided in August 2018, as Transmission Data Set 2. The overriding reason for the differences is that the two data requests established different data parameters and, as directed by Cal Advocates in those requests, the data was extracted from HPPD as of different points in time. Specific differences can be attributed to:

1. As directed by Cal Advocates, Transmission Data Set 2 excluded post-1970 pipe segments per the parameters of the data request, whereas PSEP Data Set 1 includes post-1970 pipe segments.
2. PSEP Data Set 1 includes incidental PSEP pipe segments operating below 20% Specified Minimum Yield Strength (SMYS). Per the parameters of the request by Cal Advocates, Data Set 2 excludes segments operating below 20% SMYS.
3. Abandoned pipe segments were excluded from PSEP Data Set 1 but may or may not have been included in Transmission Data Set 2. Because the HPPD database is dynamic and updates to the database are not instantaneous, there may be a period of time between when a pipeline segment is abandoned and when HPDD is updated to reflect the abandoned segment. Thus, it is possible abandoned segments may have been included in Transmission Data Set 2.

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**QUESTION 02:**

If one or more sets of data has not yet been provided to the Public Advocates Office, but was used to inform SoCalGas and SDG&E's decisions to test or replace pipe in A.18-11-010, please do the following:

- a) Identify and provide each data set.
- b) Provide a comparison between each of these data sets and the data set provided in response to Data Request 12.
- c) Please explain why SoCalGas/SDG&E did not provide and identify each such data set as a part of A.18-11-010.
- d) Please explain why SoCalGas/SDG&E did not provide and identify each such data set in response to Cal PA's prior data requests in A.18-11-010.

**RESPONSE 02:**

- a) As stated in the amended Chapter II direct testimony of Rick Phillips at pages 14-16, the Decision Tree analysis considers many factors to arrive at the implementation option for each project that is most beneficial to customers. In addition to the pipeline Maximum Allowable Operating Pressure (MAOP) and the % Specified Minimum Yield Strength (SMYS), other data was factored into the analysis that led to the decision to test, replace or abandon the pipeline sections such as, customer and community impact, system impact, pipe vintage, pipe piggability, pipe history, etc.

For a summary of key factors that influenced the final option selected for each project, please refer to Section II.B Decision Tree Analysis for each project in Chapter III of the workpapers submitted in support of the Application, provided to CalPA in response to Data Request 01 Question 1 and Data Request 21 Question 1.

- b) Not applicable.
- c) Not applicable.
- d) Not applicable.