Exhibit Reference: Ex. SCG-15 **SCG Witness:** Phillips **Subject:** PSEP

Please provide the following:

QUESTION 01:

Please provide live Excel spreadsheet versions of the latest-stage estimates for all Pipeline Safety Enhancement Plan (PSEP) pipeline projects in SCG/SDG&E's General Rate Case.

If any estimates are not available, please explain why. If not all estimates are of the same PSEP project development stage, please explain why.

SoCalGas Response 1:

The attached documents include Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C/D, and D.16-08-024. Note that the attached files have also been redacted to remove non-responsive, non-relevant employee information.

See attached Excel files.

QUESTION 02:

In developing cost estimates for gas pipeline hydrotest and replacement projects, are SCG/SDG&E able to distinguish between fixed and variable costs? If so, please describe.

For the purposes of this question, please define "fixed costs" to be costs that are the same or nearly the same regardless of project. For the purposes of this question, please define "variable costs" as costs that vary proportionally according to another specific variable, for example project length, pipe diameter, or terrain type.

SoCalGas Response 2:

No, SCG/SDG&E do not distinguish between fixed and variable costs as all estimate components contain some element of variability dependent on project type, scope, and duration.

QUESTION 03:

If the answer to Question 02 above is affirmative, please provide for every PSEP project in this application:

- a. Each fixed cost for each project (name/category and dollar amount);
- b. The total fixed cost for each project;
- c. Each variable cost for each project (name/category and dollar amount);
- d. The factor determining the variable for each variable cost identified in part (c) above (for example, project length, diameter, etc.) (name/category and dollar amount); and
- e. The total variable cost for each project

SoCalGas Response 3:

- a. Not applicable.
- b. Not applicable.
- c. Not applicable.
- d. Not applicable.
- e. Not applicable.

QUESTION 04:

On page RDP-A-34 of Ex. SCG-15, SCG requests \$6,170,000 in capital funding for "Allowance for Pipeline Failures."

Please provide:

- a. The workpapers or supporting documentation determining this amount. If none are available, please explain.
- b. If this value was derived from past incurred costs, workpapers, work authorizations, change orders, or similar documents, the appropriate document(s) showing the past incurred costs.
- c. A listing of the categories of costs incurred for pipeline failures (for example, overtime labor, water containment system, additional engineering work, etc.).

SoCalGas Response 4:

- a. See attached Excel, "ORA-SCG-047-NS4 Q04 Line Rupture Rev. A Estimate_redacted.xlsx," that has been redacted to remove non-responsive, non-relevant employee information.
- b. The cost estimate was developed through the collaboration of subject matter experts.
- a. The following categories of costs are anticipated to be incurred in the event of a pipeline failure:
 - Shut-down hydrotesting contractor
 - Notification to CPUC (shutdown and standby time)
 - Removal of remaining water
 - Excavation at the failure location & repair of pipe
 - Environmental cleanup of water spill
 - Purchase of new water
 - Transport of replacement water
 - Refilling of test section

QUESTION 05:

Please provide live Excel spreadsheet versions of the latest-stage estimates for all Pipeline Safety Enhancement Plan (PSEP) valve projects in SCG/SDG&E's General Rate Case.

If any estimates are not available, please explain why. If not all estimates are of the same project development stage, please explain why.

SoCalGas Response 5:

Please see attached Excel file, "ORA-SCG-047-NS4 Q05 CONFIDENTIAL VALVE GRC 2017 Final List w Estimates_redacted.xlsx," that is considered Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C/D, and D.16-08-024. Note that the attached file has also been redacted to remove non-responsive, non-relevant employee information.