**QUESTION 1:**

In the response to Question 1 of TURN DR Set TCAP-4, SDG&E stated, “The information being requested is not readily available to the cost allocation witnesses because historical recorded replacement data was not used to develop their testimony.”

* 1. Is the requested information or any portion thereof readily available to SDG&E employees or agents other than the cost allocation witnesses?
  2. Please describe in detail the process SDG&E took to obtain from SDG&E employees or agents other than the cost allocation witnesses the information being requested in Question 1 of TURN DR Set TCAP-4.
  3. Please identify the approximate date on which the cost allocation witnesses received Question 1 of TURN DR Set TCAP-4, and the approximate date on which the cost allocation witnesses became aware that the information being requested is not readily available to them.

**RESPONSE 1:**

1. No.
2. The cost allocation witness consulted with the subject matter experts in the Gas Operations Department of SDG&E.
3. The question was received November 16, 2012. Cost allocation became aware information was not readily available on November 30, 2012.

**QUESTION 2:**

In the response to Question 1 of TURN DR Set TCAP-4, SDG&E stated, “The information that SDG&E can provide within the time frame proposed by TURN is as follows …”

* 1. Did SDG&E understand the use of the abbreviation “TBD” after “Response Requested” in the introductory material of TURN DR Set TCAP-4 to mean something other than “to be determined”? If so, please describe in detail SDG&E’s understanding of “TBD” as used in the data request.
  2. Would SDG&E be able to provide additional information in response to the data request if it was provided more time for preparing the response? If so, please briefly describe the additional information SDG&E could provide under those circumstances, and the approximate amount of time SDG&E believes would be required in order to provide that additional information.

**RESPONSE 2:**

1. No, SoCalGas and SDG&E understood “TBD” to mean “to be determined.”
2. No.

**QUESTION 3:**

The response to Question 6c of TURN DR Set TCAP-4 states, in part, “The contributing factors associated with service replacement trenching that resulted in cost increases include but are not limited to the following…” Please identify and briefly describe each contributing factor that SDG&E identified but did not include in the list of contributing factors provided in response to Question 6c. If it would be unduly burdensome to identify each contributing factor, please identify and briefly describe the three most significant contributing factors that SDG&E identified but did not include in the list of contributing factors provided in response to Question 6c.

**RESPONSE 3:**

The list below identifies and briefly describes each contributing factor that SDG&E identified but did not include in the list of contributing factors provided in response to Question 6c.

1. Permit Fees - Higher construction and traffic control permit fees
2. American with Disabilities Act - Labor and equipment to provide protected pathways for pedestrians and wheelchairs under the ADA regulations
3. Archeological Requirements - Prevention of historical cultural artifact disruption or destruction – archeological requirements surrounding trenching
4. Temporary trench cover requirements - Trench plates must meet certain requirements and be laid flush with the street
5. Inspections - Contract plumbers hired to inspect post trench construction to ensure no sewer lines have been contacted.

**QUESTION 4:**

The response to Question 6c of TURN DR Set TCAP-4 states, in part, that one of the contributing factors resulting in cost increases for service replacement trenching is “More restrictive municipality requirements for the timing, installation and street repair associated with trench construction.”

* 1. Please identify by name and job title each SDG&E employee or contractor who provided information regarding the municipality requirements and their impact on service replacement trenching costs, and the municipality or municipalities each such employee or contractor had in mind when he or she provided this information.
  2. For each year from 2008 through 2012 (to date), inclusive, please identify each municipality in SDG&E’s service territory in which the requirements for the timing, installation or street repair associated with trench construction became more restrictive in that year. If SDG&E believes it would be unduly burdensome to identify each such municipality, please identify the five in which SDG&E believes the “more restrictive municipality requirements” had the greatest impact on SDG&E’s service replacement trenching costs during that period.
  3. For each municipality identified in response to (b), please briefly describe each requirement that became more restrictive. If SDG&E believes it would be unduly burdensome to identify each such requirement that became more restrictive, for each municipality identified in response to (b), please identify the five requirements that had the greatest impact on SDG&E’s service replacement trenching costs.
  4. For each of the “more restrictive municipality requirements” referred to in the response to question 6c of TURN-4, please provide a copy of each municipal ordinance, code section, or other document indicating adoption of the more restrictive municipality requirement.

**RESPONSE 4:**

1. Subject matter experts employed in the Gas Operations Department, Project Management, Construction Operations and Environmental Services departments of SDG&E. See Response to 4.b for list of municipalities.
2. There are 26 municipalities/agencies in San Diego County. SDG&E believes it would be unduly burdensome to identify each municipality. In Table 1, please find the five municipalities in which SDG&E believes the requirements for the timing, installation or street repair associated with trench construction became more restrictive in recent years.

Table 1



1. SDG&E objects to this question on the grounds that it is unreasonably burdensome, seeks information not relevant to this proceeding, and seeks information equally available to TURN. Without waiving these objections, and subject thereto, SDG&E responds as follows: For each municipality identified in response to (b). In Table 2, please find the five requirements that had the greatest impact on SDG&E’s service replacement trenching costs for each municipality identified in Response 4.b.

Table 2



d. SDG&E objects to this question on the grounds that it is unreasonably burdensome, seeks information not relevant to this proceeding, and seeks information equally available to TURN. Without waiving these objections, and subject thereto, SDG&E responds as follows: Providing a copy of the respective ordinance for 26 municipalities/agencies would be overly burdensome. Examples of municipalities and applicable standards or ordinances, where available, are provided below in Table 3. It should be noted that in many cases these restrictions are interpreted by the inspector on the project, and therefore the extent of the restriction can vary.

Table 3

For each of the Restrictive Municipality Requirements listed in TURN DR #4, Q6c  
Provide a copy of each Ordinance

|  |  |  |  |
| --- | --- | --- | --- |
| **Municipality or Agency** | **More Restrictive Municipality/Agency Requirements Since 2008 as listed in the response to TURN DR#4, Q6c** | **Municipality Ordinance or Agency Code Name or Number** | **Copy Provided** |
| City of San Diego | Curb-to-Curb Street Surface Repairs, not just the surface of the trench | Proposed change in pavement moratorium rules |  |
|  | Specialized Street Coatings following Street Repair |  |  |
| Cal Trans | Restrictive Project Construction times to avoid peak hours of traffic |  |  |
| Most All Cities | Greatly increased requirements for traffic control. More company materials and labor to provide municipality approved traffic control. |  |  |
| County of San Diego | Increase cost of trenching and backfill materials due to requirement of higher volumes of material; prohibitions on use of native backfill. | DS-22 Trench “T” cap specification requiring additional paving material. |  |
|  | Environmental Constraints including contaminated soil removal. | San Diego County Letter of Instructions regarding Storm Water |  |
| Notes:  1/ This proposed change for the City of San Diego would increase the moratorium for resurfaced streets to 5 years. A moratorium requires that any excavation performed in the street after it has been resurfaced during that time period must be replaced across the entire street surface curb-to-curb, not just the trench area.  2/ One of our contractors performed a cost analysis of the impact of the City of San Diego’s new “T” cap and grind trench surface repair standard. The result is that trenching costs have doubled primarily due to the increased volume of street surface material. The comparison cost analysis is provided here: | | | |

**QUESTION 5:**

The response to Question 6c of TURN DR Set TCAP-4 states, in part, that one of the contributing factors resulting in cost increases for service replacement trenching is “Greatly increased need for traffic control in city and county streets.”

* 1. Please identify by name and job title each SDG&E employee or contractor who provided information regarding the increased need for traffic control in city and county streets, and each city or county that each such employee or contractor had in mind when he or she provided this information.
  2. For each year from 2008 through 2012 (to date), inclusive, please identify each city or county in SDG&E’s service territory in which the requirements for traffic control in city and county streets increased in that year. If SDG&E believes it would be unduly burdensome to identify each such municipality, please identify the five in which SDG&E believes the “greatly increased need for traffic control” had the greatest impact on SDG&E’s service replacement trenching costs.
  3. For each example of the “greatly increased need for traffic control” referred to in the response to question 6c of TURN-4, please provide a copy of each municipal ordinance, code section, or other document indicating adoption of the increased need for traffic control.

**RESPONSE 5:**

1. Subject matter experts employed in the Gas Operations Department of SDG&E. See Response to 5.b for list of municipalities.
2. SDG&E objects to this question on the grounds that it is unreasonably burdensome, seeks information not relevant to this proceeding, and seeks information equally available to TURN. Without waiving these objections, and subject thereto, SDG&E responds as follows: In Table 4 below please find the five municipalities in which SDG&E believes the “greatly increased need for traffic control” had the greatest impact on SDG&E’s service replacement trenching costs. A city or agency’s Traffic Control Plan (TCP) includes the standards for the traffic control equipment and set up. Prior to 2007, traffic control around excavation sites was basic and relatively unregulated. Since that time, municipalities and agencies have moved to requiring formal traffic control plans (drawings showing required equipment). Today each project must have a custom drawn traffic control plan.

In the past, utility maintenance or construction crews could set up their own “traffic control” with cones and a few signs. Today because of these new requirements and the variability of standards among municipalities and agencies, contractors and full time employees have been added to draft traffic control plans and keep up with the various city requirements. In addition, vendors have been hired for traffic control equipment to support the excavation and in-street maintenance activities.

Table 4



1. See Response 5.b

**QUESTION 6:**

The response to Question 6c of TURN DR Set TCAP-4 states, in part, that one of the contributing factors resulting in cost increases for service replacement trenching is “Increased material costs.”

* 1. Please identify by name and job title each SDG&E employee or contractor who provided information regarding the increased material costs, and each specific cost that each such employee or contractor had in mind when he or she provided this information.
  2. For each year from 2008 through 2012 (to date), inclusive, please identify with specificity each material cost that increased at a rate greater than inflation for that year. If SDG&E believes it would be unduly burdensome to identify each such material cost, please identify the five that had the greatest impact on SDG&E’s service replacement trenching costs for that year.

**RESPONSE 6:**

1. Subject matter experts employed in the Gas Operations Department of SDG&E. See Response to 6.b for list of costs.
2. SDG&E objects to this question on the grounds that it is unreasonably burdensome, seeks information not relevant to this proceeding, and seeks information equally available to TURN. Without waiving these objections, and subject thereto, SDG&E responds as follows: Below please find the four material cost increases that had the greatest impact on SDG&E’s service replacement trenching costs since 2008.

  
Table 5

**QUESTION 7:**

The response to Question 6c of TURN DR Set TCAP-4 states, in part, that one of the contributing factors resulting in cost increases for service replacement trenching is “Environmental constraints resulting in increased costs associated with contaminated soil removal, disposal and replacement.”

* 1. Please identify by name and job title each SDG&E employee or contractor who provided information regarding the “environmental constraints resulting in increased costs,” and each specific cost that each such employee or contractor had in mind when he or she provided this information.
  2. For each year from 2008 through 2012 (to date), inclusive, please identify with specificity each environmental constraint resulting in increased costs that resulted in costs increasing at a rate greater than inflation for that year. If SDG&E believes it would be unduly burdensome to identify each such environmental constraint, please identify the five that had the greatest impact on SDG&E’s service replacement trenching costs for that year.
  3. For each year from 2008 through 2012 (to date), inclusive, please identify each municipality in SDG&E’s service territory in which new environmental constraints associated with contaminated soil removal, disposal and replacement went into effect that year. If SDG&E believes it would be unduly burdensome to identify each such municipality, please identify the five in which SDG&E believes the “environmental constraints” had the greatest impact on SDG&E’s service replacement trenching costs.
  4. For each municipality identified in response to (c), please briefly describe each environmental constraint that went into effect in each year from 2008 through 2012 (to date). If SDG&E believes it would be unduly burdensome to identify each such environmental constraint that went into effect, for each municipality identified in response to (c), please identify the five environmental constraints that had the greatest impact on SDG&E’s service replacement trenching costs.
  5. For each of the “environmental constraints” referred to in the response to question 6c of TURN-4, please provide a copy of each municipal ordinance, code section, or other document indicating adoption of the more restrictive municipality requirement.
  6. If any of the “environmental constraints” referred to in the response to question 6c of TURN-4 arise from California statute or regulations, please briefly describe each such environmental constraint that went into effect in each year from 2008 through 2012 (to date). If SDG&E believes it would be unduly burdensome to identify each such environmental constraint that went into effect, please identify the five such environmental constraints arising under California statute or regulations during the period from 2008 through 2012 (to date) that had the greatest impact on SDG&E’s service replacement trenching costs.
  7. If any of the “environmental constraints” referred to in the response to question 6c of TURN-4 arise from California statute or regulations, please provide a copy of each section of the state code or state regulation that produces each environmental constraint. If SDG&E believes it would be unduly burdensome to provide such copies, please cite by specific section number each such section of the state code or state regulation.

**RESPONSE 7:**

1. Subject matter experts employed in the Gas Operations Department of SDG&E. See Response to 7.b for list of costs.
2. SDG&E objects to this question on the grounds that it is unreasonably burdensome, seeks information not relevant to this proceeding, and seeks information equally available to TURN. Without waiving these objections, and subject thereto, SDG&E responds as follows: In Table 6 below please find the five environmental constraints that had the greatest impact on SDG&E’s service replacement trenching costs since 2008.

Table 6



1. SDG&E objects to this question on the grounds that it is unreasonably burdensome, seeks information not relevant to this proceeding, and seeks information equally available to TURN. Without waiving these objections, and subject thereto, SDG&E responds as follows: In Table 7 below please find the five municipalities in which SDG&E believes the “environmental constraints” had the greatest impact on SDG&E’s service replacement trenching costs.

Table 7



1. SDG&E objects to this question on the grounds that it is unreasonably burdensome, seeks information not relevant to this proceeding, and seeks information equally available to TURN. Without waiving these objections, and subject thereto, SDG&E responds as follows: See Response 7.b.
2. See Response 7.b.
3. SDG&E objects to this question on the grounds that it is unreasonably burdensome, seeks information not relevant to this proceeding, and seeks information equally available to TURN. Without waiving these objections, and subject thereto, SDG&E responds as follows: Below please find the five such environmental constraints arising under California statute or regulations during the period from 2008 through 2012 (to date) that had the greatest impact on SDG&E’s service replacement trenching costs.

Table 8





1. SDG&E objects to this question on the grounds that it is unreasonably burdensome, seeks information not relevant to this proceeding, and seeks information equally available to TURN. Without waiving these objections, and subject thereto, SDG&E responds as follows: See Response 7.f.