

**ORA DATA REQUEST
ORA-SDGE-123-MCL
SDG&E 2019 GRC – A.17-10-007
SDG&E RESPONSE
DATE RECEIVED: FEBRUARY 5, 2018
DATE RESPONDED: FEBRUARY 20, 2018**

Exhibit Reference: SDG&E-05 and SDG&E-05WP

SDG&E Witness: Omar Rivera

Subject: Gas System Integrity

Please provide the following:

1. In reference to Ex. SDG&E-05, pages OR-19 – OR-22 for Damage Prevention Program
 - a. Does SDG&E report the annual results of the federally mandated Public Awareness Program to any regulatory agency? If yes, provide the name of the regulatory agencies and how often SDG&E reports to them the results of this program.
 - b. Please provide historical data (2012-2016) for costs associated with Codes and Standards, and Records.

SDG&E Response 01:

- a. No.
- b. A report showing the five years of adjusted-recorded historical spend has been provided to Clayton Tang on Dec. 1 in the file 'MDR General Requirements Item 17 SDGE/SCG 5-Yr Hist w Fcst.xlsx' and updated on Jan. 25.

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2. In reference to Ex. SDG&E-05, page OR-24, please provide the total cost incurred for implementing SDG&E's Process Hazard Analysis, and explain the implementation plan.

SDG&E Response 02:

The total cost to be incurred for implementing the Process Hazard Analysis program (PHA) is estimated in conjunction with, and not as a separable component of, improved digitization of records within the Codes and Standards activity. SDG&E's Process Hazard Analysis (PHA) is mentioned in testimony along with two key drivers for costs incurred within the Codes and Standards activity. At page OR-23 line 16, those costs are described: "The cost reflects the labor support to manage and provide consistency across both companies with respect to the Gas Standards, and to prepare documentation and perform follow-up implementation post-SED audits." The main driver is the proposed Information Management Systems risk mitigation activity identified in SDG&E's RAMP Report, Chapter SDG&E-13 Records Management,¹ which will enable search ability and traceability functions. This improvement is described in SDG&E's RAMP Report Chapter 13, Records Management on page SDGE 13-12 under the heading "Information Management Systems:"

While there are several current and planned IT applications and enhancements to support records management, SDG&E proposes an initiative to further digitize its records. SDG&E's records have evolved over the life of the operational assets, and transferring existing paper records to an electronic format (digitization) is one aspect of modernizing SDG&E's records. In addition to digitization, SDG&E's initiative will also add searchability and traceability functionality. Regulatory compliance standards increasingly require that utilities be able to efficiently and effectively identify specific attributes related to operational assets. As a result, having IT applications for records management that enable searchability and traceability functionality are important. SDG&E has identified IT solutions to support the modernization effort. The intent of these projects is to leverage existing investments in information technology while providing improved functionality to address operational needs in the records management area.

This gas component of that RAMP Records Management risk is found in that same report at page SDGE 13-13 under item 3, Operational Compliance and Oversight, under O&M (Gas). This same risk mitigation estimate is found in the associated workpapers to the testimony, Exhibit SDG&E-05-WP at page 31. The implementation of Process Hazard Analysis is a secondary driver not directly impacting the digitization of records that is the primary function of the Codes and Standards workgroup.

¹ I.16-10-015/I.16-10-016 Risk Assessment and Mitigation Phase Report of San Diego Gas & Electric Company and Southern California Gas Company, November 30, 2016. Please also refer to Exhibit SCG-02-R/SDG&E-02-R, Chapter 1 (Diana Day) for more details regarding the utilities' RAMP Report.

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SDG&E Response 02 Continued:

PHA is a technical and critical review of proposed new equipment or processes that is conducted through a collaborative framework involving field employees (equipment operators) and the design engineers. The review process seeks to identify potential hazards and re-design to avoid the hazard in the proposed process or equipment.

The schedule and costs incurred in the implementation of a PHA directly impacts the individual project where a PHA is performed for a newly proposed equipment or processes. With the proposed Information Management system risk mitigation activity in RAMP SDG&E-13 Records Management, the result from a PHA would become searchable and traceable for future planned projects to review.