TURN DATA REQUEST-018
SDG&E-SOCALGAS 2019 GRC – A.17-11-007/8
SDG&E_SOCALGAS RESPONSE
DATE RECEIVED: FEBRUARY 22, 2018
DATE RESPONDED: MARCH 15, 2018

Subject: SoCalGas – Gas T&D (SCG-04, 06, 08)

1. Re. SCG-06 and SCG-06-WP BMusich: Regarding "Technical Services" (budget code 2GT002.000):
    a. Please provide in Excel recorded 2017 costs (in nominal and constant 2016 dollars) for this budget category, separated into "shared" and "non-shared" services.
    b. Page 29 of the workpapers shows the five-year average of these costs is around $2 million, whereas SCG forecasts $26.5 million in TY 2019. Please provide an explanation of why SCG believes this cost increase is necessary.
    c. Page 31 of the workpapers shows an incremental $12 million in "2019 RAMP Incremental" costs for High Consequence Area Class Location Mitigation.
        i. Please explain in detail the nature of these costs, including an explanation of the cost drivers and how they are "incremental" to prior years.
        ii. Please provide a detailed estimate, in Excel where possible with all calculations and assumptions, demonstrating how the $12 million figure was derived.
    d. Page 31 of the workpapers shows an incremental $5 million in "2019 RAMP Incremental" costs for contract administrator staffing.
        i. Please explain in detail the nature of these costs, the cost drivers, and how they are "incremental" to prior years.
        ii. Please provide a detailed estimate, in Excel where possible with all calculations and assumptions, demonstrating how the $5 million figure was derived.
    e. Page 31 of the workpapers shows an incremental $7.2 million in "2019 Other" costs for satellite monitoring for ground movements.
        i. Please explain in detail the nature of these costs, the cost drivers, and how they are "incremental" to prior years.
        ii. Please provide a detailed estimate, in Excel where possible with all calculations and assumptions, demonstrating how the $7.2 million figure was derived.

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Utility Response 01:

a) 2017 data for the requested workpaper is not yet available.

b) A complete overview of SoCalGas' forecast of incremental costing is provided in Ex. SCG-06, Pages EAM-16 – 18, Lines 24 – 17.

A line item detail on the incremental cost included in the Test Year 2019 forecast is located at Ex. SCG-06, Page EAM-17, Lines 9 – 19.

c) SoCalGas' use of the term High Consequence Area / HCA, has been identified as an error. The correct terminology/labeling should have reflected "Class Location Mitigation." The error will be addressed at first available opportunity.

Details on the $12 million incremental funding associated with Class Location Mitigation is located within Ex. SCG-06, Page EAM-8, Lines 6 – 19.

d) The $5 million incremental funding referenced by this request is associated with explanation appearing below the $ value (i.e., RAMP-4 Incremental Right-Of-Way…") as opposed to the explanation referenced in the request.

Details on the incremental nature of the Right-Of-Way funding is located within Ex. SCG-06, Page EAM-8, Lines 1 – 5.

e) The $7.2 million incremental funding referenced by this request is associated with explanation appearing below the $ value (i.e., Southern Gas System Reliability – Project Abandonment Cost Recovery) as opposed to the explanation referenced in the request.

Details on the incremental nature of the this costing is located within Ex. SCG-07, Pages MAB-30, Line 1 through MAB-32, Line 7, and SoCalGas' confidential response to TURN-SCGC-DR-02.

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2. Re. SCG-08 and SCG-08-CWP MBermel: SCG's testimony at pages MAB-7 to MAB-8 states "For example, SoCalGas considered using hourly reads via the Electronic Pressure Monitoring Systems (EPMS) whereby data only would have been available each hour. This alternative would have cost less but would have defeated the purpose of being able to monitor and respond to changing distribution system demands in real-time."
    a. Please provide the annual estimated costs of this alternative (2017-2019) and include all assumptions and calculations in Excel. Please explain whether a control center is necessary to read hourly data.
    b. Please explain and quantify the additional amount of risk reduction the DOCC provides in comparison with an hourly read of the distribution system.
    c. Please explain and quantify the benefits of the DOCC and use of real-time data versus hourly data reads.
    d. Please explain whether and how SCG currently uses hourly data reads (or something else) to monitor its system.
    e. Please explain why a DOCC is necessary to monitor real-time data rather than use of existing resources/procedure to mitigate the risk of catastrophic damage due to medium pipeline failure.

Utility Response 2:

a. Please see attached "DOCC Project Cost Matrix_TURN DR 018 Q.2a.xlsx."

Installation Year	**2017**	**2018**	**2019**	**Total**
Capital Cost	**-**	**22,630**	**2,543,559**	**2,566,188**
Labor	400,000	16,494	1,853,906	2,270,400
Non-labor	-	6,136	689,653	695,788

For a breakdown of the costs related to this table, please see attached "DOCC Project Cost Matrix_TURN DR 018 Q.2a.xlsx" Table 3 in the Tab "Hourly EPM Sites."

Year	2017	2018	2019	**Total**
O&M Cost	-	194,767	389,534	**584,302**
Labor	-	181,927	363,854	**545,782**
Non-labor	-	12,840	25,680	**38,520**

For a breakdown of the costs related to this table, please see attached "DOCC Project Cost Matrix_TURN DR 018 Q.2a.xlsx" Table 5 in the Tab "Hourly EPM Sites."

Utility Response 2:-CONTINUED

The existing distribution system reads hourly data; however, under routine operations it only transmits the collected data once a day, and it does not provide system integration or remote control capabilities. Currently, when there is distribution system pressure event, the existing configuration will send a data alarm within a few minutes indicating a pressure problem and allow for some limited viewing of more frequent data. This current configuration does not allow for continuous real-time monitoring in any of the approximately 600 pressure zones, such as proposed; nor is this system integrated into our transmission operations control center. It is SoCalGas' assessment that enhancing the distribution system to have real-time monitoring resources in one location, such as proposed, will enable more proficient pipeline system management. Please see Exhibit SCG-08-CWP pages 16, and 22 through 28, and Exhibit SCG-13, pages DKZ-30 and DKZ-31, for details on DOCC functionalities.

b. This distribution system enhancement is designed to prevent the potential, or respond more quickly to, over pressurization and avoid the loss of pressure of the system to minimize impacts to end-use customers. For instance, it will allow SoCalGas to remotely isolate select distribution sub-systems in the event of a regulator station equipment malfunction or pipeline failure. Currently, this action may take an hour or more because it requires SoCalGas to physically access and manually isolate. Additionally, it will allow SoCalGas to monitor gas distribution system pressures in real-time. This data granularity will also allow SoCalGasto analyze and identify regulator station equipment problems in advance of full failure through timely pressure trend information in each medium pressure pipe in the district.

From a practical perspective, having continuous real-time pipeline pressure information across the gas system versus hourly reads is the equivalent to having a clock to manage a personal schedule as opposed to simply getting an alarm at the top of the hour, or when you have an appointment, without any information between those periods.

c. Please see response 2b.

d. Regarding the distribution system specifically, as addressed in the subject testimony (Exhibit SCG-08-R), electronic pressure monitoring equipment collects hourly data, but that batch-data is currently only transmitted to Controllers once per day, with pressure alarms for out of tolerance pressures managed as exception alarms, which are transmitted to regional distribution offices for proessing within a few minutes after an event is detected. Hourly data currently includes maximum, minimum and average pressure information which is also used for compliance assurance and limited system diagnostics in support of system maintenance (such as regulator station pressure set point change/drift). Our proposed system configuration greatly enhances these capabilities and also allows for remote control to respond to identified problems in near real-time.

e. Please see response 2b.

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3. Re. SCG-08 and SCG-08-CWP MBermel: Regarding the proposed Distribution Operation Control Center ("DOCC," budget code 00343.0):
    a. Please explain whether this project was approved in the TY 2016 GRC. If not, why are there forecast costs in 2017 and 2018?
    b. Please explain whether this project will primarily solve safety or reliability concerns. Please quantify where possible and provide supporting assumption, sources, and workpapers.
    c. In Excel, please provide a list of the equipment SCG will install and a brief explanation of the corresponding benefit that installing this equipment will provide. Please quantify this benefit on an annual basis, for instance number of safety incidences avoided, reliability benefit, etc.
    d. For part (b), please provide (also in Excel) the unit cost of each type of equipment that will be installed, with a corresponding explanation and quantification of how the unit cost was derived. Please also provide historical unit costs for each type of equipment and include all workpapers, sources, and calculations.
    e. Did SCG perform a cost-benefit analysis for the proposed DOCC? If yes, please provide this analysis in Excel with all calculations and assumptions, and a corresponding explanation of how this was accomplished. If no, please explain why not.
    f. Please provide all Tables in the "Supplemental Workpapers" starting on page 15 (CWP) in Excel for the DOCC.
    g. Please provide the total number of regulator stations operated by SCG.
    h. What other utilities in the US have similar control centers to the proposed DOCC? Please provide a list to SCG's knowledge.

Utility Response 3:

a. Please refer to Exhibit SCG-08-R, pages MAB-20 and MAB-21.

b. DOCC is intended to improve pipeline safety. Please refer to Exhibit SCG-08-CWP pages 16, and 22 through 28 and Exhibit SCG-13, pages DKZ-28, DKZ-30 and DKZ-31.

c. Please refer to attached "TURN -DR-018 Q.3c.xlsx."

d. Please refer to attached "TURN -DR-018 Q.3d.xlsx."

e. SoCalGas did not perform a cost-benefit analysis for the proposed DOCC; instead, SoCalGas evaluated comparable alternatives prior to selecting the current DOCC scope. Please refer to Exhibit SCG-08-R, pages MAB-7 and MAB-8.

Utility Response 3:-CONTINUED

f. Please refer to attached "TURN -DR-018 Q.3f.xlsx."

g. The number of regulator stations is not fixed, as new regulator stations are constantly added to our system. At the beginning of this study there were 1,945 regulator stations in SoCalGas' system and 492 regulator stations in SDG&E's system. These are the numbers referenced in Exhibit SCG-08-CWP.

h. PG&E has a similar control center. SoCalGas consulted with PG&E and visited its DOCC facility as part of SoCalGas' evaluation of alternatives.

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4. Re. SCG-08 and SCG-08-CWP MBermel: Page MAB-7 of testimony states the DOCC will mitigate the identified risk of "Catastrophic Damage Involving Medium-Pressure Pipeline Failure."
    a. Please explain how the DOCC mitigates this identified risk.
    b. Please define high, medium and low pressure distribution.
    c. Please provide the approximate mileage of existing low, medium and high pressure distribution lines in SCG's service territory and in SDG&E's service territory, separately by utility.
    d. Please provide a list of all incidents in Excel between 2010-2017 that qualify as Catastrophic Damage Involving Medium-Pressure or High Pressure Distribution Pipeline Failures. Please include, in separate columns, the following information related to each failure event (all time related inquiries should be in minutes):
        i. The date and time;
        ii. The pipeline maximum allowable operating pressure (if applicable), or normal operating pressure range;
        iii. Total length of any resulting customer outage;
        iv. Time to identify location of outage from when it began;
        v. Source of how leak was identified (phone call, 911, etc.);
        vi. Time to stop leakage and begin repair;
        vii. Cause of the outage (e.g. corrosion, etc.);
        viii. Number of SCG or SDG&E workers injured or killed;
        ix. Number of members of the public injured or killed;
        x. Number of customers interrupted and for how long (separated by residential, commercial, and industrial customers).

Utility Response 4:

a. Please see response 2b.

b. The following applies to the distribution system:
- Low Pressure is a pressure less than 10 psig.
- Medium Pressure is equal to or greater than 10 psig, but not more than 60 psig.
- High Pressure is greater than 60 psig.

c.
SoCalGas – Distribution System
- High Pressure – 3,994 miles
- Medium Pressure – 47,075 miles
- Low Pressure – < 1 mile

Utility Response 4:-CONTINUED

SDG&E – Distribution System

- High Pressure – 363 miles
- Medium Pressure – 7,823 miles
- Low Pressure – 0

d. The requested information is available at: https://www.phmsa.dot.gov/data-and-statistics/pipeline/distribution-transmission-gathering-lng-and-liquid-accident-and-incident-data

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5. Re. SCG-08 and SCG-08-CWP MBermel: Please describe what SCG does when a medium-pressure pipe fails today, including how the pipe is located, how gas is diverted from the leak, and how the pipe is secured for maintenance/repair.

Utility Response 5:

This response provides a general summary becausethere are numerous variables for every incident and the request includes a wide-range of possible events.

A catastrophic failure to a medium pressure pipe would initiate an emergency response. Like any given emergency, the situation would be assessed to determine subsequent action. The impacted pipe is located using locating equipment, maps, and records. Common methods of diverting a gas leak include squeezing the pipe, installing pressure control fittings, or when necessary, clamping the pipe. Stopping the gas leak secures the pipe for immediate repairs.

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6. Re. SCG-08 and SCG-08-CWP MBermel: Please provide the risk-spend efficiency score of the DOCC compared with other alternatives for the "Catastrophic Damage Involving Medium-Pressure Pipeline Failure" risk examined by SCG. Please include all workpapers and sources.

Utility Response 6:

SoCalGas and SDG&E object to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure to the extent it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence, and is outside the scope of this proceeding. Subject to and without waiving these objections, SoCalGas and SDG&E respond as follows: Risk Reduction, Risk Spend Efficiency and Risk Mitigated to Cost Ratio calculations were not presented in the TY 2019 GRC. This approach is consistent with guidance stemming from the RAMP proceeding, as shown in the Revised Direct Testimony of Diana Day (Exhibit SCG-02-R/SDG&E-02-R, Chapter 1): "Through the SED Evaluation Report and comments submitted in response to both the SED Evaluation Report and the Companies' RAMP Report, stakeholders agreed that the RSEs are evolving, should be further refined in the S-MAP, and have limited usefulness in their current state." (Exhibit SCG-02-R/SDG&E-02-R, Chapter 1 at p. DD-17 lines 18-21.)

SoCalGas and SDG&E's comments in the RAMP proceeding stated "the Utilities do not plan to include their nascent RSE calculations in the upcoming TY 2019 GRC. However, the Utilities will work with the parties and the Commission in the S-MAP proceeding toward furthering development of a more useful effectiveness metric in the next RAMP." (I.16-10-015/I.16-10-016. SoCalGas and SDG&E Opening Comments (April 24, 2017), at 4-5; and SoCalGas and SDG&E Reply Comments (May 9, 2017), at 6-8.) Therefore, the requested information is not available. Please see the Revised Direct Testimony of Diana Day (Exhibit SCG-02-R/SDG&E-02-R, Chapter 1) and the Direct Testimony of Jamie York (Exhibit SCG-02-R/SDG&E-02-R, Chapter 3) for more information regarding the Commission's guidance in presenting the first-ever risk-informed GRC.

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7. Re. SCG-08 and SCG-08-CWP MBermel: Please identify what portions of SCG's RAMP report (Exh. SCG-10) addresses the proposed DOCC. Please provide page numbers, terminology, and citations where possible. If the DOCC was not addressed in this report, please explain why.

Utility Response 7:

The costs identified in Exhibit SCG-08-R, page MAB-2, for DOCC are driven by activities described in SoCalGas and SDG&E's November 30, 2016 Risk Assessment Mitigation Phase (RAMP) Report (Chapter SCG-10). However, costs specific to DOCC were not included in the November 2016 RAMP filing because the project was still in its early stages of development and cost estimation when RAMP was filed. Rather, these costs are presented in this GRC as a "RAMP post-filing incremental project" as described in Exhibits SCG-08-R, Tables MAB-3 and MAB-4 and SCG-08-CWP page 12.

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8. Re. SCG-08 and SCG-08-CWP MBermel: Please explain how conditions on the distribution system are monitored presently. Please include an explanation of the type of SCADA equipment presently installed, the type of data and information transmitted, how this data is collected and used. Please include a count of SCADA devices on SCG's system.

Utility Response 08:

Regarding the distribution system specifically, SoCalGas monitors its gas system as required by CFR Section 192.741 and CPUC General Order 112F. SoCalGas currently employs electronic pressure monitoring equipment to support these efforts. This equipment includes devices that collect hourly minimum, maximum and average pressure data and transmit that data to Controllers once per day. Additionally, these devices can provide an alarm to SoCalGas' region engineering and dispatch personnel for review and follow up. SoCalGas currently does not employ SCADA equipment on its distribution system. The DOCC project proposes to employ SCADA functionality to enhance SoCalGas' ability to monitor and control its distribution system to provide the increased ability to respond to abnormal operating conditions and emergency situations. See Exhibits SCG-08-R, pages MAB-22 through MAB-24 and SCG-08-CWP Supplemental Workpapers for Workpaper Group 003430 for further information.

9. Re. SCG-08 and SCG-08-CWP MBermel: Please contrast the equipment and functionalities of the proposed DOCC (as shown, for example, in Figures MAB-1 and MAB-2) with the present field monitoring and control system.

Utility Response 09:

For equipment and functionalities of the proposed DOCC, please refer to Exhibit SCG-08-CWP pages 16, and 22 through 28 and Exhibit SCG-13, pages DKZ-28, DKZ-30 and DKZ-31.

Please see response 8 above for present field monitoring and control system.

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10. Re. SCG-04, p. GOM-36-39, Leak Survey and associated workpapers:

    a. Please provide the annual leak survey costs for 2008-2011 in the same format as the table on p. WP 22

    b. Please provide the table GOM-14 data for 2008-2011

    c. Please provide a working excel worksheet showing the five-year linear trend analysis

    d. Re. p. GOM-39, line 1-8: Please explain why the "impacted mileage" is 690 in 2017 and 2018 and 3,700 miles in 2019. Please include all assumptions.

Utility Response 10:

a. SoCalGas objects to this request under Rule 10.1, on grounds that it seeks information that may be outside the scope of the TY 2019 GRC proceeding, is unduly burdensome, and is unlikely to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, SoCalGas responds as follows: The requested information is outside the scope of the standard requirements described in the Rate Case Plan and is not available in an adjusted format that would allow for a like-kind comparison in this proceeding. SoCalGas' testimony and workpapers contain five years of historical data, 2012 through 2016, that have been reviewed and adjusted to align with the Rate Case Plan requirements. Because additional years prior to 2012 are irrelevant to the TY 2019 GRC's scope, they have not undergone similar review and adjustment and therefore, would be burdensome to create.

b. SoCalGas objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that the timeframe encompassed in this request is not relevant to the subject matter involved in the pending proceeding and therefore, production of the information is unlikely to lead to the discovery of relevant and admissible evidence. In particular, this request seeks information prior to 2012 and SoCalGas does not reference any such information prior to 2012 in its testimony. Subject to and without waiving the foregoing objection, SoCalGas responds as follows: Please see the table below for the annual footage surveyed between 2008-2011.

Year	**2008**	**2009**	**2010**	**2011**
Footage Surveyed	116,299,385	117,193,314	114,605,127	118,945,201

Utility Response 10:-CONTINUED

c. SoCalGas did not prepare an Excel spreadsheet to derive a linear trend analysis. Most GRC workpapers and tables that appear in testimony are not created from, nor do they originate as Excel spreadsheets, and are produced from a database system. Use of the database for this purpose does not involve spreadsheets. The database contains a collection of tables and linking relationships that we format into reports called workpapers. Main workpapers are produced as PDF documents and the tables that appear in testimony are produced in Word format. The resulting forecasts for Leak Survey are shown in the "Base Forecast" section of the table on page 23 of SCG-04-WP. The forecasts shown in the table can be derived by using the five years of historical adjusted recorded costs from page 22 of SCG-04-WP and the linear trend function in Excel.

d. SoCalGas changed its leak survey requirements to align with the revision prescribed by GO112-F, effective January 2017. For SoCalGas' Gas Distribution, this meant that all DOT-defined transmission pipe segments (690 miles) were now subject to a six-month survey, instead of an annual survey. SoCalGas proposes to apply the bi-annual leak survey requirement beyond GO 112-F's scope to all high-pressure lines (supply lines) (3,700 miles) managed by Gas Distribution by TY 2019. SoCalGas plans to ramp up its resources and implement bi-annual leak survey for all its gas distribution high-pressure lines (supply lines) in 2019 to align with its RAMP mitigations, as outlined in Ex. SCG-04-R, page 39 lines 6-10. SoCalGas has approximately 3,700 miles of gas distribution high-pressure pipe.

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11. Re. SCG-04, p. GOM-45, Cathodic Protection and associated workpapers:

    a. Please provide a working excel spreadsheet showing the historical linear trend analysis.

Utility Response 11:

a. SoCalGas did not prepare an Excel spreadsheet to derive a linear trend analysis. Most GRC workpapers and tables that appear in testimony are not created from, nor do they originate as Excel spreadsheets, and are produced from a database system. Use of the database for this purpose does not involve spreadsheets. The database contains a collection of tables and linking relationships that we format into reports called workpapers. Main workpapers are produced as PDF documents and the tables that appear in testimony are produced in Word format. The resulting forecasts for Cathodic Protection are shown in the "Base Forecast" section in the table on page 46 of SCG-04-WP. The forecasts shown in the table can be derived by using the historical adjusted recorded costs from page 46 of SCG-04-WP and the linear trend function in Excel.

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12. Re. SCG-04, p. GOM-45, Main Maintenance and associated workpapers:

    a. Please provide the leak data shown in the ORA Master Data Request ch. 2 Q 04 for 2007-2011.

    b. Please provide the recorded costs for 2007-2011 in same format as WP p. 57.

    c. WP p. 68 – Please provide the excel spreadsheet showing the trend analysis.

Utility Response 12:

a. SoCalGas objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that the timeframe encompassed in this request is not relevant to the subject matter involved in the pending proceeding and therefore, the burden, expense, and intrusiveness of this request outweighs the likelihood that the information sought will lead to the discovery of relevant and admissible evidence. In particular, this request seeks information prior to 2012 and SoCalGas does not reference any such information prior to 2012 in its testimony.

b. SoCalGas objects to this request under Rule 10.1, on grounds that it seeks information that may be outside the scope of the TY 2019 GRC proceeding, is unduly burdensome, and is unlikely to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, SoCalGas responds as follows: The requested information is outside the scope of the standard requirements described in the Rate Case Plan and is not available in an adjusted format that would allow for a like-kind comparison in this proceeding. SoCalGas' testimony and workpapers contain five years of historical data, 2012 through and including 2016, that has been reviewed and adjusted to align with the Rate Case Plan requirements. Because additional years prior to 2012 are irrelevant to the TY 2019 GRC's scope, they have not undergone similar review and adjustment and therefore, would be burdensome to create.

c. Please see the attached TURN_DR-018-Q12.b, showing the trend analysis in Excel form. The analysis was also presented in supplemental workpaper SCG-04-GOM-O&M-SUP-002 in Exhibit SCG-04-WP.

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13. Re. SCG-04, p. GOM-56, Service Maintenance and associated workpapers:

    a. Re. WP p. 71-72: Please provide the excel spreadsheet showing the 5-year linear trend analysis

    b. Re WP p. 74 – Please explain the "continuing increase in maintenance work associated with meter guard activities."

        i. Please provide any data and analyses supporting the forecast of orders in 2019.

        ii. Please provide any reports or other documents concerning the increase in meter guard activities.

Utility Response 13:

a. SoCalGas did not prepare an Excel spreadsheet to derive a linear trend analysis. Most GRC workpapers and tables that appear in testimony are not created from, nor do they originate as Excel spreadsheets, and are produced from a database system. Use of the database for this purpose does not involve spreadsheets. The database contains a collection of tables and linking relationships that we format into reports called workpapers. Main workpapers are produced as PDF documents and the tables that appear in testimony are produced in Word format. The resulting forecasts for Service Maintenance are shown in the "Base Forecast" section in the table on page 72 of SCG-04-WP. TURN can derive the same forecasts shown in the table using the five years of historical adjusted recorded costs from page 71 of SCG-04-WP and the linear trend function in Excel.

b. Pursuant to CFR § 192.481, the DOT requires each meter set assembly (MSA) to be inspected every three (3) years for atmospheric corrosion. Although meter readers have historically performed this function, with the installation of automated meter reading and the significant decrease of Meter Readers, a new group, the CS-F MSA Inspection Organization, was formed in base year 2016. The CS-F MSA Inspection Organization performs physical, on-site inspections for each MSA to comply with DOT's mandatory MSA inspections for atmospheric corrosion and to identify conditions that may require remediation by CS-F and Distribution field employees, such as the need to replace meter guards. SoCalGas will increase the rate of meter guard replacement orders under O&M to address the inventory of pending work. The MSA Inspection Program is discussed in the testimony of Gwen Marelli, Exhibit SCG-18-R, Section III.B.5.

Utility Response 13:-CONTINUED

i. At the time of the forecast, the inventory in meter guard orders, under O&M replacement, was approximately 5,200 orders. The forecast was based on a ramp-up effort to address the inventory of existing meter guard maintenance. The forecast for 2019 meter guard replacement orders is 3,500. The meter guard costs and units are shown in Ex. SCG-04-WP, pages 72-74 and 79. Meter guard replacement conditions will continue to be identified as part of ongoing MSA inspections performed by the CS-F MSA Inspection Organization.

ii. SoCalGas objects to this request on the grounds that it is overly broad and vague and ambiguous with respect to the phrase "or other documents." SoCalGas interprets this phrase to mean other formal analyses or studies. Subject to and without waiving the foregoing objection, SoCalGas responds as follows: There are no reports or other documents concerning the increase in meter guard activities.