**Environmental Defense Fund
General Rate Case, Southern California Gas Company
R.14-11-004,
EDF Data Request No. 1**

|  |  |
| --- | --- |
| EDF Data Request No.: | EDF-SGC \_001 |
| Request Date: | April 23, 2015 | EDF Contact: | Timothy O’Connor |
| Due Date: | May 7, 2015 | EDF Contact Phone No.: | (415) 293-6132 |

1. How do SB 1371’s requirements for best practices and leak reduction fit into the Operations and Maintenance services expenses for pipelines in John Dagg’s testimony? Please provide an explanation and appropriate documentation of how those expected costs will be incorporated.

2. Please specify how Southern California Gas Company (“SCG”) is planning to quantify the methane emissions from its individual leaks and intentional releases, and for its system as a whole. And please provide an explanation and appropriate documentation as to how the costs quantification of natural gas emissions, intentional or unintentional, will be accounted for.

3. On page FBA -35 and FBA-41 of Frank Ayala’s Revised Testimony, he discusses SCG’s plan to eliminate the backlog of leaks by 2018 for service and mains. Do the costs associated with this plan of action include prioritization of the order of repair based on quantification, so that the largest leaks are eliminated first? Please provide an explanation and appropriate documentation of how this plan will be implemented, and if there are other components of the system included in the plan.

4. In Frank Ayala’s Revised Testimony about service and main maintenance beginning on FBA -31, and continuing through FBA -42, he mentions that the leak reduction effort includes leak evaluation and repair, and the impacts of SB 1371 on leak reduction efforts. However, he does not mention how SB 1371’s quantification requirement has affected costs for leak evaluation. Are the costs for training and technology used for quantification and repair prioritization included in the figures presented? Please provide an explanation and appropriate documentation showing how SCG is incorporating the costs of quantifying leaks.

5. Please provide an explanation and appropriate documentation relating to the new technology used to measure the atmospheric methane levels of older pipeline segments that was mentioned in the response to TURN DATA REQUEST-003, question 5(b). What kind of technology is used, how is it implemented, and how does SCG determine which areas of pipe to survey?

6. In ORA DATA REQUEST ORA-SCG-DR-009-DAO question 3, SCG responds that SCG and SDG&E are establishing a team of internal and external resources to conduct an assessment and develop a program to determine the extent to which they need a remote monitoring and control plan. Is this in anticipation of an SB 1371 requirement and will methane emissions be taken into account when determining the need for such tools? Please provide an explanation and appropriate documentation showing how SCG will incorporate methane reduction.