

**SOUTHERN CALIFORNIA GAS COMPANY  
SAN DIEGO GAS & ELECTRIC COMPANY**

**APPLICATION TO RECOVER COSTS RECORDED IN THE  
PIPELINE SAFETY AND RELIABILITY MEMORANDUM ACCOUNTS,  
THE SAFETY ENHANCEMENT EXPENSE BALANCING ACCOUNTS, AND  
THE SAFETY ENHANCEMENT CAPITAL COST BALANCING ACCOUNTS  
(A.16-09-005)**

**(DATA REQUEST TURN-SCGC-13)**

**Date Requested: July 24, 2017**

**Date Responded: August 25, 2017**

**Date Amended: September 8, 2017**

**Date of 2<sup>nd</sup> Amendment Submittal: October 4, 2017**

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**TURN-SCGC Data Request TURN-SCGC-013 regarding the response to TURN-SCGC-04 and TURN-SCGC-06**

**QUESTION 13.1:**

**13.1. The response to Q.4.3.1.1 states: “The operating district project scope included a 1,091-foot replacement and a new mainline valve on Line 2001 West to address a change in class location.” The response to Q.4.3.1.2 identifies the MLV as 2001-139.76-0. The response to Q.4.3.1.10 states: “The same construction contractor was used for all three jobs, and the work for each job was performed under a separate contract. Therefore, costs for each project were segregated.”**

**13.1.1.** Please identify the scope of work that was performed under each of the “three jobs” referred to in the response to Q.4.3.1.10.

**RESPONSE 13.1.1:**

- **Line 2001 West B Section 10 hydrotest:** As described in the workpapers supporting the 2016 Reasonableness Review Application (A.16-09-005) at pp. WP-III-A111 to A132, this is a 2.029 mile 30-inch hydrotest project.
- **Line 2001 West replacement:** As mentioned in response to TURN-SCGC Q4.3.1.1, the operating district project scope included a 1,091-foot replacement to address a change in class location. The 1,091-foot replacement was located east of the Section 10 hydrotest and was managed by the operating district.
- **MLV 2001-139.76-0:** Installation of an underground mainline ball valve and vault.

**13.1.2.** Did the work performed under these “three jobs” include only work performed for Section 10 of the Line 2001 West project?

**RESPONSE 13.1.2:**

No. The work performed for the 1,091-foot replacement on Line 2001 West was not part of the Line 2001 West B Section 10 project. The work for the MLV installation was within the scope of the Line 2001 West Section 10 project (design, schedule, management), but the contractor costs were tracked separately.

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**13.1.3.** If the answer to the previous question is “yes,” please explain how the costs were tracked for Section 11 and 14 of the Line 2001 West project.

**RESPONSE 13.1.3:**

Not applicable.

**13.1.4.** Please identify the total amount of cost that was incurred for each of the three jobs and separate the cost into direct O&M, direct capital, and indirect costs.

**RESPONSE: 13.1.4:**

Project	Direct Capital	Direct O&M	Indirect Costs	Total
L2001 West Sections 10,11&14*	\$3,783,073	\$8,104,456	\$1,137,742	\$13,025,271
MLV 2001-139.76-0 Installation**	\$1,496,477	\$0	\$73,090	\$1,569,567
L2001 West Replacement**	\$1,309,472	\$0	\$153,190	\$1,462,662

\* Costs for Sections 10, 11 and 14 are combined. These projects were not tracked separately. Section 10 was coordinated with the Valve Installation and Replacement project for efficiency purposes.

\*\* Costs are as of July 31, 2017.

**13.1.5.** Please indicate for which of the three jobs the District bore at least some cost responsibility.

**RESPONSE 13.1.5:**

MLV 2001-139.76-0 installation and the Line 2001 West Replacement.

**13.1.6.** For each of the three jobs, please identify the amount of the District's cost responsibility.

**RESPONSE 13.1.6:**

The District funded the installation of Mainline Valve 2001-139.76-0, including the vault surrounding the Mainline Valve, and the Line 2001 West replacement project, as indicated in response to TURN-SCGC Q.13.1.4. The costs associated with installation of a vault surrounding the new mainline valve were tracked separately

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because this scope of work is part of a PSEP Valve Enhancement Plan project. The District funded the vault installation cost in order to offset other costs paid by PSEP that the District would have had to incur associated with the installation of a new Mainline Valve. These costs included mobilization, site preparation, site facilities, site management, traffic control, material handling, demobilization, and field overheads,

- 13.1.7.** For each of the three jobs, please identify the amount that contributed to the “total loaded project cost of \$13,025,271 for O&M and capital” as stated at WP-III-A132.

**RESPONSE 13.1.7:**

See the response to TURN-SCGC Q.13.1.4. As stated in the first note, “Costs for Section 10, 11 and 14 are combined. These projects were not tracked separately. Section 10 was coordinated with the Valve Installation and Replacement project for efficiency purposes.”

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**QUESTION 13.2:**

**13.2. The response to Q.4.3.5.1 identifies the MLV 2001-139.76-0 as the valve for which the City of Banning's future roadway required the valve to be placed underground in a vault with traffic rated lids. The response to Q.4.3.5.11 identifies the "increased Design Contractor's cost was \$40,214 for the redesign" and the response to Q.4.3.5.14 identifies the "increased Construction Contractor's cost was \$620,416".**

**13.2.1.** Were the increased costs identified in the responses to Q.4.3.5.11 and Q4.3.5.14 attributed to the cost of the MLV 2001-139-76-0 for which the District bore cost responsibility.

**RESPONSE 13.2.1:**

Partially. The cost of \$40,214 identified in response to TURN-SCGC Q4.3.5.11 and \$481,013 out of the \$620,416 identified in response to TURN-SCGC Q4.3.5.14 are attributed to the cost of the MLV 2001-139.76-0 installation project. As such, the District bore responsibility for those costs.

**13.2.2.** If the answer to the previous question is "no," please identify in specific terms the items to which these increased costs were attributed to and explain why the costs were so attributed.

**RESPONSE 13.2.2:**

The remaining cost of \$139,403 out of the \$620,416 identified in response to TURN-SCGC Q4.3.5.14 was attributed to the PSEP 2001 West B Section 10 hydrotest project because the increased cost was due to hydrotest delays.

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**QUESTION 13.3:**

**13.3. With respect to the statement: “This valve was not identified in the 2011 filing of the PSEP Valve Enhancement Plan, but upon installation, it fell within the scope of the Valve Enhancement Plan. See response TURN-SCGC DR-04 Q4.3.1.1.”**

**13.3.1.** Does the statement mean that valve MLV 2001-139.76-0, which was to be installed at District expense, would then be required to be enhanced so it had automatic valve closure features per the PSEP Plan?

**RESPONSE 13.3.1:**

Yes.

**13.3.2.** If the answer to the previous question is “no,” please either correct the statement made in the previous question or clarify the quoted statement.

**RESPONSE 13.3.2:**

Not applicable.

**13.3.3.** Please identify precisely what aspects of the valve were considered part of PSEP.

**RESPONSE 13.3.3:**

Mainline Valve 2001-139.76-0 was installed due to a change in class location from Class 2 to Class 3. Under the approved PSEP Valve Enhancement Plan, SoCalGas and SDG&E are authorized to install ASV/RCV capability on transmission pipelines 20 inches in diameter or greater in Class 3 and 4 locations and High Consequence Areas that operate at an MAOP of 200 psig or greater. In addition, the pipeline segment crosses a known geologic threat, the San Gorgonio Fault Zone. Under the approved PSEP, SoCalGas and SDG&E are further authorized to install ASV/RSV capability at shorter interval spacing on up to 20 pipeline segments that cross known geological threats (e.g., earthquake faults, landslide areas, washout areas and other potential geologic or man-made hazards).

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**QUESTION 13.4:**

**13.4.** The response to Q.4.3.10.6-7 refers to several attachments. The attachment entitled “Q.4.3.10.6-7 CONFIDENTIAL L-2001 W B\_WA5\_EX 121615.pdf” at page 1 and 2 under the category “Change in Scope” breaks the “Description” down into three categories:

- “MLV1: Changes incorporate additional excavation and shoring of MLV1. Delays were also incurred due to delays of material deliveries and PPS. This change also includes the form and pour of the MLV vault.”
- “MLV2: Changes incorporate additional excavation and shoring of MLV2. Delays were also incurred due to delays of material deliveries and PPS. This change also includes the form and pour of the MLV vault.”
- “MLV3: Changes incorporate additional excavation and shoring of MLV3. Delays were also incurred due to delays of material deliveries and PPS. This change also includes the form and pour of the MLV vault.”

**13.4.1.** Please explain the difference between the MLV1, MLV2, and MLV3 as referenced in this description.

**RESPONSE 13.4.1:**

All three refer to the same mainline valve in the change order. The change order was broken down into three payments to account for the three major activities that relate to the installation of the mainline valve.

- Excavation and shoring of the mainline valve
- Delays due to lack of materials/materials documentation<sup>1</sup>
- Form and pour mainline valve vault

**13.4.2.** Using a unique value identification number, please identify the valves described as MLV1, MLV2, and MLV3.

**RESPONSE 13.4.2:**

All three refer to the installation of MLV 2001-139.76-0.

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<sup>1</sup> Note that the acronym “PPS” was a typographical error in the amendment to the contract with the contractor. “PPS” was intended to refer to the “DDS,” or Design Data Sheet.

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**QUESTION 13.5:**

**13.5. With respect to the attachment “Q.4.3.10.6-7 CONFIDENTIAL L-2001 W B\_RFIs.pdf” that was also provided in response to Q.4.3.10.6-7:**

- 13.5.1.** Please confirm that the amount of the daily cost to commence hydro testing due to delays was associated with holding the workforce and machinery in a “ready” format awaiting directions to proceed with the project.

**RESPONSE 13.5.1:**

Yes. This is referred to as “Stand-by”

- 13.5.2.** If the project had been demobilized, would that daily cost have been incurred?

**RESPONSE 13.5.2:**

No, a daily stand-by cost would not have been incurred. Instead, the costs of demobilizing the contractor and remobilizing would have been incurred.

- 13.5.3.** If the answer to the previous question is “no,” please indicate whether SoCalGas would expect the daily cost during a demobilized to be zero.

**RESPONSE 13.5.3:**

See Response 13.5.2.

- 13.5.4.** If the project had been demobilized, please indicate whether SoCalGas would have expected to pay to demobilize and then remobilize the construction site at a later date.

**RESPONSE 13.5.4:**

Yes.

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**QUESTION 13.6.:**

**13.6. With respect to the attachment “Q4.3.11.8-9 CONFIDENTIAL L-2001 W B\_WA4\_EX 100715.pdf” that was provided in response to Q.4.3.11.8-9: Regarding the description on page 1: “Contractor was informed the Hydrotest for the MLV was delayed until further notice due to Test head materials not arriving as anticipated”**

**13.6.1.** Was the contractor responsible for providing the test head materials?

**RESPONSE 13.6.1:**

No.

**13.6.2.** If the answer to the previous question is “no,” please identify the party that was responsible for ensuring the test head had arrived.

**RESPONSE 13.6.2:**

SoCalGas/SDG&E.

**13.6.3.** When were the test head materials requested by the responsible party?

**RESPONSE 13.6.3:**

July 15, 2014.

**13.6.4.** When were the test head materials received by the responsible party?

**RESPONSE 13.6.4:**

The test heads were received in multiple shipments at the job site on September 9, 15 and 22.



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**13.6.5.** What was the reason for the delay in receiving the test head materials?

**RESPONSE 13.6.5:**

The material was received without proper documentation and was quarantined until appropriate documents were obtained and could be verified.

**13.6.6.** When did the responsible party first become aware that there was a problem in obtaining the test head materials?

**RESPONSE 13.6.6:**

August 19, 2014.

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**QUESTION 13.7:**

**13.7. With respect to the response to Q.4.3.16:**

**13.7.1.** Was the replacement pipe installed as of November 27, 2014, when the hydrotest was postponed?

**RESPONSE 13.7.1:**

No.

**13.7.2.** If the answer to the previous question is “no,” please state the date at which the replacement pipe was installed.

**RESPONSE 13.7.2:**

January 22, 2015.

**13.7.3.** When the project was demobilized from November 27, 2014 through the late spring, was the site restored?

**RESPONSE 13.7.3:**

Yes.

**13.7.4.** If the answer to the previous question is “yes,” please describe the activities that were required to restore the site.

**RESPONSE 13.7.4:**

The contractor placed visqueen (plastic sheeting) and sand bags on the hillside and excavation area to avoid soil erosion during the break in construction.

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- 13.7.5.** When the site was remobilized in the spring, what activities were left for the contractor to complete?

**RESPONSE 13.7.5:**

Activities left to be completed include the following:

- Hydrotest
- Tie-in
- Line pressurization
- Survey welds
- Abatement of removed/replaced section of pipe
- Backfilling
- Work area restoration (new holes for chain link fence, smooth out worksite and spread gravel)
- Removal of equipment and temporary facilities (bobcats, backhoes, toilets)

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**QUESTION 13.8:**

**13.8. Regarding the response to Q.6.3.1.2, which states: “Incremental costs were not determined. The 80 feet of replacement pipe would have been included in the project scope of the future Phase 1B project, as described in response to TURN-SCGC DR-06 Q6.3.1.1.”**

**13.8.1.** Has the cost of the 80 feet of replacement pipe been included in the costs that the Applicants propose to recover for the hydrotest of Supply Line 36-9-09-N 2b?

**RESPONSE 13.8.1:**

Response amended on October 4, 2017. Changes noted in red and deletions are noted in red strikethrough.

~~Yes.No.~~

**13.8.2.** If the answer to the previous question is “no,” please explain how the Applicants propose to recover the cost of the 80 feet of replacement pipe.

**RESPONSE 13.8.2:**

Response amended on October 4, 2017. Changes noted in red and deletions are noted in red strikethrough.

~~Not applicable.~~ The costs for the approximately 68 feet of replacement pipe will be recovered in a future application.

**13.8.3.** If the answer to the question prior to the previous question is “yes,” please explain why the Applicants would propose to recover the cost of 80 feet of replacement pipe as if it were the expense associated with a hydrotest.

**RESPONSE 13.8.3:**

Response amended on October 4, 2017. Changes noted in red and deletions are noted in red strikethrough.

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~~As stated in response to TURN-SCGC Q6.3.1.1, the 80 feet of pipe was the extension needed to locate the test head out of an environmentally sensitive and rocky area to a more suitable location. The planning for a Phase 1B replacement project on Line 36-9-09N was taken into consideration, see Figure 3 (WP-III-A209). SoCalGas and SDG&E planned to leave the pipe in place once the hydrotest was completed in anticipation of using it as a tie-in point for the Phase 1B project. Not applicable.~~

- 13.8.4.** Please identify the total loaded cost associated with the 80 feet of replacement pipe including all direct costs and indirect costs.

**RESPONSE 13.8.4**

~~Response amended on October 4, 2017. Changes noted in red and deletions are noted in red strikethrough.~~

~~SoCalGas and SDG&E did not separately track costs associated with the 80-foot section of pipe. Thus, as stated in response to TURN-SCGC Q.6.3.1.2, incremental costs were not determined. SoCalGas and SDG&E estimate the cost of the pre-lay pipe for a future replacement pipe is \$580,278.~~

- 13.8.5.** Please explain how the Applicants separated the costs of installing the 80 feet of replacement pipeline from the other elements of the project.

**RESPONSE 13.8.5:**

~~Response amended on October 4, 2017. Changes noted in red and deletions are noted in red strikethrough.~~

~~See the response to TURN-SCGC Q.13.8.4. SoCalGas and SDG&E did not separate the cost of installing the 80 feet of replacement pipeline from the other elements of the project. SoCalGas and SDG&E developed an after-the-fact estimate of the cost associated with the 80 feet of replacement pipe.~~

- 13.8.6.** Please state whether the Applicants propose to recover the cost of the 80 feet of replacement pipe in the current application as accelerated mileage or in another application.

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**RESPONSE 13.8.6.**

Response amended on October 4, 2017. Changes noted in red and deletions are noted in red strikethrough.

~~No~~, SoCalGas and SDG&E do not seek authorization to recover the estimated costs for this portion of pipe in this Application. SoCalGas and SDG&E ~~do not propose~~ may request authorization to recover the cost of the 80 feet of pipe as accelerated mileage ~~or~~ in a another future application. SoCalGas and SDG&E propose to recover the cost of the 80 feet of pipe in this Application as pre-lay pipe for a Phase 1B project that has not yet entered construction.

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**QUESTION 13.9:**

**13.9. With regard to the response to Q.6.3.2.1: If the Applicants propose to recover the cost of the installation of 80 feet of replacement pipe in the current application, please provide a corrected version of the following tables and figures:**

**13.9.1.** Table 1 that properly shows the cost of installing the 80 feet of replacement pipe as a pipeline replacement cost correctly as a non-zero amount on the "Loaded Capital Costs" row.

**RESPONSE 13.9.1:**

Response amended on October 4, 2017. Changes noted in red and deletions are noted in red strikethrough.

~~In preparing a response to this question, SoCalGas and SDG&E identified a potential error in how the costs associated with this 80-foot portion of pipe were recorded and presented in this application. SoCalGas and SDG&E are looking into this further, and will provide a response to this series of questions once this review is complete. Not applicable.~~

**13.9.2.** Table 2 that properly reflects the 80 feet of replacement pipeline.

**RESPONSE 13.9.2:**

Response amended on October 4, 2017. Changes and additions are noted in red.

Table 2 is accurate and does not require revision. The 80 feet of replacement pipe is not included in the mileage data.

**13.9.3.** Table 4 that properly shows all costs associated with the 80 feet of replacement pipe in a column marked as capital separately from the column marked as O&M.

**RESPONSE 13.9.3:**

Response amended on October 4, 2017. Changes and additions are noted in red.

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Revised Table 4:

COST SUMMARY				
	PHASE 2 WOA		O&M	Delta Over/(under)
<b>COMPANY LABOR</b>	\$ 199,702	\$	127,448	\$ (72,254)
<b>CONTRACT COSTS</b>	\$ 1,558,410	\$	1,687,986	\$ 129,576
<b>MATERIALS</b>	\$ 88,958	\$	34,870	\$ (54,088)
<b>OTHER DIRECTS</b>	\$ 41,855	\$	555,180	\$ 513,325
<b>INDIRECTS</b>	\$ 279,946	\$	160,727	\$ (119,219)
<b>TOTAL</b>	\$ 2,168,871	\$	2,566,211	\$ 397,340

**13.9.4.** Figure 1 that shows the 80 feet of replacement pipe as accelerated mileage.

**RESPONSE 13.9.4:**

Response amended on October 4, 2017. Changes and additions are noted in red.

Figure 1 is correct and does not require a correction.

**13.9.5.** Figure 2 that shows the 80 feet of replacement pipe as accelerated mileage.

**RESPONSE 13.9.5:**

Response amended on October 4, 2017. Changes and additions are noted in red.

Figure 2 is correct and does not require a correction.



**SOUTHERN CALIFORNIA GAS COMPANY  
SAN DIEGO GAS & ELECTRIC COMPANY**

**APPLICATION TO RECOVER COSTS RECORDED IN THE  
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THE SAFETY ENHANCEMENT EXPENSE BALANCING ACCOUNTS, AND  
THE SAFETY ENHANCEMENT CAPITAL COST BALANCING ACCOUNTS  
(A.16-09-005)**

**(DATA REQUEST TURN-SCGC-13)**

**Date Requested: July 24, 2017**

**Date Responded: August 25, 2017**

**Date Amended: September 8, 2017**

**Date of 2<sup>nd</sup> Amendment Submittal: October 4, 2017**

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**QUESTION 13.10:**

**13.10. With respect to the confidential response to Q.6.3.6, which shows a difference of \$82,824 between the construction contractor's actual contract cost of 1,222,750 and the Performance Partner/Construction Contractor's TPE of \$1,139,926 shown on page WP-III-A210:**

**13.10.1.** Please provide a copy of all Change Order materials or other notices or correspondence provided to SoCalGas' PSEP management team by its contractor that are related to the added cost identified above.

**RESPONSE 13.10.1:**

**The attached supporting documents include Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024.** Copies of the contract change order and Requests for Information are provided in the attachment folder.

**13.10.2.** Please provide a copy of all of SoCalGas' PSEP management team's responses to its contractor in regards to these change order materials, notices or correspondence.

**RESPONSE 13.10.2:**

**The attached supporting documents include Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024.** Copies of the contract change order and Requests for Information are provided in the attachment folder.

**SOUTHERN CALIFORNIA GAS COMPANY  
SAN DIEGO GAS & ELECTRIC COMPANY**

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THE SAFETY ENHANCEMENT CAPITAL COST BALANCING ACCOUNTS  
(A.16-09-005)**

**(DATA REQUEST TURN-SCGC-13)**

**Date Requested: July 24, 2017**

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**Date Amended: September 8, 2017**

**Date of 2<sup>nd</sup> Amendment Submittal: October 4, 2017**

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**QUESTION 13.11:**

**13.11. With respect to the confidential attachments provided in response to Q.6.3.6.1 and Q.6.4.3.1:**

13.11.1.1. Please define the term "Construction Management & Support" and identify the entity or entities that provided these services for each project covered in these two responses.

**RESPONSE 13.11.1:**

**The following response includes Confidential and Protected Information Pursuant to PUC Section 583, GO 66-C, and D.16-08-024.** For purposes of presenting actual project costs in the workpapers supporting the 2016 Reasonableness Review Application, SoCalGas and SDG&E grouped the actual construction-related contracted services costs under Contract Costs and then further grouped those costs into three categories: Construction Contractor, Construction Management Services and Environmental Abatement Services.

Construction Management Services include costs for construction-related activities such as inspections, water management, LNG/CNG, equipment rental, etc. These costs are separate and distinct from the costs incurred by the construction contractor, which may include materials and equipment rental, and exclude costs incurred for environmental abatement or on-site monitoring (e.g., industrial hygienist).

Line 36-9-09 6a: Construction Management Services vendors:

[REDACTED]

SOUTHERN CALIFORNIA GAS COMPANY  
SAN DIEGO GAS & ELECTRIC COMPANY

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(A.16-09-005)

(DATA REQUEST TURN-SCGC-13)

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Line 36-9-09 2b: Construction Management Services vendors:

[REDACTED]

[REDACTED] provides Project Management Services and Construction Management Services.

13.11.2. Please define the term “Project Management and Project Services” and identify the entity or entities that provided these services for each project covered in these two responses.

**RESPONSE 13.11.2:**

The following response includes Confidential and Protected Information Pursuant to PUC Section 583, GO 66-C, and D.16-08-024. For purposes of presenting actual project costs in the workpapers supporting the 2016 Reasonableness Review Application, SoCalGas and SDG&E grouped the actual planning and design-related contracted services costs under Other Direct Costs and then further grouped those costs into five categories: Engineering & Design Services; Environmental Planning Services; Permits and ROW; Project Management and Project Services; and Other.

Project Management and Project Services includes the costs of services rendered for project management, survey and mapping, materials management and other planning services.

Line 36-9-09 6a: Project Management and Project Services vendors:

[REDACTED]

**SOUTHERN CALIFORNIA GAS COMPANY  
SAN DIEGO GAS & ELECTRIC COMPANY**

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(A.16-09-005)**

**(DATA REQUEST TURN-SCGC-13)**

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Line 36-9-09 2b: Project Management and Project Services vendors:



provides Project Management Services and Construction Management Services.

- 13.11.3.** Given that the hydrotest for Supply Line SL-36-9-09-N 2b had numerous unanticipated field conditions that had to be addressed and the hydrotest for Supply Line SL-36-9-09-N 6a had no unanticipated field conditions that had to be addressed, why did the construction management cost for Supply Line SL-36-9-09-N 6a amount to \$612,130 per mile while the construction management cost for Supply Line SL-36-9-09-N 2b amounted to only \$186,504 per mile?

**RESPONSE 13.11.3:**

Hydrotest project costs are not necessarily comparable on a per-mile basis. While Line 36-9-09 2b was a 2.2-mile long hydrotest and Line 36-9-09 6a was a one-mile long hydrotest, the construction conditions were similar, so the construction management costs are similar. While a hydrotest project of longer length requires more water, the additional cost of water is relatively small. Factors that tend to impact construction management costs include construction duration, water treatment requirements, providing CNG/LNG to maintain customer service and similar factors unrelated to project length. None of these types of construction conditions varied significantly between these two projects.

Note, SoCalGas and SDG&E included costs generated from Change Orders in the "Construction Contractor" cost category and not in the "Construction Management & Support" cost category.

- 13.11.4.** Given that the hydrotest for Supply Line SL-36-9-09-N 2b had numerous unanticipated field conditions that had to be addressed and the hydrotest for Supply Line SL-36-9-09-N 6a had no unanticipated field conditions that had to be addressed, why did the engineering and design cost for Supply Line SL-36-9-09-N 6a amount to \$362,133 per mile while the engineering and design cost for Supply Line SL-36-9-09-N 2b amounted to only \$175,180 per mile?

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(A.16-09-005)**

**(DATA REQUEST TURN-SCGC-13)**

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**RESPONSE 13.11.4:**

As explained in Response 13.11.3 above, hydrotest project costs are not necessarily comparable on a per-mile basis. While Line 36-9-09 2b was a 2.2-mile long hydrotest and Line 36-9-09 6a was a one-mile long hydrotest, the Engineering and Design factors of the two projects were similar, so the Engineering and Design costs are similar. Engineering and Design costs are generally driven by the complexity of a project rather than project length. The Engineering and Design Services costs for these two hydrotests are similar because the level of complexity of the two projects was similar. Factors that tend to impact engineering planning and design costs relate to the number of redesigns or additional surveying or potholing that may be required. None of these types of factors varied significantly between these two projects.

Note, SoCalGas and SDG&E included costs generated from Change Orders in the "Construction Contractor" cost category and not in "Engineering & Design Services."

- 13.11.5.** Given that the hydrotest for Supply Line SL-36-9-09-N 2b had numerous unanticipated field conditions that had to be addressed and the hydrotest for Supply Line SL-36-9-09-N 6a had no unanticipated field conditions that had to be addressed, why did the project management cost for Supply Line SL-36-9-09-N 6a amount to \$248,650 per mile while the project management cost for Supply Line SL-36-9-09-N 2b amounted to only \$101,003 per mile?

**RESPONSE 13.11.5:**

As explained in Response 13.11.3 above, hydrotest project costs are not necessarily comparable on a per-mile basis. While Line 36-9-09 2b was a 2.2-mile long hydrotest and Line 36-9-09 6a was a one-mile long hydrotest, Project Management costs are not typically driven by project length. Rather, Project Management costs tend to be driven by the complexities encountered during all seven stages of a project lifecycle. The 36-9-09 North Section 2B project management team did not encounter a significant number of complexities during the seven stage process, as compared to the complexities encountered during execution of the Line 36-9-09-6A project.

**SOUTHERN CALIFORNIA GAS COMPANY  
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(A.16-09-005)**

**(DATA REQUEST TURN-SCGC-13)**

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Note, SoCalGas and SDG&E included costs generated from Change Orders in the “Construction Contractor” cost category and not in “Project Management Services.”

**SOUTHERN CALIFORNIA GAS COMPANY  
SAN DIEGO GAS & ELECTRIC COMPANY**

**APPLICATION TO RECOVER COSTS RECORDED IN THE  
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(A.16-09-005)**

**(DATA REQUEST TURN-SCGC-13)**

**Date Requested: July 24, 2017**

**Date Responded: August 25, 2017**

**Date Amended: September 8, 2017**

**Date of 2<sup>nd</sup> Amendment Submittal: October 4, 2017**

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**QUESTION 13.12:**

**13.12. Please provide a copy of the response to data requests ORA-01, ORA-02, ORA-03, and ORA-04 complete with all attachments. Where attachments include Excel workbooks, the workbooks should be fully functional including all formulas and data relied upon and complete with all links.**

**RESPONSE 13.12:**

**The attached supporting documents include Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024. Copies of the data request responses and attachments are provided in the attachment folder.**

**BEFORE THE PUBLIC UTILITIES  
COMMISSION OF THE STATE OF CALIFORNIA**

**DECLARATION OF HUGO MEJIA  
REGARDING CONFIDENTIALITY OF CERTAIN DATA/DOCUMENTS  
PURSUANT TO D.16-08-024**

I, Hugo Mejia, do declare as follows:

1. I am a Project and Execution Manager in the Major Projects, Regulatory Compliance and Controls for San Diego Gas & Electric Company (“SDG&E”) and Southern California Gas Company (“SoCalGas”) designated by Jimmie Cho, Senior Vice President, Gas Operations and System Integrity for SDG&E and SoCalGas. I have been delegated authority to sign this declaration by Mr. Cho. I have reviewed the Response of SoCalGas and SDG&E to the Thirteenth Data Request of The Utility Reform Network (TURN) and Southern California Generation Coalition (SCGC) of the California Public Utilities Commission (CPUC) in the Pipeline Safety and Enhancement Plan (PSEP) 2016 Reasonableness Review A.16-09-005 proceeding, submitted concurrently herewith (Response to TURN-SCGC’s Thirteenth Data Request). I personally am familiar with the facts and representations in this Declaration, except where stated as based upon my information and belief. If called upon to testify, I could and would testify to the following based upon my personal knowledge and/or information and belief.

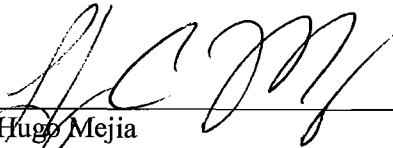
2. I hereby provide this Declaration in accordance with Decision (D.) 16-08-024 to demonstrate that the confidential information (Protected Information) provided in the Response to TURN-SCGC’s Thirteenth Data Request is within the scope of data protected as confidential under applicable law and pursuant to Public Utilities Code (“PUC”) § 583 and General Order (“GO”) 66-C, as further described in Attachment A. The intervenors in this proceeding (The Utility Reform Network, the Office of Ratepayer Advocates, and Southern California Generation Coalition) have requested that SDG&E and SoCalGas provide their responses to all data requests to all other parties; since this necessarily includes the Office of Ratepayer Advocates, this Declaration has been necessitated.



3. In accordance with the legal authority described herein, the Protected Information should be protected from public disclosure.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed this 24<sup>th</sup> day of August, 2017, at Los Angeles, California.

  
\_\_\_\_\_  
Hugo Mejia  
Project and Execution Manager

## ATTACHMENT A

### **SoCalGas and SDG&E Request Confidential Treatment of the Following Information in Their Response to TURN-SCGC's Thirteenth Data Request in A.16-09-005, Application to Recover Costs Recorded in Pipeline Safety & Reliability Memorandum Accounts, Safety Enhancement Capital Costs Balancing Accounts, and Safety Enhancement Expense Balancing Accounts**

SDG&E and SoCalGas designated the combination of the pipeline diameter attribute and location data as confidential in their response to TURN-SCGC's Thirteenth Data Request in A.16-09-005, Application to Recover Costs Recorded in Pipeline Safety & Reliability Memorandum Accounts, the Safety Enhancement Expense Balancing Accounts, and the Safety Enhancement Capital Cost Balancing Accounts, because:

- (1) This data is sensitive critical energy infrastructure information that is not currently published by PHMSA and, if made publicly available, could present a risk to the security of California's critical energy infrastructure. SoCalGas' and SDG&E's assessment of the risks associated with critical energy infrastructure data will continue to evolve as the sophistication, frequency and volume of security threats increase. In light of certain events, such as the attack on Pacific Gas & Electric Company's Metcalf Substation in 2013, SoCalGas and SDG&E believe pipeline diameter data must be treated as confidential. SoCalGas and SDG&E designate this pipeline diameter data as confidential pursuant to several laws, regulations, and guides that seek to protect critical infrastructure information and sensitive security information from public disclosure for national security reasons. These include, but are not limited to: (i) the Protected Critical Infrastructure Information (PCII) Program; (ii) FERC Order 630 - Critical Energy Infrastructure Information (CEII); (iii) Sensitive Security Information Regulations; and (iv) the Transportation Security Administration's (TSA) Pipeline Security Guidelines. *See also* the Federal Register Notice on August 27, 2015 (Volume 80, Number 166) concerning PHMSA/OPS' proposed changes to the National Pipeline Mapping System (NPMS) data collection and the protection of pipeline information such as MAOP and pipe diameter. The yellow highlighted portions on the pages identified in the table below fall within the category of sensitive critical energy infrastructure.

SDG&E and SoCalGas designated the vendor bid and pricing information (including rates and invoices) as confidential in their response to TURN-SCGC's Thirteenth Data Request in A.16-09-005, Application to Recover Costs Recorded in Pipeline Safety & Reliability Memorandum Accounts, the Safety Enhancement Expense Balancing Accounts, and the Safety Enhancement Capital Cost Balancing Accounts because:

- (2) This data is market-sensitive information and is entitled to confidential treatment under D.11-01-36, 2011 WL 660568 (2011) GO 66-C Sections 2.2(b), 2.8. The disclosure of such information would trigger the protection of section 2.2(b) of G.O. 66-C, which protects "[r]eports, records and information requested or required by the Commission which, if revealed, would place the regulated company at an unfair business disadvantage." The yellow highlighted portions on the pages identified in the table below fall within the category of vendor identifying information.

SDG&E and SoCalGas designated their employee names as confidential because:

- (3) Disclosure of this information would constitute an unwarranted invasion of personal privacy. Releasing names could put employees at risk for identity theft, personal harm, harassment or other negative outcomes. This information is exempt from public disclosure, and constitutes confidential information pursuant to Government Code § 6254(c); Gov't Code 6255; Civil Code §§ 1798.3 & 1798.24 (the California Information Practices Act); and Cal. Const., Art. I, § 1 (California constitutional right to privacy) among other relevant provisions. The yellow highlighted portions

on the pages identified in the table below fall within the category of employee identifying information (e.g., names, signatures, other contact information).

DATA / INFORMATION	JUSTIFICATION FOR CONFIDENTIALITY	ATTACHMENTS
<p>Pipeline attribute (i.e. diameter, pressure, and location)</p>	<p>This information has been identified as confidential protected information as this data constitutes sensitive critical energy infrastructure information that is not currently published by the PHMSA and, if made publicly available, could present a risk to the security of the SoCalGas and SDG&amp;E pipeline system and California’s critical energy infrastructure.</p> <p><u>CEII</u>: 18 CFR §388.113(c); FERC Orders 630, 643, 649, 662, 683, and 702 (defining CEII).</p> <p><u>Critical Infrastructure Information</u>: 6 U.S.C. §§131(3), 133(a)(1)(E); 6 CFR §§ 29.2(b), 29.8 (defining CII and restricting its disclosure).</p> <p>Gov’t Code § 6254(e) (“Geological and geophysical data, plant production data, and similar information relating to utility systems development, or market or crop reports, that are obtained in confidence from any person.”)</p> <p>Gov’t Code § 6254 (ab) (“Critical infrastructure information, as defined in Section 131(3) of Title 6 of the United States Code, that is voluntarily submitted to the Office of Emergency Services for use by that office”)</p>	<p>Q13.10.1 CONFIDENTIAL 36-9-09 North Sec 2B_RFI-08 Wedding Bands: pp.1 Q13.10.2 CONFIDENTIAL 36-9-09 North Sec 2B 5660040043: pp.1</p> <p>Q13.12 CONFIDENTIAL Q10 Change Notices 10-28-16 4 files.pdf: pp.1-6,9,10,12,13,17,20,21,23,25-30,32,33,35,37,44,47,48,51,53,54,56,58,63,75,76,79,80,82,83,85,90-92,97,99,101-110,114-116,123-125,127,129,137-143,146,157-160,162,167,168,173,174,176,177,178,180-183,188,191-193,202,206,211,213,215,219,223,234-236,241,242,248,254,259,262,272,273,285,301,302,310,311,313,315,324,330,338,345,359,368-370,382,387-390,392,393,397-401,403,405,406,407,409,410,415-424,426,427,435,438,439,441-448,451,452,454,463,465,466,472,473,476,478,479-482,487,489,491, 493,494,503,510 and 511</p> <p>Q13.12 CONFIDENTIAL Q02 Work Order Authorizations 4 files.pdf: pp.2,4,5-6,9-15,18,20,24,26,29,30-32,34-43,45,46,49-51,53,54,56-61,63-69,71,72,75-78,82-86,89,94,97,98-107,111-113,115,117,121,123,126,128,129,130-132,136,139,141,143,147,150,151,155,158</p>
<p>Vendor information</p>	<p>Vendor names, bid and pricing information have been marked as confidential protected information as publicly disclosing this information could lead to a competitive disadvantage and potential loss of market share for those vendors.</p> <p><i>See, e.g.</i>, D.11-01-36, 2011 WL 660568 (2011)</p> <p>GO 66-C Sections 2.2(b), 2.8</p>	<p>Q13.10.1 CONFIDENTIAL 36-9-09 N Sec 2B_RFI-04 Additional Exv: pp.1-2 Q13.10.1 CONFIDENTIAL 36-9-09 N Sec 2B_RFI-05 Serv tees cap: pp.1-2 Q13.10.1 CONFIDENTIAL 36-9-09 N Sec 2B_RFI-07 Service Tees: pp.1-2 Q13.10.1 CONFIDENTIAL 36-9-09 N Sec 2B_RFI-08 Wedding Bands: pp.1-2 Q13.10.1 CONFIDENTIAL 36-9-09 N Sec 2B_RFI-09 Replace Curb: pp.1-2 Q13.10.1 CONFIDENTIAL 36-9-09 N Sec 2B_RFI-10 Ground Water: pp.1-2 Q13.10.1 CONFIDENTIAL 36-9-09 N Sec 2B_RFI-11 Additional Excv: pp.1-2 Q13.10.1 CONFIDENTIAL 36-9-09 N Sec 2B_RFI-12 Bare Spots: pp.1-2</p>

	<p>Gov't Code § 6254.15 (disclosure not required for "corporate financial records, corporate proprietary information including trade secrets, and information relating to siting within the state furnished to a government agency by a private company for the purpose of permitting the agency to work with the company in retaining, locating, or expanding a facility within California")</p> <p>Gov't Code §6254.7(d) (relating to trade secrets)</p> <p>Gov't Code § 6254(k); Evid. Code §1060; Civil Code §3426</p>	<p>Q13.10.2 CONFIDENTIAL 36-9-09 N Sec 2B Agreement: pp.1-3</p> <p>Q13.12 CONFIDENTIAL Q10 Change Notices 10-28-16 4 files.pdf: pp.3-8,10,26-28,31,34,43,51-53,56,58,60,63,64,66,67,69,70,72,73,75,76,77,78,79,80,82,83,85,88,89,95,96,97-100,104-109,129,131-134,137-143,146,150,153,155,165,180,187,189-198,205,210-212,229,234,235,237-239,248-250,255,256,259,264,266,273,274,278,280,285,292,293,300,301,304-309,311,3125,315,317,318,323-325,328-330,332,333,336-338,340,342-345,347-349,357-362,364,368,369,372,376,377,379,386-390,392,399-402,404,408,411-414,419,420,421,426,427,438,442-445,447,448,451,453,454,458,463,464,465,466,469,470-472,474,477-482,491,493,494,495,497,499,503,504,505,510,511,513,514,515,517</p> <p>Q13.12 CONFIDENTIAL Q02 Work Order Authorizations 4 files.pdf: pp.92145</p>
<p>Employee identifying information (e.i. names, signatures, other contact information)</p>	<p>Public disclosure of staff level employee names, signatures, and other contact information is being prevented to protect against privacy, employee security, identity theft, and cyber-security risks.</p> <p>Gov't Code § 6254(c); Gov't Code 6255;</p> <p>Civil Code §§ 1798.3 &amp; 1798.24 (the California Information Practices Act);</p> <p>Cal. Const., Art. I, § 1 (California constitutional right to privacy).</p>	<p>Q13.10.1 CONFIDENTIAL 36-9-09 N Sec 2B_RFI-04 Additional Excv: pp.1-2</p> <p>Q13.10.1 CONFIDENTIAL 36-9-09 N Sec 2B_RFI-05 Serv tees cap: pp.1-2</p> <p>Q13.10.1 CONFIDENTIAL 36-9-09 N Sec 2B_RFI-07 Service Tees: pp.1-2</p> <p>Q13.10.1 CONFIDENTIAL 36-9-09 N Sec 2B_RFI-08 Wedding Bands: pp.1-2</p> <p>Q13.10.1 CONFIDENTIAL 36-9-09 N Sec 2B_RFI-09 Replace Curb: pp.1-2</p> <p>Q13.10.1 CONFIDENTIAL 36-9-09 N Sec 2B_RFI-10 Ground Water: pp.1-2</p> <p>Q13.10.1 CONFIDENTIAL 36-9-09 N Sec 2B_RFI-11 Additional Exv: pp.1-2</p> <p>Q13.10.1 CONFIDENTIAL 36-9-09 N Sec 2B_RFI-12 Bare Spots: pp.1-2</p> <p>Q13.10.2 CONFIDENTIAL 36-9-09 N Sec 2B Agreement: pp.1,3</p> <p>Q13.12 CONFIDENTIAL Q10 Change Notices 10-28-16 4 files.pdf: pp.1-14,16,17,19-37,39,40,42,44,46-48,50-56,58-60,62,63,65-66,68-69,71,72,74,75,77,79,81,82,84,85,87-94,96-99,101,104,105-129,131,133-143,145-146,148,149,152-154,156-164,166-210,212-234,237-292,294-324,326,328-332,334,336-369,371-493,495-513,515-517</p> <p>Q13.12 CONFIDENTIAL Q02 WO Auth 4 files.pdf: pp.1-3,6-145,147-156,158</p>