

**APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY FOR AUTHORITY TO RECOVER
VENTURA COMPRESSOR MODERNIZATION PROJECT REVENUE REQUIREMENT IN
CUSTOMER RATES AND FOR APPROVAL OF RELATED COST ALLOCATION AND RATE
DESIGN PROPOSALS (A.23-08-019)
(DATA REQUEST CalPA-SCG-DR04)**

Date Requested: May 10, 2024, Submitted: May 24, 2023

QUESTION 1: What year was the Ventura Compressor Station first installed, and in what year(s) was the compressor station equipment later upgraded or replaced?

RESPONSE 1:

A compressor station has been in use at this site since at least 1923, and the current compression equipment was installed in the 1980s. SoCalGas developed plans to modernize the Ventura Compressor Station due to the limited functionality of the approximately 40-year-old infrastructure and to compensate for the significant decline in local producer supply. (PEA at 1-1; see *a/so* PEA at 1-4, 2-1, 3-1, 3-7, 3-9, 5.5-6 to 5.5-7 “Historical Development of the Project Site,” etc.)

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QUESTION 2: Please identify and provide the pipeline and compressor codes and standards which were in use when Ventura Compressor station was originally installed.

RESPONSE 2:

SoCalGas objects to this request on the grounds some of the information requested is equally available to the requestor. Subject to and without waiving the foregoing objection, SoCalGas responds as follows.

A compressor station has been in use at this site since at least 1923 and has been through multiple modernizations in subsequent years. The existing station was modernized in the 1980s to meet operating requirements. As such, SoCalGas interprets this question to ask for codes and standards relevant to the equipment installed in the 1980s, which were subject to the applicable requirements of Title 49 Code of Federal Regulations Part 192 at the time. Other codes and standards are applicable, including, but not limited to, the following codes and standards for the station piping and gas compressors:

1. State of California, Public Utilities Commission, General Order No. 112-D.
2. Occupational Safety and Health Administration (OSHA).
3. ANSI B31.3, ANSI B16.5 for Hydrocarbon piping & ANSI B31.4 for miscellaneous utility piping.
4. ANSI S1.13-71 for Methods for measurement of Sound Pressure Level.
5. API 1B Oil Field V. Belting.
6. API 7B-11C Specifications for Internal Combustion Engine.
7. API 11P, First Edition, Packaged High Speed Separable Engine-Driven Reciprocating Gas Compressors.
8. API RP-520, Safety Valves.
9. API 618 Reciprocating Compressor Standards.
10. API 661, Air Cooled Heat Exchanger for General Refinery Service.
11. ASME Section VIII Pressure Vessel Code.
12. ASME Section IX, Welding and Brazing Qualifications.
13. ISA Standards & Recommended Practices.
14. National Fire Protection Association 37.
15. Steel Structural Painting Council SSPC Manual #6.
16. Structural Welding Code D1.1-75 AWS.
17. Tubular Exchanger Manufacturer Association, TEMA.
18. UL Underwriters Laboratory.
19. Uniform Building Code.
20. Uniform Fire Code.
21. Ventura County APCD Rule 74.9.

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QUESTION 3: SoCalGas' response to DR-03 Question 1 responds that the Ventura site has never undergone a change of Class Location since its installation. Please provide all available documents establishing the Ventura site class location when it was installed.

RESPONSE 3:

Cal Advocates DR03-01 asked for information within the "proposed project location." SoCalGas response stated it understood the term "proposed project location" to refer to SoCalGas's existing 8.4-acre Ventura Compressor Station property located at 1555 North Olive Street in the City of Ventura and that the question pertains to all existing pipeline segments within the footprint of the existing 8.4-acre site.

In response to this question, SoCalGas understands "Ventura site" in this question and DR04 Questions 4 and 5 to refer to the "proposed project location," i.e., SoCalGas's existing 8.4-acre Ventura Compressor Station property located at 1555 North Olive Street in the City of Ventura and that the question pertains to all existing pipeline segments within the footprint of the existing 8.4-acre site.

The Code of Federal Regulations (CFR) established class locations in 1970 upon its initial publication. Following the CFR's implementation, a small pipeline installation occurred within the facility in 1973. The attached design data sheet from the 1973 installation identifies the project location as Class 3 at the time of installation. Any subsequent changes in population density have not resulted in a class location change.

Confidential and Protected Materials provided pursuant to PUC Section 583, GO 66-D, D.17-09-023

Attachment:

- VCM A.23-08-019 Ventura CPCN SCG 04-03_DDS.pdf. The attachment, contained in the zip folder "*Ventura CPCN zip folder*" includes Confidential and Protected Materials provided pursuant to PUC Section 583, GO 66-D, D.17-09-023 with the accompanying declaration (Confidentiality Declaration_Ventura CPCN).

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QUESTION 4: SoCalGas response to DR-03 Question 5(d) states that “Based on data from 2012 through the present, pipeline segments have not exceeded pressures established by 192.619(c).”

- a. Please provide pressure logs for each of these pipeline segments, including those years prior to 2012.
- b. If SoCalGas cannot provide evidence of pressure tests, please explain why.

RESPONSE 4:

SoCalGas’s previous response to DR-03 Q5 included six segments. However, pipeline 1005-38.54-XO4 was incorrectly included in the previous response for DR-03 Question 4 and 5. 1005-38.54-XO4 does not operate under 192.619(C) (replaced post 1970). SoCalGas will be providing a correction to the previous responses to address this oversight.

- a. Five years of pressure logs collected from SCADA (Supervisory Control and Data Acquisition) pressure monitoring for the main lines 1005 and 404 that feed the laterals in DR-03 Q5 are attached and confirm that pressure did not exceed pressures established by 192.619(C). SoCalGas retains SCADA historical data for a period of 5 years.

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Attachment:

- VCM A.23-08-019 Ventura CPCN SCG 04-04.xlsx. The attachment, contained in the zip folder “*Ventura CPCN zip folder*”. includes Confidential and Protected Materials provided pursuant to PUC Section 583, GO 66-D, D.17-09-023 with the accompanying declaration (Confidentiality Declaration_Ventura CPCN).
- b. The pipelines in question are operating under 192.619(C); accordingly, pressure tests are not required.

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QUESTION 5: SoCalGas' tabular response to DR-03 Question 5 provides the names of the pipeline segments within the Ventura Compressor Station site with MAOP pursuant to 192.619(c). Please additionally identify for these pipeline segments the following:

- a. Pipeline Name
- b. Longitudinal Joint Factor
- c. Source of Longitudinal Joint Factor (e.g. 49 CFR 192 or 1955 ASA (American Standards Association))
- d. Length of Segment (in feet)
- e. Wall Thickness (in inches)
- f. Outer Diameter of Pipe Segment (in inches)
- g. Specified Minimum Yield Strength (SMYS)
- h. Percent SMYS
- i. Long Seam Type (e.g. AO Smith, DSAW, ERW, Seamless, Spiral)
- j. Year Installed
- k. Most Recent Test Date or Year of Pressure Test
- l. Test Pressure
- m. Test Medium
- n. Test Duration (in minutes)
- o. MAOP (calculated if not for the 192.619 (c) exemption)
- p. MOP (highest pressure which SoCalGas currently operates the segment)
- q. Percent SMYS at the MOP
- r. Ratio of Test Pressure to the MOP
- s. Class Location

RESPONSE 5:

Please see the attachment table for responses 5(a) through 5(s). As noted above, pipeline 1005-38.54-XO4 was incorrectly included in the previous response for DR-03 Question 4 and 5. 1005-38.54-XO4 does not utilize 192.619(C). SoCalGas will be providing a correction to the previous responses to address this oversight.

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Attachment:

- VCM A.23-08-019 Ventura CPCN SCG 04-05.xlsx. The attachment, contained in the zip folder "*Ventura CPCN zip folder*". includes Confidential and Protected Materials provided pursuant to PUC Section 583, GO 66-D, D.17-09-023 with the accompanying declaration (Confidentiality Declaration_Ventura CPCN).

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QUESTION 6: In its Application, SoCalGas presents Figure 13, which shows the locations of the proposed project and alternate project sites.

- a. What analysis has SoCalGas performed to estimate the downwind effects of a possible escape of gas from each of these locations (Current Facility Site, Avocado Site, Devil's Canyon Road Site, Ventura Steel Site)?
- b. Please provide all available documents, maps, studies of prevailing wind conditions, and any other analysis SoCalGas has performed on this matter for each of these locations.

RESPONSE 6:

a. SoCalGas understands the "Current Facility Site" to refer to the Proposed Project.

1. A health risk assessment (HRA) which includes air dispersion modeling was prepared for a previous proposal for the modernization of the compressor station which included a configuration of four new natural gas engine driven compressors. The HRA was submitted to Ventura County Air Pollution Control District (VCAPCD) in March 2020 as part of the Authority to Construct (ATC) application package. This ATC application was withdrawn from VCAPCD by SoCalGas since the project is required to comply with the newly established General Order 177 (GO-177) and an ATC application will be submitted for the project proposed in the Application at a later time.
2. An Air Quality and Greenhouse Gas Emissions Technical Report was completed in April 2023 as part of the Proponent's Environmental Assessment (PEA). CalEEMod was used to quantify direct emissions from construction and operations as well as indirect GHG emissions associated with the use of grid electricity.
3. A Risk Assessment Report was prepared for the Proposed Project in April 2024 as part of the Proponent's Environmental Assessment (PEA). This report includes an air dispersion modeling for the quantitative risk analysis (QRA) that calculated the consequences of accidental release of natural gas over a wide range of potential conditions. The Risk Assessment Report will be updated to address comments from CPUC's Second Completeness/Deficiency Review of Ventura Compressor Station Modernization Project PEA.

No analysis of the downwind effects has been performed for alternative site locations since preliminary design has not been completed.

b. Documents provided below as attachments:

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- Application for Authority to Construct: Ventura Compressor Station Modernization Project, March 2020. Attachment: VCM_A2308019_CalPA_SCG_04_Q06_Attach_01_VCS ATC application 3-27-2020
- Air Quality and Greenhouse Gas Emissions Report, April 2023 (Appendix B which is included in the PEA). https://www.socalgas.com/sites/default/files/AppendixB_AQ-GHGTechReport.pdf
- Proponent's Environmental Assessment for SoCalGas Ventura Compressor Modernization Project filed on August 24, 2023, Section 5.20.1.3 Wind, Humidity, and Temperature, Section 5.20b Impact Analysis. https://www.socalgas.com/sites/default/files/PEA_Combined_PDFA.pdf

Confidential and Protected Materials provided pursuant to PUC Section 583, GO 66-D, D.17-09-023

- Risk Assessment for the Ventura Compressor Station Modernization Project dated April 1, 2024. Attachment: Confidential PEA Appendix S_Risk Assessment. The attachment includes Confidential and Protected Materials provided pursuant to PUC Section 583, GO 66-D, D.17-09-023 and the accompanying declaration (Confidentiality Declaration_Maria_Martinez PEA Appendix S_Risk Assessment)