

**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-09)

Date Requested: January 25, 2019

Date Responded: February 8, 2019

The following questions are in reference to SoCalGas/SDG&E's Line 2000-C Hydrotest Project presented in A.18-11-010 for reasonableness review.

QUESTION 01:

Please provide the detailed chain of events leading to identifying the wrinkle bend on Test Section 7.

RESPONSE 01:

SoCalGas and SDG&E construe "Test Section 7" to mean Test Break 7. With this understanding, SoCalGas and SDG&E respond as follows.

During the design stage, on or about January 16, 2015, the project execution team submitted a PSEP Pipeline Integrity Request Form to the Pipeline Integrity group. The purpose of this form is to: (1) communicate the Pipeline Integrity assessment schedule so that work between the PSEP and Pipeline Integrity groups can be coordinated; and (2) identify (a) anomalies that could become critical during a PSEP pressure test, (b) retrofitting requirements, and (c) repairs that could be conducted while the pipeline is out of service. In response to the request form, the Pipeline Integrity group identified a wrinkle bend within Test Break 7.

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QUESTION 02:

Were all the segments of Line 2000-C inspected for wrinkle bends?

RESPONSE 02:

Yes.

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QUESTION 03:

Please provide a detailed explanation of the remediation steps taken to address the wrinkle bend.

RESPONSE 03:

The wrinkle bend at Test Break 7 was located within the planned replacement tie-in piece. It was cut out of the pipe when the pipeline was removed from service and replaced with a new section of pipe during tie-in. The presence of the wrinkle bend was taken into consideration during the selection of the location of the test break—by locating the test break in this location, SoCalGas/SDG&E were able to replace the wrinkle bend during the hydrotest.

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QUESTION 04:

Please provide a brief description of the anomaly identified along the long seam during tie-in preparation activities west of the final tie-in. In the description please include the reason of this anomaly, the risks of not addressing the anomaly, the remediation steps taken to address the anomaly, and precautionary steps to be taken in the future to avoid such an anomaly.

RESPONSE 04:

During Non-Destructive testing of the tie-in weld on the west side of Test Break 15, SoCalGas and SDG&E detected a linear indication in the outer cap of the longitudinal seam of the existing pipe. This long seam anomaly was due to lack of fusion on the existing weld. If the anomaly was not addressed, the pressure test risked failing at this location. Initially, SoCalGas and SDG&E removed weld material on the pipe in an attempt to remediate the anomaly, however, maximum allowable material removal depth was reached without eliminating the anomaly. To fully remediate the anomaly, SoCalGas and SDG&E removed and replaced the segment of pipe.

SoCalGas and SDG&E manage risk associated with pipeline anomalies through their Transmission Integrity Management Program (TIMP), which performs prescribed assessments and takes appropriate actions to reduce the risk of a pipeline failure on all transmission pipelines.

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QUESTION 05:

Why did SoCalGas/SDG&E plan to recover costs of Phase 2A and Phase 2B mileage in this PSEP proceeding?

RESPONSE 05:

As stated in Direct Testimony Chapter 2 (Phillips) at page 8, there are no standalone Phase 2 projects submitted for review in this Application, but some of the projects presented in this Application include Phase 2 scopes of work that were "accelerated" and included within the scope of Phase 1 projects to achieve efficiencies, minimize customer and community impacts and/or for constructability reasons.

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QUESTION 06:

Please provide the dollar amount of costs savings resulting from performing accelerated Phase 2A and Phase 2B mileage within Phase 1A scope.

RESPONSE 06:

SoCalGas and SDG&E did not prepare a separate cost estimate to isolate the costs of separate projects to execute the Phase 2A and Phase 2B mileage within Phase 1A scope of this project. Based on operator knowledge and experience, not including the accelerated mileage in this project would require separate projects to be planned and executed in a future PSEP phase which would duplicate the activities and expenses undertaken to complete the project. Included in these activities and expenses are engineering and design, material procurement, and related construction activities, including permit acquisition, traffic control, mobilization and demobilization of a laydown yard, mobilization and demobilization of a construction contractor, and mobilization and demobilization of non-construction contractor personnel. Inclusion now also avoids future community and system impacts associated with taking the pipeline out of service a second time.

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QUESTION 07:

Please provide any documentation and manuals describing SCG standards on soil covering.

RESPONSE 07:

SoCalGas Gas Standard 223.0002 "Minimum Trench Requirements for Transmission Pipelines" is provided in the attachment folder.

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QUESTION 08:

Please describe the soil conditions that required extra work on soil covering to achieve SCG standards on soil conditions.

RESPONSE 08:

To address environmental conditions, including loose, sandy soil types, exposure to high winds, and other factors, SoCalGas and SDG&E covered the pipeline with additional soil to increase the amount of cover.

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QUESTION 09:

Please describe the remediation steps taken to achieve SCG standards on soil conditions.

RESPONSE 09:

Excess soil was gathered from the surrounding work space and used to increase the layer of cover over portions of the pipe, as appropriate.

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QUESTION 10:

Please provide a brief description on the water availability near the construction sites of Line 2000-C.

RESPONSE 10:

SoCalGas and SDG&E construe "water availability" to mean access to water for construction activities. With this understanding, SoCalGas and SDG&E respond as follows.

The project was located within a sparsely populated location where water sources were not conveniently located near the test areas. The closest water sources were 1.5 to 3 miles away from the water staging locations used for construction activities.

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QUESTION 11:

Please describe the decision path that concluded that water must be transported to the sites of construction along Line 2000-C.

RESPONSE 11:

SoCalGas and SDG&E object to the term "decision path" as vague and ambiguous. Without waiving and subject to the foregoing objection, SoCalGas and SDG&E respond as follows:

Based on operator experience, the only viable alternative for trucking water was to build temporary piping between the nearest source and water staging location. As indicated in Response 10, the nearest water sources were 1.5 to 3 miles away. Temporary piping to transport water across such distances would require large pumps to overcome friction/elevation, as well as monitoring to ensure the lines are not damaged by local traffic/vandals. The most expeditious and cost-effective solution was to transport water by truck.