

**DRA DATA REQUEST
DRA-SCG-147-DAO
SOCALGAS 2012 GRC – A.10-12-006
SOCALGAS RESPONSE**

**DATE RECEIVED: NOVEMBER 9, 2011
DATE RESPONDED: NOVEMBER 23, 2011**

Exhibit Reference: SCG-205

Subject: Gas Engineering O&M

Please provide the following:

1. Referring to page RKS-3, lines 1-2, please provide a citation to DRA's testimony wherein DRA states, "...DRA recommends that the Commission approve SoCalGas' entire Shared-Services (USS), booked expense, proposal."

SoCalGas Response:

SoCalGas specifically notes in rebuttal testimony that DRA did not take exception to SoCalGas' USS forecast as noted in Exhibit SCG-205, pages RKS-3 and RKS-50. The reference noted here in DRA-SCG-147-DAO was inadvertently mixed with the SDG&E DRA witness that recommended acceptance of Gas Engineering's USS forecast.¹ Mr. Stanford will correct this reference when he makes corrections to this exhibit upon taking the witness stand. Although this reference will be corrected, it does not change the recommendation or the basis for the recommendation of SoCalGas' USS forecast. Since DRA did not oppose it, SoCalGas reiterates its rebuttal position in that it respectively requests the Commission adopt its USS forecast of \$16,053,000.

¹ DRA-9, pg. 6, line 17; pg. 7, lines 2 and 8

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2. Referring to page RKS-3, please provide a citation to support the assertion, “DRA’s testimony claims that SoCalGas did not provide any engineering support.”

SoCalGas Response:

The qualifying term “any” in the statement above was used to categorize the spirit of DRA’s use of various terms such as: “sufficient...appropriate”², “thorough”³, and “adequate evidence”⁴, in reference to SoCalGas’ perceived absence of quality or quantity of supporting documentation. DRA’s language seems to lead the reader that little or no engineering data was supplied while in fact quite the contrary is true. Within testimony, workpapers, data-request responses to intervenors, and rebuttal testimony, SoCalGas has presented and provided considerable supporting documentation.

² DRA-44, p. 83, l. 22

³ Id., p. 84, L. 5,

⁴ Id., L. 22

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3. Referring to page RKS-3, please provide specific references to the “great volume of engineering analysis provided to [DRA] by SoCalGas” that “DRA ignored.”

SoCalGas Response:

As it relates to TIMP and certain DIMP activities, it appears that DRA overlooked or ignored the various formats and levels of engineering documentation that have been provided throughout testimonies, workpapers, and intervenor data requests. The materials referenced in the question above include the following:

- Baseline Assessment Plan provided in response to SCG-DRA-022. The BAP contains well over 2200 line segments to be assessed. As noted in rebuttal, DRA did not note the actual projects and remaining work to be performed. It asserted that SoCalGas was done with its assessments and proposed an alternate method of forecast leading to a much reduced funding level. The BAP shows in detail the volume of work to be remaining and clearly evident that the appropriate forecast methodology is zero-based using the tangible projects listed.
- GIPP – Preliminary Program Summary, Risk flowchart, program presentation (DRA-042);
GIPP Implementation Plan (Rebuttal);
- ILI project cost analysis (DRA-022)(SCGC-03);
- ECDA project cost analysis (DRA-022)(SCGC-03);
- DREAMS – steel and plastic pipe replacement plan and algorithms (DRA-027);
- AL Riser Program Report, Pilot Survey, and Gas standard, (DRA-040);
- SLIP – Implementation Plan and Data presented, (DRA-041).

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4. Referring to page RKS-17, please provide the number of HCA and non-HCA miles assessed and re-assessed, by method used, and cost incurred by method, as part of the Pipeline Integrity Transmission Program for 2010 and 2011 YTD.

SoCalGas Response:

The tables presented below show: **A)** The assessed miles and method data for 2010 and 2011 YTD; **B)** a summary of the program assessment status, through 2011 YTD), and **C)** 2010 assessment costs by method (2011 costs are not available at this time).

A) 2010 and 2011 YTD assessment summary:

Assessment Method	2010 (Miles)					2011 YTD (Miles)				
	Baseline Assessment		Re-Assessment		Total	Baseline Assessment		Re-Assessment		Total
	HCA	NON HCA	HCA	NON HCA		HCA	NON HCA	HCA	NON HCA	
ECDA	24	4	3	0	31	21.5	0	1.5	0	23
ILI	34	314	75	147	570	9	5	72	8	94
Pressure Test	0.14	0	0.4	0	0.54	0.4	0	0	0	0.4

B) T1MP program assessment summary:

	(Miles)
Total HCA to be Baseline Assessed	1,325
2003-2009 assessed	1,047
2010 Assessed	58
2011 (Sept. YTD)	31
Remaining	189

C) 2010 assessment costs:

Assessment Method	2010 Expenditures (x000)
Inline Inspection	\$14,921
External Corrosion Direct Assessment	\$6,970
Pressure Test – See details 1 & 2 below	See below

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Response to Question 4 (Continued)

1) Pressure Testing Costs for In-service Piping

Line PGR-6

Total Pressure Test Miles: 0.7
No. of Pressure Test Segments: 7
Avg. Pressure Test Length: 0.1

Pressure Test Year	Labor	Non-Labor	Totals
2010	\$22,623	\$209,095	\$231,718

2) Pressure Testing Costs for Mixed Assessment & New Construction Projects

**LINE 80 - Mixed Assessment Costs
(see note below)**

Total Pressure Test Miles: 0.3
No. of Pressure Test Segments: 4
Avg. Pressure Test Length: 0.08

Date	Labor	Non-Labor	Totals
2010	\$42,467	\$949,983	\$992,450

NOTE: L80 was assessed using a combination of both in-line inspection and pressure testing. These combined costs were an integral part of the job planning, and shared many of the same resources for planning and execution. As a result these combined costs cannot be separated.

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5. Referring to pages RKS-17, lines 6-10, please identify the number of HCA miles assessed at the end of 2010 and 2011YTD.

SoCalGas Response:

See response to Question No. 4.

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6. Referring to page RKS-14, SoCalGas states, “SoCalGas has implemented and is managing its TIMP program, through its Baseline Assessment Plan (BAP), to meet this compliance requirement date.” Please state whether or not the miles of transmission pipelines in the BAP include both HCA and non-HCA miles?

SoCalGas Response:

The BAP includes only HCA mileage.

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7. Referring to page RKS-19, wherein SoCalGas states, “The BAP shows specific projects at specific costs that must be completed by December 17, 2012.” Provide a copy of the BAP referred to in the statement.

SoCalGas Response:

The intent is to indicate that the BAP (provided in response to SCG-DRA-022, Question 3, lists the finite number of projects requiring completion. Each of these projects has an estimated cost value associated and are represented in the various GRC expense requests.