TURN/SCGC DATA REQUEST-06
SDG&E-SOCALGAS 2019 GRC – A.17-11-007/8
SDG&E_SOCALGAS RESPONSE
DATE RECEIVED: MARCH 28, 2018
DATE RESPONDED: APRIL 19, 2018

Data Request No: TURN/SCGC DR 006
Exhibit Reference: SCG - 15
Witness: Phillips
Subject: Follow up to TURN/SCGC-001

SoCalGas Question 01: Please provide a copy of the complete response including attachments to each of the 19 data requests sent by TURN or jointly by TURN and SCGC in A.16-09-005.

Utility Response 01:

SoCalGas objects to this request on the grounds the request is overly broad and unduly burdensome and seeks production of non-confidential documents that are either publicly available or already in the possession and/or control of TURN/SCGC.

Without waiving the foregoing objections, SoCalGas responds as follows: Documents will be produced in electronic format under separate cover, subject to the Non-Disclosure Agreement between the parties and the Protective Order governing this proceeding. The documents include Confidential and Protected Materials pursuant to PUC Section 583, GO 66-D, and D.17-09-023.

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SoCalGas Question 02: Please provide a copy of the complete response including attachments to each of the data requests sent by TURN, SCGC, jointly by TURN and SCGC, and ORA in A.14-12-016.

Utility Response 02:

SoCalGas objects to this request on the grounds the request is overly broad and unduly burdensome and seeks production of non-confidential documents that are either publicly available or already in the possession and/or control of TURN/SCGC.

Without waiving the foregoing objections, SoCalGas responds as follows: Documents will be produced in electronic format under separate cover, subject to the Non-Disclosure Agreement between the parties and the Protective Order governing this proceeding. The documents include Confidential and Protected Materials pursuant to PUC Section 583, GO 66-D, and D.17-09-023.

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SoCalGas Question 03:

3. For each of the projects completed and subject to review in A.14-12-016, please provide the actual number of construction working days.

SoCalGas Response 03:

Project Name	Working days[1]
Line 2000-A	112
Line 42-66-1 & 2	36
Storage - Playa Del Rey Phase 1&2	36

[1] Based on daily inspection reports for these projects.

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SoCalGas Question 04:

4. For each of the projects completed and subject to review in A.16-09-005, please provide the actual number of construction working days.

SoCalGas Response 04:

Project Line	Working days[2]
1005	120
1011	34
1013	77
1014	29
1015 (North & South)	124
2000 West Sec (1,2,3)	133
2001 West A Sec (15,16)	21
2001 West B Sec (10,11,14)	132
	127
	83
2003 Sec (1,3,4)	48
	74
	18
235 West Sawtooth Canyon	45
33-120 Section 2	63
35-20-N	19
36-37	43
36-9-09 North Section 2B	38

[2] Based on daily inspection reports for these projects.

Project Line	Working days[3]
36-9-09 North Section 6A	48
36-1032 Sec (1,2,3)	116
	72
	85
38-539	123
406 Sec (1,2,2A,4,5)	109
406 Sec (1,2,2A,4,5)	96
	96
	31
	32
407 (North & South)	36
	44
41-30-A	26
45-120 Section 1	106
45-120XO1	26
49-14	63
49-22	44
	69
49-32	93
PDR Storage Phase 4 and 5	68

[3] Based on daily inspection reports for these projects.

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Data Requests: Regarding Applicants Response to TURN/SCGC-SEU-001

SoCalGas Question 05:

5. The Excel workbooks provided in response to TURN/SCGC-SEU-001, Q.2c each contain a tab labeled "General Ref." On that tab at approximately row 30 is a section labeled "SCG Company Labor Section." Within this section there are four separate hourly rates listed, each having one or more job titles associated with it.
    a. Please state all components of each of the four hourly rates including base pay (salary or wages), payroll taxes, employee benefits, overheads, etc.
    b. Please indicate the percent share of the hourly rate that is associated with each of the components defined in response to the previous question.

SoCalGas Response 05:

a. The rates listed are base pay.

b. The hourly rates listed are 100% base pay.

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SoCalGas Question 06:

6. The Excel workbooks provided in response to TURN/SCGC-SEU-001, Q.2c each appear to be redacted. Please describe each type of information that has been redacted from these workbooks.

SoCalGas Response 06:

Employee names have been redacted from these workbooks.

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SoCalGas Question 07:

7. With respect to the workpapers to SCG-15 that were provided in response to TURN/SCGC-SEU-001, Q.1: Please define the categories used under the heading of "SoCalGas Labor-Management, Engineering, and Non-Union
   1. Labor" and provide a detailed description of the duties and activities associated with each of these categories (see for example page 46 of the workpapers):
      a. Project Management
      b. Project Field Management
      c. Project Engineers
      d. Construction Management/Inspectors
      e. Environmental
      f. Other Departments

SoCalGas Response 07:

a. **Project Management** : Tasks and duties include, but are not limited to, managing the successful initiation, planning, design, execution, and closure of a project, which includes monitoring the project's budget and schedule. Other specific duties include approving timecards, reporting project performance, managing stakeholder involvement, and providing work direction and/or establishing requirements to the various specialized support teams, such as, Permitting, Land & Right of Way, Environmental, and Safety. Project managers are responsible for verifying that contractors deliver the services agreed to, as specified in contractual agreements, and per the agreed upon scope of work.

SoCalGas Response 07 Continued:

b. **Project Field Management:** This category captures costs for hours spent by PSEP Construction Team Leads, who oversee multiple individual PSEP projects. In addition to those in the PSEP organization, SoCalGas and SDG&E personnel outside of the PSEP organization also provide support on an as-needed basis. Employees in the Transmission and Distribution Regions and Gas Engineering organizations provide project-specific support in areas such as customer impact analysis, engineering drawing review, tie-in operations, and construction. This category also captures costs associated with this support from SoCalGas and SDG&E personnel outside of the PSEP Organization.

c. Project Engineers: Tasks and duties include, but are not limited to, assisting project managers in the areas described in response (a) above. Project Engineers serve as a primary point of contact for the various project deliverables and tasks required to successfully execute a PSEP project. Tasks include quality checks and verification of completeness of project documentation, such as engineering/design drawings, data design sheets, test procedures, and many other compliance documents. Project Engineer responsibilities also include coordinating project meetings and updating the project team with progress made at each project life cycle stage. The Project Engineer supports the project manager in validating that contractors deliver the services agreed to, as specified in contractual agreements, and per the agreed upon scope of work.

d. Construction Management/Inspectors: Tasks and duties include, but are not limited to, overseeing Field Engineers, verifying material and specifications, coordinating and scheduling project activities with other company departments, pipeline contractors and third party vendors, reviewing and approving daily logs (DIR), documenting construction activities, and overseeing third party inspectors and verifying coating and welding is properly documented. These personnel affirm contractors complete the project in accordance with the project's scope of work and design drawings, and that the construction activities are documented accurately.

SoCalGas Response 07 Continued:

e. **Environmental:** Tasks and duties include, but are not limited to, environmental project review, acquiring applicable permits and validating compliance with permit conditions, agency notifications and coordination, field monitoring and documentation, coordination with stakeholders, vendor coordination and management, project team updates, annual reporting, and invoice review and approval.

f. **Other Departments:**

Includes the following departments :

Estimating: Tasks and duties include, but are not limited to, developing preliminary estimates, preparing Total Installed Cost Estimates, performing take-offs, negotiating contracts with vendors, and coordinating with subject matter experts to develop cost estimates.

Project Controls: Tasks and duties include, but are not limited to, forecasting expenditures and providing cost analyses**.** Team members provide day-to-day support for their assigned projects and allocate their time accordingly.

Scheduling: Tasks and duties include, but are not limited to, developing project schedules, providing periodic scheduling updates, and tracking performance.

Outreach: Tasks and duties include, but are not limited to, coordinating construction activities with impacted municipalities, communities, and customers, and informing impacted stakeholders regarding construction activities.

Training: Tasks and duties include, but are not limited to, conducting pre-construction and on-site safety training for project personnel.

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SoCalGas Question 08:

8. With respect to the workpapers to SCG-15 that were provided in response to TURN/SCGC-SEU-001, Q.1: Please define the categories used under the heading of "Assumptions" (with the reference to the "use of contracted Project Management Engineering and Design services) and provide a detailed description of the duties and activities associated with each of these categories:
   a. Engineering/ Design Services
   b. PM/Project Services
   c. Construction Management
   d. Surveying/As Builts

SoCalGas Response 08:

a. Engineering/Design Services – The key responsibilities of Engineering and Design Services personnel include performing the planning and engineering design work necessary to complete a project. This work is also necessary to develop robust project cost estimates. The estimating scope of work is intended to facilitate the proximation of identifiable cost components up to, and including, the completion of construction and closeout. Planning and engineering design work typically includes the following activities:
- Assessment and validation of project extent/parameters;
- Physical visit to job site to gain familiarity with the area;
- Development of preliminary and detailed design;
- Development of pipeline profile;
- Identification of pressure test segments based on the minimum and maximum allowable test pressures in order to achieve required test pressures; and
- Identification of any special pipeline crossings for replacement projects (e.g., waterways, railroads, freeways, etc.).

b. PM/Project Services – Tasks, services and duties include, but are not limited to, collaborating with various groups to facilitate their tasks, including working with Land Acquisition to secure land rights, material coordination, warehousing services, estimating services, construction subject matter expert services, project management, and project scheduling services.

SoCalGas Response 08 Continued:

c. **Construction Management** – This category captures costs associated with third party inspectors, field engineers and construction managers. The responsibilities of this group are similir to the SoCalGas and SDG&E company personnel who provide construction management support, as described in response to Question 7d above.

d. **Surveying/As-Builts** – Tasks and duties include, but are not limited to, aerial mapping for ortho-photography, surveying, mapping and substructure engineering. Responsibilities further include, but are not limited to, scanning, indexing and organizing utility substructure and pothole logs, detecting and marking out utilities, and preparing Geotech reports required for boring activities.

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SoCalGas Question 09:

9. With respect to the workpapers to SCG-15 that were provided in response to TURN/SCGC-SEU-001, Q.1:
    a. For each of the PSEP projects listed in SCG-15, how did SoCalGas determine the number of hours required for each of the major professional categories, that is, project management, engineering (all aspects), construction management, environmental services, etc.
    b. For each of the PSEP projects listed in SCG-15, please state how SoCalGas determined the hours of work that would be performed on a project by an employee identified in one of the categories listed previously in Question 4 versus being performed by a contractor identified in one of the categories listed previously in Question 5?
    c. For each of the PSEP projects listed in SCG-15, has SoCalGas relied upon its experience with previous PSEP projects to determine the values stated in its workpapers for each of the categories listed in Questions 4 and 5?

SoCalGas Response 09:

SoCalGas interprets this question as asking how it determines whether to use contract employees versus company employees to perform forecasted activities. With this understanding, SoCalGas responds as follows:

a. SoCalGas determined the number of hours required for each major cost category by working with subject matter experts (SMEs) to determine the schedule and personnel that will be required for the project. The level of effort that is estimated for each classification is based on the activities and past project experience. See the response to Question 9.b for further information.

SoCalGas Response 09 Continued:

b. SoCalGas interprets this question as related to questions 7 and 8. Staff augmentation with contracted personnel is identified during a project's initial scoping by the Project Manager or Portfolio Manager. The project execution plan that identifies how the project will proceed is created and, based on the staffing levels, experience, and workload required, a project is then either designed by Company personnel or contracted personnel. Staff augmentation typically occurs for the following activities: engineering and design services, survey, land services, and environmental services. For example, engineering and design services entail the creation of drawing packages, plot plans, cross sections, seismic engineering, and project management activities. SoCalGas does not always have enough Company personnel available to staff a large volume of projects continuously throughout the year. Similarly, SoCalGas may need to hire land services personnel to keep up with permitting, TRE and other land-related requirements.

c. Yes.

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SoCalGas Question 10:

10. With respect to the workpapers to SCG-15 that were provided in response to TURN/SCGC-SEU-001, Q.1, for the hydrotesting work on Line 235 W Section 1:
    a. On page 47, SoCalGas lists 20,064 hours of construction management time. On the same page, SoCalGas lists 3,514 hours of project management/project services time. Given that the project is 152 days in length, it appears that SoCalGas projects 132 hours of construction management time per day or 16.5 construction managers per day for the duration of the project, assuming an 8 hour day. Similarly, SoCalGas projects 23.12 hours of project management/project services time per day or nearly 3 project managers/project services contractors per day for the duration of the project, assuming an 8 hour day.
        i. Please confirm that the above numbers of personnel identified above are correct.
        ii. If the numbers are correct, please explain in detail how SoCalGas would appropriately utilize 16.5 construction managers and 3 project managers/project services contractors on the pressure testing work for Line 235 W Section 1 by stating separately the duties and activities for each of the 16.5 construction managers and 3 project managers/project services contractors projected to be working on this project.
        iii. If SoCalGas disagrees with the calculation of the number of contract personnel identified for any category listed above, please provide a corrected number and answer the previous question using the corrected number.

QUESTION 10:-Continued

b. On page 46, SoCalGas lists 3,221 hours of project management employee time. On the same page, SoCalGas lists 3,409 hours of project field management employee time, and 1,824 hours of construction management/inspectors employee time. Given that the project is 152 days in length, it appears that SoCalGas projects 21.2 hours of project management time per day or 2.65 project managers per day for the duration of the project, assuming an 8 hour day.

Similarly, it appears that SoCalGas projects 22.4 hours of project field management employee time per day or 2.8 project field managers per day for the duration of the project, assuming an 8 hour day. Furthermore, it appears that SoCalGas projects 12 hours of construction management/inspector employee time per day or 1.5 construction managers/inspectors for the duration of the project, assuming an 8 hour day.

i. Please confirm that the above numbers of personnel identified above are correct.

ii. If the numbers are correct, please explain in detail how SoCalGas would appropriately utilize 2.65 project managers, 2.8 project field managers, and 1.5 construction management/inspectors on the pressure testing work for Line 235 W Section 1 by stating separately the duties and activities for each of the 2.65 project managers, 2.8 project field managers, and 1.5 construction management/inspectors projected to be working on this project.

iii. If SoCalGas disagrees with the calculation of the number of SoCalGas personnel identified for any category listed above, please provide a corrected number and answer the previous question using the corrected number.

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SoCalGas Response 10:

a.i The assumptions are incorrect.

a.ii Not applicable.

a.iii TURN/SCGC incorrectly assumed 8 hours per day. Page WP-I-A12 of the workpapers shows that 12 hours per day are anticipated.

The estimate accounts for approximately 11 "construction manager" FTEs per day of construction. [4] Their duties and activities are listed in response to question 8. Also, the titles shown on rows 10, 13, 24, and 26 of the "CM" tab provide further description (see footnote 4).

The estimate accounts for approximately 1.9 "project managers/project services" FTEs per day. [5] Their duties and activities are listed in response to question 8. Also, the titles of personnel who make up this category provide further description (see footnote 5).

b.i The numbers quoted in the question are incorrect.

b.ii Not applicable.

b.iii SoCalGas objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it does not seek the production of information, but rather, directs SoCalGas to perform calculations for TURN and SCGC that TURN and SCGC can calculate themselves based on the information previously provided. Subject to and without waiving the foregoing objection, SoCalGas responds as follows:

TURN/SCGC incorrectly state that "the project is 152 days in length." The construction portion of the project is 152 days. Engineering and design phases before construction and the closeout phase that follows construction add additional days. While the 152 days may be a reasonable approximation of the duration for the categories of "project field managers" and "construction managers/inspectors," the duration of time applicable to "project managers" is longer.

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[4] The 11 positions are listed in the workbook "235 W Sec1 Ph3 Stage 3 Est 05 08 17 redacted," in the "CM" tab, on rows 10, 13, 24, and 26.

[5] Many positions fall within the approximately 1.9 FTEs. The positions and their associated hours are found in the workbook "235 W Sec1 Ph3 Stage 3 Est 05 08 17 redacted" in four different tabs. "Eng" tab, on rows 37, 52, 53, 58, 69, 70, 90, and 93. "Survey-Ph 1"tab, rows 19 and 28. "Survey – Ph 2" tab, rows 09, 11, 18, 20, 27, 28, 29 and 30;."Land" tab, rows 05-12.

SoCalGas Response 10 Continued:

TURN/SCGC incorrectly assume an 8 hour day during construction. WP-I-A12 states 12 hours per day for the 152 days of construction.

The estimate accounts for approximately 1.5 "project manager" FTEs, assuming an 18-month timeframe for all phases of the project. [6] Their activities and duties are listed in response to question 7. Also, the titles of personnel who make up this category provide further description (see footnote 6).

The estimate accounts for approximately 1.9 "project field manager" FTEs estimated during the construction phase. [7] Their activities and duties are listed in response to question 7. Also, the titles of personnel who make up this category provide further description (see footnote 7).

The estimate accounts for approximately 1.0 "construction management/inspectors" FTE during the construction phase. [8] Their activities and duties are listed in response to question 7. Also, the titles of personnel who make up this category provide further description (see footnote 8).

[6] "Project managers" relate to the "SCG-PSEP Project Management" workbook. This is listed in the "Engr" tab, cells K5 through M5 (3,221 hours), which is the sum of column D of rows 8, 28-35, 38-43, 46-51, 55-56, 60-68, 72-76).

[7] "Project field managers" relate to both the "SCG- PSEP Project (Field Management)" and " SCG-PSEP Project (Field Management) Close out" workbooks. See the "Engr" tab cells K6 though M6 (1,152 hours), which is the sum of column D of rows 9, 20-23, 36, and 44 and the "CM" tab cell E82 (2,256 hours), which is the sum of column D of rows 9, 41, 46, 54, 61, and 66.

[8] "Construction management/inspectors" relate to the "SCG-Inspectors/CA's" workbook. This is listed in the "CM" tab cell E64 (1,824 hours).

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SoCalGas Question 11:

11. With respect to the workpapers to SCG-15 that were provided in response to TURN/SCGC-SEU-001, Q.1, for the hydrotesting work on Line 235 W Section 2:
    a. On page 63, SoCalGas lists 14,400 hours of construction management time. On the same page, SoCalGas lists 3,129 hours of project management/project services time. Given that the project is 120 days in length, it appears that SoCalGas projects 120 hours of construction management time per day or 15 construction managers per day for the duration of the project, assuming an 8 hour day. Similarly, SoCalGas projects 26.1 hours of project management/project services time per day or 3.3 project managers/project services contractors per day for the duration of the project, assuming an 8 hour day.
        i. Please confirm that the above numbers of personnel identified above are correct.
        ii. If the numbers are correct, please explain in detail how SoCalGas would appropriately utilize 15 construction managers and 3.3 project managers/project services contractors on the pressure testing work for Line 235 W Section 2 by stating separately the duties and activities for each of the 15 construction managers and 3.3 project managers/project services contractors projected to be working on this project.
        iii. If SoCalGas disagrees with the calculation of the number of contract personnel identified for any category listed above, please provide a corrected number and answer the previous question using the corrected number.

QUESTION 11:-Continued

b. On page 62, SoCalGas lists 1,967 hours of project management employee time. On the same page, SoCalGas lists 2,751 hours of project field management employee time, and 960 hours of construction management/inspectors employee time. Given that the project is 120 days in length, it appears that SoCalGas projects 16.4 hours of project management time per day or 2 project managers per day for the duration of the project, assuming an 8 hour day.

   Similarly, it appears that SoCalGas projects 22.9 hours of project field management employee time per day or 2.9 project field managers per day for the duration of the project, assuming an 8 hour day. Furthermore, it appears that SoCalGas projects 8 hours of construction management/inspector employee time per day or 1 construction manager/inspector for the duration of the project, assuming an 8 hour day.

   i. Please confirm that the above numbers of personnel identified above are correct.

   ii. If the numbers are correct, please explain in detail how SoCalGas would appropriately utilize 2 project managers, 2.9 project field managers, and 1 construction management/inspector on the pressure testing work for Line 235 W Section 2 by stating
   separately the duties and activities for each of the 2 project managers, 2.9 project field managers, and 1 construction management/inspector projected to be working on this project.

   iii. If SoCalGas disagrees with the calculation of the number of SoCalGas personnel identified for any category listed above, please provide a corrected number and answer the previous question using the corrected number.

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SoCalGas Response 11:

SoCalGas objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it does not seek the production of information, but rather, directs SoCalGas to perform calculations for TURN and SCGC that TURN and SCGC can calculate themselves based on the information previously provided. Subject to and without waiving the foregoing objection, SoCalGas responds as follows:

The calculation can be performed by TURN and SCGC using information previously provided and the methodology described in response to Question 10 above. Descriptions of the duties and activities for the various categories are provided in responses to Questions 7 and 8 above.

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SoCalGas Question 12:

12. With respect to the workpapers to SCG-15 that were provided in response to TURN/SCGC-SEU-001, Q.1, for the hydrotesting work on Line 235 W Section 3:
    a. On page 77, SoCalGas lists 8,208 hours of construction management time. On the same page, SoCalGas lists 2,610 hours of project management/project services time. Given that the project is 76 days in length, it appears that SoCalGas projects 108 hours of construction management time per day or 13.5 construction managers per day for the duration of the project, assuming an 8 hour day. Similarly, SoCalGas projects 34.3 hours of project management/project services time per day or 4.3 project managers/project services contractors per day for the duration of the project, assuming an 8 hour day.
        i. Please confirm that the above numbers of personnel identified above are correct.
        ii. If the numbers are correct, please explain in detail how SoCalGas would appropriately utilize 13.5 construction managers and 4.3 project managers/project services contractors on the pressure testing work for Line 235 W Section 3 by stating separately the duties and activities for each of the 13.5 construction managers and 4.3 project managers/project services contractors projected to be working on this project.
        iii. If SoCalGas disagrees with the calculation of the number of contract personnel identified for any category listed above, please provide a corrected number and answer the previous question using the corrected number.

QUESTION 12:-Continued

b. On page 76, SoCalGas lists 1,735 hours of project management employee time. On the same page, SoCalGas lists 2,163 hours of project field management employee time, and 912 hours of construction management/inspectors employee time. Given that the project is 76 days in length, it appears that SoCalGas projects 22.8 hours of project management time per day or 2.9 project managers per day for the duration of the project, assuming an 8 hour day. Similarly, it appears that SoCalGas projects 28.5 hours of project field management employee time per day or 3.6 project field managers per day for the duration of the project, assuming an 8 hour day. Furthermore, it appears that SoCalGas projects 12 hours of construction management/inspector employee time per day or 1.5 construction manager/inspectors for the duration of the project, assuming an 8 hour day.

   i. Please confirm that the above numbers of personnel identified above are correct.

   ii. If the numbers are correct, please explain in detail how SoCalGas would appropriately utilize 2.9 project managers, 3.6 project field managers, and 1.5 construction management/inspector on the pressure testing work for Line 235 W Section 3 by stating separately the duties and activities for each of the 2.9 project managers, 3.6 project field managers, and 1.5 construction management/inspector projected to be working on this project.

QUESTION 12:-Continued

iii. If SoCalGas disagrees with the calculation of the number of SoCalGas personnel identified for any category listed above, please provide a corrected number and answer the previous question using the corrected number.

SoCalGas Response 12:

SoCalGas objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it does not seek the production of information, but rather, directs SoCalGas to perform calculations for TURN and SCGC that TURN and SCGC can calculate themselves based on the information previously provided. Subject to and without waiving the foregoing objection, SoCalGas responds as follows:

The calculation can be performed by TURN and SCGC using information previously provided and the methodology described in response to Question 10 above. Descriptions of the duties and activities for the various categories are provided in responses to Questions 7 and 8 above.

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SoCalGas Question 13:

13. TURN/SCGC-SEU-001, Q.1, for the hydrotesting work on Line 407:
    a. On page 88, SoCalGas lists 1,380 hours of construction management time. On the same page, SoCalGas lists 1,112 hours of project management/project services time. Given that the project is 46 days in length, it appears that SoCalGas projects 30 hours of construction management time per day or 3.75 construction managers per day for the duration of the project, assuming an 8 hour day. Similarly, SoCalGas projects 24.2 hours of project management/project services time per day or 3 project managers/project services contractors per day for the duration of the project, assuming an 8 hour day.
        i. Please confirm that the above numbers of personnel identified above are correct.
        ii. If the numbers are correct, please explain in detail how SoCalGas would appropriately utilize 3.75 construction managers and 3 project managers/project services contractors on the pressure testing work for Line 407 by stating separately the duties and activities for each of the 3.75 construction managers and 3 project managers/project services contractors projected to be working on this project.
        iii. If SoCalGas disagrees with the calculation of the number of contract personnel identified for any category listed above, please provide a corrected number and answer the previous question using the corrected number.
    b. On page 88, SoCalGas lists 2,720 hours of project management employee time. On the same page, SoCalGas lists 324 hours of project field management employee time, and 460 hours of construction management/inspectors employee time. Given that the project is 46 days in length, it appears that SoCalGas projects 59.1 hours of project management time per day or 7.4 project managers per day for the duration of the project,

QUESTION 13 – Continued

assuming an 8 hour day. Similarly, it appears that SoCalGas projects 7 hours of project field management employee time per day or 0.9 project field managers per day for the duration of the project, assuming an 8 hour day. Furthermore, it appears that SoCalGas projects 10 hours of construction management/inspector employee time per day or 1.25 construction manager/inspectors for the duration of the project, assuming an 8 hour day.

i. Please confirm that the above numbers of personnel identified above are correct.

ii. If the numbers are correct, please explain in detail how SoCalGas would appropriately utilize 7 project managers, 0.9 project field managers, and 1.25 construction management/inspector on the pressure testing work for Line 407 by stating separately the duties and activities for each of the 7 project managers, 0.9 project field managers, and 1.25 construction management/inspector projected to be working on this project.

iii. If SoCalGas disagrees with the calculation of the number of SoCalGas personnel identified for any category listed above, please provide a corrected number and answer the previous question using the corrected number.

SoCalGas Response 13:

SoCalGas objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it does not seek the production of information, but rather, directs SoCalGas to perform calculations for TURN and SCGC that TURN and SCGC can calculate themselves based on the information previously provided. Subject to and without waiving the foregoing objection, SoCalGas responds as follows:

The calculation can be performed by TURN and SCGC using information previously provided and the methodology described in response to Question 10 above. Descriptions of the duties and activities for the various categories are provided in responses to Questions 7 and 8 above.

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SoCalGas Question 14:

14. With respect to the workpapers to SCG-15 that were provided in response to TURN/SCGC-SEU-001, Q.1, for the hydrotesting work on Line 1011:
    a. On page 99, SoCalGas lists 2,080 hours of construction management time. On the same page, SoCalGas lists 914 hours of project management/project services time. Given that the project is 52 days in length, it appears that SoCalGas projects 40 hours of construction management time per day or 5 construction managers per day for the duration of the project, assuming an 8 hour day. Similarly, SoCalGas projects 17.6 hours of project management/project services time per day or 2.2 project managers/project services contractors per day for the duration of the project, assuming an 8 hour day.
        i. Please confirm that the above numbers of personnel identified above are correct.
        ii. If the numbers are correct, please explain in detail how SoCalGas would appropriately utilize 5 construction managers and 2.2 project managers/project services contractors on the pressure testing work for Line 1011 by stating separately the duties and activities for each of the 5 construction managers and 2.2 project managers/project services contractors projected to be working on this project.
        iii. If SoCalGas disagrees with the calculation of the number of contract personnel identified for any category listed above, please provide a corrected number and answer the previous question using the corrected number.
    b. On page 99, SoCalGas lists 2,482 hours of project management employee time. On the same page, SoCalGas lists 621 hours of project field management employee time, and 520 hours of construction management/inspectors employee time. Given that the project is 52 days in length, it appears that SoCalGas projects 47.7 hours of project management time per day or 6 project managers per day for the duration of the project, assuming an 8 hour day. Similarly, it appears that SoCalGas projects 11.9 hours of

QUESTION 14-Continued

project field management employee time per day or 1.5 project field managers per day for the duration of the project, assuming an 8 hour day. Furthermore, it appears that SoCalGas projects 10 hours of construction management/inspector employee time per day or 1.25 construction manager/inspectors for the duration of the project, assuming an 8 hour day.

i. Please confirm that the above numbers of personnel identified above are correct.

ii. If the numbers are correct, please explain in detail how SoCalGas would appropriately utilize 6 project managers, 1.5 project field managers, and 1.25 construction management/inspector on the pressure testing work for Line 1011 by stating separately the duties and activities for each of the 6 project managers, 1.5 project field managers, and 1.25 construction management/inspector projected to be working on this project.

iii. If SoCalGas disagrees with the calculation of the number of SoCalGas personnel identified for any category listed above, please provide a corrected number and answer the previous question using the corrected number

SoCalGas Response 14:

SoCalGas objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it does not seek the production of information, but rather, directs SoCalGas to perform calculations for TURN and SCGC that TURN and SCGC can calculate themselves based on the information previously provided. Subject to and without waiving the foregoing objection, SoCalGas responds as follows:

The calculation can be performed by TURN and SCGC using information previously provided and the methodology described in response to Question 10 above. Descriptions of the duties and activities for the various categories are provided in responses to Questions 7 and 8 above.

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SoCalGas Question 15:

15. With respect to the workpapers to SCG-15 that were provided in response to TURN/SCGC-SEU-001, Q.1, for the hydrotesting work on Line 2000 Chino Hills:
    a. On page 114, SoCalGas lists 16,920 hours of construction management time. On the same page, SoCalGas lists 1,211 hours of project management/project services time. Given that the project is 141days in length, it appears that SoCalGas projects 120 hours of construction management time per day or 15 construction managers per day for the duration of the project, assuming an 8 hour day. Similarly, SoCalGas projects 8.6 hours of project management/project services time per day or 1.1 project managers/project services contractors per day for the duration of the project, assuming an 8 hour day.
        i. Please confirm that the above numbers of personnel identified above are correct.
        ii. If the numbers are correct, please explain in detail how SoCalGas would appropriately utilize 15 construction managers and 1.1 project managers/project services contractors on the pressure testing work for Line 2000 Chino Hills by stating separately the duties and activities for each of the 15 construction managers and 1.1 project managers/project services contractors projected to be working on this project.
        iii. If SoCalGas disagrees with the calculation of the number of contract personnel identified for any category listed above, please provide a corrected number and answer the previous question using the corrected number.

QUESTION 15-Continued

b. On page 113, SoCalGas lists 4,435 hours of project management employee time. On the same page, SoCalGas lists 1,409 hours of project field management employee time, and 1,128 hours of construction management/inspectors employee time. Given that the project is 141 days in length, it appears that SoCalGas projects 31.4 hours of project management time per day or 3.9 project managers per day for the duration of the project, assuming an 8 hour day. Similarly, it appears that SoCalGas projects 10 hours of project field management employee time per day or 1.25 project field managers per day for the duration of the project, assuming an 8 hour day. Furthermore, it appears that SoCalGas projects 8 hours of construction management/inspector employee time per day or 1.0 construction manager/inspector for the duration of the project, assuming an 8 hour day.

   i. Please confirm that the above numbers of personnel identified above are correct.

   ii. If the numbers are correct, please explain in detail how SoCalGas would appropriately utilize 3.9 project managers, 1.25 project field managers, and 1.0 construction management/inspector on the pressure testing work for Line 2000 Chino Hills by stating separately the duties and activities for each of the 3.9 project managers, 1.25 project field managers, and 1.0 construction management/inspector projected to be working on this project.

   iii. If SoCalGas disagrees with the calculation of the number of SoCalGas personnel identified for any category listed above, please provide a corrected number and answer the previous question using the corrected number.

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SoCalGas Response 15:

SoCalGas objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it does not seek the production of information, but rather, directs SoCalGas to perform calculations for TURN and SCGC that TURN and SCGC can calculate themselves based on the information previously provided. Subject to and without waiving the foregoing objection, SoCalGas responds as follows:

The calculation can be performed by TURN and SCGC using information previously provided and the methodology described in response to Question 10 above. Descriptions of the duties and activities for the various categories are provided in responses to Questions 7 and 8 above.

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SoCalGas Question 16:

16. With respect to the workpapers to SCG-15 that were provided in response to TURN/SCGC-SEU-001, Q.1, for the hydrotesting work on Line 2000-E:
    a. On page 126, SoCalGas lists 5,400 hours of construction management time. On the same page, SoCalGas lists 1,453 hours of project management/project services time. Given that the project is 104 days in length, it appears that SoCalGas projects 51.9 hours of construction management time per day or 6.5 construction managers per day for the duration of the project, assuming an 8 hour day. Similarly, SoCalGas projects 14.0 hours of project management/project services time per day or 1.7 project managers/project services contractors per day for the duration of the project, assuming an 8 hour day.
        i. Please confirm that the above numbers of personnel identified above are correct.
        ii. If the numbers are correct, please explain in detail how SoCalGas would appropriately utilize 6.5 construction managers and 1.7 project managers/project services contractors on the pressure testing work for Line 2000-E by stating separately the duties and activities for each of the 6.5 construction managers and 1.7 project managers/project services contractors projected to be working on this project.
        iii. If SoCalGas disagrees with the calculation of the number of contract personnel identified for any category listed above, please provide a corrected number and answer the previous question using the corrected number.
    b. On page 125, SoCalGas lists 2,374 hours of project management employee time. On the same page, SoCalGas lists 1,200 hours of project field management employee time, and 832 hours of construction management/inspectors employee time. Given that the project is 104 days in length, it appears that SoCalGas projects 22.87 hours of project management time per day or 2.9 project managers per day for the duration of the project,

QUESTION 16-Continued

assuming an 8 hour day. Similarly, it appears that SoCalGas projects 11.5 hours of project field management employee time per day or 1.4 project field managers per day for the duration of the project, assuming an 8 hour day. Furthermore, it appears that SoCalGas projects 8 hours of construction management/inspector employee time per day or 1.0 construction manager/inspector for the duration of the project, assuming an 8 hour day.

i. Please confirm that the above numbers of personnel identified above are correct.

ii. If the numbers are correct, please explain in detail how SoCalGas would appropriately utilize 2.9 project managers, 1.4 project field managers, and 1.0 construction management/inspector on the pressure testing work for Line 2000-E by stating separately the duties and activities for each of the 2.9 project managers, 1.4 project field managers, and 1.0 construction management/inspector projected to be working on this project.

iii. If SoCalGas disagrees with the calculation of the number of SoCalGas personnel identified for any category listed above, please provide a corrected number and answer the previous question using the corrected number.

SoCalGas Response 16:

SoCalGas objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it does not seek the production of information, but rather, directs SoCalGas to perform calculations for TURN and SCGC that TURN and SCGC can calculate themselves based on the information previously provided. Subject to and without waiving the foregoing objection, SoCalGas responds as follows:

The calculation can be performed by TURN and SCGC using information previously provided and the methodology described in response to Question 10 above. Descriptions of the duties and activities for the various categories are provided in responses to Questions 7 and 8 above.

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SoCalGas Question 17:

17. With respect to the workpapers to SCG-15 that were provided in response to TURN/SCGC-SEU-001, Q.1, for the hydrotesting work on Line 2000 Blythe to Cactus City:
    a. On page 143, SoCalGas lists 15,240 hours of construction management time. On the same page, SoCalGas lists 1,211 hours of project management/project services time. Given that the project is 127 days in length, it appears that SoCalGas projects 120 hours of construction management time per day or 15 construction managers per day for the duration of the project, assuming an 8 hour day. Similarly, SoCalGas projects 9.5 hours of project management/project services time per day or 1.2 project managers/project services contractors per day for the duration of the project, assuming an 8 hour day.
        i. Please confirm that the above numbers of personnel identified above are correct.
        ii. If the numbers are correct, please explain in detail how SoCalGas would appropriately utilize 15 construction managers and 1.2 project managers/project services contractors on the pressure testing work for Line 2000 Blythe to Cactus City by stating separately the duties and activities for each of the 15 construction managers and 1.2 project managers/project services contractors projected to be working on this project.
        iii. If SoCalGas disagrees with the calculation of the number of contract personnel identified for any category listed above, please provide a corrected number and answer the previous question using the corrected number.

QUESTION 17 Continued

b. On page 143, SoCalGas lists 4,341 hours of project management employee time. On the same page, SoCalGas lists 1,823 hours of project field management employee time, and 1,534 hours of construction management/inspectors employee time. Given that the project is 127 days in length, it appears that SoCalGas projects 34.2 hours of project management time per day or 4.3 project managers per day for the duration of the project, assuming an 8 hour day. Similarly, it appears that SoCalGas projects 14.4 hours of project field management employee time per day or 1.8 project field managers per day for the duration of the project, assuming an 8 hour day. Furthermore, it appears that SoCalGas projects 12.1 hours of construction management/inspector employee time per day or 1.5 construction manager/inspector for the duration of the project, assuming an 8 hour day.

i. Please confirm that the above numbers of personnel identified above are correct.

ii. If the numbers are correct, please explain in detail how SoCalGas would appropriately utilize 4.3 project managers, 1.8 project field managers, and 1.5 construction management/inspector on the pressure testing work for Line 2000 Blythe to Cactus City by stating separately the duties and activities for each of the 4.3 project managers, 1.8 project field managers, and 1.5 construction management/inspector projected to be working on this project.

iii. If SoCalGas disagrees with the calculation of the number of SoCalGas personnel identified for any category listed above, please provide a corrected number and answer the previous question using the corrected number.

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SoCalGas Response 17:

SoCalGas objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it does not seek the production of information, but rather, directs SoCalGas to perform calculations for TURN and SCGC that TURN and SCGC can calculate themselves based on the information previously provided. Subject to and without waiving the foregoing objection, SoCalGas responds as follows:

The calculation can be performed by TURN and SCGC using information previously provided and the methodology described in response to Question 10 above. Descriptions of the duties and activities for the various categories are provided in responses to Questions 7 and 8 above.

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SoCalGas Question 18:

18. With respect to the workpapers to SCG-15 that were provided in response to TURN/SCGC-SEU-001, Q.1, for the hydrotesting work on Line 2001 West Section C:

    a. On page 155, SoCalGas lists 7,250 hours of construction management time. On the same page, SoCalGas lists 4,045 hours of project management/project services time. Given that the project is 141 days in length, it appears that SoCalGas projects 51.4 hours of construction management time per day or 6.4 construction managers per day for the duration of the project, assuming an 8 hour day. Similarly, SoCalGas projects 28.7 hours of project management/project services time per day or 3.6 project managers/project services contractors per day for the duration of the project, assuming an 8 hour day.

        i. Please confirm that the above numbers of personnel identified above are correct.

        ii. If the numbers are correct, please explain in detail how SoCalGas would appropriately utilize 6.4 construction managers and 3.6 project managers/project services contractors on the pressure testing work for Line 2001 W-C by stating separately the duties and activities for each of the 6.4 construction managers and 3.6 project managers/project services contractors projected to be working on this project.

        iii. If SoCalGas disagrees with the calculation of the number of contract personnel identified for any category listed above, please provide a corrected number and answer the previous question using the corrected number.

QUESTION 18 Continued:

b. On page 154, SoCalGas lists 9,903 hours of project management employee time. On the same page, SoCalGas lists 1,243 hours of project field management employee time, and 2,140 hours of construction management/inspectors employee time. Given that the project is 141 days in length, it appears that SoCalGas projects 70.2 hours of project management time per day or 8.8 project managers per day for the duration of the project, assuming an 8 hour day. Similarly, it appears that SoCalGas projects 8.8 hours of project field management employee time per day or 1.1 project field managers per day for the duration of the project, assuming an 8 hour day. Furthermore, it appears that SoCalGas projects 15.2 hours of construction management/inspector employee time per day or 1.9 construction manager/inspector for the duration of the project, assuming an 8 hour day.

i. Please confirm that the above numbers of personnel identified above are correct.

ii. If the numbers are correct, please explain in detail how SoCalGas would appropriately utilize 8.8 project managers, 1.1 project field managers, and 1.9 construction management/inspector on the pressure testing work for Line 2001 W-C by stating separately the duties and activities for each of the 8.8 project managers, 1.1 project field managers, and 1.9 construction management/inspector projected to be working on this project.

iii. If SoCalGas disagrees with the calculation of the number of SoCalGas personnel identified for any category listed above, please provide a corrected number and answer the previous question using the corrected number.

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SoCalGas Response 18:

SoCalGas objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it does not seek the production of information, but rather, directs SoCalGas to perform calculations for TURN and SCGC that TURN and SCGC can calculate themselves based on the information previously provided. Subject to and without waiving the foregoing objection, SoCalGas responds as follows:

The calculation can be performed by TURN and SCGC using information previously provided and the methodology described in response to Question 10 above. Descriptions of the duties and activities for the various categories are provided in responses to Questions 7 and 8 above.

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SoCalGas Question 19:

19. With respect to the workpapers to SCG-15 that were provided in response to TURN/SCGC-SEU-001, Q.1, for the hydrotesting work on Line 2001 West Section D:

    a. On page 167, SoCalGas lists 12,700 hours of construction management time. On the same page, SoCalGas lists 546 hours of project management/project services time. Given that the project is 126 days in length, it appears that SoCalGas projects 100.8 hours of construction management time per day or 12.6 construction managers per day for the duration of the project, assuming an 8 hour day. Similarly, SoCalGas projects 4.3 hours of project management/project services time per day or 0.5 project managers/project services contractors per day for the duration of the project, assuming an 8 hour day.

        i. Please confirm that the above numbers of personnel identified above are correct.

        ii. If the numbers are correct, please explain in detail how SoCalGas would appropriately utilize 12.6 construction managers and 0.5 project managers/project services contractors on the pressure testing work for Line 2001 W-D by stating separately the duties and activities for each of the 12.6 construction managers and 0.5 project managers/project services contractors projected to be working on this project.

        iii. If SoCalGas disagrees with the calculation of the number of contract personnel identified for any category listed above, please provide a corrected number and answer the previous question using the corrected number.

    b. On page 167, SoCalGas lists 2,763 hours of project management employee time. On the same page, SoCalGas lists 1,298 hours of project field management employee time, and 365 hours of construction management/inspectors employee time. Given that the project is 126 days in length, it appears that SoCalGas projects 21.9 hours of project management

QUESTION 19 Continued

time per day or 2.7 project managers per day for the duration of the project, assuming an 8 hour day. Similarly, it appears that SoCalGas projects 10.3 hours of project field management employee time per day or 1.3 project field managers per day for the duration of the project, assuming an 8 hour day. Furthermore, it appears that SoCalGas projects 2.9 hours of construction management/inspector employee time per day or 0.4 construction manager/inspector for the duration of the project, assuming an 8 hour day.

i. Please confirm that the above numbers of personnel identified above are correct.

ii. If the numbers are correct, please explain in detail how SoCalGas would appropriately utilize 2.7 project managers, 1.3 project field managers, and 0.4 construction management/inspector on the pressure testing work for Line 2001 W-D by stating separately the duties and activities for each of the 2.7 project managers, 1.3 project field managers, and 0.4 construction management/inspector projected to be working on this project.

iii. If SoCalGas disagrees with the calculation of the number of SoCalGas personnel identified for any category listed above, please provide a corrected number and answer the previous question using the corrected number.

SoCalGas Response 19:

SoCalGas objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it does not seek the production of information, but rather, directs SoCalGas to perform calculations for TURN and SCGC that TURN and SCGC can calculate themselves based on the information previously provided. Subject to and without waiving the foregoing objection, SoCalGas responds as follows:

The calculation can be performed by TURN and SCGC using information previously provided and the methodology described in response to Question 10 above. Descriptions of the duties and activities for the various categories are provided in responses to Questions 7 and 8 above.

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SoCalGas Question 20:

20. With respect to the workpapers to SCG-15 that were provided in response to TURN/SCGC-SEU-001, Q.1, for the hydrotesting work on Line 2001 West Section E:

    a. On page 179, SoCalGas lists 5,210 hours of construction management time. On the same page, SoCalGas lists 1,453 hours of project management/project services time. Given that the project is 73 days in length, it appears that SoCalGas projects 71.4 hours of construction management time per day or 8.9 construction managers per day for the duration of the project, assuming an 8 hour day. Similarly, SoCalGas projects 19.9 hours of project management/project services time per day or 2.5 project managers/project services contractors per day for the duration of the project, assuming an 8 hour day

        i. Please confirm that the above numbers of personnel identified above are correct.

        ii. If the numbers are correct, please explain in detail how SoCalGas would appropriately utilize 8.9 construction managers and 2.5 project managers/project services contractors on the pressure testing work for Line 2001 W-E by stating separately the duties and activities for each of the 8.9 construction managers and 2.5 project managers/project services contractors projected to be working on this project.

        iii. If SoCalGas disagrees with the calculation of the number of contract personnel identified for any category listed above, please provide a corrected number and answer the previous question using the corrected number.

    b. On page 178, SoCalGas lists 2,337 hours of project management employee time. On the same page, SoCalGas lists 1,127 hours of project field management employee time, and 584 hours of construction management/inspectors employee time. Given that the project is 73 days in

QUESTION 20 Continued

length, it appears that SoCalGas projects 32.0 hours of project management time per day or 4.0 project managers per day for the duration of the project, assuming an 8 hour day. Similarly, it appears that SoCalGas projects 15.4 hours of project field management employee time per day or 1.9 project field managers per day for the duration of the project, assuming an 8 hour day. Furthermore, it appears that SoCalGas projects 8.0 hours of construction management/inspector employee time per day or 1.0 construction manager/inspector for the duration of the project, assuming an 8 hour day.

i. Please confirm that the above numbers of personnel identified above are correct.

ii. If the numbers are correct, please explain in detail how SoCalGas would appropriately utilize 4.0 project managers, 1.9 project field managers, and 1.0 construction management/inspector on the pressure testing work for Line 2001 W-E by stating separately the duties and activities for each of the 4.0 project managers, 1.9 project field managers, and 1.0 construction management/inspector projected to be working on this project.

iii. If SoCalGas disagrees with the calculation of the number of SoCalGas personnel identified for any category listed above, please provide a corrected number and answer the previous question using the corrected number.

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SoCalGas Response 20:

SoCalGas objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it does not seek the production of information, but rather, directs SoCalGas to perform calculations for TURN and SCGC that TURN and SCGC can calculate themselves based on the information previously provided. Subject to and without waiving the foregoing objection, SoCalGas responds as follows:

The calculation can be performed by TURN and SCGC using information previously provided and the methodology described in response to Question 10 above. Descriptions of the duties and activities for the various categories are provided in responses to Questions 7 and 8 above.