

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

**APPLICATION FOR REVIEW OF COSTS INCURRED IN EXECUTING  
PIPELINE SAFETY ENHANCEMENT PLAN (PSEP)  
(A.18-11-010)**

**(Cal PA Data Request-07)**

**Date Requested: January 24, 2019**

**Date Responded: March 6, 2019**

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**QUESTION 01:**

Please provide all Safety and Enforcement Division SED Audits and Field Reports related to the 44-pipeline hydrotest, replacement, and abandonment projects.

**RESPONSE 01:**

The attachments include Confidential and Protected Materials provided pursuant to PUC Section 583, GO 66-D, D.17-09-023, the accompanying declaration, and/or non-disclosure agreement.

SoCalGas and SDG&E construe this request to seek Safety and Enforcement Division (SED) audits and field reports related to the pipeline projects in this proceeding that are within SoCalGas and SDG&E's possession, custody, or control.

SoCalGas and SDG&E are aware of two formal audits of PSEP conducted by SED. A review of construction records for completed PSEP projects was conducted by SED from November 13-17, 2017, and a review of materials traceability records and field verification was conducted by SED from March 19-23, 2018. SED sent a letter dated August 10, 2018 to SoCalGas and SDG&E summarizing both audits. The letter indicated no probable violations were observed and offered one recommendation. As requested, SoCalGas and SDG&E responded to that letter in writing addressing the recommendation. SED sent a closure letter dated October 29, 2018 for those audits and accepted the response of SoCalGas and SDG&E. All three of these letters are included as attachments to this response.

SoCalGas and SDG&E are aware that SED has conducted numerous job site inspections of PSEP projects; however, SoCalGas and SDG&E do not possess any SED Audits or Field Reports relating to those visits.

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**QUESTION 02:**

Please explain and provide all documents showing SoCalGas and SDG&E actions to correct findings, recommendations, or observations in SED Audits and Field Reports.

**RESPONSE 02:**

SoCalGas and SDG&E restate previously asserted objections as follows: Pursuant to the California Public Utilities Commission's Rules of Practice and Procedure 10.1, SoCalGas and SDG&E object to the request for "all documents" on the grounds that the burden and expense of locating and producing all such documents outweighs the likelihood that the information sought will lead to the discovery of admissible evidence in this proceeding.

Subject to and without waiving the foregoing objection, SoCalGas and SDG&E respond as follows:

Following a telephonic meet-and-confer held on February 12, 2019, by email communication on February 15, 2019, Cal Advocates suggested "tabling" a response to this question until Cal Advocates can review the response provided to Question 01 or, in the alternative, SoCalGas and SDG&E could recommend a revised scope.

As noted in response to Question 1 above, there were no findings that required corrective actions, but there was one recommendation which SoCalGas and SDG&E agreed to implement. Accordingly, SoCalGas and SDG&E implemented this recommendation, and are in the process of revising Standard Procedure 1101 (SP-1101), the Quality Plan for PSEP, to document this revised practice, as well as additional enhancements to the Quality Plan. This updated version of SP-1101 is still in draft form and not yet final. SoCalGas and SDG&E propose to provide the final revised SP-1101 to Cal Advocates within 10 days of its finalization as fully responsive to this request.

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**QUESTION 03:**

Please provide all SoCalGas and SDG&E internal Audits and Field Reports related to the 44-pipeline hydrotest, replacement, and abandonment projects.

**RESPONSE 03:**

The attachments include Confidential and Protected Materials provided pursuant to PUC Section 583, GO 66-D, D.17-09-023, the accompanying declaration, and/or non-disclosure agreement.

Please see the attached seventy (70) non-privileged, final audit reports completed by SoCalGas and SDG&E's Quality Assurance Quality Control (QAQC) group that pertain to pipeline hydrotest, replacement, and abandonment projects included in the 2018 PSEP Reasonableness Review Application.

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**QUESTION 04:**

Please explain and provide all documents showing SoCalGas and SDG&E actions to correct findings, recommendations, or observations in SoCalGas and SDG&E internal Audits and Field Reports.

**RESPONSE 04:**

SoCalGas and SDG&E restate previously asserted objections as follows: Pursuant to the California Public Utilities Commission's Rules of Practice and Procedure 10.1, SoCalGas and SDG&E object to the request for "all documents" on the grounds that the burden and expense of locating and producing all such documents outweighs the likelihood that the information sought will lead to the discovery of admissible evidence in this proceeding.

Subject to and without waiving the foregoing objection, SoCalGas and SDG&E respond as follows:

Following a telephonic meet-and-confer held on February 12, 2019, by email communication on February 15, 2019, Cal Advocates suggested "tabling" a response to this question until Cal Advocates can review the response provided to Question 03 or, in the alternative, SoCalGas and SDG&E could recommend a revised scope. Accordingly, SoCalGas and SDG&E refer Cal Advocates to the attachments provided in response to Question 03.