

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

**APPLICATION TO RECOVER COSTS RECORDED IN THE
PIPELINE SAFETY AND RELIABILITY MEMORANDUM ACCOUNTS,
THE SAFETY ENHANCEMENT EXPENSE BALANCING ACCOUNTS, AND
THE SAFETY ENHANCEMENT CAPITAL COST BALANCING ACCOUNTS
(A.16-09-005)**

(DATA REQUEST TURN-SCGC-005)

Date Requested: June 21, 2017

Date Responded: July 14, 2017

QUESTION 5.1:

These questions are directed at the workpapers regarding the Line 2003 Replacement and Hydrotest Project.

5.1.1. With respect to the statement on page WP-III-A135: “Included in this project was 647 feet of pipe accelerated from SoCalGas and SDG&E’s PSEP Phase 2B. This Phase 2B footage was included to realize efficiencies and to enhance project constructability.” Table 2 breakdown the Phase 2B footage among the three sections of the project.

5.1.1.1. Please describe in specific terms what pipe corresponds to the 629 feet of pipe accelerated from Phase 2B in Section 1 and show the location of the pipe in Figures 3 and 4.

5.1.1.2. Please state in detail the basis for including the pipe in the Line 2003 Section 1 hydrotest project.

5.1.1.3. Please demonstrate that there were cost savings achieved by including the 629 feet of pipe in the project by showing the cost estimates including and excluding this length of pipe.

5.1.1.4. Please describe in specific terms what pipe corresponds to the 12 feet of pipe accelerated from Phase 2B in Section 3 and show the location of the pipe in Figures 5 and 6.

5.1.1.5. Please state in detail the basis for including the pipe in the Line 2003 Section 3 replacement project.

5.1.1.6. Please demonstrate that there were cost savings achieved by including the 12 feet of pipe in the project by showing the cost estimates including and excluding this length of pipe.

5.1.1.7. Please describe in specific terms what pipe corresponds to the 6 feet of pipe accelerated from Phase 2B in Section 4 and show the location of the pipe in Figures 7 and 8.

5.1.1.8. Please state in detail the basis for including the pipe in the Line 2003 Section 4 replacement project.

5.1.1.9. Please demonstrate that there were cost savings achieved by including the 6 feet of pipe in the project by showing the cost estimates including and excluding this length of pipe.

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(A.16-09-005)**

(DATA REQUEST TURN-SCGC-005)

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RESPONSE 5.1:

- 5.1.1.1 The 629 feet of accelerated pipe in Section 1 from Phase 2B is Category 1, installed in 1949. The accelerated pipe is reflected in blue dotted marks on Figure 3, within the tested pipeline (shown in yellow). It consists of 453 feet of pipe on the west end of the section and 176 of pipe east end of the section. A high-resolution copy of Figure 3 is provided in the attachment folder.
- 5.1.1.2 As stated in Direct Testimony Chapter 2 (Phillips) at p. 9, accelerated miles are miles that otherwise would be addressed in a later phase of PSEP under the approved prioritization process, but are advanced to Phase 1A to realize operating and cost efficiencies. The basis for including the 629 feet was to avoid setting the test heads and construction activity on the bridge over the flood control channel. One test end was located away from the bridge structure onto a city street and the other test end was located onto city property, away from traffic.
- 5.1.1.3 SoCalGas and SDG&E did not prepare a cost estimate to compare the cost of including the 629 feet of pipe within the scope of this project, versus excluding these 629 feet of pipe. Note, this question appears to assume it would have been feasible to exclude the entire 629 feet of pipe from the scope of this project, however, additional footage was required, as described in response to TURN-SCGC DR-05 Q5.1.1.2.
- 5.1.1.4 The 12 feet of pipe accelerated in Section 3 from Phase 2B is Category 1, installed in 1951. The accelerated pipe is reflected in blue dotted marks on Figure 5, within the replaced pipeline (shown in green). It consists of 8 feet of pipe on the south end of the section and 4 feet of pipe on the north end of the section. A high-resolution copy of Figure 5 is provided in the attachment folder.
- 5.1.1.5 The basis for including the 12 feet of incidental pipe was to remove a wedding band and fire control fitting installed at the same time as the Phase 1A pipe, thereby further enhancing the integrity of the pipeline by removing appurtenances that are no longer needed. Note, standard purchased pipe lengths are 20 or 40 feet, and most of the pipe purchased for PSEP projects is received from the manufacturer in 40-foot lengths. Purchased pipe is cut to size in the field during construction. For constructability purposes, the 40-foot pipe may be cut so as to include additional footage on either side of Category 1 pipe to eliminate fittings, welds or other appurtenances on existing pipe. The key construction activity in this

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process is the cutting of the existing pipe while it is out of service. SoCalGas and SDG&E select a safe and practical location for the cutting equipment, which may entail adding additional footage and generally does not create additional cost.

- 5.1.1.6 SoCalGas and SDG&E did not prepare a cost estimate to compare the costs of including the 12 feet of pipe within the scope of this Phase 1A project versus excluding the 12 feet and addressing that segment in a later project. As mentioned in response TURN-SCGC 5.1.1.5, the inclusion of the 12-foot segment further enhanced the integrity of the pipeline by removing appurtenances that are no longer needed. Note, this question appears to assume it would have been feasible to exclude the entire 12 feet of pipe from this project, however, additional footage on each side of a replacement project is required to complete construction.
- 5.1.1.7 The 6 feet of pipe accelerated in Section 4 from Phase 2B is Category 1, installed in 1951. The accelerated pipe is reflected in blue dotted marks on Figure 7, within the southern end of the replaced pipeline (shown in green). A high-resolution copy of Figure 7 is provided in the attachment folder.
- 5.1.1.8 The basis for including the six feet of incidental pipe was to remove a wedding band and fire control fitting installed at the same time as the Phase 1A pipe, thereby further enhancing the integrity of the pipeline by removing appurtenances that are no longer needed. Note, this question appears to assume it would have been feasible to exclude the entire six feet of pipe from the scope of the project, however, additional footage on each side of a replacement project is required to complete construction. See Response TURN-SCGC 5.1.1.5 for additional details regarding the cutting of pipe in the field for constructability.
- 5.1.1.9 SoCalGas and SDG&E did not prepare a cost estimate to compare the costs of including the six feet of pipe within the scope of this Phase 1A project versus excluding the six feet and addressing that segment in a later project. As mentioned in response TURN-SCGC 5.1.1.5, the inclusion of the entire six-foot segment further enhanced the integrity of the pipeline by removing appurtenances that are no longer needed. Note, this question appears to assume it would have been feasible to exclude these six feet of pipe from this project, however, additional footage on each side of a replacement project is required to complete construction.

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QUESTION 5.1.2:

With respect to the statement on page WP-III-A142: “Hydrotest of Line 2003 Section 1 consisted of 544 feet of Category 4 Criteria and an additional 636 feet of pipe totaling 1,180 feet.”

5.1.2.1. Please reconcile the 636 feet and 1,180 feet in the above statement to the 629 feet and 1,173 feet shown in Table 2 for Phase 1.

RESPONSE 5.1.2.1:

The footage included in the statement on page WP-III-A142 represents the footage identified as in scope during Stage 3 (Initial Planning and Design). As stated on page WP-III-A147, during Stage 5 (Construction), an additional six feet of pipe was excavated to expose a nearby valve for servicing. Therefore, the figures in Table 2 represent the correct footage (adjusted for rounding).

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QUESTION 5.1.3:

With respect to the statements regarding Section 1 on page WP-III-A147: “Construction lasted 5 weeks longer than planned. Field Conditions: Conditions were encountered in the field that were not anticipated during design and planning that had to be addressed or mitigated. Listed below is a summary of the key field changes broken down by type of change for this section:

Environmental: Coal tar wrap was discovered in the soil surrounding the pipe. Abatement of the contaminated soil had to be completed before completing excavation.

Constructability Issues: An additional 6 feet of pipe was excavated to expose a nearby valve for servicing. Site Restoration: The City Inspector required curb to curb paving whereas the permit only required paving over the area we disturbed.”

- 5.1.3.1. Please state the date that the construction site was fully mobilized.
- 5.1.3.2. Please state the date when the coal tar wrap was discovered.
- 5.1.3.3. How long did it take to abate the coal tar wrap contamination of the soil?
- 5.1.3.4. Was the entire job site subject to the delay because of the contamination or was a portion of the job site still workable because it was not contaminated?
- 5.1.3.5. If a portion of the job site was still workable, please state what activities were able to be completed while waiting for or completing the abatement activities.
- 5.1.3.6. What was the incremental cost associated with abating the contamination?
- 5.1.3.7. What was the incremental cost associated with excavating an additional 6 feet of pipe to expose a nearby valve for servicing?
- 5.1.3.8. Was this incremental cost charged to the Line 2003 Replacement and Hydrotest Project?
- 5.1.3.9. If the answer to previous question is “yes,” please explain why the cost of servicing an adjacent valve is a PSEP cost instead of a district maintenance cost.

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- 5.1.3.10. How much delay was caused for the Section 1 project by waiting for the excavation of the additional 6 feet of pipeline?
- 5.1.3.11. Was the entire Section 1 project delayed by this activity?
- 5.1.3.12. If the answer to the previous question is “no,” please identify what portion of the Section 1 project was able to continue while the excavation took place.
- 5.1.3.13. What was the incremental cost associated with complying with the building inspector’s requirement that paving be done on curb-to-curb basis rather than on a smaller area as stated in the permit?
- 5.1.3.14. What was the incremental delay caused by this requirement?
- 5.1.3.15. Please provide a copy of all Change Order materials or other notices or correspondence provided to SoCalGas’ PSEP management team by its contractor that are related to the delay or added cost created by each of the issues described above in the cited quotation.
- 5.1.3.16. Please provide a copy of all of SoCalGas’ PSEP management team’s responses to its contractor in regards to these change order materials, notices or correspondence.

RESPONSE 5.1.3:

- 5.1.3.1 August 18, 2014.
- 5.1.3.2 August 21, 2014.
- 5.1.3.3 Approximately 15 days.
- 5.1.3.4 A portion of the job site was still workable because it was not contaminated.
- 5.1.3.5 While completing the abatement activities, some work was still able to take place such as traffic control set up, trenching with the abatement contractor, welding and clean up.

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- 5.1.3.6 The increased Contractor cost was \$72,002 for abating the contamination. In addition to these direct costs, there may be additional costs for SoCalGas/SDG&E labor and non-construction costs for activities, such as project management and inspection services, that were not tracked and reported separately for this specific delay.
- 5.1.3.7 The incremental cost associated with excavating an additional six feet of pipe to expose a nearby valve for servicing was \$87,177. This includes hand digging near the transmission line and the slowed excavation due to increased time to excavate to accommodate frequent inspections from the industrial hygienist because of the possible presence of contaminated soil.
- 5.1.3.8 No.
- 5.1.3.9 Not applicable.
- 5.1.3.10 Not applicable.
- 5.1.3.11 There was no delay to the overall construction completion date as a result of these activities; hydrotest and tie-in dates were met.
- 5.1.3.12 The construction contractor cleaned up work areas, paved the parking lot behind the apartment complex, moved k-rail and moved fence panels.
- 5.1.3.13 The increased Construction Contractor cost associated with the building inspector's requirements was \$30,643. This included paving, additional compaction tests, planting a tree, striping the road and slurry sealing the asphalt. In addition to these direct costs, there may be additional costs for SoCalGas/SDG&E labor and non-construction costs for activities, such as project management and inspection services, that were not tracked and reported separately for this specific delay.
- 5.1.3.14 None.
- 5.1.3.15-16 **The attached supporting documents include Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024. Copies of the**

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Construction Contractor's and SoCalGas' contract amendments are provided in the attachment folder.

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Date Requested: June 21, 2017

Date Responded: July 14, 2017

QUESTION 5.1.4:

With respect to the statements regarding Section 3 on page WP-III-A148: “Construction lasted 13 weeks from mobilization to demobilization instead of the planned 9 weeks. Conditions were encountered in the field that were not anticipated during design and planning that had to be addressed or mitigated. Listed below is a summary of the key field changes broken down by type of change for this section:

Excavation: During construction, an additional excavation was needed to confirm the pipe that was marked due to an incorrectly identified pipeline on a construction survey map. The pipe was located adjacent to L-2003.

Changed Permit Conditions: The Los Angeles World Airport (LAWA) reduced daily construction time from eight hours to six hours and reduced the length of open trench allowed at any one time in order to reduce impacts on traffic. These had the effect of impacting overall productivity.

Constructability Issues: Modifications were required for Section 3 pipe and a nearby fiber-optics substructure. The fiber-optics substructure was 4 feet from Section 3 and the tie-in could not be done safely without modifying another utility’s infrastructure.”

5.1.4.1. Please state the date that the construction site was fully mobilized.

5.1.4.2. Please state the date when the incorrectly identified pipeline on the construction survey map was discovered.

5.1.4.3. Which business entity was responsible for correctly marking the pipeline on the construction survey map?

5.1.4.4. How long did it take to perform the additional excavation to confirm the pipe that was incorrectly marked?

5.1.4.5. Was the entire job site subject to the delay because of the excavation or was a portion of the job site still workable while the excavation took place?

5.1.4.6. If a portion of the job site was still workable, please describe what was delayed and what wasn't delayed on the job site while the excavation took place.

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5.1.4.7. When were the reduced workday and reduced trench length requirements imposed on the Section 3 project?

5.1.4.8. What was the increase in the number of workdays created by LAWA's requirements reducing daily construction hours and reducing the length of the open trench?

5.1.4.9. What was the increase in cost associated with LAWA's requirements reducing daily construction hours and reducing the length of the open trench?

5.1.4.10. Please state the date that the conflict between the Section 3 pipe and the nearby fiber-optics substructure was first identified.

5.1.4.11. How long did it take to relocate the Section 3 pipe to eliminate the conflict with the fiber-optic substructure?

5.1.4.12. Did this delay affect the entire Section 3 job site or was a portion of the job site still workable while the conflict between the pipeline and fiber-optic substructure was resolved?

5.1.4.13. If a portion of the job site was still workable, please describe what was delayed and what wasn't delayed on the job site while the resolution took place.

5.1.4.14. What was the incremental cost associated with modifying the Section 3 pipe in order to resolve the conflict with the fiber-optic substructure?

5.1.4.15. Please provide a copy of all Change Order materials or other notices or correspondence provided to SoCalGas' PSEP management team by its contractor that are related to the delay or added cost created by each of the issues described above in the cited quotation.

5.1.4.16. Please provide a copy of all of SoCalGas' PSEP management team's responses to its contractor in regards to these change order materials, notices or correspondence.

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Date Requested: June 21, 2017

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RESPONSE 5.1.4:

- 5.1.4.1 April 20, 2015.
- 5.1.4.2 April 23, 2015.
- 5.1.4.3 The following response includes Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024. [REDACTED] under the [REDACTED] contract was responsible for marking the pipeline on the construction survey map.
- 5.1.4.4 There was no additional excavation and no additional time once SoCalGas and SDG&E determined the pipe was incorrectly marked.
- 5.1.4.5 The entire job site was delayed for one day because of the requirement for a new permit and updated traffic control plan. The total project delay was four days because of the days spent working on the incorrectly marked pipeline.
- 5.1.4.6 Not applicable.
- 5.1.4.7 April 20, 2015.
- 5.1.4.8 None.
- 5.1.4.9 The increased Construction Contractor cost was \$118,104. In addition to these direct costs, there may be additional costs for SoCalGas/SDG&E labor and non-construction costs for activities, such as project management and inspection services, that were not tracked and reported separately for this specific delay.
- 5.1.4.10 June 10, 2015.
- 5.1.4.11 Not applicable. Section 3 pipe was not relocated; the fiber-optic substructure was relocated.
- 5.1.4.12 There was no delay to the overall construction completion date as a result of these activities; hydrotest and tie-in dates were met.
- 5.1.4.13 Not applicable.

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- 5.1.4.14 The increased Construction Contractor cost was \$194,114. In addition to these direct costs, there may be additional costs for SoCalGas/SDG&E labor and non-construction costs for activities, such as project management and inspection services, that were not tracked and reported separately for this specific delay.
- 5.1.4.15-16 **The attached supporting documents include Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024.** Copies of the Construction Contractor's and SoCalGas' Requests for Information (RFI) and contract amendment are provided in the attachment folder.

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Date Responded: July 14, 2017

QUESTION 5.1.5:

With respect to the statements regarding Section 3 on page WP-III-A149: “Construction lasted 3 weeks from mobilization to demobilization instead of the planned 6 weeks. Conditions were encountered in the field that were not anticipated during design and planning that had to be addressed or mitigated. Listed below is a summary of the key field changes broken down by type of change for this section:

Changed Permit Conditions: Restricted construction hours were required by the city which required Saturday work to meet construction deadlines.

Substructures: A water line in close proximity required additional hand digging to prevent any damage and additional excavation was required to expose and remove a wedding band.

- 5.1.5.1. Did SoCalGas complete all of the PSEP work planned for this site?
- 5.1.5.2. Please state the date that the construction site was fully mobilized.
- 5.1.5.3. When did the city inform SoCalGas that the construction hours were restricted?
- 5.1.5.4. How many hours per day were allowed under the restricted hours?
- 5.1.5.5. How many Saturday work hours were required to meet deadlines?
- 5.1.5.6. If the construction lasted only 3 weeks from mobilization to demobilization instead of the planned 6 weeks, why was it necessary to work on Saturdays to meet the deadlines?
- 5.1.5.7. Which deadlines required Saturday construction in order that they could be met?
- 5.1.5.8. How much additional time was required to complete the Section 4 project because of the hand digging that was necessary to avoid damage to the water line?
- 5.1.5.9. How much additional cost is associated with the need to hand dig in order to avoid damage to the water line?

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- 5.1.5.10. How much additional time was needed to complete the additional excavation required to expose and remove a wedding band?
- 5.1.5.11. How much additional cost is associated with the actions necessary to expose and remove the wedding band?
- 5.1.5.12. Please explain why it was necessary to remove the wedding band?
- 5.1.5.13. Was the wedding band replaced or merely removed?
- 5.1.5.14. Please provide a copy of all Change Order materials or other notices or correspondence provided to SoCalGas' PSEP management team by its contractor that are related to the delay or added cost created by each of the issues described above in the cited quotation.
- 5.1.5.15. Please provide a copy of all of SoCalGas' PSEP management team's responses to its contractor in regards to these change order materials, notices or correspondence.

RESPONSE 5.1.5:

SoCalGas and SDG&E interpret this question as referring to Section 4, rather than Section 3. Subject to that interpretation, SoCalGas and SDG&E respond as follows:

- 5.1.5.1 Yes.
- 5.1.5.2 November 3, 2014.
- 5.1.5.3 November 3, 2014.
- 5.1.5.4 6.
- 5.1.5.5 33.
- 5.1.5.6 It was necessary to work on Saturdays to shorten the construction duration to finish before Thanksgiving as requested by the City.
- 5.1.5.7 See response to TURN-SCGC DR-05 Q5.1.5.6.

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- 5.1.5.8 The additional time for hand digging for the water line was not tracked separately from other hand digging activities.
- 5.1.5.9 There were no additional construction contractor costs associated with the hand dig delay. There may be additional costs for SoCalGas/SDG&E labor and non-construction costs for activities, such as project management and inspection services, that were not tracked and reported separately for this specific delay.
- 5.1.5.10 The additional excavation required to expose and remove a wedding band was not tracked separately from other construction activities. There was no delay to the overall construction completion date as a result of these activities; hydrotest and tie-in dates were met.
- 5.1.5.11 There were no additional construction contractor costs associated with the wedding band delay. There may be additional costs for SoCalGas/SDG&E labor and non-construction costs for activities, such as project management and inspection services, that were not tracked and reported separately for this specific delay.
- 5.1.5.12 SoCalGas and SDG&E did not prepare a cost estimate to compare the costs of including the wedding band within the scope of this Phase 1A project versus excluding the wedding band. By removing a wedding band at the same time as the Phase 1A pipe it further enhanced the integrity of the pipeline by removing appurtenances that are no longer needed. Based on operator knowledge and experience, the removal of unnecessary wedding bands and having a tie-in location that would not be near existing wedding bands was the more prudent approach to completing the project.
- 5.1.5.13 Replaced.
- 5.1.5.14-5 **The attached supporting documents include Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024.** Copies of the Construction Contractor's and SoCalGas' contract amendments are provided in the attachment folder.

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QUESTION 5.1.6:

With respect to Table 4 on page WP-III-A150: Please produce a version of Table 4 that shows only Section 1 costs that were estimated in the Phase 2 WOA and incurred for both O&M and capital in completing the project.

RESPONSE 5.1.6:

Because the costs of the Line 2003 Replacement and Hydrotest Project were documented and tracked as a single project, the costs cannot now be separated into three project sections without making after-the-fact assumptions about how the total project costs could be allocated among the three sections. WOAs are initiated at Stage 1 (initial scoping cost estimate) and updated at Stage 3 (Phase 2 WOA) to capture estimated project costs for pipeline projects that require test or replacement. WOAs may include one or more hydrotest or replacement sections, but it is not a general practice to initiate separate WOAs for each individual section for the same pipeline project unless circumstances, such as construction schedule or design approach, warrant separate tracking mechanisms for each section. Therefore, the Phase 2 WOA column cannot now be broken out between the sections of this project without making after-the-fact assumptions about how the total WOA amount could be allocated among the four hydrotest sections.

Similarly, it is not feasible to separate the O&M (actual) and Capital (actual) Costs among the three sections of this project. PSEP projects are planned and designed to comply with the Commission's directive in a cost effective manner, while minimizing impacts to customers and the community. In order to achieve these goals, the engineering and design work, as well as construction activity, was tracked for the entire project and not tracked separately for each section. Separately tracking multiple portions of this project would have increased the administrative burdens and costs of the project without providing a commensurate safety enhancement benefit for customers.

The attached supporting documents include Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024. The table provided in the attachment file shows the estimated TIC costs for Sections 1, 3, and 4. The actual costs incurred for O&M and Capital are combined for all three sections.

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(DATA REQUEST TURN-SCGC-005)

Date Requested: June 21, 2017

Date Responded: July 14, 2017

QUESTION 5.1.7:

With respect to Table 4 on page WP-III-A150: Please produce a version of Table 4 that shows only Section 3 costs that were estimated in the Phase 2 WOA and incurred for both O&M and capital in completing the project.

RESPONSE 5.1.7:

See the response to TURN-SCGC-005 Question 5.1.6.

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(DATA REQUEST TURN-SCGC-005)

Date Requested: June 21, 2017

Date Responded: July 14, 2017

QUESTION 5.1.8:

With respect to Table 4 on page WP-III-A150: Please produce a version of Table 4 that shows only Section 4 costs that were estimated in the Phase 2 WOA and incurred for both O&M and capital in completing the project.

RESPONSE 5.1.8:

See the response to TURN-SCGC-005 Question 5.1.6.

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(A.16-09-005)**

(DATA REQUEST TURN-SCGC-005)

Date Requested: June 21, 2017

Date Responded: July 14, 2017

QUESTION 5.2:

These questions are directed at the workpapers regarding the Line 235 West Sawtooth Canyon Replacement Project.

5.2.1. With respect to the statement on page WP-III-A153: “In 2013, a .210-mile portion of L-235 West was reclassified from a Class 1 to a Class 3 location. Due to the class location change, Gas Transmission Operations (GTO) initiated an approximate 1,100-foot replacement project of the newly classified class 3 location pipe. The class location change created two High Consequence Area (HCA) sections on both ends of the class location change.”

5.2.1.1. When did SoCalGas identify the two sections of pipe adjacent to the Class 3 pipeline segment as HCA sections that needed to be pressure tested or replaced?

5.2.1.2. Why didn't SoCalGas identify the two sections of pipe adjacent to the Class 3 pipeline segment as HCA sections in the same timeframe that it identified the 1,100-foot section of Class 3 pipeline?

5.2.1.3. If the 1,100-foot section had been combined with the two adjacent HCA sections for the original definition of the project, would the resulting length of pipeline been subject to a pressure test rather than replacement?

5.2.1.4. Did GTO account for its 1,100-foot replacement project under PSEP?

5.2.1.5. If the answer to the previous question is “no,” please explain in detail how GTO accounted for its 1,100-foot replacement project.

5.2.1.6. If GTO did account for its 1,100-foot replacement project under PSEP, why isn't it being review for reasonableness?

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RESPONSE 5.2.1:

- 5.2.1.1 January 5, 2013.
- 5.2.1.2 SoCalGas did identify the two sections of pipe adjacent to the Class 3 in the same timeframe.
- 5.2.1.3 No, a pressure test was not possible for the 1,100-foot section because of the class location. The wall thickness and pipe grade of the existing 1,100-foot section (previously a Class 1 location) was not capable of withstanding the Class 3 location pressure testing threshold.
- 5.2.1.4 No.
- 5.2.1.5 Gas Transmission Operations (GTO) accounted for the cost by creating a separate Work Order Authorization (WOA) to capture the cost for the project. Contractor costs were prorated by footage.
- 5.2.1.6 Not applicable.

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QUESTION 5.2.2:

With respect to Table 2 on page WP-III-A154:

- 5.2.2.1. Please describe in specific terms what pipe corresponds to the 63 feet of incidental mileage pipe and show the location of the pipe in Figures 1 and 2.
- 5.2.2.2. Please state in detail the basis for including the pipe in the Line 235 West Sawtooth Canyon replacement project.
- 5.2.2.3. Please demonstrate that there were cost savings achieved by including the 63 feet of incidental pipe in the project by showing the cost estimates including and excluding this length of pipe.

RESPONSE 5.2.2:

- 5.2.2.1 The 63 feet of incidental pipe is Category 1, installed in 2005. The incidental pipe is reflected in pink hash marks on Figure 1, on Section 1 of the replaced pipeline (shown in green). A high-resolution copy of Figure 1 is provided in the attachment folder.
- 5.2.2.2 The 63 feet of incidental pipe were included in the scope of the project for constructability. By including this incidental portion of pipe, SoCalGas and SDG&E avoided the costs and impacts associated with completing two additional tie-ins between the two Phase 1A segments.
- 5.2.2.3 SoCalGas and SDG&E did not prepare a cost estimate to compare the cost of including these 63 feet of pipe within the scope of this Phase 1A project versus excluding the 63 feet. As noted in response to TURN-SCGC 5.2.2.2, this project design avoided potential costs and impacts associated with completing two additional tie-ins between the Phase 1A segments.

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(DATA REQUEST TURN-SCGC-005)

Date Requested: June 21, 2017

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QUESTION 5.2.3:

With respect to the statement on page WP-III-A156: “Replacement was also justified because the existing HCA pipeline segments could not be tested to the required level without overstressing the pipe, thus requiring replacement of the segments.”

5.2.3.1. How did SoCalGas reach a determination that “the existing HCA pipeline segments could not be tested to the required level without overstressing the pipe”?

5.2.3.2. How high a pressure would Line 235 have to be subjected to in a pressure test in order to meet the testing requirements for HCA pipe?

5.2.3.3. How high a pressure would Line 235 have to be subjected to in a pressure test in order to meet the testing requirements for Class 3 pipe?

5.2.3.4. Please identify all of the characteristics of the HCA sections of Line 235 that establish its inability to be pressure tested.

5.2.3.5. Is this limitation true of Class 3 section of Line 235?

RESPONSE 5.2.3:

5.2.3.1 SoCalGas performed a Specified Minimum Yield Strength (SMYS) calculation which determines the stress capability of the pipe. The calculation resulted in stresses that were over 100%, which means the pipe could not have withstood the pressure required to complete the test.

5.2.3.2 For the Class 1 HCA pipe, 1170 psig.

5.2.3.3 1404 psig.

5.2.3.4 SoCalGas and SDG&E identified metal loss on Line 235. Based upon available pipeline integrity data, the minimum test pressure for the HCA locations was over 100% SMYS.

5.2.3.5 Yes.

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Date Responded: July 14, 2017

QUESTION 5.2.4:

Regarding Table 3 on WP-III-A158:

5.2.4.1. Do the cost figures presented in this table include any costs for the Class 3 (original GTO project) segment of pipeline?

5.2.4.2. If the answer to the previous question is “yes,” please identify the portion of these costs that is associated with the Class 3 (original GTO project) segment of pipeline.

RESPONSE 5.2.4:

5.2.4.1 No.

5.2.4.2 Not applicable.

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Date Requested: June 21, 2017

Date Responded: July 14, 2017

QUESTION 5.2.5:

Regarding Table 4 on WP-III-A161:

5.2.5.1. Do the cost figures presented in this table include any costs for the Class 3 (original GTO project) segment of pipeline?

5.2.5.2. If the answer to the previous question is “yes,” please identify the portion of these costs that is associated with the Class 3 (original GTO project) segment of pipeline.

RESPONSE 5.2.5:

5.2.5.1 No.

5.2.5.2 Not applicable.

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Date Requested: June 21, 2017

Date Responded: July 14, 2017

QUESTION 5.2.6:

With respect to the statement on page WP-III-A162: “Line 235W Sawtooth Canyon has record of a pressure test to 1.1 times MAOP that occurred in 1957, when the line was located in a Class 1 location. Since Line 235W Sawtooth Canyon had a pressure test to 1.1 times MAOP when it was located in a Class 1 location, it has pressure test records that provide the minimum information to demonstrate compliance with then applicable industry strength testing and record keeping standards.1 In 2013, however, portions of Line 235W Sawtooth Canyon were identified as being in HCAs due to the identification of a nearby campground. As a result, because a segment of Line 235W in Sawtooth Canyon is now located in an HCA and lacks a pressure test to 1.25 times MAOP, it must be addressed as part of PSEP Phase 1A.”

5.2.6.1. Did SoCalGas conclude that the pipeline lacked the strength to pressure test it to the 1.25 times MAOP level that was required for the HCA designation?

RESPONSE 5.2.6.1:

Yes.

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Date Requested: June 21, 2017

Date Responded: July 14, 2017

QUESTION 5.3:

These questions are directed at the workpapers regarding the SL-33-120 Section 2 Replacement Project.

5.3.1. With respect to the statement on page WP-III-A165: “Included in this project was 32 feet of pipe accelerated from SoCalGas and SDG&E’s PSEP Phase 2B. This Phase 2B footage was included to realize efficiencies and to enhance project constructability.”

5.3.1.1. Please describe in specific terms what pipe corresponds to the 32 feet of pipe accelerated from Phase 2B in Section 2 and show the location of the pipe in Figures 1 and 2.

5.3.1.2. Please state in detail the basis for including the pipe in the SL-33-120 Section 2 replacement project.

5.3.1.3. Please demonstrate that there were cost savings achieved by including the 32 feet of Phase 2B pipe in the project by showing the cost estimates including and excluding this length of pipe.

RESPONSE 5.3.1:

5.3.1.1 The 32 feet of accelerated pipe from Phase 2B is Category 1 and 2, installed in 1960. The accelerated pipe is reflected in blue dotted marks on Figure 1, within the replaced pipeline (shown in green). It consists of 9 feet of Category 1 pipe on the northern side of the section, and 23 feet of Category 2 pipe south of the section. A high-resolution copy of Figure 1 is provided in the attachment folder.

5.3.1.2 The basis for including the 32 feet of accelerated pipe was for constructability.

5.3.1.3 SoCalGas and SDG&E did not prepare a cost estimate to compare the cost of including the 32 feet of pipe within the scope of this Phase 1A project versus excluding the 32 feet and addressing that segment in a later project. See Response TURN-SCGC 5.1.1.5 for additional details regarding the cutting of pipe in the field for constructability.

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QUESTION 5.3.2

With respect to the statement on page WP-III-A171: “The estimated total loaded cost for the 1,515 feet of xxxx pipe was \$5,032,172, as shown in Table 5, and is based on preliminary designs.” Please reconcile the 1,515 feet of pipe to the 0.279 mile of pipe referred to in Table 2 stating which figure is correct.

RESPONSE 5.3.2:

The 1,515 feet (0.287 miles) is based on preliminary designs, including accelerated mileage. The final total mileage of pipe replaced was 0.279 miles, including accelerated mileage, therefore the figures of 1,515 feet and 0.279 miles were both correct for different stages of the project.

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(DATA REQUEST TURN-SCGC-005)

Date Requested: June 21, 2017

Date Responded: July 14, 2017

QUESTION 5.3.3:

Regarding Table 3 on WP-III-A171:

- 5.3.3.1. Why is the contract cost category presented with a zero value?
- 5.3.3.2. What are the types of cost included in the “other direct cost” category?
- 5.3.3.3. Please breakdown the \$3.2 million shown in Table 3 into its most significant components.

RESPONSE 5.3.3:

- 5.3.3.1 The estimator entered a value of zero under the contract costs in order to prevent an incorrect loader calculation in the WOA template. Instead, the contract cost was populated under the purchase services section of the WOA template.
- 5.3.3.2 With respect to Table 3: SL-33-120 Section 2 Phase 2 WOA Estimate (WP-III-A171), the estimated Other Direct Costs (Phase 2 WOA) for this project represent unloaded direct project costs, with the exception of Company Labor and Materials that SoCalGas intended to purchase directly. **The attached supporting documents include Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024.** The table provided in the attachment folder is a more detailed look at estimated and actual project costs and is based on the TIC estimated costs and the actual costs.
- 5.3.3.3 See the response to TURN-SCGC DR-05 Q5.3.3.2

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Date Requested: June 21, 2017

Date Responded: July 14, 2017

QUESTION 5.3.4:

With respect to the statement on page WP-III-A172: “During Stage 4, detailed design and material procurement was completed in order to provide a construction ready packet to the construction contractor to execute the planned project scope.”

5.3.4.1. What was the estimate of costs that SoCalGas developed in Phase 4 in response to all of the design changes listed on WP-III-A172?

5.3.4.2. Given the there is a zero in the contract cost category for both Tables 3 and 4, how was SoCalGas to evaluate the performance partner/construction contractor TPE?

5.3.4.3. Since the discussion of the performance partner/construction contractor TPE on WP-III-A173 states a figure for the Stage 3 construction contractor direct estimate that was used to develop the Phase 2 WOA, please reconcile this figure to the zero in the contract cost category for both Tables 3 and 4, explaining which figure is correct.

RESPONSE 5.3.4

5.3.4.1 SoCalGas and SDG&E did not prepare estimates for each of the design changes, because the design changes occurred during planning and were incorporated before construction. The costs that were quantified are as follows:

- A cost of \$20,000 was estimated for the installation and purchase of a vault around the Pressure Control Fitting.

5.3.4.2 The Target Price Estimate (TPE) is developed prior to Stage 5 when the engineering design package is completed. The Performance Partner and SoCalGas develop the cost estimate separately and then negotiate on an agreed target price. SoCalGas and SDG&E would utilize the Construction Contractor estimate as developed in Stage 3, as listed in WP-III-A173.

5.3.4.3 The estimator entered a value of zero under the contract cost category in order to prevent an incorrect loader calculation in the WOA template. The construction contractor estimate and actual costs are included in the Other Direct Cost category. The table provided in the attachment folder for Q5.3.3.2 is a more detailed look at estimated and actual project costs and reconciles the construction contractor costs as a component of Other Direct Costs. Both Tables 3 (WP-III-

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A171) and 4 (WP-III-A176) are correct and reconcile to the detailed tables provided.

QUESTION 5.3.5:

With respect to the statements regarding field conditions on WP-III-A174: “Conditions were encountered in the field that were not anticipated during design and planning that had to be addressed or mitigated. These conditions impacted the project scope and schedule. During the price negotiation it was determined that final paving would need to be completed in three mobilizations within a third-party property owner’s parking lot. After construction started, SoCalGas and SDG&E were able to negotiate the use of 1.5 sack slurry up to existing grade as temporary paving and subsequently permanently pave the entire alignment in one mobilization.

Constructability Issues: The initial design assumed that existing SL-33-120 would be in the centerline of SoCalGas’ 10-foot easement (see Figure 4). Initial trenching by the contractor found that the existing pipeline varied within the xxxx wide easement. This could create conflicts with the proposed location of the new pipe. In lieu of handdigging the entire pipeline, to avoid hitting the xxxx existing pipeline, the decision was made to slot trench the entire pipeline. Slot trenching is the process of digging narrow trenches. Because slot trenching the entire pipeline is so intensive, two vacuum trucks were used instead of one. The second vacuum truck would perform work ahead of the crews. In addition, slot trenching was a factor that limited efficiencies because the performance partner could move only as fast as the slot trenches could be dug. These changes affected project costs. The stopple mechanism was unable to achieve a complete seal. As a result, the project team had to forgo the planned cold tie-in and perform a hot tie-in. This pipeline feeds a major cogeneration plant that is vital for cooling during the summer and as a result, the hot tie-in had to be coordinated with the cogeneration plant.

Substructures: The project design assumed the tie-in point to Regulator Station ID 914-N would be east of the existing SL-33-120 pipeline. However, during construction, a concrete thrust block was discovered within the proposed alignment. This discovery resulted in a major realignment to the west side of the existing SL-33-120 pipeline.

5.3.5.1. Please state the date that the construction site was fully mobilized.

5.3.5.2. What was the cost estimated at the time of the final negotiations for the cost of paving the parking lot in the three mobilizations as described in the quote above?

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- 5.3.5.3. What was the estimated time taken for the paving the parking lot in the three mobilizations?
- 5.3.5.4. What was the actual cost associated with the paving with the 1.5 sack slurry and the final single mobilization for the paving as described in the quote above?
- 5.3.5.5. What was the actual time taken to complete the paving work as described in the quote above?
- 5.3.5.6. What is referred to as “intensive” in the statement: “Because slot trenching the entire pipeline is so intensive, two vacuum trucks were used instead of one”? (That is intensive in terms of labor, materials, excavated materials, etc?)
- 5.3.5.7. What was the incremental cost associated with slot trenching the site instead of trenching as originally planned?
- 5.3.5.8. Please state the additional time that was required to slot trench the site relative to the amount of time estimated to take using the planned trenching approach.
- 5.3.5.9. Please provide a detailed explanation as to why the stopple mechanism failed to achieve a complete seal.
- 5.3.5.10. Please describe each of the alternatives that were available to SoCalGas to address the situation. Include in each description of the alternative the estimated cost in the same format as Table 3 and the estimate time requirement. The alternative analysis should at least include the alternatives of replacing and/or repairing the stopple mechanism so that a cold-tie in could be completed as well as the alternative where a hot tie-in was pursued.
- 5.3.5.11. Does the statement: “This discovery resulted in a major realignment to the west side of the existing SL-33-120 pipeline” mean that the “tie-in point to Regulator Station ID 914-N would be west of the existing SL-33-120 pipeline”?
- 5.3.5.12. If the answer to previous question is “yes,” please describe what was involved in changing the tie-in point to the regulator station from the east side to the west side of the pipeline.

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- 5.3.5.13. If the answer to the question prior to the previous question is “no,” please provide additional detail to the quoted statement that allows for understanding of the changes that were required.
- 5.3.5.14. Please provide the incremental cost associated with the change in the tie-in point to the regulator station.
- 5.3.5.15. Please provide the incremental delay caused by the need to change the tie-in point to the regulator station.
- 5.3.5.16. Please provide a copy of all Change Order materials or other notices or correspondence provided to SoCalGas’ PSEP management team by its contractor that are related to the delay or added cost created by each of the issues described above in the cited quotation.
- 5.3.5.17. Please provide a copy of all of SoCalGas’ PSEP management team’s responses to its contractor in regards to these change order materials, notices or correspondence.

RESPONSE 5.3.5:

- 5.3.5.1 June 23, 2014.
- 5.3.5.2 The cost estimated at the time of the final negotiations for site restoration was \$223,763. This includes the three mobilizations for parking lot paving, which was not itemized as part of restoration.
- 5.3.5.3 60 hours.
- 5.3.5.4 The Contractor’s cost was \$197,614 for site restoration which included paving with 1.5 sack slurry. There was a credit to SoCalGas for \$37,500 for reducing the paving mobilizations. In addition to these direct costs, there may be additional costs savings for SoCalGas/SDG&E labor and non-construction costs for activities, such as project management and inspection services, that were not tracked and reported separately for this specific event.
- 5.3.5.5 The actual time taken to complete the paving work was 53 man hours.

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Date Responded: July 14, 2017

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- 5.3.5.6 The term "intensive" is used in the quoted statement as an adjective to describe the thorough and vigorous effort required in "Slot Trenching" in terms of both time and labor. Slot trenching is the process of hand digging narrow trenches about four inches wide, rather than using mechanical equipment that could strike unknown substructures or subsurface utilities. Slot trenching utilizes vacuum or hydro excavators, which minimizes the chances of damaging unknown substructures or subsurface utilities. Due to possible uncertainties within the regulator station, it was decided slot trenching was an acceptable method to verify the new ditch line was not in conflict with the existing line.
- 5.3.5.7 Two change orders associated with the slot trench totaling \$504,672 were incurred; a portion of this cost is associated with an alignment change at the regulator station, a necessary change identified during slot trenching.
- In addition to these direct costs, there may be additional costs for SoCalGas/SDG&E labor and non-construction costs for activities, such as project management and inspection services, that were not tracked and reported separately for this specific delay.
- 5.3.5.8 The additional time associated with slot trenching the site instead of trenching as originally planned was 11 days.
- 5.3.5.9 The pipe's ovality (i.e., out-of-roundness) and seam weld protrusion prevented stopple equipment from achieving a 100% seal. The stopple contractor estimated that it could achieve 95% containment of the gas flow, and a 5% gas flow rate exceeds a safe flow rate for the planned operation.
- 5.3.5.10 As explained in response to TURN-SCGC 5.3.5.9, the pipe's ovality and seam weld protrusion prevented stopple equipment from achieving a 100% seal. Therefore, the installation of other stopples was not a viable alternative. As such, SoCalGas and SDG&E pursued a hot tie-in using valves to isolate as soon as weather permitted. SoCalGas and SDG&E did not develop cost estimates for these alternatives.
- 5.3.5.11 No. The tie-in point remained in the same location on the east.
- 5.3.5.12 Not applicable.

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

**APPLICATION TO RECOVER COSTS RECORDED IN THE
PIPELINE SAFETY AND RELIABILITY MEMORANDUM ACCOUNTS,
THE SAFETY ENHANCEMENT EXPENSE BALANCING ACCOUNTS, AND
THE SAFETY ENHANCEMENT CAPITAL COST BALANCING ACCOUNTS
(A.16-09-005)**

(DATA REQUEST TURN-SCGC-005)

Date Requested: June 21, 2017

Date Responded: July 14, 2017

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- 5.3.5.13 Due to the discovery of an unanticipated thrust block substructure, the alignment of the pipeline was altered to the west of the existing Regulator Station pipeline. The tie-in point remained in the same location on the east. The new alignment of the connection to the Regulator Station goes underneath the existing SL 33-120 then ties in west of the existing pipeline.
- 5.3.5.14 The Construction Contractor cost associated with the change initiated by slot trenching within the Regulator Station, which resulted in the alignment of the pipeline to be moved to the west of the existing Regulator Station and SL-33-120 pipeline, was \$504,702. In addition to these direct costs, there may be additional costs for SoCalGas/SDG&E labor and non-construction costs for activities, such as project management and inspection services, that were not tracked and reported separately for this specific delay.
- 5.3.5.15 There was 11-day incremental delay.
- 5.3.5.16-17 **The attached supporting documents include Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024.** Copies of change orders and Requests for Information (RFIs) are provided in the attachment folder.

**BEFORE THE PUBLIC UTILITIES
COMMISSION OF THE STATE OF CALIFORNIA**

**DECLARATION OF JEFFERY SALAZAR
REGARDING CONFIDENTIALITY OF CERTAIN DATA/DOCUMENTS
PURSUANT TO D.16-08-024**

I, Jeffery Salazar, do declare as follows:

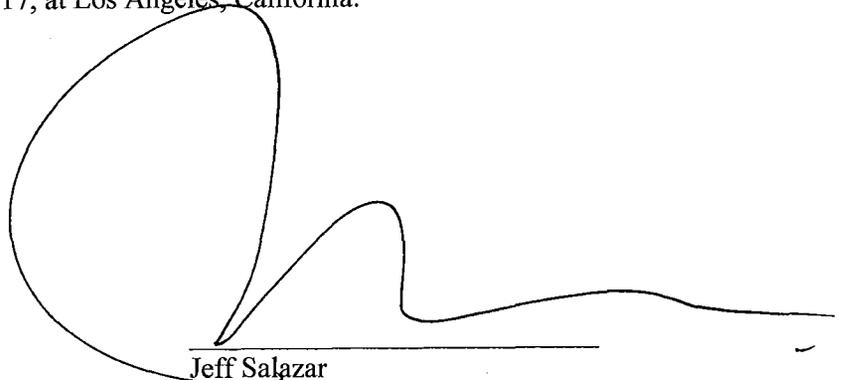
1. I am a Program Recovery & Compliance Manager in the Major Programs & Project Controls for San Diego Gas & Electric Company (“SDG&E”) and Southern California Gas Company (“SoCalGas”) designated by Jimmie Cho, Senior Vice President, Gas Operations and System Integrity for SDG&E and SoCalGas. I have been delegated authority to sign this declaration by Mr. Cho. I have reviewed the Response of SoCalGas and SDG&E to the Fifth Data Request of The Utility Reform Network (TURN) and Southern California Generation Coalition (SCGC) of the California Public Utilities Commission (CPUC) in the Pipeline Safety and Enhancement Plan (PSEP) 2016 Reasonableness Review A.16-09-005 proceeding, submitted concurrently herewith (Response to TURN-SCGC’s Fifth Data Request). I personally am familiar with the facts and representations in this Declaration, except where stated as based upon my information and belief. If called upon to testify, I could and would testify to the following based upon my personal knowledge and/or information and belief.

2. I hereby provide this Declaration in accordance with Decision (D.) 16-08-024 to demonstrate that the confidential information (Protected Information) provided in the Response to TURN-SCGC’s Fifth Data Request is within the scope of data protected as confidential under applicable law and pursuant to Public Utilities Code (“PUC”) § 583 and General Order (“GO”) 66-C, as further described in Attachment A. The intervenors in this proceeding (The Utility Reform Network, the Office of Ratepayer Advocates, and Southern California Generation Coalition) have requested that SDG&E and SoCalGas provide their responses to all data requests to all other parties; since this necessarily includes the Office of Ratepayer Advocates, this Declaration has been necessitated.

3. In accordance with the legal authority described herein, the Protected Information should be protected from public disclosure.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed this 6th day of July, 2017, at Los Angeles, California.

A handwritten signature in black ink, consisting of a large, stylized loop followed by a horizontal line and a small flourish.

Jeff Salazar
Program Recovery & Compliance Manager

ATTACHMENT A

SoCalGas and SDG&E Request Confidential Treatment of the Following Information in Their Response to TURN-SCGC's Fifth Data Request in A.16-09-005, Application to Recover Costs Recorded in Pipeline Safety & Reliability Memorandum Accounts, Safety Enhancement Capital Costs Balancing Accounts, and Safety Enhancement Expense Balancing Accounts

SDG&E and SoCalGas designated the combination of the pipeline diameter attribute and location data as confidential in their response to TURN-SCGC's Fifth Data Request in A.16-09-005, Application to Recover Costs Recorded in Pipeline Safety & Reliability Memorandum Accounts, the Safety Enhancement Expense Balancing Accounts, and the Safety Enhancement Capital Cost Balancing Accounts, because:

- (1) This data is sensitive critical energy infrastructure information that is not currently published by PHMSA and, if made publicly available, could present a risk to the security of California's critical energy infrastructure. SoCalGas' and SDG&E's assessment of the risks associated with critical energy infrastructure data will continue to evolve as the sophistication, frequency and volume of security threats increase. In light of certain events, such as the attack on Pacific Gas & Electric Company's Metcalf Substation in 2013, SoCalGas and SDG&E believe pipeline diameter data must be treated as confidential. SoCalGas and SDG&E designate this pipeline diameter data as confidential pursuant to several laws, regulations, and guides that seek to protect critical infrastructure information and sensitive security information from public disclosure for national security reasons. These include, but are not limited to: (i) the Protected Critical Infrastructure Information (PCII) Program; (ii) FERC Order 630 - Critical Energy Infrastructure Information (CEII); (iii) Sensitive Security Information Regulations; and (iv) the Transportation Security Administration's (TSA) Pipeline Security Guidelines. *See also* the Federal Register Notice on August 27, 2015 (Volume 80, Number 166) concerning PHMSA/OPS' proposed changes to the National Pipeline Mapping System (NPMS) data collection and the protection of pipeline information such as MAOP and pipe diameter. The yellow highlighted portions on the pages identified in the table below fall within the category of sensitive critical energy infrastructure.

SDG&E and SoCalGas designated the vendor bid and pricing information (including rates and invoices) as confidential in their response to TURN-SCGC's Fifth Data Request in A.16-09-005, Application to Recover Costs Recorded in Pipeline Safety & Reliability Memorandum Accounts, the Safety Enhancement Expense Balancing Accounts, and the Safety Enhancement Capital Cost Balancing Accounts because:

- (2) This data is market-sensitive information and is entitled to confidential treatment under D.11-01-36, 2011 WL 660568 (2011) GO 66-C Sections 2.2(b), 2.8. The disclosure of such information would trigger the protection of section 2.2(b) of G.O. 66-C, which protects "[r]eports, records and information requested or required by the Commission which, if revealed, would place the regulated company at an unfair business disadvantage." The yellow highlighted portions on the pages identified in the table below fall within the category of vendor identifying information.

SDG&E and SoCalGas designated their employee names as confidential because:

- (3) Disclosure of this information would constitute an unwarranted invasion of personal privacy. Releasing names could put employees at risk for identity theft, personal harm, harassment or other negative outcomes. This information is exempt from public disclosure, and constitutes

confidential information pursuant to Government Code § 6254(c); Gov't Code 6255; Civil Code §§ 1798.3 & 1798.24 (the California Information Practices Act); and Cal. Const., Art. I, § 1 (California constitutional right to privacy) among other relevant provisions. The yellow highlighted portions on the pages identified in the table below fall within the category of employee identifying information (e.g., names, signatures, other contact information). The yellow highlighted portions on the pages identified in the table below fall within the category of employee identifying information.

DATA / INFORMATION	JUSTIFICATION FOR CONFIDENTIALITY	ATTACHMENTS
<p>Pipeline attribute (i.e. diameter, pressure, and location)</p>	<p>This information has been identified as confidential protected information as this data constitutes sensitive critical energy infrastructure information that is not currently published by the PHMSA and, if made publicly available, could present a risk to the security of the SoCalGas and SDG&E pipeline system and California’s critical energy infrastructure.</p> <p><u>CEII</u>: 18 CFR §388.113(c); FERC Orders 630, 643, 649, 662, 683, and 702 (defining CEII).</p> <p><u>Critical Infrastructure Information</u>: 6 U.S.C. §§131(3), 133(a)(1)(E); 6 CFR §§ 29.2(b), 29.8 (defining CII and restricting its disclosure).</p> <p>Gov’t Code § 6254(e) (“Geological and geophysical data, plant production data, and similar information relating to utility systems development, or market or crop reports, that are obtained in confidence from any person.”)</p> <p>Gov’t Code § 6254 (ab) (“Critical infrastructure information, as defined in Section 131(3) of Title 6 of the United States Code, that is voluntarily submitted to the Office of Emergency Services for use by that office”)</p>	<p>Q5.1.03.15-16 CONFIDENTIAL Const_Contract Amend 5660040378-WA3: pp.2-3 Q5.1.03.15-16 CONFIDENTIAL Const_Request for Contract Work Mod TPI 5: pp.1 Q5.1.03.15-16 CONFIDENTIAL Enviro_Request for Contract Work Mod TPI 1: pp.1 Q5.1.03.15-16 CONFIDENTIAL Enviro_Request for Contract Work Mod TPI 3: pp.1 Q5.1.03.15-16 CONFIDENTIAL Site Rest_Contract Amend 5660040378-WA3: pp.2-3 Q5.1.03.15-16 CONFIDENTIAL Site Rest_Req for Contract Work Mod TPI 12: pp.1 Q5.1.04.15-16 CONFIDENTIAL Const_Request for Contract Work Mod_RFI 8: pp.1 Q5.1.04.15-16 CONFIDENTIAL Exc_2003_014_EC_Sec 3_RFI 1: pp.4,8 Q5.1.04.15-16 CONFIDENTIAL Exc_Request for Contract Work Mod_RFI 1: pp.1 Q5.1.04.15-16 CONFIDENTIAL Permit Cond_2003_014_EC_Sec 3_RFI 4: pp.1 Q5.1.04.15-16 CONFIDENTIAL Permit Cond_Req Contract Work Mod_RFI 4: pp.1 Q5.1.05.14-15 CONFIDENTIAL Permit Cond_Req for Contract Work Mod_TPI 1: pp.1</p> <p>Q5.3.05.16-17 CONFIDENTIAL SL-33-120 Sec 2 Contract Amend_RFI 5, 6, 14: pp.1-2 Q5.3.05.16-17 CONFIDENTIAL SL-33-120 Sec 2 RFI 5 Corresp: pp.1 Q5.3.05.16-17 CONFIDENTIAL SL-33-120 Sec 2 RFI 6 Corresp: pp.1</p>
<p>Vendor information</p>	<p>Vendor names, bid and pricing information have been marked as confidential protected information as publicly disclosing this information could lead to a competitive disadvantage and potential loss of market share for those vendors.</p> <p><i>See, e.g.,</i> D.11-01-36, 2011 WL 660568 (2011)</p> <p>GO 66-C Sections 2.2(b), 2.8</p> <p>Gov’t Code § 6254.15 (disclosure not required for</p>	<p>Q5.1.03.15-16 CONFIDENTIAL Const_Contract Amend 5660040378-WA3: pp.1-3 Q5.1.03.15-16 CONFIDENTIAL Const_Request for Contract Work Mod TPI 5: pp.1 Q5.1.03.15-16 CONFIDENTIAL Enviro_Request for Contract Work Mod TPI 1: pp.1 Q5.1.03.15-16 CONFIDENTIAL Enviro_Request for Contract Work Mod TPI 3: pp.1 Q5.1.03.15-16 CONFIDENTIAL Site Rest_Contract Amend 5660040378-WA3: pp.1-3 Q5.1.03.15-16 CONFIDENTIAL Site Rest_Req for Contract Work Mod TPI 12: pp.1 Q5.1.04.15-16 CONFIDENTIAL Const Contract Amend 5660040378-WA3: pp.1-2 Q5.1.04.15-16 CONFIDENTIAL Const_2003_014_EC_Sec 3_RFI 8: pp.1-2</p>

	<p>“corporate financial records, corporate proprietary information including trade secrets, and information relating to siting within the state furnished to a government agency by a private company for the purpose of permitting the agency to work with the company in retaining, locating, or expanding a facility within California”)</p> <p>Gov’t Code §6254.7(d) (relating to trade secrets)</p> <p>Gov’t Code § 6254(k); Evid. Code §1060; Civil Code §3426</p>	<p>Q5.1.04.15-16 CONFIDENTIAL Const_Request for Contract Work Mod_RFI 8: pp.1</p> <p>Q5.1.04.15-16 CONFIDENTIAL Exc_2003_014_EC_Sec 3_RFI 1: pp.1-2,4-8</p> <p>Q5.1.04.15-16 CONFIDENTIAL Exc_Contract Amend 5660040378-WA3: pp.1-2</p> <p>Q5.1.04.15-16 CONFIDENTIAL Exc_Request for Contract Work Mod_RFI 1: pp.1</p> <p>Q5.1.04.15-16 CONFIDENTIAL Permit Cond_2003_014_EC_Sec 3_RFI 4: pp.1-2</p> <p>Q5.1.04.15-16 CONFIDENTIAL Permit Cond_Contract Amend 5660040378-WA3: pp.1-2</p> <p>Q5.1.04.15-16 CONFIDENTIAL Permit Cond_Req Contract Work Mod_RFI 4: pp.1</p> <p>Q5.1.05.14-15 CONFIDENTIAL Permit Cond_Contract Amend 5660040378-WA2: pp.1</p> <p>Q5.1.05.14-15 CONFIDENTIAL Permit Cond_Req for Contract Work Mod_TPI 1: pp.1</p> <p>Q5.1.05.14-15 CONFIDENTIAL Permit Cond_TPI No. 1: pp.1</p> <p>Q5.1.6-5.1.7-5.1.8 CONFIDENTIAL L-2003 Cost Tables: pp.1</p> <p>Q5.3.03.2 CONFIDENTIAL SL-33-120 Sec 2 Cost Table: pp.1</p> <p>Q5.3.05.16-17 CONFIDENTIAL SL-33-120 Sec 2 Contract Amend_RFI 5, 6, 14: pp.1-3</p> <p>Q5.3.05.16-17 CONFIDENTIAL SL-33-120 Sec 2 RFI 5 Corresp: pp.1-3</p> <p>Q5.3.05.16-17 CONFIDENTIAL SL-33-120 Sec 2 RFI 6 Corresp: pp.1-3</p> <p>Q5.3.05.16-17 CONFIDENTIAL SL-33-120 Sec 2 RFI 14 Corresp: pp.1-2</p> <p>Data Request Response: Q5.1.4.3</p>
<p>Employee identifying information (e.i. names, signatures, other contact information)</p>	<p>Public disclosure of staff level employee names, signatures, and other contact information is being prevented to protect against privacy, employee security, identity theft, and cyber-security risks.</p> <p>Gov’t Code § 6254(c); Gov’t Code 6255;</p> <p>Civil Code §§ 1798.3 & 1798.24 (the California Information Practices Act);</p> <p>Cal. Const., Art. I, § 1 (California constitutional right to privacy).</p>	<p>Q5.1.03.15-16 CONFIDENTIAL Const_Contract Amend 5660040378-WA3: pp.1</p> <p>Q5.1.03.15-16 CONFIDENTIAL Const_Request for Contract Work Mod TPI 5: pp.1</p> <p>Q5.1.03.15-16 CONFIDENTIAL Enviro_Request for Contract Work Mod TPI 1: pp.1</p> <p>Q5.1.03.15-16 CONFIDENTIAL Enviro_Request for Contract Work Mod TPI 3: pp.1</p> <p>Q5.1.03.15-16 CONFIDENTIAL Site Rest_Contract Amend 5660040378-WA3: pp.1</p> <p>Q5.1.03.15-16 CONFIDENTIAL Site Rest_Req for Contract Work Mod TPI 12: pp.1</p> <p>Q5.1.04.15-16 CONFIDENTIAL Const_Contract Amend 5660040378-WA3: pp.1</p> <p>Q5.1.04.15-16 CONFIDENTIAL Const_2003_014_EC_Sec 3_RFI 8: pp.2</p> <p>Q5.1.04.15-16 CONFIDENTIAL Const_Request for Contract Work Mod_RFI 8: pp.1</p> <p>Q5.1.04.15-16 CONFIDENTIAL Exc_2003_014_EC_Sec 3_RFI 1: pp.2,4-8</p>

		<p> Q5.1.04.15-16 CONFIDENTIAL Exc_Contract Amend 5660040378-WA3: pp.1 Q5.1.04.15-16 CONFIDENTIAL Exc_Request for Contract Work Mod_RFI 1: pp.1 Q5.1.04.15-16 CONFIDENTIAL Permit Cond_2003_014_EC_Sec 3_RFI 4: pp.2 Q5.1.04.15-16 CONFIDENTIAL Permit Cond_Contract Amend 5660040378-WA3: pp.1 Q5.1.04.15-16 CONFIDENTIAL Permit Cond_Req Contract Work Mod_RFI 4: pp.1 Q5.1.05.14-15 CONFIDENTIAL Permit Cond_Contract Amend 5660040378-WA2: pp.1 Q5.1.05.14-15 CONFIDENTIAL Permit Cond_Req for Contract Work Mod_TPI 1: pp.1 Q5.1.05.14-15 CONFIDENTIAL Permit Cond_TPI No. 1: pp.1 </p> <p> Q5.3.05.16-17 CONFIDENTIAL SL-33-120 Sec 2 Contract Amend_RFI 5, 6, 14: pp.1,3 Q5.3.05.16-17 CONFIDENTIAL SL-33-120 Sec 2 RFI 5 Corresp: pp.1,3 Q5.3.05.16-17 CONFIDENTIAL SL-33-120 Sec 2 RFI 6 Corresp: pp.1,3 Q5.3.05.16-17 CONFIDENTIAL SL-33-120 Sec 2 RFI 14 Corresp: pp.1-2 </p>
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