

**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)**

(SCGC Data Request-01 Amended)

Date Requested: November 30, 2018
Date Responded: December 7, 2018
Date Resubmitted: December 21, 2018
Date Amended: April 9, 2019

QUESTION 01:

Please provide Table 1, Pipeline Hydrotest and Replacement Projects for 2018 Reasonableness Review, WP-Intro-3, annotated to identify each project that includes “accelerated Phase 2B” mileage.

RESPONSE 01:

Response amended on April 9, 2019. Changes are noted in red and deletions are noted in red strikethrough. In the table below, the Phase 2B mileage column is updated to reflect corrections to mileage characterizations. These corrections are reflected in amended testimony and workpapers in A.18-11-010, served on April 2, 2019.

The table below indicates the PSEP projects in this proceeding that include accelerated Phase 2B mileage.

For further details on accelerated Phase 2B mileage, see CONFIDENTIAL Chapter III (Phillips) workpapers, which are being provided in electronic format in response to question SCGC DR-1.3, and which are subject to the terms of the parties’ executed Non-Disclosure and Protective Agreement (“NDA”).

Pipeline Workpaper Title	Project Scope (miles, rounded)			Utility	Phase 2B Mileage
	Hydrotest	Replace	Abandon		
30-18 Section 1 and 3 Replacement Project		2.008	0.003	SoCalGas	No Yes
33-120 Section 3 Replacement Project		0.516		SoCalGas	No
36-1002 Replacement Project		0.034		SoCalGas	No
36-9-09 North Section 1 Replacement Project		5.975		SoCalGas	No
36-9-09 North Section 3 Replacement Project		2.956		SoCalGas	Yes
36-9-09 North Section 4A and 4B Replacement Project		1.034		SoCalGas	Yes
36-9-09 North Section 7A and 7B Replacement Project		4.260		SoCalGas	No

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	Hydrotest	Replace	Abandon		
37-07 Replacement Project		3.222		SoCalGas	No
37-18 Sections 1,2,3,4 and 5 Replacement Project		4.291		SoCalGas	No
38-200 Replacement Project		0.369		SoCalGas	No
38-501 Replacement Project		2.410	0.013	SoCalGas	Yes
38-504 Replacement Project		0.377		SoCalGas	No
38-512 Replacement Project		4.901	0.059	SoCalGas	No
38-514 Replacement Project		2.930		SoCalGas	No
38-931 Replacement Project		0.997	0.018	SoCalGas	No
41-17 Replacement Project			1.790	SoCalGas	No
41-116 Replacement Project		0.009		SoCalGas	No
41-6000-2 Replacement Project		11.706	0.035	SoCalGas	Yes
43-121 North Section 1 Replacement Project		1.009		SoCalGas	No
43-121 South Replacement Project		1.475	0.002	SoCalGas	No
44-137 Replacement Project		1.031	0.008	SoCalGas	No
44-687 Replacement Project		0.303		SoCalGas	No
44-720 Replacement Project		1.482	0.011	SoCalGas	Yes
49-15 Replacement Project		2.779	0.011	SDG&E	Yes
49-28 Replacement Project		2.600		SDG&E	Yes
85 South Newhall Avenue Replacement Project		0.085	0.089	SoCalGas	No
2000-West Santa Fe Springs Replacement Project		0.150	0.050	SoCalGas	No
31-09 Hydrotest Project	0.188	0.014	0.011	SoCalGas	Yes
32-21 Section 1 Hydrotest Project	1.479	0.082		SoCalGas	NoYes
32-21 Section 2 Hydrotest Project	1.560	0.035	0.007	SoCalGas	No
32-21 Section 3 Hydrotest Project	2.381	0.010		SoCalGas	No
37-18-F Hydrotest Project	2.044	0.021	0.019	SoCalGas	No
49-11 Hydrotest Project	0.878	0.082		SDG&E	Yes
406 Section 3 Hydrotest Project	0.426	0.007		SoCalGas	Yes
2000-C Hydrotest Project	7.498	0.087		SoCalGas	Yes

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Pipeline Workpaper Title	Project Scope (miles, rounded)			Utility	Phase 2B Mileage
	Hydrotest	Replace	Abandon		
2001 West-B Hydrotest Project	1.789	0.011		SoCalGas	Yes
2003 Section 2 Hydrotest Project	0.085	0.009		SoCalGas	Yes
36-9-09 North Section 5A Hydrotest and Replacement Project	0.572	0.914	0.007	SoCalGas	Yes
49-13 Replacement and Hydrotest Project	1.936	1.239		SDG&E	Yes
404 Sections 1, 2, 2A, 3, 3A, 4&5, 8A and 9 Replacement and Hydrotest Projects	12.000	0.356	0.298	SoCalGas	Yes
1004 Hydrotest and Replacement Projects	8.574	0.395	0.063	SoCalGas	Yes
36-9-09 JJ Abandonment Project		0.009	0.453	SoCalGas	No
36-9-09 South Abandonment Project		0.005	1.235	SoCalGas	No
Kern Wildlife Bundle Abandonment Project			15.225	SoCalGas	No

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QUESTION 1.2:

Please provide a working electronic copy of every Excel spreadsheet (or other Excel model) that was used in preparing testimony. As used throughout this data request, working Excel spreadsheets contain all data used and all formulas employed to derive the tables and charts shown in the testimony or otherwise support figures stated or conclusions drawn in the testimony. Working Excel spreadsheets contain all links to other Excel spreadsheets in active format.

RESPONSE 1.2:

Response amended on April 9, 2019. Changes are noted in red and deletions are noted in red strikethrough. Attachments “SCGC DR-01_Q01.2_Ch. III (Phillips)_Table 7 Disallowance_Amended 04-05-2019” and “SCGC DR-01_Q01.2_Ch. III (Phillips)_Table 8 Post 55 Disallowance_Amended 04-05-2019” are updated to reflect corrections to disallowance figures. These corrections are reflected in amended testimony and workpapers in A.18-11-010, served on April 2, 2019.

SoCalGas and SDG&E object to this request on the grounds that the data request is overly broad and vague and ambiguous with respect to the request to provide “a working electronic copy of every Excel spreadsheet (or other Excel model) that was used in preparing testimony. As used throughout this request, working Excel spreadsheets contain all data used and all formulas employed to derive the tables and charts shown in the testimony or otherwise support figures stated or conclusions drawn in the testimony.” Without waiving the foregoing objections, SoCalGas and SDG&E respond as follows.

SoCalGas and SDG&E understand this request to seek the active Excel files, if any, that correspond to the tables in testimony. See attached spreadsheets.

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QUESTION 1.3:

Please provide hard (paper) copies of the confidential version of the four volumes of workpapers for this reasonableness review.

RESPONSE 1.3:

Response amended on April 9, 2019. Changes are noted in red and deletions are noted in red strikethrough. Volumes I and II of confidential workpapers are updated and provided herein to reflect corrections for certain inaccuracies discovered subsequent to the original filing, dated November 13, 2018, and to promote clarity. These corrections are reflected in amended testimony and public workpapers in A.18-11-010, served on April 2, 2019.

Note: The two volumes of confidential workpapers (clean and redline) are being provided in electronic format and are subject to the terms of the parties' NDA.

SoCalGas and SDG&E object to the request for "hard (paper)" copies of the confidential version of the four volumes of workpapers on the grounds that (a) the request to provide the documents in "hard (paper)" format imposes undue burden and expense on SoCalGas and SDG&E that outweighs the likelihood that "hard (paper)" copies will lead to the discovery of admissible evidence, pursuant to Rule 10.1 of the Rules of Practice and Procedure, (b) the request for hard copies is inconsistent with Rule 1.10 of the Rules of Practice and Procedure, and (c) SCGC is equally able to print the documents. Without waiving the foregoing objections, SoCalGas and SDG&E respond as follows.

Four volumes of confidential workpapers are being provided in electronic format and are subject to the terms of the parties' NDA.

Public versions of the workpapers are available on the SoCalGas and SDG&E websites:

- SoCalGas: <https://www.socalgas.com/regulatory/A18-11-010.shtml>
- SDG&E: <https://www.sdge.com/rates-and-regulations/proceedings/application-review-incurred-costs-executing-psep>