

Application of SAN DIEGO GAS & ELECTRIC)
COMPANY for authority to update its gas and)
electric revenue requirement and base rates)
effective January 1, 2024 (U 902-M))

Application No. 22-05-___

Exhibit No.: (SDG&E-09-WP)

WORKPAPERS TO
PREPARED DIRECT TESTIMONY
OF AMY KITSON / TRAVIS T. SERA
ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

May 2022



2024 General Rate Case - APP
INDEX OF WORKPAPERS

Exhibit SDG&E-09-WP - GAS INTEGRITY PROGRAMS

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Overall Summary For Exhibit No. SDG&E-09-WP

Area:	GAS INTEGRITY PROGRAMS
Witness:	Amy Kitson

Description	In 2021 \$ (000) Incurred Costs			
	Adjusted-Recorded	Adjusted-Forecast		
	2021	2022	2023	2024
Non-Shared Services	11,026	14,052	11,771	12,768
Shared Services	0	0	0	0
Total	11,026	14,052	11,771	12,768

Note: Totals may include rounding differences.

San Diego Gas & Electric Company
2024 GRC - APP
Non-Shared Service Workpapers

Area: GAS INTEGRITY PROGRAMS
Witness: Amy Kitson

Summary of Non-Shared Services Workpapers:

Description	In 2021 \$ (000) Incurred Costs			
	Adjusted-Recorded	Adjusted-Forecast		
	2021	2022	2023	2024
A. TIMP	8,772	11,425	8,676	9,514
B. DIMP	2,254	2,627	2,960	2,866
C. FIMP	0	0	0	258
D. GSEP	0	0	135	130
Total	11,026	14,052	11,771	12,768

Note: Totals may include rounding differences.

San Diego Gas & Electric Company
2024 GRC - APP
Non-Shared Service Workpapers

Area: GAS INTEGRITY PROGRAMS
Witness: Amy Kitson
Category: A. TIMP
Workpaper: 1TD001.000

Summary for Category: A. TIMP

	In 2021\$ (000) Incurred Costs			
	Adjusted-Recorded	Adjusted-Forecast		
	2021	2022	2023	2024
Labor	1,121	1,278	1,512	1,570
Non-Labor	7,651	10,147	7,164	7,944
NSE	0	0	0	0
Total	8,772	11,425	8,676	9,514
FTE	10.5	12.0	14.2	14.7

Workpapers belonging to this Category:

1TD001.000 TIMP

Labor	1,121	1,278	1,512	1,570
Non-Labor	7,651	10,147	7,164	7,944
NSE	0	0	0	0
Total	8,772	11,425	8,676	9,514
FTE	10.5	12.0	14.2	14.7

Note: Totals may include rounding differences.

Beginning of Workpaper
1TD001.000 - TIMP

San Diego Gas & Electric Company
2024 GRC - APP
Non-Shared Service Workpapers

Area: GAS INTEGRITY PROGRAMS
 Witness: Amy Kitson
 Category: A. TIMP
 Category-Sub: 1. TIMP
 Workpaper: 1TD001.000 - TIMP

Activity Description:

TIMP assessments, remediation, preventative & mitigative measures, and other activities in compliance with 49 CFR Part 192, Subpart O, as well as new requirements of 49 CFR § 192.710.

Forecast Explanations:

Labor - Base YR Rec

SDG&E company labor in support of the TIMP.

Non-Labor - Base YR Rec

SDG&E non-labor costs (e.g., contracts) in support of the TIMP.

NSE - Base YR Rec

N/A

Summary of Results:

		In 2021\$ (000) Incurred Costs								
		Adjusted-Recorded					Adjusted-Forecast			
Years		2017	2018	2019	2020	2021	2022	2023	2024	
Labor		524	592	703	855	1,121	1,279	1,513	1,571	
Non-Labor		4,070	5,909	7,313	7,313	7,651	10,147	7,164	7,944	
NSE		0	0	0	0	0	0	0	0	
Total		4,594	6,501	8,016	8,167	8,772	11,426	8,677	9,515	
FTE		5.0	6.0	6.7	8.0	10.5	12.0	14.2	14.7	

Note: Totals may include rounding differences.

San Diego Gas & Electric Company
2024 GRC - APP
Non-Shared Service Workpapers

Area: GAS INTEGRITY PROGRAMS
 Witness: Amy Kitson
 Category: A. TIMP
 Category-Sub: 1. TIMP
 Workpaper: 1TD001.000 - TIMP

Summary of Adjustments to Forecast:

In 2021 \$(000) Incurred Costs										
Forecast Method		Base Forecast			Forecast Adjustments			Adjusted-Forecast		
Years		2022	2023	2024	2022	2023	2024	2022	2023	2024
Labor	Base YR Rec	1,121	1,121	1,121	157	391	449	1,278	1,512	1,570
Non-Labor	Base YR Rec	7,651	7,651	7,651	2,496	-487	293	10,147	7,164	7,944
NSE	Base YR Rec	0	0	0	0	0	0	0	0	0
Total		8,772	8,772	8,772	2,653	-96	742	11,425	8,676	9,514
FTE	Base YR Rec	10.5	10.5	10.5	1.5	3.7	4.2	12.0	14.2	14.7

Forecast Adjustment Details:

Year	Labor	NLbr	NSE	Total	FTE	Adj Type
2022	157	2,496	0	2,653	1.5	1-Sided Adj
Explanation:	This adjustment captures the incremental 2022 costs above the base year recorded. Cost forecasts are primarily driven by the number of expected assessments (7) as determined by the required compliance assessment cycles.					
2022 Total	157	2,496	0	2,653	1.5	
2023	391	-487	0	-96	3.7	1-Sided Adj
Explanation:	This adjustment captures the incremental 2023 costs above the base year recorded. Cost forecasts are primarily driven by the number of expected assessments (5) as determined by the required compliance assessment cycles.					
2023 Total	391	-487	0	-96	3.7	
2024	449	293	0	742	4.2	1-Sided Adj
Explanation:	This adjustment captures the incremental 2024 costs above the base year recorded. Cost forecasts are primarily driven by the number of expected assessments (5) as determined by the required compliance assessment cycles.					
2024 Total	449	293	0	742	4.2	

Note: Totals may include rounding differences.

San Diego Gas & Electric Company
2024 GRC - APP
Non-Shared Service Workpapers

Area: GAS INTEGRITY PROGRAMS
Witness: Amy Kitson
Category: A. TIMP
Category-Sub: 1. TIMP
Workpaper: 1TD001.000 - TIMP

Determination of Adjusted-Recorded (Incurred Costs):

	2017 (\$000)	2018 (\$000)	2019 (\$000)	2020 (\$000)	2021 (\$000)
Recorded (Nominal \$)*					
Labor	409	474	581	726	974
Non-Labor	3,691	5,447	6,883	6,860	7,577
NSE	0	0	0	0	0
Total	4,100	5,921	7,464	7,586	8,551
FTE	4.3	5.1	5.8	6.9	8.9
Adjustments (Nominal \$) **					
Labor	0	0	0	0	1
Non-Labor	-41	0	-2	-2	74
NSE	0	0	0	0	0
Total	-41	0	-2	-2	75
FTE	0.0	0.0	0.0	0.0	0.1
Recorded-Adjusted (Nominal \$)					
Labor	409	474	581	726	975
Non-Labor	3,650	5,447	6,881	6,858	7,651
NSE	0	0	0	0	0
Total	4,059	5,921	7,462	7,584	8,626
FTE	4.3	5.1	5.8	6.9	9.0
Vacation & Sick (Nominal \$)					
Labor	61	72	83	103	146
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	61	72	83	103	146
FTE	0.7	0.9	0.9	1.1	1.5
Escalation to 2021\$					
Labor	55	47	39	27	0
Non-Labor	420	461	431	454	0
NSE	0	0	0	0	0
Total	475	508	470	481	0
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Constant 2021\$)					
Labor	524	592	703	855	1,121
Non-Labor	4,070	5,909	7,313	7,313	7,651
NSE	0	0	0	0	0
Total	4,594	6,501	8,016	8,167	8,772
FTE	5.0	6.0	6.7	8.0	10.5

* After company-wide exclusions of Non-GRC costs

** Refer to "Detail of Adjustments to Recorded" page for line item adjustments

Note: Totals may include rounding differences.

San Diego Gas & Electric Company
2024 GRC - APP
Non-Shared Service Workpapers

Area: GAS INTEGRITY PROGRAMS
Witness: Amy Kitson
Category: A. TIMP
Category-Sub: 1. TIMP
Workpaper: 1TD001.000 - TIMP

Summary of Adjustments to Recorded:

In Nominal \$ (000) Incurred Costs					
Years	2017	2018	2019	2020	2021
Labor	0	0	0	0	0.632
Non-Labor	-41	0	-2	-2	74
NSE	0	0	0	0	0
Total	-41	0	-2	-2	75
FTE	0.0	0.0	0.0	0.0	0.1

Detail of Adjustments to Recorded:

Year	Labor	NLbr	NSE	FTE	Adj Type
2017	0	-41	0	0.0	CCTR Transf To 2100-0086.000
Explanation:	Electric Distribution costs that were erroneously mapped to TIMP due to remapping rules.				
2017 Total	0	-41	0	0.0	
2018 Total	0	0	0	0.0	
2019	0	-2	0	0.0	CCTR Transf To 2100-0091.000
Explanation:	Electric Distribution costs that were erroneously mapped to TIMP due to remapping rules.				
2019 Total	0	-2	0	0.0	
2020	0	-2	0	0.0	1-Sided Adj
Explanation:	Incremental COVID-related costs that are anticipated to be requested for recovery through a non-GRC Catastrophic Event Memorandum Account (CEMA).				
2020	0	0	0	0.0	1-Sided Adj
Explanation:	Incremental COVID-related costs that are anticipated to be requested for recovery through a non-GRC Catastrophic Event Memorandum Account (CEMA).				
2020 Total	0	-2	0	0.0	
2021	0	-2	0	0.0	1-Sided Adj
Explanation:	Incremental COVID-related costs that are anticipated to be requested for recovery through a non-GRC Catastrophic Event Memorandum Account (CEMA).				
2021	0	0	0	0.0	1-Sided Adj
Explanation:	Incremental COVID-related costs that are anticipated to be requested for recovery through a non-GRC Catastrophic Event Memorandum Account (CEMA).				
2021	0	-1	0	0.0	1-Sided Adj
Explanation:	One-sided entry - Cost element 6230914 vendor rebates in NonGRC, reclass to GRC				
2021	0	77	0	0.0	1-Sided Adj

Note: Totals may include rounding differences.

San Diego Gas & Electric Company
 2024 GRC - APP
 Non-Shared Service Workpapers

Area: GAS INTEGRITY PROGRAMS
 Witness: Amy Kitson
 Category: A. TIMP
 Category-Sub: 1. TIMP
 Workpaper: 1TD001.000 - TIMP

<u>Year</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>FTE</u>	<u>Adj Type</u>
Explanation: One-sided entry - SAP adj using cost element 6900200, costs in nonGRC, should be in GRC					
2021	1	0	0	0.1	1-Sided Adj
Explanation: One-sided entry - transfer DIMP direct costs from nonGRC to GRC; mapping error					
2021 Total	1	74	0	0.1	

Note: Totals may include rounding differences.

San Diego Gas & Electric Company
2024 GRC - APP
Non-Shared Service Workpapers

Area: GAS INTEGRITY PROGRAMS
Witness: Amy Kitson
Category: A. TIMP
Category-Sub: 1. TIMP
Workpaper: 1TD001.000 - TIMP

RAMP Item # 1

RAMP Activity

RAMP Chapter: SDG&E-Risk-3 Incident Related to the High Pressure System (Excluding Dig-in)

RAMP Line Item ID: C15 & M3 T1-T2

RAMP Line Item Name: Integrity Assessments & Remediation (HCA and Non-HCA)

Tranche(/s): Tranche1: Transmission - HCA; Tranche2: Transmission - non-HCA

GRC Forecast Cost Estimates (\$000)

	2021 Historical Embedded Cost (2021 \$)	2022 Forecast (2021 \$)	2023 Forecast (2021 \$)	2024 Forecast (2021 \$)	2024 RAMP Range (2020 Incurred \$)	
					Low	High
Tranche 1 Cost Estimate	5,889	10,189	7,480	9,038	5,048	6,483
Tranche 2 Cost Estimate	2,883	1,237	1,196	476	1,184	1,519

Cost Estimate Changes from RAMP:

Forecasted projects have been updated since the RAMP report; SDG&E continuously updates the TIMP assessment plan and manages projects in alignment within compliance cycles. Additionally, SDG&E determined that the Gas Transmission Safety Rule Part 1 verification of material properties and attributes should be considered a TIMP activity and C21 and M2 have been combined as a result.

GRC Work Unit/Activity Level Estimates

Unit of Measure	2021 Historical Embedded Activities	2022 Forecast Activities	2023 Forecast Activities	2024 Forecast Activities	2024 RAMP Range Activities	
					Low	High
Tranche 1 Miles assessed - HCA	28.80	34.60	49.40	7.60	24.00	30.00
Tranche 2 Miles assessed - non-HCA	14.10	4.20	7.90	0.40	6.00	7.00

Work Unit Changes from RAMP:

Units have been updated since the RAMP report based on project changes.

Risk Spend Efficiency (RSE)

	GRC RSE	RAMP RSE
Tranche 1	19.800	355.000
Tranche 2	9.200	300.000

San Diego Gas & Electric Company
2024 GRC - APP
Non-Shared Service Workpapers

Area: GAS INTEGRITY PROGRAMS
Witness: Amy Kitson
Category: A. TIMP
Category-Sub: 1. TIMP
Workpaper: 1TD001.000 - TIMP

RSE Changes from RAMP:

RSE inputs have been updated since the RAMP report.

San Diego Gas & Electric Company
2024 GRC - APP
Non-Shared Service Workpapers

Area: GAS INTEGRITY PROGRAMS
Witness: Amy Kitson
Category: B. DIMP
Workpaper: 1TD002.000

Summary for Category: B. DIMP

	In 2021\$ (000) Incurred Costs			
	Adjusted-Recorded	Adjusted-Forecast		
	2021	2022	2023	2024
Labor	336	387	436	422
Non-Labor	1,918	2,240	2,524	2,444
NSE	0	0	0	0
Total	2,254	2,627	2,960	2,866
FTE	3.7	4.3	4.8	4.7

Workpapers belonging to this Category:

1TD002.000 DIMP

Labor	336	387	436	422
Non-Labor	1,918	2,240	2,524	2,444
NSE	0	0	0	0
Total	2,254	2,627	2,960	2,866
FTE	3.7	4.3	4.8	4.7

Note: Totals may include rounding differences.

Beginning of Workpaper
1TD002.000 - DIMP

San Diego Gas & Electric Company
2024 GRC - APP
Non-Shared Service Workpapers

Area: GAS INTEGRITY PROGRAMS
 Witness: Amy Kitson
 Category: B. DIMP
 Category-Sub: 1. DIMP
 Workpaper: 1TD002.000 - DIMP

Activity Description:

DIMP activities and projects such as DREAMS, GIPP, SLIP, DRIP and other various activities in compliance with 49 CFR Part 192, Subpart P.

Forecast Explanations:

Labor - Base YR Rec

SDG&E company labor in support of the DIMP.

Non-Labor - Base YR Rec

SDG&E non-labor costs (e.g., contracts) in support of the DIMP.

NSE - Base YR Rec

N/A

Summary of Results:

		In 2021\$ (000) Incurred Costs								
		Adjusted-Recorded					Adjusted-Forecast			
		2017	2018	2019	2020	2021	2022	2023	2024	
Years										
Labor		1,023	793	327	387	336	386	435	421	
Non-Labor		5,213	805	1,151	1,974	1,918	2,240	2,524	2,444	
NSE		0	0	0	0	0	0	0	0	
Total		6,236	1,598	1,479	2,361	2,254	2,626	2,959	2,865	
FTE		11.3	4.1	2.8	3.4	3.7	4.3	4.8	4.7	

Note: Totals may include rounding differences.

San Diego Gas & Electric Company
2024 GRC - APP
Non-Shared Service Workpapers

Area: GAS INTEGRITY PROGRAMS
 Witness: Amy Kitson
 Category: B. DIMP
 Category-Sub: 1. DIMP
 Workpaper: 1TD002.000 - DIMP

Summary of Adjustments to Forecast:

In 2021 \$(000) Incurred Costs										
Forecast Method		Base Forecast			Forecast Adjustments			Adjusted-Forecast		
Years		2022	2023	2024	2022	2023	2024	2022	2023	2024
Labor	Base YR Rec	336	336	336	51	100	86	387	436	422
Non-Labor	Base YR Rec	1,918	1,918	1,918	322	606	526	2,240	2,524	2,444
NSE	Base YR Rec	0	0	0	0	0	0	0	0	0
Total		2,254	2,254	2,254	373	706	612	2,627	2,960	2,866
FTE	Base YR Rec	3.7	3.7	3.7	0.6	1.1	1.0	4.3	4.8	4.7

Forecast Adjustment Details:

Year	Labor	NLbr	NSE	Total	FTE	Adj Type
2022	51	322	0	373	0.6	1-Sided Adj
Explanation:	This adjustment captures incremental 2022 costs above the base year recorded. O&M costs are driven in part by the capital VIPP activities, which are increasing in alignment with D.19-09-051. Costs include DIMP management activities such as reporting, data and records management, and development of prospective PAARs.					
2022 Total	51	322	0	373	0.6	
2023	100	606	0	706	1.1	1-Sided Adj
Explanation:	This adjustment captures incremental 2023 costs above the base year recorded. O&M costs are driven in part by the capital VIPP activities, which are increasing in alignment with D.19-09-051. Costs include DIMP management activities such as reporting, data and records management, and development of prospective PAARs.					
2023 Total	100	606	0	706	1.1	
2024	86	526	0	612	1.0	1-Sided Adj
Explanation:	This adjustment captures incremental 2024 costs above the base year recorded. O&M costs are driven in part by the capital VIPP activities, which are increasing in alignment with D.19-09-051. Costs include DIMP management activities such as reporting, data and records management, and development of prospective PAARs.					
2024 Total	86	526	0	612	1.0	

Note: Totals may include rounding differences.

SDG&E/GAS INTEGRITY PROGRAMS/Exh No:SDG&E-09-WP/Witness: A. Kitson

San Diego Gas & Electric Company
2024 GRC - APP
Non-Shared Service Workpapers

Area: GAS INTEGRITY PROGRAMS
Witness: Amy Kitson
Category: B. DIMP
Category-Sub: 1. DIMP
Workpaper: 1TD002.000 - DIMP

Determination of Adjusted-Recorded (Incurred Costs):

	2017 (\$000)	2018 (\$000)	2019 (\$000)	2020 (\$000)	2021 (\$000)
Recorded (Nominal \$)*					
Labor	798	634	271	328	290
Non-Labor	4,675	742	1,083	1,851	1,917
NSE	0	0	0	0	0
Total	5,473	1,377	1,354	2,180	2,207
FTE	9.7	3.5	2.4	2.9	3.1
Adjustments (Nominal \$) **					
Labor	0	0	0	0	2
Non-Labor	0	0	0	0	1
NSE	0	0	0	0	0
Total	0	0	0	0	3
FTE	0.0	0.0	0.0	0.0	0.1
Recorded-Adjusted (Nominal \$)					
Labor	798	634	271	328	292
Non-Labor	4,675	742	1,083	1,851	1,918
NSE	0	0	0	0	0
Total	5,473	1,377	1,354	2,180	2,210
FTE	9.7	3.5	2.4	2.9	3.2
Vacation & Sick (Nominal \$)					
Labor	118	96	39	47	44
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	118	96	39	47	44
FTE	1.6	0.6	0.4	0.5	0.5
Escalation to 2021\$					
Labor	107	63	18	12	0
Non-Labor	538	63	68	123	0
NSE	0	0	0	0	0
Total	645	126	86	135	0
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Constant 2021\$)					
Labor	1,023	793	327	387	336
Non-Labor	5,213	805	1,151	1,974	1,918
NSE	0	0	0	0	0
Total	6,236	1,598	1,479	2,361	2,254
FTE	11.3	4.1	2.8	3.4	3.7

* After company-wide exclusions of Non-GRC costs

** Refer to "Detail of Adjustments to Recorded" page for line item adjustments

Note: Totals may include rounding differences.

San Diego Gas & Electric Company
2024 GRC - APP
Non-Shared Service Workpapers

Area: GAS INTEGRITY PROGRAMS
 Witness: Amy Kitson
 Category: B. DIMP
 Category-Sub: 1. DIMP
 Workpaper: 1TD002.000 - DIMP

Summary of Adjustments to Recorded:

In Nominal \$ (000) Incurred Costs					
Years	2017	2018	2019	2020	2021
Labor	0	0	0	0	2
Non-Labor	0	0	0	0	1
NSE	0	0	0	0	0
Total	0	0	0	0	3
FTE	0.0	0.0	0.0	0.0	0.1

Detail of Adjustments to Recorded:

Year	Labor	NLbr	NSE	FTE	Adj Type
2017 Total	0	0	0	0.0	
2018 Total	0	0	0	0.0	
2019 Total	0	0	0	0.0	
2020 Total	0	0	0	0.0	
2021	2	1	0	0.1	CCTR Transf To 2100-0310.000
Explanation:	Transfer costs for DIMP DCRR order 530000221763 from GOGD WKP 1GD004 to GOTD WKP 1TD002.				
2021 Total	2	1	0	0.1	

Note: Totals may include rounding differences.

San Diego Gas & Electric Company
2024 GRC - APP
Non-Shared Service Workpapers

Area: GAS INTEGRITY PROGRAMS
 Witness: Amy Kitson
 Category: B. DIMP
 Category-Sub: 1. DIMP
 Workpaper: 1TD002.000 - DIMP

RAMP Item # 1

RAMP Activity

RAMP Chapter: SDG&E-Risk-9 Incident Related to the Medium Pressure System (Excluding Dig-in)

RAMP Line Item ID: C16 T1

RAMP Line Item Name: Distribution Integrity Management Program (DIMP)

Tranche(/s): Tranche1: Plastic - Main (VIPP)

GRC Forecast Cost Estimates (\$000)

	2021 Historical Embedded Cost (2021 \$)	2022 Forecast (2021 \$)	2023 Forecast (2021 \$)	2024 Forecast (2021 \$)	2024 RAMP Range (2020 Incurred \$)	
					Low	High
Tranche 1 Cost Estimate	2,254	2,627	2,960	2,866	2,850	3,300

Cost Estimate Changes from RAMP:

At the time of the RAMP report, C16 included shared services from SoCalGas. These same costs have been excluded from 1TD002.000 and are presented in 2200-7001. Since the RAMP report, including the shared services costs, cost estimates have increased immaterially due to expanded management activities.

GRC Work Unit/Activity Level Estimates

Unit of Measure	2021 Historical Embedded Activities	2022 Forecast Activities	2023 Forecast Activities	2024 Forecast Activities	2024 RAMP Range Activities	
					Low	High
Tranche 1 No feasible units	0.00	0.00	0.00	0.00	0.00	0.00

Work Unit Changes from RAMP:

No change to the work units from the RAMP report.

Risk Spend Efficiency (RSE)

	GRC RSE	RAMP RSE
Tranche 1	0.200	3.400

RSE Changes from RAMP:

Refer to Capital workpapers.

San Diego Gas & Electric Company
2024 GRC - APP
Non-Shared Service Workpapers

Area: GAS INTEGRITY PROGRAMS
Witness: Amy Kitson
Category: C. FIMP
Workpaper: 1TD004.000

Summary for Category: C. FIMP

	In 2021\$ (000) Incurred Costs			
	Adjusted-Recorded	Adjusted-Forecast		
	2021	2022	2023	2024
Labor	0	0	0	0
Non-Labor	0	0	0	258
NSE	0	0	0	0
Total	<u>0</u>	<u>0</u>	<u>0</u>	<u>258</u>
FTE	0.0	0.0	0.0	0.0

Workpapers belonging to this Category:

1TD004.000 FIMP

Labor	0	0	0	0
Non-Labor	0	0	0	258
NSE	0	0	0	0
Total	<u>0</u>	<u>0</u>	<u>0</u>	<u>258</u>
FTE	0.0	0.0	0.0	0.0

Note: Totals may include rounding differences.

Beginning of Workpaper
1TD004.000 - FIMP

San Diego Gas & Electric Company
2024 GRC - APP
Non-Shared Service Workpapers

Area: GAS INTEGRITY PROGRAMS
 Witness: Amy Kitson
 Category: C. FIMP
 Category-Sub: 1. FIMP
 Workpaper: 1TD004.000 - FIMP

Activity Description:

FIMP is a newly developed integrity management program that will enhance the safety of facilities in the SDG&E natural gas system by applying integrity management principles to facility equipment. FIMP includes facilities such as compressor stations, pressure limiting stations, natural gas vehicle stations, renewable natural gas facilities and associated equipment. FIMP O&M activities include inspections, remediation, and other associated activities.

Forecast Explanations:

Labor - Zero-Based

SDG&E company labor in support of the FIMP.

Non-Labor - Zero-Based

SDG&E non-labor costs (e.g., contracts) in support of the FIMP.

NSE - Zero-Based

N/A

Summary of Results:

		In 2021\$ (000) Incurred Costs								
		Adjusted-Recorded					Adjusted-Forecast			
		2017	2018	2019	2020	2021	2022	2023	2024	
Years										
Labor		0	0	0	0	0	0	0	0	
Non-Labor		0	0	0	0	0	0	0	258	
NSE		0	0	0	0	0	0	0	0	
Total		0	0	0	0	0	0	0	258	
FTE		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	

Note: Totals may include rounding differences.

San Diego Gas & Electric Company
2024 GRC - APP
Non-Shared Service Workpapers

Area: GAS INTEGRITY PROGRAMS
 Witness: Amy Kitson
 Category: C. FIMP
 Category-Sub: 1. FIMP
 Workpaper: 1TD004.000 - FIMP

Summary of Adjustments to Forecast:

In 2021 \$(000) Incurred Costs										
Forecast Method		Base Forecast			Forecast Adjustments			Adjusted-Forecast		
Years		2022	2023	2024	2022	2023	2024	2022	2023	2024
Labor	Zero-Based	0	0	0	0	0	0	0	0	0
Non-Labor	Zero-Based	0	0	0	0	0	258	0	0	258
NSE	Zero-Based	0	0	0	0	0	0	0	0	0
Total		0	0	0	0	0	258	0	0	258
FTE	Zero-Based	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0

Forecast Adjustment Details:

<u>Year</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>Total</u>	<u>FTE</u>	<u>Adj_Type</u>
2022 Total	0	0	0	0	0.0	
2023 Total	0	0	0	0	0.0	
2024	0	40	0	40	0.0	1-Sided Adj
Explanation:	Zero-based forecast for FIMP Transmission activities. The FIMP will be a new incremental program in 2024 that provides a comprehensive, systematic, and integrated approach for managing and enhancing the safety and integrity of facilities and associated equipment. Costs include activities related to program development; pressure vessel, tank, and electrical equipment inspections and remediation for 1 transmission station; data collection, integration, and management; and process improvement. Refer to supplemental workpapers in workpaper 1TD004.000 for more detail.					
2024	0	218	0	218	0.0	1-Sided Adj
Explanation:	Zero-based forecast for FIMP Distribution activities. The FIMP will be a new incremental program in 2024 that provides a comprehensive, systematic, and integrated approach for managing and enhancing the safety and integrity of facilities and associated equipment. Costs include activities related to program development; pressure vessel, tank, and electrical equipment inspections and remediation for 6 NGV stations; data collection, integration, and management; and process improvement. Refer to supplemental workpapers in workpaper 1TD004.000 for more detail.					
2024 Total	0	258	0	258	0.0	

Note: Totals may include rounding differences.

SDG&E/GAS INTEGRITY PROGRAMS/Exh No:SDG&E-09-WP/Witness: A. Kitson

San Diego Gas & Electric Company
2024 GRC - APP
Non-Shared Service Workpapers

Area: GAS INTEGRITY PROGRAMS
Witness: Amy Kitson
Category: C. FIMP
Category-Sub: 1. FIMP
Workpaper: 1TD004.000 - FIMP

Determination of Adjusted-Recorded (Incurred Costs):

	2017 (\$000)	2018 (\$000)	2019 (\$000)	2020 (\$000)	2021 (\$000)
Recorded (Nominal \$)*					
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	0	0	0	0	0
FTE	0.0	0.0	0.0	0.0	0.0
Adjustments (Nominal \$) **					
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	0	0	0	0	0
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Nominal \$)					
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	0	0	0	0	0
FTE	0.0	0.0	0.0	0.0	0.0
Vacation & Sick (Nominal \$)					
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	0	0	0	0	0
FTE	0.0	0.0	0.0	0.0	0.0
Escalation to 2021\$					
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	0	0	0	0	0
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Constant 2021\$)					
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	0	0	0	0	0
FTE	0.0	0.0	0.0	0.0	0.0

* After company-wide exclusions of Non-GRC costs

** Refer to "Detail of Adjustments to Recorded" page for line item adjustments

Note: Totals may include rounding differences.

San Diego Gas & Electric Company
2024 GRC - APP
Non-Shared Service Workpapers

Area: GAS INTEGRITY PROGRAMS
 Witness: Amy Kitson
 Category: C. FIMP
 Category-Sub: 1. FIMP
 Workpaper: 1TD004.000 - FIMP

Summary of Adjustments to Recorded:

In Nominal \$ (000) Incurred Costs					
Years	2017	2018	2019	2020	2021
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	0	0	0	0	0
FTE	0.0	0.0	0.0	0.0	0.0

<u>Year</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>FTE</u>	<u>Adj Type</u>
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Note: Totals may include rounding differences.

San Diego Gas & Electric Company
2024 GRC - APP
Non-Shared Service Workpapers

Area: GAS INTEGRITY PROGRAMS
 Witness: Amy Kitson
 Category: C. FIMP
 Category-Sub: 1. FIMP
 Workpaper: 1TD004.000 - FIMP

RAMP Item # 1

RAMP Activity

RAMP Chapter: SDG&E-Risk-3 Incident Related to the High Pressure System (Excluding Dig-in)

RAMP Line Item ID: NEW 04

RAMP Line Item Name: NEW - Facility Integrity Management Program (FIMP)- Transmission

Tranche(/s): Tranche1: Transmission Facilities

GRC Forecast Cost Estimates (\$000)

	2021 Historical Embedded Cost (2021 \$)	2022 Forecast (2021 \$)	2023 Forecast (2021 \$)	2024 Forecast (2021 \$)	2024 RAMP Range (2020 Incurred \$)	
					Low	High
Tranche 1 Cost Estimate	0	0	0	40	0	0

Cost Estimate Changes from RAMP:

Applying the FIMP to SDG&E transmission facilities was not considered at the time of the RAMP report. This update supports the application of integrity management processes above and beyond existing operational activities and is intended to enhance processes for managing the safety and integrity of facilities infrastructure. Refer to supplemental workpapers in workpaper 1TD004.000 for more detail.

GRC Work Unit/Activity Level Estimates

Unit of Measure	2021 Historical Embedded Activities	2022 Forecast Activities	2023 Forecast Activities	2024 Forecast Activities	2024 RAMP Range Activities	
					Low	High
Tranche 1 # of assets assessed - Stations	0.00	0.00	0.00	1.00	0.00	0.00

Work Unit Changes from RAMP:

As noted above, applying the FIMP to SDG&E transmission facilities was not considered at the time of the RAMP report. The updated forecast of 2024 scope includes pressure vessels and electrical equipment at 1 station.

Risk Spend Efficiency (RSE)

	GRC RSE	RAMP RSE
Tranche 1	42.500	0.000

RSE Changes from RAMP:

RSE Score has been calculated since RAMP report.

San Diego Gas & Electric Company
2024 GRC - APP
Non-Shared Service Workpapers

Area: GAS INTEGRITY PROGRAMS
Witness: Amy Kitson
Category: C. FIMP
Category-Sub: 1. FIMP
Workpaper: 1TD004.000 - FIMP

RAMP Item # 2

RAMP Activity

RAMP Chapter: SDG&E-Risk-3 Incident Related to the High Pressure System (Excluding Dig-in)

RAMP Line Item ID: NEW 01

RAMP Line Item Name: NEW - Facility Integrity Management Program (FIMP) - Distribution

Tranche(/s): Tranche1: Supply Line - Facilities

GRC Forecast Cost Estimates (\$000)

	2021 Historical Embedded Cost (2021 \$)	2022 Forecast (2021 \$)	2023 Forecast (2021 \$)	2024 Forecast (2021 \$)	2024 RAMP Range (2020 Incurred \$)	
					Low	High
Tranche 1 Cost Estimate	0	0	0	218	0	0

Cost Estimate Changes from RAMP:

Applying the FIMP to SDG&E distribution facilities was not considered at the time of the RAMP report. This update supports the application of integrity management processes above and beyond existing operational activities and is intended to enhance processes for managing the safety and integrity of facilities infrastructure. Refer to supplemental workpapers in workpaper 1TD004.000 for more detail.

GRC Work Unit/Activity Level Estimates

Unit of Measure	2021 Historical Embedded Activities	2022 Forecast Activities	2023 Forecast Activities	2024 Forecast Activities	2024 RAMP Range Activities	
					Low	High
Tranche 1 # of assets assessed - Facilities	0.00	0.00	0.00	6.00	0.00	0.00

Work Unit Changes from RAMP:

As noted above, applying the FIMP to SDG&E distribution facilities was not considered at the time of the RAMP report. The updated forecast of 2024 scope includes pressure vessels and electrical equipment at 6 NGV facilities.

Risk Spend Efficiency (RSE)

	GRC RSE	RAMP RSE
Tranche 1	20.700	0.000

RSE Changes from RAMP:

RSE Score has been calculated since RAMP report.

Supplemental Workpapers for Workpaper 1TD004.000

San Diego Gas & Electric Company
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Non-Shared Service Workpapers

FIMP SDG&E O&M Supplemental Workpaper

Table 1: 2024 SDG&E O&M Forecast									
Organization	Workpaper #	Category	Labor	Non-labor	Total	Units	Unit Measure	\$/Unit	Narrative
Distribution	1TD004.000	Data Management	\$0	\$81,000	\$81,000	0	\$ -	\$0	Data management costs include data collection, record research, data entry and data integration. In addition, this cost includes process improvement by implementing an inspection workflow lifecycle solution to track fixed equipment inspections throughout the lifecycle of the equipment.
		Electrical Equipment	\$0	\$136,500	\$136,500	6	Facilities	\$22,750	Electrical equipment costs include planning and scheduling support for inspections, NFPA 70B inspections, repairs and remediations resulting from inspections at SDG&E' six Natural Gas Vehicle stations.
Total Distribution			\$0	\$217,500	\$217,500				
Transmission	1TD004.000	Electrical Equipment	\$0	\$10,000	\$10,000	1	Stations	\$10,000	Electrical equipment costs include planning and scheduling support for inspections, NFPA 70B inspections, repairs and remediations resulting from inspections at 1 transmission facility.
		Fixed Equipment	\$0	\$30,000	\$30,000	1	Stations	\$30,000	Fixed equipment costs include pressure vessels preassessment, assessment and post assessment activities for approximately 10 vessels at 1 transmission facility. These activities include planning, scheduling, equipment preparation for inspection, inspection and data analysis, post inspection data QA/QC, repairs and alterations as a result of inspections.
Total Transmission			\$0	\$40,000	\$40,000				
Total Combined			\$0	\$257,500	\$257,500				

San Diego Gas & Electric Company
2024 GRC - APP
Non-Shared Service Workpapers

Area: GAS INTEGRITY PROGRAMS
 Witness: Amy Kitson
 Category: D. GSEP
 Workpaper: 1TD005.000

Summary for Category: D. GSEP

	In 2021\$ (000) Incurred Costs			
	Adjusted-Recorded	Adjusted-Forecast		
	2021	2022	2023	2024
Labor	0	0	27	26
Non-Labor	0	0	108	104
NSE	0	0	0	0
Total	<u>0</u>	<u>0</u>	<u>135</u>	<u>130</u>
FTE	0.0	0.0	0.4	0.4

Workpapers belonging to this Category:

1TD005.000 Gas Safety Enhancement Programs

Labor	0	0	27	26
Non-Labor	0	0	108	104
NSE	0	0	0	0
Total	<u>0</u>	<u>0</u>	<u>135</u>	<u>130</u>
FTE	0.0	0.0	0.4	0.4

Note: Totals may include rounding differences.

Beginning of Workpaper
1TD005.000 - Gas Safety Enhancement Programs

San Diego Gas & Electric Company
2024 GRC - APP
Non-Shared Service Workpapers

Area: GAS INTEGRITY PROGRAMS
 Witness: Amy Kitson
 Category: D. GSEP
 Category-Sub: 1. Gas Rules & Regulations Implementation
 Workpaper: 1TD005.000 - Gas Safety Enhancement Programs

Activity Description:

Implementation of new gas safety rules and regulations activities as follows: MAOP Reconfirmation as required by PHMSA's Gas Transmission Safety Rule (GTSR) Part 1 (49 CFR 192.624); GTSR Part 2, which includes corrosion management and remediation measures; and the Valve Installation and Minimum Rupture Standards Rule (Valve Rule).

Forecast Explanations:

Labor - Zero-Based

SDG&E company labor to implement and comply with new gas safety rules and regulations requirements.

Non-Labor - Zero-Based

SDG&E non-labor costs (e.g., contracts) in support of implementing and complying with new gas safety rules and regulations.

NSE - Zero-Based

N/A

Summary of Results:

		In 2021\$ (000) Incurred Costs								
		Adjusted-Recorded					Adjusted-Forecast			
Years		2017	2018	2019	2020	2021	2022	2023	2024	
Labor		0	0	0	0	0	0	27	26	
Non-Labor		0	0	0	0	0	0	108	104	
NSE		0	0	0	0	0	0	0	0	
Total		0	0	0	0	0	0	135	130	
FTE		0.0	0.0	0.0	0.0	0.0	0.0	0.4	0.4	

Note: Totals may include rounding differences.

San Diego Gas & Electric Company
2024 GRC - APP
Non-Shared Service Workpapers

Area: GAS INTEGRITY PROGRAMS
 Witness: Amy Kitson
 Category: D. GSEP
 Category-Sub: 1. Gas Rules & Regulations Implementation
 Workpaper: 1TD005.000 - Gas Safety Enhancement Programs

Summary of Adjustments to Forecast:

In 2021 \$(000) Incurred Costs										
Forecast Method		Base Forecast			Forecast Adjustments			Adjusted-Forecast		
Years		2022	2023	2024	2022	2023	2024	2022	2023	2024
Labor	Zero-Based	0	0	0	0	27	26	0	27	26
Non-Labor	Zero-Based	0	0	0	0	108	104	0	108	104
NSE	Zero-Based	0	0	0	0	0	0	0	0	0
Total		0	0	0	0	135	130	0	135	130
FTE	Zero-Based	0.0	0.0	0.0	0.0	0.4	0.4	0.0	0.4	0.4

Forecast Adjustment Details:

Year	Labor	NLbr	NSE	Total	FTE	Adj Type
2022 Total	0	0	0	0	0.0	
2023	18	72	0	90	0.2	1-Sided Adj
Explanation:	Zero-based forecast for reconfirming pipeline MAOP as required by the GTSR Part 1. Refer to supplemental workpapers in workpaper 1TD005.000 for more detail.					
2023	3	10	0	13	0.1	1-Sided Adj
Explanation:	Zero-based forecast for GTSR Part 2 compliance activities. Refer to supplemental workpapers in workpaper 1TD005.000 for more detail.					
2023	6	26	0	32	0.1	1-Sided Adj
Explanation:	Zero-based forecast for Valve Rule compliance activities. Refer to supplemental workpapers in workpaper 1TD005.000 for more detail.					
2023 Total	27	108	0	135	0.4	
2024	18	72	0	90	0.2	1-Sided Adj
Explanation:	Zero-based forecast for reconfirming pipeline MAOP as required by the GTSR Part 1. Refer to supplemental workpapers in workpaper 1TD005.000 for more detail.					
2024	3	13	0	16	0.1	1-Sided Adj
Explanation:	Zero-based forecast for GTSR Part 2 compliance activities. Refer to supplemental workpapers in workpaper 1TD005.000 for more detail.					
2024	5	19	0	24	0.1	1-Sided Adj
Explanation:	Zero-based forecast for Valve Rule compliance activities. Refer to supplemental workpapers in workpaper 1TD005.000 for more detail.					
2024 Total	26	104	0	130	0.4	

Note: Totals may include rounding differences.

San Diego Gas & Electric Company
2024 GRC - APP
Non-Shared Service Workpapers

Area: GAS INTEGRITY PROGRAMS
Witness: Amy Kitson
Category: D. GSEP
Category-Sub: 1. Gas Rules & Regulations Implementation
Workpaper: 1TD005.000 - Gas Safety Enhancement Programs

Determination of Adjusted-Recorded (Incurred Costs):

	2017 (\$000)	2018 (\$000)	2019 (\$000)	2020 (\$000)	2021 (\$000)
Recorded (Nominal \$)*					
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	0	0	0	0	0
FTE	0.0	0.0	0.0	0.0	0.0
Adjustments (Nominal \$) **					
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	0	0	0	0	0
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Nominal \$)					
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	0	0	0	0	0
FTE	0.0	0.0	0.0	0.0	0.0
Vacation & Sick (Nominal \$)					
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	0	0	0	0	0
FTE	0.0	0.0	0.0	0.0	0.0
Escalation to 2021\$					
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	0	0	0	0	0
FTE	0.0	0.0	0.0	0.0	0.0
Recorded-Adjusted (Constant 2021\$)					
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	0	0	0	0	0
FTE	0.0	0.0	0.0	0.0	0.0

* After company-wide exclusions of Non-GRC costs

** Refer to "Detail of Adjustments to Recorded" page for line item adjustments

Note: Totals may include rounding differences.

San Diego Gas & Electric Company
2024 GRC - APP
Non-Shared Service Workpapers

Area: GAS INTEGRITY PROGRAMS
 Witness: Amy Kitson
 Category: D. GSEP
 Category-Sub: 1. Gas Rules & Regulations Implementation
 Workpaper: 1TD005.000 - Gas Safety Enhancement Programs

Summary of Adjustments to Recorded:

In Nominal \$ (000) Incurred Costs					
Years	2017	2018	2019	2020	2021
Labor	0	0	0	0	0
Non-Labor	0	0	0	0	0
NSE	0	0	0	0	0
Total	0	0	0	0	0
FTE	0.0	0.0	0.0	0.0	0.0

<u>Year</u>	<u>Labor</u>	<u>NLbr</u>	<u>NSE</u>	<u>FTE</u>	<u>Adj Type</u>
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Note: Totals may include rounding differences.

San Diego Gas & Electric Company
2024 GRC - APP
Non-Shared Service Workpapers

Area: GAS INTEGRITY PROGRAMS
 Witness: Amy Kitson
 Category: D. GSEP
 Category-Sub: 1. Gas Rules & Regulations Implementation
 Workpaper: 1TD005.000 - Gas Safety Enhancement Programs

RAMP Item # 1

RAMP Activity

RAMP Chapter: SDG&E-Risk-3 Incident Related to the High Pressure System (Excluding Dig-in)

RAMP Line Item ID: NEW 02

RAMP Line Item Name: NEW - Valve Rule

Tranche(s): Tranche1: Transmission - HCA & non-HCA

GRC Forecast Cost Estimates (\$000)

	2021 Historical Embedded Cost (2021 \$)	2022 Forecast (2021 \$)	2023 Forecast (2021 \$)	2024 Forecast (2021 \$)	2024 RAMP Range (2020 Incurred \$)	
					Low	High
Tranche 1 Cost Estimate	0	0	32	24	0	0

Cost Estimate Changes from RAMP:

The Valve Rule was not considered at the time of the RAMP report since the timing of publication was not known . PHMSA has since issued the Valve Rule as of March 2022 and forecasts have been developed based on a preliminary analysis of required compliance activities.

GRC Work Unit/Activity Level Estimates

Unit of Measure	2021 Historical Embedded Activities	2022 Forecast Activities	2023 Forecast Activities	2024 Forecast Activities	2024 RAMP Range Activities	
					Low	High
Tranche 1 No feasible units	0.00	0.00	0.00	0.00	0.00	0.00

Work Unit Changes from RAMP:

Since O&M costs are driven by capital activities, units are presented in workpaper X03670.

Risk Spend Efficiency (RSE)

	GRC RSE	RAMP RSE
Tranche 1	0.000	0.000

RSE Changes from RAMP:

New mitigation since the RAMP Report.

San Diego Gas & Electric Company
2024 GRC - APP
Non-Shared Service Workpapers

Area: GAS INTEGRITY PROGRAMS
 Witness: Amy Kitson
 Category: D. GSEP
 Category-Sub: 1. Gas Rules & Regulations Implementation
 Workpaper: 1TD005.000 - Gas Safety Enhancement Programs

RAMP Item # 2

RAMP Activity

RAMP Chapter: SDG&E-Risk-3 Incident Related to the High Pressure System (Excluding Dig-in)

RAMP Line Item ID: M02 T1-T2

RAMP Line Item Name: Gas Transmission Safety Rule - MAOP Reconfirmation (HCA and Non-HCA)

Tranche(s): Tranche1: Transmission - HCA; Tranche2: Transmission - Non-HCA

GRC Forecast Cost Estimates (\$000)

	2021 Historical Embedded Cost (2021 \$)	2022 Forecast (2021 \$)	2023 Forecast (2021 \$)	2024 Forecast (2021 \$)	2024 RAMP Range (2020 Incurred \$)	
					Low	High
Tranche 1 Cost Estimate	0	0	69	69	6,480	20,736
Tranche 2 Cost Estimate	0	0	21	21	270	864

Cost Estimate Changes from RAMP:

Since the RAMP report, pressure testing costs are forecasted as capital expenditures based on FERC guidance (refer to testimony); costs have generally shifted to the capital workpapers and remaining O&M costs are driven by program management activities.

GRC Work Unit/Activity Level Estimates

Unit of Measure	2021 Historical Embedded Activities	2022 Forecast Activities	2023 Forecast Activities	2024 Forecast Activities	2024 RAMP Range Activities	
					Low	High
Tranche 1 No feasible units	0.00	0.00	0.00	0.00	2.40	8.16
Tranche 2 No feasible units	0.00	0.00	0.00	0.00	0.10	0.34

Work Unit Changes from RAMP:

Since the RAMP report, pressure testing costs are forecasted as capital expenditures based on FERC guidance (refer to testimony). O&M costs consist of program management activities (e.g., data management and reporting) and identifying a unit of measure is not feasible. Refer to workpaper 214770.001 for unit forecasts.

Risk Spend Efficiency (RSE)

	GRC RSE	RAMP RSE
Tranche 1	5.400	6.900
Tranche 2	7.600	4.100

San Diego Gas & Electric Company
2024 GRC - APP
Non-Shared Service Workpapers

Area: GAS INTEGRITY PROGRAMS
 Witness: Amy Kitson
 Category: D. GSEP
 Category-Sub: 1. Gas Rules & Regulations Implementation
 Workpaper: 1TD005.000 - Gas Safety Enhancement Programs

RSE Changes from RAMP:

RSE inputs have changed since the RAMP report.

RAMP Item # 3

RAMP Activity

RAMP Chapter: SDG&E-Risk-3 Incident Related to the High Pressure System (Excluding Dig-in)

RAMP Line Item ID: NEW 03

RAMP Line Item Name: NEW - Gas Transmission Safety Rule (GTSR) Part 2

Tranche(/s): Tranche1: Transmission - HCA & non-HCA

GRC Forecast Cost Estimates (\$000)

	2021 Historical Embedded Cost (2021 \$)	2022 Forecast (2021 \$)	2023 Forecast (2021 \$)	2024 Forecast (2021 \$)	2024 RAMP Range (2020 Incurred \$)	
					Low	High
Tranche 1 Cost Estimate	0	0	13	16	0	0

Cost Estimate Changes from RAMP:

GTSR Part 2 was not considered at the time of the RAMP report since the requirements and timing of publication were not known at the time. PHMSA has established a projected publication date of June 2022 and forecasts have been developed for expected requirements.

GRC Work Unit/Activity Level Estimates

Unit of Measure	2021 Historical Embedded Activities	2022 Forecast Activities	2023 Forecast Activities	2024 Forecast Activities	2024 RAMP Range Activities	
					Low	High
Tranche 1 No feasible units	0.00	0.00	0.00	0.00	0.00	0.00

Work Unit Changes from RAMP:

A unit of measure is not feasible for the wide range of activities that are expected to be required under GTSR Part 2. Refer to supplemental workpapers in workpaper 1TD005.000 for additional detail.

Risk Spend Efficiency (RSE)

	GRC RSE	RAMP RSE
Tranche 1	0.000	0.000

RSE Changes from RAMP:

New mitigation since the RAMP Report.

Supplemental Workpapers for Workpaper 1TD005.000

San Diego Gas & Electric Company
2024 GRC - APP
Non-Shared Service Workpapers

PRIVILEGED AND CONFIDENTIAL/WORK PRODUCT: Created at the Direction of Counsel Setareh Mortazavi

SDGE O&M Supplemental Workpaper

Workpaper: 1TD005.000

Workpaper for Shared Services: 2200.7003

	Labor	Non-Labor	Shared Services	Total
2021	\$ -	\$ -	\$ -	\$ -
2022	\$ -	\$ -	\$ -	\$ -
2023	\$ 18,000.00	\$ 72,000.00	\$ 10,000.00	\$ 100,000.00
2024	\$ 18,000.00	\$ 72,000.00	\$ 10,000.00	\$ 100,000.00
2025	\$ 18,000.00	\$ 72,000.00	\$ 10,000.00	\$ 100,000.00
2026	\$ 18,000.00	\$ 72,000.00	\$ 10,000.00	\$ 100,000.00
2027	\$ 18,000.00	\$ 72,000.00	\$ 10,000.00	\$ 100,000.00

**based in SME input

O&M costs may include elements of program management such as reporting, training, etc.

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GSEP Part 2 Supplemental Workpaper - SCG O&M, SCG Capital, SDGE O&M, SDGE Capital, Shared Services

192.461 and 192.319

Total Survey Scope for DCVG/ACVG (All Programs)

Item	CY2022 Coating Survey Scope (feet/year)	CY2023 Coating Survey Scope (feet/year)	CY2024 Coating Survey Scope (feet/year)	CY2025 Coating Survey Scope (feet/year)	CY2026 Coating Survey Scope (feet/year)	CY2027 Coating Survey Scope (feet/year)
Class 1	-	158,024.39	8,943.73	-	110,880.00	-
Class 2	-	-	-	-	-	-
Class 3	-	19,008.00	-	52,944.00	44,352.00	-
Class 4	-	-	-	-	-	-
Total (feet/year)	-	177,032.39	8,943.73	52,944.00	155,232.00	-
Total (miles/year)	-	33.53	1.69	10.03	29.40	-

Area	Coating Survey Cost (\$/mile)	Coating Survey Cost (\$/foot)
Class 1	\$ 17,000.00	\$ 3.22
Class 2	\$ 18,000.00	\$ 3.41
Class 3	\$ 26,666.67	\$ 5.05
Class 4	\$ 43,333.33	\$ 8.21

Notes

The average cost to do a coating survey was obtained from the 2016 PHMSA Impact Assessment and adjusted based on feedback from the SME.

Average Remediation/Mitigation costs per foot.

Item	Recoat Average Cost (\$/foot of repair)
Repair Cost	\$4,458.22

Notes

Based on approximated historical project costs

Program Estimate (Gross, non-adjusted)

Item	CY2022 Program Estimate (2021 dollars)	CY2023 Program Estimate (2021 dollars)	CY2024 Program Estimate (2021 dollars)	CY2025 Program Estimate (2021 dollars)	CY2026 Program Estimate (2021 dollars)	CY2027 Program Estimate (2021 dollars)
Coating Survey (DCVG/ACVG)	\$ -	\$ 604,790.65	\$ 28,796.10	\$ 267,393.94	\$ 581,000.00	\$ -
Repair (Recoat)	\$ -	\$ 1,317,336.30	\$ 66,552.23	\$ 393,967.75	\$ 1,155,114.88	\$ -
Total	\$ -	\$ 1,922,126.95	\$ 95,348.33	\$ 661,361.69	\$ 1,736,114.88	\$ -

Notes

It is assumed projects will take one year

Program Scaling Factors

Item	Ramp Up CY2022 (unitless)	Ramp Up CY2023 (unitless)	Ramp Up CY2024 (unitless)	Ramp Up CY2025 (unitless)	Ramp Up CY2026 (unitless)	Ramp Up CY2027 (unitless)
Scaling Factor	0.01	0.50	0.65	0.75	0.85	1.00

Notes

The scaling factors (0-1) are designed to account for the gradual increase in spend as the program scales.

Shared Service Factor

Item	Shared Services CY2022 (unitless)
SoCalGas	0.94
SDG&E	0.06

Notes

The shared service factor includes the distribution of costs between SoCalGas and SDG&E, and was based on the ratio of transmission lines in company database

Capital vs. O&M Distribution Factors

Item	Distribution CY2022 (unitless)
Capital	0.95
O&M	0.05

Notes

The distribution factors are being included to account for the fact that the cost per dig factor includes the remediation cost.

Capital vs. O&M Distribution of the Program Estimate for Each Utility

Item	CY2022 Program Estimate (2021 dollars)	CY2023 Program Estimate (2021 dollars)	CY2024 Program Estimate (2021 dollars)	CY2025 Program Estimate (2021 dollars)	CY2026 Program Estimate (2021 dollars)	CY2027 Program Estimate (2021 dollars)
SoCalGas						
Capital	0	\$ 858,229.68	\$ 55,344.94	\$ 442,946.99	\$ 1,317,798.00	\$ -
O&M	0	\$ 45,169.98	\$ 2,912.89	\$ 23,313.00	\$ 69,357.79	\$ -
SoCalGas Total	0	\$ 903,399.67	\$ 58,257.83	\$ 466,259.99	\$ 1,387,155.79	\$ -
SDG&E						
Capital	0	\$ 54,780.62	\$ 3,532.66	\$ 28,273.21	\$ 84,114.77	\$ -
O&M	0	\$ 2,594.87	\$ 167.34	\$ 1,339.26	\$ 3,984.38	\$ -
Shared Services	0	\$ 288.32	\$ 18.59	\$ 148.81	\$ 442.71	\$ -
SDG&E Total	0	\$ 57,663.81	\$ 3,718.58	\$ 29,761.28	\$ 88,541.86	\$ -
Grand Total	0	\$ 961,063.47	\$ 61,976.41	\$ 496,021.27	\$ 1,475,697.65	\$ -

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GSEP Part 2 Supplemental Workpaper - SCG O&M, SCG Capital, SDGE O&M, SDGE Capital, Shared Services

192.465

Total Incremental Survey Scope for Close Interval Surveys (CIS), by Class Location

Item	CY2022 CIS 1 Scope (feet/year)	CY2023 CIS 1 Scope (feet/year)	CY2024 CIS 1 Scope (feet/year)	CY2025 CIS 1 Scope (feet/year)	CY2026 CIS 1 Scope (feet/year)	CY2027 CIS 1 Scope (feet/year)
Class 1	48960	48960	48960	48960	48960	48960
Class 2	3060	3060	3060	3060	3060	3060
Class 3	91800	91800	91800	91800	91800	91800
Class 4	3060	3060	3060	3060	3060	3060
Total (feet/year)	146,880	146,880	146,880	146,880	146,880	146,880
Total (miles/year)	28	28	28	28	28	28

Area	Close Interval Survey Cost (\$/mile)	CIS Cost (\$/foot)
Class 1	\$ 34,000.00	\$ 6.44
Class 2	\$ 36,000.00	\$ 6.82
Class 3	\$ 53,333.33	\$ 10.10
Class 4	\$ 86,666.67	\$ 16.41

Notes

The average cost to do a coating survey was obtained from the 2016 PHMSA Impact Assessment and adjusted based on feedback from the SME. The cost per mile of conducting a CIS includes a factor of 2 to account for proposed language requiring 5 ft. interval spacing for a CIS (current practice is 10 ft)

Average Remediation/Mitigation costs per foot.

Item	Recoat Average Cost (\$/foot of repair)
Repair Cost	\$12,737.77

Notes

Based on approximated historical project costs

Program Estimate (Gross, non-adjusted)

Item	CY2022 Program Estimate (2021 dollars)	CY2023 Program Estimate (2021 dollars)	CY2024 Program Estimate (2021 dollars)	CY2025 Program Estimate (2021 dollars)	CY2026 Program Estimate (2021 dollars)	CY2027 Program Estimate (2021 dollars)
CIS 1	\$ 1,313,636.36	\$ 1,313,636.36	\$ 1,313,636.36	\$ 1,313,636.36	\$ 1,313,636.36	\$ 1,313,636.36
Repair (Recoat)	\$ -	\$ 5,667,091.67	\$ 5,667,091.67	\$ 5,667,091.67	\$ 5,667,091.67	\$ 5,667,091.67
CIS 2	\$ -	\$ -	\$ 1,545,454.55	\$ 1,545,454.55	\$ 1,545,454.55	\$ 1,545,454.55
Total	\$ 1,313,636.36	\$ 6,980,728.03	\$ 8,526,182.58	\$ 8,526,182.58	\$ 8,526,182.58	\$ 8,526,182.58

Notes

It is assumed projects will take one year and permitting will take one year

Program Scaling Factors

Item	Ramp Up CY2022 (unitless)	Ramp Up CY2023 (unitless)	Ramp Up CY2024 (unitless)	Ramp Up CY2025 (unitless)	Ramp Up CY2026 (unitless)	Ramp Up CY2027 (unitless)
Scaling Factor	0.01	0.50	0.65	0.75	0.85	1.00

Notes

The scaling factors (0-1) are designed to account for the gradual increase in spend as the program scales.

Shared Service Factor

Item	Shared Services CY2022 (unitless)
SoCalGas	0.94
SDG&E	0.06

Capital vs. O&M Distribution Factors

Item	Distribution CY2022 (unitless)
Capital	0.95
O&M	0.05

Notes

Same assumptions as for 192.461 and 192.319

Capital vs. O&M Distribution of the Program Estimate for Each Utility

Workpaper
X03670.003
2TD005.000

214770.003
1TD005.000
2200.7003

Item	CY2022 Program Estimate (2021 dollars)	CY2023 Program Estimate (2021 dollars)	CY2024 Program Estimate (2021 dollars)	CY2025 Program Estimate (2021 dollars)	CY2026 Program Estimate (2021 dollars)	CY2027 Program Estimate (2021 dollars)
SoCalGas						
Capital	0	\$ 3,116,895.07	\$ 4,949,022.68	\$ 5,710,410.78	\$ 6,471,798.88	\$ 7,613,881.04
O&M	0	\$ 164,047.11	\$ 260,474.88	\$ 300,547.94	\$ 340,620.99	\$ 400,730.58
SoCalGas Total	0	\$ 3,280,942.17	\$ 5,209,497.55	\$ 6,010,958.72	\$ 6,812,419.88	\$ 8,014,611.62
SDG&E						
Capital	0	\$ 198,950.75	\$ 315,895.06	\$ 364,494.31	\$ 413,093.55	\$ 485,992.41
O&M	0	\$ 9,423.98	\$ 14,963.45	\$ 17,270.02	\$ 19,567.59	\$ 23,020.69
Shared Services	0	1047.109	1662.606	1913.891	2174.177	2557.855
SDG&E Total	0	\$ 209,421.84	\$ 332,521.12	\$ 383,678.22	\$ 434,835.31	\$ 511,570.95
Grand Total	0	\$ 3,490,364.02	\$ 5,542,018.67	\$ 6,394,636.93	\$ 7,247,255.19	\$ 8,526,182.58

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GSEP Part 2 Supplemental Workpaper - SCG O&M, SCG Capital, SDGE O&M, SDGE Capital, Shared Services

192.473

Total Incremental Survey Scope for Interference Current Surveys, by Class Location

Item	CY2022 Interference Current Survey Scope (miles/year)	CY2023 Interference Current Survey Scope (miles/year)	CY2024 Interference Current Survey Scope (miles/year)	CY2025 Interference Current Survey Scope (miles/year)	CY2026 Interference Current Survey Scope (miles/year)	CY2027 Interference Current Survey Scope (miles/year)
Class 1	4.198	4.198	4.198	4.198	4.198	4.198
Class 2	0.26	0.26	0.26	0.26	0.26	0.26
Class 3	3.144	3.144	3.144	3.144	3.144	3.144
Class 4	0	0	0	0	0	0
Total (feet/year)	40138.56	40138.56	40138.56	40138.56	40138.56	40138.56
Total (miles/year)	7.60	7.60	7.60	7.60	7.60	7.60

Estimated Cost to Complete an Interference Current Survey, by Class Location

Area	Interference Current Survey Cost (\$/mile)
Class 1	\$ 17,000.00
Class 2	\$ 18,000.00
Class 3	\$ 26,666.67
Class 4	\$ 43,333.33

Notes

The average cost to do a coating survey was obtained from the 2016 PHMSA Impact Assessment and adjusted based on feedback from the SME.

Average Remediation/Mitigation costs per mile, by Class Location.

Item	Average AC Mitigation Cost (\$/mile)
Class 1	\$1,666,799.34
Class 2	\$2,083,499.18
Class 3	\$2,916,898.85
Class 4	\$0.00

Notes

Based on approximated historical project costs

Program Estimate (Gross, non-adjusted)

Item	CY2022 Program Estimate (2021 dollars)	CY2023 Program Estimate (2021 dollars)	CY2024 Program Estimate (2021 dollars)	CY2025 Program Estimate (2021 dollars)	CY2026 Program Estimate (2021 dollars)	CY2027 Program Estimate (2021 dollars)
Interference Current Survey	\$ 159,886.00	\$ 159,886.00	\$ 159,886.00	\$ 159,886.00	\$ 159,886.00	\$ 159,886.00
Repair (AC Mitigation)	\$ -	\$ 216,974.37	\$ 216,974.37	\$ 216,974.37	\$ 216,974.37	\$ 216,974.37
Total	\$ 159,886.00	\$ 376,860.37	\$ 376,860.37	\$ 376,860.37	\$ 376,860.37	\$ 376,860.37

Notes

It is assumed interference current studies will take one year and AC mitigation will take one year

Program Scaling Factors

Item	Ramp Up CY2022 (unitless)	Ramp Up CY2023 (unitless)	Ramp Up CY2024 (unitless)	Ramp Up CY2025 (unitless)	Ramp Up CY2026 (unitless)	Ramp Up CY2027 (unitless)
Scaling Factor	0.01	0.50	0.65	0.75	0.85	1.00

Notes

The scaling factors (0-1) are designed to account for the gradual increase in spend as the program scales.

Shared Service Factor

Item	Shared Services CY2022 (unitless)
SoCalGas	0.94
SDG&E	0.06

Capital vs. O&M Distribution Factors

Item	Distribution CY2022 (unitless)
Capital	0.95
O&M	0.05

Notes

Same assumptions as for 192.461 and 192.319

Capital vs. O&M Distribution of the Program Estimate for Each Utility

Workpaper	Item	CY2022 Program Estimate (2021 dollars)	CY2023 Program Estimate (2021 dollars)	CY2024 Program Estimate (2021 dollars)	CY2025 Program Estimate (2021 dollars)	CY2026 Program Estimate (2021 dollars)	CY2027 Program Estimate (2021 dollars)
	SoCalGas						
X03670.003	Capital	0	\$ 168,268.15	\$ 218,748.60	\$ 252,402.23	\$ 286,055.86	\$ 336,536.31
2TD005.000	O&M	0	\$ 8,856.22	\$ 11,513.08	\$ 13,284.33	\$ 15,055.57	\$ 17,712.44
	SoCalGas Total	0	\$ 177,124.37	\$ 230,261.68	\$ 265,686.56	\$ 301,111.43	\$ 354,248.74
	SDG&E						
214770.003	Capital	0	\$ 10,740.52	\$ 13,962.68	\$ 16,110.78	\$ 18,258.88	\$ 21,481.04
1TD005.000	O&M	0	\$ 508.76	\$ 661.39	\$ 763.14	\$ 864.89	\$ 1,017.52
2200.7003	Shared Services	0	\$ 56.53	\$ 73.49	\$ 84.79	\$ 96.10	\$ 113.06
	SDG&E Total	0	\$ 11,305.81	\$ 14,697.55	\$ 16,958.72	\$ 19,219.88	\$ 22,611.62
	Grand Total	0	\$ 188,430.18	\$ 244,959.24	\$ 282,645.27	\$ 320,331.31	\$ 376,860.37

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GSEP Valve Rule Supplemental Workpaper - SCG O&M, SCG Capital, SDGE O&M, SDGE Capital, Shared Services

Project Scope for Valve Rule

Project Name	CY2022 Replacement Pipeline (miles/year)	CY2023 Replacement Pipeline (miles/year)	CY2024 Replacement Pipeline (miles/year)	CY2025 Replacement Pipeline (miles/year)	CY2026 Replacement Pipeline (miles/year)	CY2027 Replacement Pipeline (miles/year)
Total	0.00	15.92	9.00	9.84	9.84	0.00

Notes
Estimating projects that start after effective date

Valve Requirements for the Rule

Project Name	CY2022 Valve Requirement (valves/year)	CY2023 Valve Requirement (valves/year)	CY2024 Valve Requirement (valves/year)	CY2025 Valve Requirement (valves/year)	CY2026 Valve Requirement (valves/year)	CY2027 Valve Requirement (valves/year)
Total	0	4	2	2	2	2

Notes
Based on spacing requirements (8) and project mileage assumptions

Item	CY2022 Program Estimate (2021 dollars)	CY2023 Program Estimate (2021 dollars)	CY2024 Program Estimate (2021 dollars)	CY2025 Program Estimate (2021 dollars)	CY2026 Program Estimate (2021 dollars)	CY2027 Program Estimate (2021 dollars)
Valves and Valve Installation	\$0.00	\$14,328,000.00	\$8,100,000.00	\$8,856,000.00	\$8,856,000.00	\$8,856,000.00
Total	\$0.00	\$14,328,000.00	\$8,100,000.00	\$8,856,000.00	\$8,856,000.00	\$8,856,000.00

Notes
Based on historical valve project costs, assume \$3.6M per valve

Program Scaling Factors

Item	Ramp Up CY2022 (unitless)	Ramp Up CY2023 (unitless)	Ramp Up CY2024 (unitless)	Ramp Up CY2025 (unitless)	Ramp Up CY2026 (unitless)	Ramp Up CY2027 (unitless)
Scaling Factor	0.00	0.75	1.00	1.00	1.00	1.00

Notes
The scaling factors (0-1) are designed to account for the gradual increase in spend as the program scales. 2022 is assumed to be 0 since the effective date of these activities are in early 2023

Program Estimate (net, adjusted)

Item	CY2022 Program Estimate (2021 dollars)	CY2023 Program Estimate (2021 dollars)	CY2024 Program Estimate (2021 dollars)	CY2025 Program Estimate (2021 dollars)	CY2026 Program Estimate (2021 dollars)	CY2027 Program Estimate (2021 dollars)
Valves and Valve Installation	\$0.00	\$10,746,000.00	\$8,100,000.00	\$8,856,000.00	\$8,856,000.00	\$8,856,000.00
Total	\$0.00	\$10,746,000.00	\$8,100,000.00	\$8,856,000.00	\$8,856,000.00	\$8,856,000.00

Notes
The adjusted (net) program estimate incorporates the abandonment factor and program scaling factor.

Shared Service Factor

Item	Shared Services (unitless)
SoCalGas	0.94
SDG&E	0.06

Notes
The shared service factor includes the distribution of costs between SoCalGas and SDG&E, and was based on the ratio of transmission lines in company database

Capital vs. O&M Distribution Factors

Item	Distribution (unitless)
Capital	0.95
O&M	0.05

Notes
O&M based on SME judgment of possible non-capital costs associated with the requirements

Capital vs. O&M Distribution of the Program Estimate for Each Utility

Item	CY2022 Program Estimate (2021 dollars)	CY2023 Program Estimate (2021 dollars)	CY2024 Program Estimate (2021 dollars)	CY2025 Program Estimate (2021 dollars)	CY2026 Program Estimate (2021 dollars)	CY2027 Program Estimate (2021 dollars)
SoCalGas						
Capital	\$0.00	\$9,596,178.00	\$7,233,300.00	\$7,908,408.00	\$7,908,408.00	\$7,908,408.00
O&M	\$0.00	\$505,062.00	\$380,700.00	\$416,232.00	\$416,232.00	\$416,232.00
SoCalGas Total	\$0.00	\$10,101,240.00	\$7,614,000.00	\$8,324,640.00	\$8,324,640.00	\$8,324,640.00
SDG&E						
Capital	\$0.00	\$612,522.00	\$461,700.00	\$504,792.00	\$504,792.00	\$504,792.00
O&M	\$0.00	\$32,238.00	\$24,300.00	\$26,568.00	\$26,568.00	\$26,568.00
Shared Services	\$0.00	\$3,223.80	\$2,430.00	\$2,656.80	\$2,656.80	\$2,656.80
SDG&E Total	\$0.00	\$644,760.00	\$486,000.00	\$531,360.00	\$531,360.00	\$531,360.00
Grand Total	\$0.00	\$10,746,000.00	\$8,100,000.00	\$8,856,000.00	\$8,856,000.00	\$8,856,000.00

Workpaper
X03670.005
1TD005.000

214770.005
1TD005.000
2200.7003

San Diego Gas & Electric Company
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Non-Shared Service Workpapers

Area: GAS INTEGRITY PROGRAMS
Witness: Amy Kitson

Appendix A: List of Non-Shared Cost Centers

Cost Center	Sub	Description
2100-0167	000	GAS DISTRIBUTION SERVICES DIRECTOR-TIMP
2100-3419	000	PIPELINE INTEGRITY CONSTRUCTION SDG&E
2100-3569	000	INTEGRITY MANAGEMENT SDG&E
2100-3595	000	SDG&E PIPELINE INTEGRITY EVALUATIONS-TIMP
2100-3827	000	retired.GAS INFRASTRUCTURE PROTECTION PROJECT-Trans
2100-3828	000	retired.PROJ MGR - SEWER LATERAL INSPECT PRGM-TIMP
2100-3902	000	retired.PROJ MGR - ANODLESS RISER PRGM-TIMP
2100-3909	000	GIS STRATEGY & APPS-TIMP
2100-4051	000	PI CONTRACTS & MATLS
2100-4160	000	GTSR Program Management
2100-4161	000	FIMP (Facilities Integrity Management Program)
2100-7002	000	FIMP (Facilities Integrity Management Program)