

**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-12)

Date Requested: July 3, 2017

Date Responded: September 5, 2017

QUESTION 12.1:

12.1. These questions are directed at the Workpapers to Chapter III.

- 12.1.1. For each replacement and each hydro test project listed in the table of contents to WP-III-A1-A429:**
- 12.1.1.1.** Please break down the O&M and/or capital actual company labor cost recorded in Table 4 between labor employed by the PSEP organization and labor employed by the Applicants outside of the PSEP organization.
 - 12.1.1.2.** Does the company labor cost include any indirects such as payroll taxes or vacation?
 - 12.1.1.3.** How do the Applicants keep track of labor costs associated with employees employed outside of the PSEP organization, e.g., Gas Control or District operating personnel, that may be required to perform specific activities in support of a replacement or hydro test project?
 - 12.1.1.4** To the extent the Applicants consider these labor costs to be part of the cost of the replacement or hydro test projects, how do the Applicants account for the fact that they recover costs associated with employees in Gas Control or District operations through the general rate case process?

RESPONSE 12.1.1:

- 12.1.1.1. See attachment in the attachments folder.
- 12.1.1.2. No.
- 12.1.1.3. Employees employed outside of the PSEP organization track time spent supporting PSEP implementation to specific PSEP Internal Order numbers (IOs). Each month, the PSEP PMO team reviews PSEP IOs and identifies the labor charged to PSEP. A file is compiled with the names of PSEP and non-PSEP employees charging PSEP IOs. **The attached supporting documents include Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024.** A copy of the monthly report, *Support Organizations Charging PSEP*, is provided in the attachment folder.

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12.1.1.4 There were insufficient Company Full Time Equivalents (FTEs) to support PSEP requirements, therefore additional resources in non-PSEP organizations were hired above GRC-funded levels in order to implement PSEP as soon as practicable, as ordered by the Commission. Support resources track their time through PSEP IOs, as appropriate, when supporting implementation of PSEP projects, as described in the response to TURN-SCGC Q.12.1.1.3.

It is common for organizations to track their time through IOs for capital projects, such as PSEP projects, to track costs related to capital projects.

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(DATA REQUEST TURN-SCGC-12)

Date Requested: July 3, 2017

Date Responded: September 5, 2017

QUESTION 12.2:

These questions are directed at Chapter 2 of the Applicants testimony.

- 12.2.1. With respect to the statement on page 7: “Third, the PMO develops reports and Key Performance Indicators (KPIs) at both the granular project level and the overall PSEP level. SoCalGas and SDG&E management, on a monthly basis, review the KPIs to monitor PSEP. Included in the KPIs are financial metrics, pressure testing and replacement progress metrics (e.g., number of projects that have entered construction and placed into service), valve metrics (e.g., number of valves that have entered construction and been placed into service), safety metrics, environmental compliance metrics, material availability metrics, Diverse Business Enterprise goals, and headcount. Qualitative data is reviewed by the PSEP PMO and SoCalGas and SDG&E Management including a summary of key accomplishments, constraints, and opportunities for improvement.”**
- 12.2.1.1. Please provide the monthly reports including KPI for each of the replacement and hydro test projects listed in the table of contents to WP-III-A1-A429.
- 12.2.1.2. Please explain how the PMO addressed the management of those projects that experienced delays or significant increases in costs through the monthly review of the KPI.
- 12.2.1.3. Have these KPI reports enabled the PMO to identify systemic problems in existing projects at more advanced stages that could be identified earlier in ongoing projects so as to avoid problems or delays? An example that comes to mind is tar wrap associated with pipelines of a certain age leeching into the soil and causing project delays in projects that have been completed. Has the PMO taken steps to ensure that this type of problem is better anticipated in the ongoing projects?
- 12.2.1.4. How does the PMO ensure that information from the field is fed back into the planning process for projects planned at a later date?

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RESPONSE 12.2.1:

12.2.1.1. PSEP maintains many different reports at the project level, portfolio level, and program level. Below is a non-exhaustive list of reports generated by PSEP, along with their purposes and/or functions. Copies of these reports are provided in response to this data request, because they are used to manage PSEP projects at all three levels described on a regular basis, and they are the ones that pertain to the other data request responses in this grouping. Due to the voluminous nature of the reports at the project level, three projects were selected to provide a representative sample.

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 following reports are provided in the attachment folder.

<u>Report Level</u>	<u>Report Title</u>	<u>Function</u>
A. PSEP-Wide	1. Metrics, KPIs & Updates	Overall metric analysis conducted monthly
	2. Executive Steering Committee Presentation	Report to SoCalGas and SDG&E Executives
	3. Procedures	Materials, Engineering, permitting and Work Process map procedures defining how to perform these functions
	4. Bulletins	Bulletins provide updates to existing procedures
	5. Commodity Lead Times	Matrix developed for scheduling and forecasting material lead times
	6. Permit Lead Times	Matrix developed for scheduling and forecasting permit lead times
	7. Work Order Authorization (WOA) Funding report	Used monthly to monitor cost and forecast for each project in PSEP
	8. 30-Day Lookahead	Provide weekly status of the projects starting construction in next 30 days
	9. Quality Team Summary Report	Provides monthly updates on quality control and quality assurance
	10. Monthly P6 Master	Prepared monthly as a roll up of each

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	Schedule	individual project schedule
	11. Inspector Count Summary Report	Provides inspector resources for each project
	12. PSEP Monthly Progress Report	Provide monthly update of key areas and metrics
	13. Cost Report	Details cost of each project and PSEP wide cost by company and portfolio
	14. Customer Impact Report	Details customer outage and bypass needs for each project
	15. Support Organizations Charging PSEP Report	Shows the detail of support company labor by organization and Director
B. Portfolio Level	1. Project Status Report	Report reviewed bi-weekly by PSEP Leadership detailing project schedules costs and current status
	2. PM Bi-Weekly Planned Vs Forecast	Report used at bi-weekly PM meeting to review schedule, cost and current status
	3. PM Bi-Weekly Minutes	Minutes from bi-weekly PM meeting used to report on action items, project progress and overall PSEP performance
C. Project Level	1. Project Schedules	Monthly updates to each individual project schedules created and updated monthly by each project PM
	2. Project Cashflow Report	Report created to update cost each month by project PM
	3. Permit Execution Plan	Track and update permit status for each project
	4. Bill of Materials (BOM)	Used to order and specify materials needed for each project
	5. SAP Cost Reports	Various cost summary and detail reports run as needed by Project Manager

12.2.1.2. The PMO conducted bi-weekly meetings to review cost and schedule. During these meetings, key metrics were evaluated. Action items were assigned to

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evaluate cost or schedule impacts based on team input. For example, if a municipal permit was causing a project delay, a team member would be assigned to follow up with the agency or project team, as appropriate.

A project schedule may be delayed throughout a project's life cycle for various reasons. Some delays relate to external causes, such as permitting challenges, land owner negotiations or environmental mitigation requirements. Other delays relate to gas system availability, such as system requirements to meet seasonal customer demand.

- 12.2.1.3. Yes, the PMO used these reports and meetings to identify recurring issues in existing projects to mitigate similar occurrences in other projects in earlier planning stages. Examples of early project issues that were mitigated to a greater extent over time are the time necessary to obtain permits, time necessary to receive materials, and imprecise cost estimates. These issues were mitigated to a greater extent over time, through the use of prepared expectancy tables, development of greater subject matter expertise, organizational changes, and other process improvements.

For example, permit approval durations were monitored and placed into an expectancy table. Utilizing this information, project schedules were refined to allow sufficient time for permit acquisition prior to the start of construction. Through this process refinement, the risk of project delays caused by permitting issues was mitigated to a greater extent over time.

In addition, the PSEP organization centralized the permitting of projects in March 2015, and SoCalGas retained personnel with greater subject matter expertise in permitting. The formation of the centralized permitting team is one example of capitalizing on lessons learned and continuous improvement. This team improved consistency, quality of permit applications, centralized communication with each permitting agency, and centralized reporting. Schedule delays driven by permitting delays were reduced as a result of these steps.

Some project delays occurred early in PSEP due to environmental factors. Environmental permitting risks were mitigated to a greater extent in subsequent projects through enhanced screening during project planning. Greater environmental review of projects in the early design stages enabled SoCalGas to identify potential environmental issues and begin the permitting process earlier in the project life cycle.

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Similarly, to reduce the risk of schedule delays driven by material acquisition delays, SoCalGas tracked and measured actual times to order and receive materials on a chart to allow sufficient time in subsequent project schedules to order necessary materials, ship the materials, receive materials, and quality-check the materials prior to the start of construction. SoCalGas monitored scheduled delivery dates and retained “expeditors” to communicate with material suppliers to support timely delivery. Material delivery dates were monitored to confirm material availability prior to construction start. Additionally, resources were added within the Gas Engineering organization to provide more timely guidance regarding material acceptability requirements, a second materials yard was established, and some specialty materials were moved to a third party supplier for handling.

Furthermore, additional engineering design reviews were added for early design drawings to incorporate Gas Engineering feedback into each project design earlier in the design and planning process. This enhancement mitigated the potential risk of design changes later in the project lifecycle, which in turn mitigated the risk of potential schedule delays and design cost increases.

In addition to the above examples, to reduce the risk of project demobilizations, additional management approval requirements were put in place before a project was authorized to proceed to construction.

To enhance the accuracy of cost estimates, SoCalGas formed an Estimating Team, and hired additional subject matter experts to enhance estimating processes and procedures. Through greater incorporation of American Association of Cost Engineers (AACE) principles into the estimating process, estimate accuracy improved over time and documentation and standardization of the estimating process was improved.

These examples were identified through the metrics compiled and meetings conducted by the PMO. The PMO continues to utilize meetings and KPIs to evaluate project metrics for improve the efficiency of project implementation and mitigate project risks.

Lessons learned are gathered and communicated back to teams and based on these lessons learned, procedures are updated and bulletins issued to communicate the improved process and procedures throughout the PSEP organization.

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Continuous improvement initiatives have also improved project delivery and cost efficiency. For example, the PSEP organization developed and implemented a process to order materials in bulk, reducing material costs and improving material availability for the entire program.

- 12.2.1.4. The PMO uses several methodologies to consider information from the field during the planning process for projects. For example, construction management personnel are part of the PMO and regularly offer guidance during project review meetings, KPI reviews and other interactions. These collaborations provide opportunities to gather and incorporate feedback from field personnel regarding project location, potential construction issues, soil conditions, etc. In addition, as described in response to TURN-SCGC Q.12.2.1.3, lessons learned are collected and communicated throughout the PSEP organization.

Bi-weekly Project Management meetings are held to discuss and review PSEP projects, delays, cost updates and other trends. Project status reports have been issued since August 2014, monthly PSEP Master Schedules have been issued since the second quarter of 2013, and 30-Day lookahead schedules have been provided since January 2015.

Project scope, schedule and cost are reviewed at Stage Gate meetings, where project managers are required to report on the progress of projects and obtain authorization to progress to the next stage of project execution. For example, management approval at a Stage Gate meeting is required before a project can proceed to construction. Through this Stage Gate review and approval process, project planning and implementation activities are revised to incorporate feedback and guidance from field and management personnel.

Once a project begins construction, the project engineers and project managers continue to monitor activities and incorporate any lessons learned into subsequent projects.

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(DATA REQUEST TURN-SCGC-12)

Date Requested: July 3, 2017

Date Responded: September 5, 2017

QUESTION 12.2.2:

With respect to the statement on page 20: “Despite the benefits associated with competitively bidding contracts, there are circumstances when it is not possible or prudent to do so. In such instances, single or sole sourcing can be reasonable contracting options that help realize efficiencies, reduce administrative costs, and promote the completion of PSEP as soon as practicable.”

- 12.2.2.1. How does the PMO determine whether the cost associated with these sole source contracts is reasonable?
- 12.2.2.2. Does the PMO evaluate the cost of delay that might occur absent the sole source contract?
- 12.2.2.3. Did the PMO approve a sole source contract for any of the projects for which cost recovery is requested in this application?
- 12.2.2.4. If the answer to the previous question is “yes,” please identify which projects include a sole source contract.
- 12.2.2.5. For each of the projects identified in the response to the previous question, please identify the amount of the contract that was sole sourced and the reasons why the PMO approved the sole source contract.

RESPONSE 12.2.2.1:

- 12.2.2.1. This determination is made through evaluation of various circumstance-specific factors, including, but not limited to, the amount of the potential purchase or contract, the number of qualified vendors that supply the goods or services needed, recent experience acquiring similar goods or services, quotes or price lists provided by the vendors or suppliers, and the outcome of recent competitive solicitations for similar goods or services. Also taken into consideration is the additional time and administrative burden associated with conducting sourcing events.
- 12.2.2.2. The cost and burden are generally considered, however, a detailed estimate of the costs and burdens is not prepared.

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- 12.2.2.3. Yes.
- 12.2.2.4. SoCalGas/SDG&E continue to review documentation potentially responsive to this request and will provide a response upon completion of this review.
- 12.2.2.5. SoCalGas/SDG&E continue to review documentation potentially responsive to this request and will provide a response upon completion of this review.

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Date Requested: July 3, 2017

Date Responded: September 5, 2017

QUESTION 12.2.3:

With respect to the statement on page 21: “Under the Performance Partner Program, each project worked on by a Performance Partner is subject to a target pricing risk/reward mechanism. This mechanism is based on establishing a target price agreed to by SoCalGas and SDG&E and the Performance Partner. Using this target price, the Performance Partner has a cost incentive to efficiently perform the project because it shares in both reduced and excess costs. The Performance Partner is not, however, entitled to any profits when costs exceed 20% of the target price.”

- 12.2.3.1. For each of the projects that are the subject of this application for which a performance partner completed the contract, please identify the target price and explain how the Applicants and the Performance Partner agreed to that target.
- 12.2.3.2. For each of the projects that are the subject of this application for which a performance partner completed the project, please provide a copy of the contract between the Performance Partner and the Applicants.
- 12.2.3.3. For each of the projects that are the subject of this application for which a performance partner completed the project, please provide a copy of the documents prepared by PMO staff the relate to the evaluation of the bid produced by the Performance Partner.

RESPONSE 12.2.3.1:

- 12.2.3.1 The procedure for the target price estimation process consists of independent estimate development by SoCalGas/SDG&E and the Performance Partner, followed by a meeting to compare cost estimate development methodology and discuss the resulting pricing, with both parties preparing revisions and comparisons, as needed. Before an agreement to proceed is reached, the project team must determine the contractor’s estimate is reasonable, based on the information available at the time of estimation. The final output from a target price negotiation is a variance table, which includes the total estimated cost deemed reasonable to complete the project. When the authorization to perform work is provided for each job, this final negotiated value is reduced by an amount related to SoCalGas/SDG&E’s provision of insurance coverage. **The attached supporting documents include Confidential and Protected Materials Pursuant to PUC Section**

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583, GO 66-C, and D.16-08-024. See attachment 12.2.3.1 for each Performance Partner's target price.

- 12.2.3.2 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 contracts between SoCalGas/SDG&E and each applicable Performance Partner are provided in the attachment folder.
- 12.2.3.3 The attached supporting documents include Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024. A table summarizing the prices from the rounds of negotiation required to reach a satisfactory price for the respective projects and evaluation documents are included in the attachment folder.

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QUESTION 12.2.4:

With respect to the statement: “In addition to the risk-reward mechanism, SoCalGas and SDG&E were also able to 4 negotiate other incentive mechanisms to reduce costs to customers. These include: (1) overall caps on Performance Partner overheads; (2) individual project profit caps under the sharing mechanism; (3) negotiated annual profit caps based on total work completed (this resulted in an approximate \$950,000 rebate after the first year of the contracts); (4) caps on the mark-up from third party subcontractors used by the performance partner; and (5) the ability to audit Performance Partner costs.” Did the Applicants have one Performance Partner agreement that was used for each of the 17 projects completed with Performance Partners or was a separate contract negotiated for each Performance Partner?

RESPONSE 12.2.4:

Master agreements were negotiated with each Performance Partner and Releases were issued for each separate scope of work. See the attachments provided in response to question 12.2.3.2, copies of the Master Agreements and subsequent Releases.

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QUESTION 12.2.5:

With respect to the discussion of materials procurement on pages 22-23:

- 12.2.5.1. Please provide evidence that shows cost per foot of pipe or cost per unit of other equipment or materials and demonstrate that these costs are at or below market prices.
- 12.2.5.2. Do the Applicants periodically audit their procurement activities to ensure that purchases are made at or below market levels?

RESPONSE 12.2.5.1:

- 12.2.5.1. **The following response contains Confidential and Protected Information Pursuant to PUC Section 583, GO 66-C, and D.16-08-024.** Purchase Order 4400102012 (dated February 14, 2014), provides evidence of SoCalGas/SDG&E purchasing materials below market prices. Through that Purchase Order, SoCalGas/SDG&E purchased approximately 160,000 feet of ten-inch pipe for about [REDACTED]. The average market price during this timeframe was about [REDACTED]. In that same Purchase Order, SoCalGas/SDG&E also purchased approximately 50,000 feet of 24-inch pipe for about [REDACTED]. The average market price for similar pipe during this timeframe was about [REDACTED].
- 12.2.5.2. Yes.

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QUESTION 12.2.6:

With respect to the statement on page 24: “Within the last year, PSEP has re-bid or renegotiated contracts with providers of the following functions: inspectors, engineering design, survey, environmental services, warehousing.” Please show written evidence of the reduction in such costs.

RESPONSE 12.2.6:

The following response contains Confidential and Protected Information Pursuant to PUC Section 583, GO 66-C, and D.16-08-024. SoCalGas/SDG&E object to this request on the grounds that the meaning of the phrase “written evidence” is vague and ambiguous. Subject to and without waiving the foregoing objection, SoCalGas/SDG&E respond as follows:

Inspectors: A competitive bidding event was conducted and the results were as follows:

Awarded Inspection Firm	Overall Average Rate Reduction/Increase
[REDACTED]	20% Reduction
[REDACTED]	17% Reduction

Engineering and Design: A competitive bidding event was conducted and the results were as follows:

Awarded Engineering Firm	Overall Average Rate Reduction/Increase
[REDACTED]	9% Reduction
[REDACTED]	16% Reduction
[REDACTED]	2% Increase
[REDACTED]	3% Reduction
[REDACTED]	12% Reduction
[REDACTED]	7% Reduction

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Survey: A competitive bidding event was conducted and the results were as follows:

Awarded Engineering Firm	Overall Average Rate Reduction/Increase
[REDACTED]	8% Reduction
[REDACTED]	5% Reduction
[REDACTED]	11% Reduction
[REDACTED]	9% Reduction
[REDACTED]	1% Reduction
[REDACTED]	2% Increase
[REDACTED]	1% Reduction
[REDACTED]	1% Reduction

Through the request for proposal (RFP), subcontractor mark-up was standardized at [REDACTED], leading to a 4% reduction in overall costs. In addition to the overall rate reduction, primary vendors were identified within geographic regions based on office location and rates, to reduce the overall cost of travel expenses.

Environmental Services: SoCalGas/SDG&E negotiated with the environmental prime contractor to obtain a rate cap of [REDACTED] and a third party mark-up reduction from [REDACTED] [REDACTED]

Warehousing: SoCalGas/SDG&E negotiated labor adjustments tied to the Employment Cost Index (ECI) with a maximum cap of [REDACTED]. SoCalGas/SDG&E also negotiated a reduction of third-party mark-up costs from [REDACTED] and a [REDACTED] per-acre reduction in the cost per month for the 15-acre yard, reducing costs by \$30k per month.

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QUESTION 12.2.7:

With respect to the discussion of reducing insurance costs on pages 24-25:

Please show written evidence of the reduction in such costs.

RESPONSE 12.2.7:

The attached supporting documents include Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024. SoCalGas/SDG&E object to this request on the grounds that the meaning of the phrase “written evidence” is vague and ambiguous. Subject to and without waiving the foregoing objection, SoCalGas/SDG&E respond as follows: See documentation provided in the attachment folder.

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(DATA REQUEST TURN-SCGC-12)

Date Requested: July 3, 2017

Date Responded: September 5, 2017

QUESTION 12.2.8:

With respect to the statement on page 25: “Additionally, SoCalGas and SDG&E implemented procedures to verify the accuracy of costs. This includes verifying that billing rates are correct, reviewing time sheets for hours worked, and reviewing other supporting documentation for accuracy.”

- 12.2.8.1. Please identify who is responsible for implementing the procedures to verify the accuracy of costs?
- 12.2.8.2. How is the accuracy of timesheets established?
- 12.2.8.3. How many projects is a PMO project manager assigned to simultaneously?

RESPONSE 12.2.8:

- 12.2.8.1. The PSEP Project Execution and PMO groups are responsible for implementing the review and approval of costs.
- 12.2.8.2. SoCalGas and SDG&E interpret the question regarding the accuracy of timesheets established to refer to contractors’ timesheets. The contractors submit weekly timesheets indicating their time worked on PSEP projects. Once the contractor invoice is received, a Business Analyst in the PSEP Business Administration group reviews the invoice for accuracy and checks the labor hours submitted with the timesheets. In addition, the Business Analyst verifies contract rates. Once this initial review is complete, the invoice is forwarded to the appropriate Project Manager in the Project Execution group to review and approve the invoice for payment.
- 12.2.8.3. SoCalGas and SDG&E interpret this question to be referring to the Project Managers in the Project Execution group. The number of projects assigned to a Project Manager can vary anywhere from one to ten, based on the size, complexity, and level of activity of individual projects.

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QUESTION 12.3:

These questions are directed at Appendix B to Chapter 2 of the Applicants testimony.

- 12.3.1. With regard to the statement at page 2: “SoCalGas judgmentally selected a PSEP contractor to be assessed.”**
- 12.3.1.1. How did SoCalGas determine which PSEP contractor to evaluate?
- 12.3.1.2. Please state all of the criteria used to determine the selection.
- 12.3.1.3. Please identify each of the PSEP contractors that were considered as part of the selection process.
- 12.3.1.4. Please provide the documentation related to the selection of the PSEP contractor.

RESPONSE 12.3.1:

- 12.3.1.1 One of our largest contractors had stated on different occasions over the last 15 years that it makes more profit on bid jobs than on jobs that follow a performance partner contracting type model. The contractor offered to open its books to inspection by SoCalGas/SDG&E to evaluate this claim and SoCalGas/SDG&E took the contractor up on this offer.
- 12.3.1.2. Key factors evaluated by SoCalGas and SDG&E include: whether a contractor is one with which SoCalGas/SDG&E has done a large volume of work and has an established history; whether the contractor agrees to allow an auditing firm selected by SoCalGas/SDG&E to review its books; whether the contractor agrees to allow the auditor to select the projects to be audited; and whether the contractor agrees to allow the results of the audit to potentially be used in regulatory proceedings.
- 12.3.1.3. **The following response contains Confidential and Protected Information Pursuant to PUC Section 583, GO 66-C, and D.16-08-024.** All the Performance Partner contractors were considered: [REDACTED]

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12.3.1.4. There is no such documentation.

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Date Requested: July 3, 2017

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QUESTION 12.3.2:

With regard to the statement at page 5: “KPMG judgmentally selected a sample of six lump sum projects including both gas transmission and distribution projects.”

- 12.3.2.1. How did KPMG determine which lump sum projects to evaluate?
- 12.3.2.2. Please state all of the criteria used to determine the selection.
- 12.3.2.3. Please identify each of the lump sum projects that were considered as part of the selection process.
- 12.3.2.4. Please provide the documentation related to the selection of the lump sum projects.

RESPONSE 12.3.2:

- 12.3.2.1. The overall purpose of the Contractor Profit Analysis performed by KPMG was to assess whether the contractor’s average profit was higher or lower on lump-sum projects when compared to the contractor’s average profit on cost-based contracts.

SoCalGas/SDG&E is informed and believes KPMG determined which projects to evaluate by considering the following:

- How many projects could be evaluated based on KPMG’s scope and budget.
- Projects completed (or close to completed) within the past two years so that the timeframe is relevant to PSEP’s cost-based contract data. This timeframe also closely aligns with the assessment period for which contractor overhead and indirect cost data is available based on the results from the Performance Partner Program in 2013 (see the response to Question 12.3.5).
- Project types to include both gas transmission and gas distribution as well as represent both large and small projects.
- Select the same number of projects from each year.

SoCalGas/SDG&E is informed and believes that based on this criteria, KPMG obtained a list of lump sum projects that the contractor completed or was close to completing (+95% complete) within the calendar years 2013 and 2014.

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SoCalGas/SDG&E is informed and believes the project list received by KPMG from the contractor included a total of 54 lump sum gas transmission and gas distribution projects. SoCalGas/SDG&E is informed and believes KPMG selected six projects for evaluation from this list.

12.3.2.2. SoCalGas/SDG&E is informed and believes KPMG considered the following project attributes in the selection:

- Project type
- Project year
- Final contract price
- Job cost ledger amount

12.3.2.3 SoCalGas/SDG&E does not have possession or control of the list of projects sampled. This information is proprietary to the Contractor and SoCalGas is informed and believes that KPMG is not authorized by the Contractor to disclose this information to SoCalGas. Page 2 of the report of Attachment B states that the projects included both gas transmission and distribution projects.

12.3.2.4. SoCalGas/SDG&E does not have possession or control of any such documentation.

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QUESTION 12.3.3:

With regard to the statement at page 5: “LS project costs were tracked identically to PSEP project costs. The six sampled projects had the same cost types as the PSEP cost based Performance Partner projects tracked in their job cost reports.”

- 12.3.3.1. Who performed the identical tracking of the LS projects and the PSEP project costs?
- 12.3.3.2. Please describe the process of tracking LS project costs identically to PSEP project costs.

RESPONSE 12.3.3:

- 12.3.3.1. The project cost tracking is performed by the contractor. KPMG performed a review of the contractor’s project accounting records and determined the contractor’s project cost tracking was consistent across the different project types reviewed.
- 12.3.3.2. Based on SoCalGas/SDG&E’s understanding of the contractor’s project accounting processes, the contractor tracks and accounts for project costs using a standardized chart of accounts. As provided in the Contractor Profit Analysis report, the contractor tracks its project cost by: Labor, Burden, Per Diem, Subcontracts, Contract Labor, Materials, Sales Tax, Consumables, Rented Equipment, Rented Equipment (non-fueled) and Contractor Equipment. Each of these components were tracked consistently for both lump sum projects as well as PSEP projects.

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QUESTION 12.3.4:

With regard to the statement at page 5: “Upon review of burden in the LS job costs, the percentages utilized to obtain the burden costs were 41% for both Union and Non-Union labor; however these burden costs were not the Contractor’s actual burden.”

- 12.3.4.1. Is KPMG stating that the contractor marked up both the union and non-union costs using a 41 percent figure that was not based on its costs?
- 12.3.4.2. If the answer to the previous question is “no,” please explain the quoted statement.

RESPONSE 12.3.4:

- 12.3.4.1 KPMG is stating that the Contractor used a 41% labor burden figure in its lump sum job costs, and that this was above its actual burden for the sampled projects. SoCalGas/SDG&E does not have sufficient knowledge to state whether this 41% labor burden figure reflects the Contractor’s actual labor burden over a greater number of projects or more extended period of time.
- 12.3.4.2 Not applicable.

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QUESTION 12.3.5:

With regard to the statement at pages 5-6: “Similar to the PSEP contracts, the burden percentages comprised of payroll taxes, insurance, consumables, supervision and miscellaneous. KPMG calculated the Contractor’s actual burden based on a 2013 program and obtained 28.71% direct union burden, 20.55% indirect non-union burden.”

- 12.3.5.1. Is KPMG stating that the burden that ought to be calculated on fixed bid contracts should be equal to the cumulative percentages associated with indirects comprised of payroll taxes, insurance, consumables, supervision and miscellaneous?
- 12.3.5.2. If the answer to the previous question is “no,” please explain the first sentence of the quoted statement.
- 12.3.5.3. Please describe the 2013 program that the second sentence of the quoted statement refers to.
- 12.3.5.4. Who developed the 2013 program and upon what was it based?
- 12.3.5.5. Does the 2013 program contain actual inputs from the contractor under study?
- 12.3.5.6. If the answer to the previous question is “no,” please describe the inputs for the 2013 study and explain how they apply to the contractor.
- 12.3.5.7. Please describe how KPMG calculated the actual burden figures: 28.71% direct union burden, 20.55% indirect non-union burden.

RESPONSE 12.3.5:

- 12.3.5.1. No.
- 12.3.5.2. The sentence “Similar to the PSEP contracts, the burden percentages comprised of payroll taxes, insurance, consumables, supervision and miscellaneous”

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describes the components that comprised the burden percentages, and moreover conveys that the burden percentage composition is similar to PSEP contracts. KPMG performed the analysis and calculated the labor burden in this manner in order to verify that the calculation for labor burden was consistent between lump sum projects and PSEP projects.

- 12.3.5.3. The 2013 program refers to an assessment previously performed by KPMG, at the request of SoCalGas/SDG&E pursuant to their Performance Partnership Agreements, of all of SoCalGas/SDG&E's performance partners in order to determine their actual costs compared to contract rates.
- 12.3.5.4. The referenced 2013 program was developed by SoCalGas with assistance from KPMG. The 2013 program is based on SoCalGas' objective to minimize costs and KPMG's experience conducting construction contractor cost audits.
- 12.3.5.5. Yes. The results of the referenced 2013 program include information and cost data that were provided by each contractor under study.
- 12.3.5.6. Not applicable.
- 12.3.5.7. Actual labor burden figures were derived from supporting cost data provided by the studied contractor. Supporting cost data included, but was not limited to: contractor financial statements, direct and indirect cost ledgers, self-insured insurance cost estimates, payroll records, taxes and employee benefits that support each of the contractors' labor burden as prescribed in the contractors' Performance Partnership Agreement.

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QUESTION 12.3.6:

With respect to the statement on page 6: “The actual calculated burden percentages have been utilized to adjust the Contractor’s job costs for the six samples selected. Since the calculated actual burden rates are lower than the burdens utilized by the Contractor in the job costs, the adjusted job cost amounts are lower.”

- 12.3.6.1. Is KPMG stating that they recalculated the job costs by applying the 28.71% to all direct union labor costs and 20.55% to all direct non-union labor costs to re-determine the burden amounts that were then reflected in the total job cost figures?
- 12.3.6.2. If the answer to the previous question is “no,” please explain the first sentence of the quoted statement.

RESPONSE 12.3.6:

- 12.3.6.1. Yes.
- 12.3.6.2. Not Applicable.

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Date Requested: July 3, 2017

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QUESTION 12.3.7:

With respect to the statement on page 6: “The Final Job Cost Amount for the 54 projects the Contractor provided do not include overhead costs. KPMG calculated the Contractor’s actual overhead based on a 2013 program and obtained an 8.99% overhead percentage. KPMG utilized the actual overhead percentage of 8.99% in its calculations.”

- 12.3.7.1. Please describe the 2013 program that the second sentence of the quoted statement refers to.
- 12.3.7.2. Who developed the 2013 program and upon what was it based?
- 12.3.7.3. Does the 2013 program contain actual inputs from the contractor under study?
- 12.3.7.4. If the answer to the previous question is “no,” please describe the inputs for the 2013 study and explain how they apply to the contractor.
- 12.3.7.5. Please describe how KPMG determined the contractor’s overhead percentage to be 8.99%.

RESPONSE 12.3.7:

- 12.3.7.1. See response to TURN-SCGC Q12.3.5.3.
- 12.3.7.2. See response to TURN-SCGC Q12.3.5.4.
- 12.3.7.3. Yes. The results of the referenced 2013 program include information and cost data that were provided by the contractor under study.
- 12.3.7.4. Not applicable.
- 12.3.7.5. KPMG determined the contractor’s 8.99% overhead by assessing the contractor’s and contractor parent company’s financial statements (including their Selling, General and Administration Expenses (SG&A)), direct costs and their total cost of revenue.

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QUESTION 12.3.8:

With respect to the statement on page 6: “To reconcile the costs of the sampled reports to the PSEP cost based Performance Partner contracts (KPMG’s calculated actual burden and overhead percentage), KPMG isolated Labor Cost and discounted Burden amounts from Burden Cost. Next, KPMG calculated the 28.71% direct union burden and 20.55% indirect non-union burden from the Labor Cost amounts, accordingly. Lastly, the 8.99% overhead was added to the subtotal job cost amount to then obtain the adjusted profit for the project. Once these steps were completed for all six projects independently, the profit percentages were averaged and compared to the Contractor’s profit calculation [Table 4]. The difference of 3.88% was then applied to all 54 projects to obtain their adjusted profit calculation and then averaged once more to obtain the adjusted average profit calculation.”

- 12.3.8.1. Is KPMG stating that they recalculated the job costs by applying the 28.71% to all direct union labor costs and 20.55% to all direct non-union labor costs to re-determine the burden amounts then adding the burden to the direct labor costs and finally applying the 8.99% overhead factor to the entire labor plus burden costs?
- 12.3.8.2. If the answer to the previous question is “no,” please explain the first two sentences of the quoted statement.
- 12.3.8.3. Did KPMG include non-labor costs in its job cost calculations?
- 12.3.8.4. If the answer to the previous question is “yes,” please describe how KPMG included non-labor costs in its job cost calculations and whether it applied the 8.99% overhead factor to these costs.
- 12.3.8.5. If KPMG excluded non-labor costs from its job cost calculations, please explain why it was appropriate to do this.

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RESPONSE 12.3.8:

- 12.3.8.1. Yes, and in addition, the 8.99% overhead factor was also applied to non-labor costs.
- 12.3.8.2. Not Applicable.
- 12.3.8.3. Yes.
- 12.3.8.4. Non-labor job costs were also included in the contractor's job cost reports. As a result, the 8.99% overhead factor was also applied to non-labor costs.
- 12.3.8.5. Not applicable.

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QUESTION 12.3.9:

With respect to Table 4:

- 12.3.9.1. Is the final contract price the actual bid that the contractor submitted?
- 12.3.9.2. Is the final job cost amount the actual amount that the contractor spent in completing the work?
- 12.3.9.3. If the answer to the previous question is “no,” is the final job cost amount the total job cost that KPMG calculated?
- 12.3.9.4. If the answer to the previous question is “no,” please explain what the figures are in the “Final Job Cost Amount” column.
- 12.3.9.5. Please describe in detail how the figures in the “contractor profit calculation” column are determined.
- 12.3.9.6. Please describe in detail how the figures in the “adjusted profit calculation” column are determined.
- 12.3.9.7. Assuming that profit amounts to the difference between the contract price (revenues) and the job costs, if the KPMG job cost calculations employed burden percentages of 28.71% and 20.55%, which are substantially less than the 41% that the contractor apparently used, why would the KPMG profit calculations end up being smaller than the contractor’s profit calculations?

RESPONSE 12.3.9:

- 12.3.9.1. No. The final contract price represents the contractor’s original contract price, plus contract amendments issued throughout the project by the contractor’s client.
- 12.3.9.2. No.
- 12.3.9.3. No, the final job cost amount in Table 4 represents the contractor’s final job cost, as provided to KPMG, which included estimated labor burden costs.

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- 12.3.9.4. The final job cost amount in Table 4 represents the contractor's final job cost, as provided to KPMG, which included estimated labor burden costs.
- 12.3.9.5. The Contractor Profit Calculation in Table 4 represents the contractor's profit calculation, as provided to KPMG.
- The Contractor Profit Calculation = (Final Contract Price – Final Job Cost Amount) / Final Contract Price.
- 12.3.9.6. The Adjusted Profit Calculation in Table 4 represents KPMG's calculated profit margin and was calculated per the following:
- Adjusted Profit Calculation = (Final Contract Price – *Adjusted* Final Job Cost Amount) / Final Contract Price.
- 12.3.9.7. SoCalGas/SDG&E objects to the request on the grounds the request is vague, ambiguous and unintelligible, and presents an incomplete hypothetical. Subject to and without waiving the foregoing objection, SoCalGas/SDG&E responds as follows:
- The contractor's final job cost amounts obtained by KPMG did not include overhead. In order to accurately calculate the contractor's actual profit, KPMG added a 8.99% overhead factor to the adjusted job cost amounts. This increased the contractor's calculated job costs and decreased the contractor's calculated overall profit.

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Date Requested: July 3, 2017

Date Responded: September 5, 2017

QUESTION 12.4:

These questions are directed at Chapter 3 of the Applicants testimony.

12.4.1. With respect to the statement on page 7: “Based on the mileage of post-1955 pipe without sufficient record of a pressure test, 5 SoCalGas and SDG&E have calculated a disallowance based on SoCalGas and SDG&E’s 6 average cost of pressure testing.”

Please provide the workpapers for the calculation of the \$1.7 million and show a list of projects that the figure is based on.

RESPONSE 12.4.1:

The average cost to Hydrotest is calculated by dividing the total Hydrotest Costs by the Total Length (miles). Refer to the formula below:

$$\text{Average Cost to Hydrotest} = \frac{\text{Total Hydrotest Cost}}{\text{Total Length (miles)}}$$

Hydrotest Cost Calculation

1. There are six projects that are indicated as **Hydrotest Projects** and all six are included in the calculation. These are projects in which 100% of the activities were for hydrotesting a specific segment of pipeline. These projects are identified where “Hydrotest” is indicated in the Project Type field.
2. There are 20 projects that are indicated as **Replacement Projects**. These projects had a mix of hydrotesting and pipeline replacement jobs. The hydrotest costs for these projects were separately identified from the total project costs and included in the calculation.
3. **Length (miles)** - The footage was the length of each project. A factor of 5,280 feet/mile was applied for the conversion from feet to miles. **The following response contains Confidential and Protected Information Pursuant to PUC Section 583, GO 66-C, and D.16-08-024.**

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QUESTION 12.4:

These questions are directed at Chapter 3 of the Applicants testimony.

12.4.2. With respect to the statement on page 8: “For replacement and abandonment projects without sufficient record of a pressure test and with remaining book value, SoCalGas and SDG&E have acknowledged the reduction to rate base in an amount equal to the undepreciated book value of the entire replacement or abandonment project.”

12.4.2.1. For each of the abandon or replaced pipes, please separately list the original book value.

12.4.2.2. For each of the abandon or replaced pipes, please separately list the undepreciated book value.

RESPONSE 12.4.2:

12.4.2.1. As of May 2017, the recorded book values for post-1955 abandoned or replaced pipes are provided in the table below.

Company	Project Name	Original Book Value	Undepreciated Book Value
SoCalGas	35-20-N	\$93	\$30
SoCalGas	45-120	\$7,052	\$1,025
SoCalGas	235 West	\$596	\$29
SoCalGas	2000 West Sec (1,2,3)	\$285,754	\$228,735
SoCalGas	2003 Sec (1,3,4)	\$13,432	\$770
SoCalGas	2003 Sec (1,3,4)	\$17,229	\$789
SoCalGas	1014	\$1,814	\$102
SoCalGas Total		\$325,971	\$231,480

There were \$0 undepreciated book balances for SDG&E.

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12.4.2.2. See the response to Question 12.4.2.1.

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QUESTION 12.4.3:

12.4.3. With respect to the statement on page 17: “Further, a concerted effort was also made to maximize the seating capacity of the 22nd and 23rd Floor through the use of smaller touchdown workstations and shared offices and workstations.” Please provide the standard square footage per employee housed on the 22nd and 23rd floors in comparison with the standard square footage per employee housed on the other floors of the Gas Company Tower, excluding the executive floors.

RESPONSE 12.4.3:

For purposes of preparing this response, SoCalGas and SDG&E interpret “employee” to refer to “available workspace,” because the number of employees/contractors fluctuates.

<u>Floor</u>	<u>Average Square Footage per available workspace</u>
Floors 22 and 23*	64 sq. ft.
Other GCT Floors**	69 sq. ft.

* Does not reflect actual occupancy of shared offices or two person cubicle spaces shared by three individuals, which would lower the average square footage per available workspace to 60 sq. ft.

** Excludes the 2nd Floor (Cafeteria) and 21st Floor (Executive Floor)

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QUESTION 12.4.4:

With respect to Table 12: Please provide a detailed description of the scope validation activities that were conducted for each project that was descopeed.

RESPONSE 12.4.4:

The activities for scope validation in Stage 1 include, but aren't limited to: review of Feature Study Map or equivalent data, such as HPPD data, document change between initial filing and current data, identify Criteria mileage, validate HCA and class location, and research pipe segment test history.

1. Supply Line 35-20-A: Pipeline Database was updated to reflect test record information for this segment.
2. Supply Line 38-523: Pipeline attribute data (wall thickness and/or grade) was updated based on review and resulted in a determination that the pipeline is operating below 20% SMYS.
3. Supply Line 41-6045: Pipeline attribute data (wall thickness and/or grade) was updated based on review and resulted in a determination that the pipeline is operating below 20% SMYS.
4. Supply Line 41-80: Class location was updated, which recategorized Supply Line 41-80 as a Phase 2 segment. In addition, the pressure on this line may be reduced to 250 psig (below 20% SMYS), when abandonment of Supply Line 41-6000-2 is completed.

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QUESTION 12.4.5:

With respect to Table 13: Please answer questions for each individual project listed.

- 12.4.5.1. Please explain the basis for the proposed O&M cost adjustment identifying the major cost adjustment items that rolled up to the figure shown in the table.
- 12.4.5.2. Please explain the basis for the proposed capital cost adjustment identifying the major cost adjustment items that rolled up to the figure shown in the table

RESPONSE 12.4.5:

- 12.4.5.1. As stated in Direct Testimony (Phillips) at page19, the primary reasons for cost adjustments are to record additional costs (e.g., contractor invoices, accrual reversals, and to update Company labor hour/journal entry). **The attached supporting documents include Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024.** A table identifying the major cost adjustment items is provided in the attachment folder.
- 12.4.5.2. See the response to TURN-SGC Q.12.4.5.1.

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QUESTION 12.5:

These questions are directed at Chapter 5 of the Applicants testimony.

- 12.5.1. With respect to Footnote 5 on page 6: “The construction contract negotiations were initially held with the assigned Performance Partner. If the bid from the first performance partner was deemed unacceptable, SoCalGas and SDG&E negotiated with another Performance Partner to reach an acceptable agreement.”**
- 12.5.1.1. How many times did the PMO reject a Performance Partner bid and negotiated with a second Performance Partner?
- 12.5.1.2. Please describe each situation where the Performance Partner bid was deemed unacceptable identifying which valve projects were involved in the bid.
- 12.5.1.3. How did the PMO determine that a Performance Partner bid was unacceptable?

RESPONSE 12.5.1:

- 12.5.1.1. SoCalGas/SDG&E construe the scope of this question as limited to the projects included in this application. This occurred once while executing the projects presented in this Application.
- 12.5.1.2. **The following response includes Confidential and Protected Information Pursuant to PUC Section 583, GO 66-C, and D.16-08-024.** In early November 2014, [REDACTED] and SoCalGas/SDG&E exchanged cost estimates for the San Gabriel Valley (SGV) – Fern and Walnut project. [REDACTED] presented an initial estimate of [REDACTED] and SoCalGas/SDG&E presented an initial estimate of [REDACTED]. SoCalGas/SDG&E agreed to recalculate its estimate following [REDACTED] anticipated means and methods for construction of the project. Both [REDACTED] and SoCalGas/SDG&E exchanged revised estimates prepared assuming comparable construction means and methods. [REDACTED] revised estimate for Round 2 was [REDACTED] and SoCalGas/SDG&E’s revised estimate was [REDACTED] for a total variance of about 12%.

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█ declined to change its estimate to resolve this variance. Because █ estimate was well above SoCalGas/SDG&E's initial Stage 3 estimate, SoCalGas decided to seek an alternate estimate from another Performance Partner.

SoCalGas/SDG&E requested an estimate from █ Both █ and SoCalGas/SDG&E developed project estimates for a Round 1 Target Price Estimate. █ Round 1 estimate was █ and the SoCalGas/SDG&E estimate was █, for a total variance of about 12%. To resolve this variance, SoCalGas/SDG&E and █ prepared second round estimates. The █ Round 2 estimate was \$983,059 and the SoCalGas/SDG&E estimate was █ for a total variance of less than 1%.

12.5.1.3. See the response to Question 12.5.1.3.

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QUESTION 12.5.2:

With respect to the statement on page 8: “SoCalGas and SDG&E solicited competitive bids on rates from seven qualified electrical contractors for four geographic regions, and selected three of these contractors to be the “Alliance” contractors for electrical construction activities on valve projects. Alliance Contractors are assigned projects based on workload and geographic considerations.”

12.5.2.1. Please identify for each valve project which Alliance contractor(s) (if any) completed the work.

12.5.2.2. Please identify for each valve project which Performance Partner(s) (if any) completed the work.

12.5.2.3. Please identify for each valve project what elements of the project (if any) were competitively bid.

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RESPONSES 12.5.2:

12.5.2.1-2. The following response includes Confidential and Protected Information Pursuant to PUC Section 583, GO 66-C, and D.16-08-024.

Valve Project	Alliance Contractor	Performance Partner	Bundled Bid Contract
Arrow & Haven			x
Bain St			x
Brea	[REDACTED]	None	
Chino			x
Haskell			x
Moreno - Large			x
Moreno - Small			x
Pixley	[REDACTED]	[REDACTED]	
Prado			x
Puente	None	None	
Santa Fe Springs			x
SGV Fern & Walnut	[REDACTED]	[REDACTED]	
Victoria	[REDACTED]	[REDACTED]	
Whitewater			x
Palmdale with L-235 and SL 44-654			x

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- 12.5.2.3.** All Mechanical and electrical elements of each valve project, with the exception of the Puente project, were competitively bid.

QUESTION 12.5.3:

- 12.5.3.** With respect to the statement on page 8: “Prior to implementation of the Performance Partner contract, SoCalGas and SDG&E was prepared to start construction on nine bundles and solicited bids from three qualified mechanical and three qualified electrical contractors. SoCalGas and SDG&E conducted bid evaluations that took into consideration, price, schedule, work experience and commercial factors to award the nine bundles to one mechanical and one electrical contractor.”
- 12.5.3.1. For each valve “bundle” that was competitively bid, please provide the bid package that the PMO sent to the contractors.
- 12.5.3.2. For each valve “bundle” that was competitively bid, please provide the bids received from the contractors.
- 12.5.3.3. For each valve “bundle” that was competitively bid, please provide the bids evaluations completed by PMO employees or contractors.
- 12.5.3.4. For each valve “bundle” that was competitively bid, please provide the bid(s) awarded and identify the contractor(s) to whom the bid(s) was awarded.

RESPONSE 12.5.3:

- 12.5.3.1. The attached supporting documents include Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024. A copy of the bid package is provided in the attachment folder.
- 12.5.3.2. The attached supporting documents include Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024. A copy of the bids received are provided in the attachment folder.
- 12.5.3.3. The attached supporting documents include Confidential and Protected Materials

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Pursuant to PUC Section 583, GO 66-C, and D.16-08-024. A copy of the bid evaluations is provided in the attachment folder.

- 12.5.3.4. **The attached supporting documents include Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024.** A copy of the bid award and the name of the contractor awarded the bid is provided in the attachment folder.

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QUESTION 12.6:

These questions are directed at Chapter 6 of the Applicants testimony.

12.6.1. With respect to the statement on page 4-5: “To develop and deploy this advanced infrastructure, SoCalGas in conjunction with its Advanced Meter supplier and system provider engaged in the following work:

- **Design, fabrication, and installation of the base remote methane monitoring stations;**
- **Integration of the remote monitoring stations with SoCalGas’ Advance Metering System, to be able to read and process data from each of the field devices;**
- **Implementation of an early-generation data management and alarm processing host system to read methane sensor data, register and process alarms, and to provide for daily system integrity checks of deployed units. This system is provided as a “managed service” by SoCalGas’ Advance Meter system provider for test purposes.”**

12.6.1.1. Is the Advanced Meter supplier the same company from which SoCalGas purchased its AMI system?

12.6.1.2. If the answer to the previous question is “no,” please identify the Advanced Meter supplier.

12.6.1.3. Why did SoCalGas choose to use this Advance Meter supplier to be the supplier for the methane monitoring stations?

12.6.1.4. Do the methane monitoring stations interface with the AMI systems?

12.6.1.5. If so, where in the data gathering process do the methane monitoring systems interface with the AMI system?

12.6.1.6. Did SoCalGas consider alternatives to a methane monitoring system that interfaces with the AMI system?

12.6.1.7. If the answer to the previous question is “yes,” please provide the comparisons, studies, evaluations, or other documents that demonstrate that SoCalGas

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considered alternatives to a methane monitoring system that interfaces with the AMI system.

- 12.6.1.8. Please provide evaluations of the various alternatives that demonstrates that a methane monitoring system that interfaces with the AMI system is the superior alternative.
- 12.6.1.9. If SoCalGas did not consider alternatives to a methane monitoring system that interfaces with the AMI system, please explain why it did not and why that its failure to consider alternatives should be considered reasonable.

RESPONSE 12.6.1:

- 12.6.1.1. Yes.
- 12.6.1.2. Not applicable.
- 12.6.1.3. The Advanced Meter supplier was selected to develop a communication module to leverage the existing AMI system deployed across the service territory to provide the widest communication coverage and to minimize the costs associated with the deployment of another communication system.
- 12.6.1.4. Yes.
- 12.6.1.5. The communication module in the ten methane monitoring stations deployed by SoCalGas interfaces with the AMI system in a manner similar to the approximately six million AMI gas meters currently installed throughout the service territory. The AMI system data collection units receive data from the stations and forward this data to the AMI head-end system. For this pilot effort, the methane data collected is parsed from the six million gas meter data to a hosted system for data management and analysis.
- 12.6.1.6. Yes. SoCalGas considered alternative communication systems as well as various methane sensing devices. Each option was evaluated for numerous capabilities and functionalities, including but not limited to: constructability, compatibility with existing systems, ease of installation and maintenance, performance, and power requirements.

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- 12.6.1.7. **The attached supporting documents include Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024.** See attachment “Q12.6.1.7 12.6.2.7 Methane Sensing Device Functionality Comparison Matrix.pdf”, Q12.6.1.7 12.6.2.7 Communication Systems Functionality Comparison Matrix.pdf”, and “Q12.6.1.7 12.6.2.7 SoCalGas_SDGE On-Ramp Pilot Executive Summary.pdf.”
- 12.6.1.8. **The attached supporting documents include Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024.** See the documentation provided in response to TURN-SCGC Q.12.6.1.7. The methane monitoring system that interfaces with the AMI system is better suited for the pilot application and future system-wide deployment. It provides the means for SoCalGas to leverage the existing AMI system and network infrastructure that is deployed across most of its service territory, thereby enabling SoCalGas to minimize the capital expenditure that would be associated with the deployment of a separate communication system and network for these remote monitoring stations. Other options for communication systems remain in consideration for future developments to allow versatility and expansion into areas where AMI system coverage may be limited or is not planned.
- 12.6.1.9. Not applicable.

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QUESTION 12.6.2:

With respect to the statement on page 5-6: “At SDG&E, a total of fifteen (15) self-contained, battery-powered remote continuous methane monitoring systems were deployed along SDG&E’s transmission Line 3010 at or near facilities with special evacuation considerations in the event of a pipeline gas release. To develop and deploy this advanced infrastructure, SoCalGas Engineering, working in support of SDG&E, engaged in the following work:

- **Specification, development, purchase and installation of base remote methane monitoring sensors and integrated Advance Meter radios system compatible modules;**
- **Integration of the remote monitoring stations with SDG&E Advance Metering System compatible collector radios, to enable reading and processing data from each of the field devices.**
- **Implementation of an early generation data management and alarm processing host system. This system is provided as a “managed service” by the Advance Meter supplier for test purposes. Additionally, SDG&E and SoCalGas worked with SDG&E’s Advance Meter system supplier to develop an advance meter system-compatible radio module containing an integral methane sensor (OEM) in a single small package, which can be easily pole-mounted on a fence or right of-way pipeline marker posts.”**

12.6.2.1. Is the Advanced Meter supplier the same company from which SDG&E purchased its AMI system?

12.6.2.2. If the answer to the previous question is “no,” please identify the Advanced Meter supplier.

12.6.2.3. Why did SDG&E choose to use this Advance Meter supplier to be the supplier for the methane monitoring stations?

12.6.2.4. Do the methane monitoring stations interface with the AMI systems?

12.6.2.5. If so, where in the data gathering process do the methane monitoring systems interface with the AMI system?

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- 12.6.2.6. Did SDG&E consider alternatives to a methane monitoring system that interfaces with the AMI system?
- 12.6.2.7. If the answer to the previous question is “yes,” please provide the comparisons, studies, evaluations, or other documents that demonstrate that SDG&E considered alternatives to a methane monitoring system that interfaces with the AMI system.
- 12.6.2.8. Please provide evaluations of the various alternatives that demonstrates that a methane monitoring system that interfaces with the AMI system is the superior alternative.
- 12.6.2.9. If SDG&E did not consider alternatives to a methane monitoring system that interfaces with the AMI system, please explain why it did not and why that its failure to consider alternatives should be considered reasonable.

RESPONSE 12.6.2.1:

- 12.6.2.1. Yes.
- 12.6.2.2. Not applicable.
- 12.6.2.3. The Advanced Meter supplier was selected to develop a compatible remote methane sensor station that includes a compatible integrated radio and a minimum six-month internal battery life. The Advanced Meter supplier was selected to develop the integrated radio to leverage the existing AMI system and network deployed across the service territory to provide the widest communication coverage and to minimize the costs associated with the deployment of another communication system.
- 12.6.2.4. Yes.
- 12.6.2.5. The 15 remote methane monitoring stations deployed on this pilot effort are slated to interface with SDG&E’s Advanced Meter radio system similar to the approximate 1.2 million electric meters and 900,000 gas meter communications modules deployed today. The remote methane monitoring stations are to communicate to a nearby AMI system electric meter, which will in turn communicate with an electric meter with cellular communications, and on to the

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AMI system Collection Engine. For this pilot effort, the data generated by the remote methane monitoring station was collected by temporary AMI system collection units that transmit the methane data to a separate AM vendor-hosted system for data management and analysis.

- 12.6.2.6. Yes. SoCalGas/SDG&E considered alternative communication systems, as well various methane sensing devices. Each option was evaluated for numerous capabilities and functionalities, including but not limited to: constructability, compatibility with existing systems, ease of installation and maintenance, performance, and power requirements.
- 12.6.2.7. **The attached supporting documents include Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024.** See attachments “Q12.6.1.7 12.6.2.7 Methane Sensing Device Functionality Comparison Matrix.pdf”, Q12.6.1.7 12.6.2.7 Communication Systems Functionality Comparison Matrix.pdf”, and Q12.6.1.7 12.6.2.7 SoCalGas_SDGE On-Ramp Pilot Executive Summary.pdf.”
- 12.6.2.8. See the documentation provided in response to Q.12.6.2.7. SoCalGas/SDG&E determined the methane monitoring system that interfaces with the AMI system is better suited for the pilot application and future system-wide deployment. It provides the means for SDG&E to leverage the existing AMI system and infrastructure that is deployed across most of its service territory, enabling SDG&E to minimize the capital expenditure that would be associated with the deployment of a separate communication system and network for these remote monitoring stations. Other options for communication systems remain in consideration for future developments to allow versatility and expansion into areas where AMI system coverage may be limited or is not planned.
- 12.6.2.9. Not applicable.

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QUESTION 12.6.3:

With respect to the statement on pages 6-7: “This work has required significant developmental work to be completed by both SoCalGas, SDG&E, and their respective Advanced Meter radios system suppliers to:

- Develop remote Advanced Meter modules either containing integrally coupled methane sensors or directly able to couple with methane sensors;
- Develop data interfaces and software systems to provide for reading of the methane sensors through the module/AM radios; and
- Develop software to present and manage the information after it is transferred from the field methane sensors via the Utilities’ Advanced meter radio systems.

This developmental work and related costs are included for cost recovery. The early developmental work has set the groundwork for execution of additional safety enhancement technology installations. The expenditures have and will continue to further establish proof-of concept in employing these Advanced Metering systems to remotely monitor and assess in near real time, leakage on the pipeline systems, and to move from concept-proof to full enterprise production. The general pilot work will also enable SoCalGas and SDG&E to leverage future advances in commercialized methane sensors, as this technology continues to see major progress in sensing accuracy, reliability, and cost.”

- 12.6.3.1. How are SoCalGas and SDG&E evaluating the developmental tracking work?
- 12.6.3.2. Please provide the evaluation criteria that are being used to determine if the tracking work is performing at expected levels.
- 12.6.3.3. Are SoCalGas and SDG&E comparing the performance of the remote sensing equipment and systems obtained from the two separate development projects?
- 12.6.3.4. If the answer to the previous question is “no,” please explain in detail why SoCalGas and SDG&E comparing the performance of the remote sensing equipment and systems and why their failure to make such a comparison should be considered reasonable.

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RESPONSE 12.6.3.1:

- 12.6.3.1. SoCalGas and SDG&E continue to work closely with various suppliers of both integrated solutions and modular methane station designs. Methane sensing equipment continues to be evaluated independently of the communication modules with specifications for development of standard communication interfaces between sensors and communications modules.
- 12.6.3.2. SoCalGas and SDG&E are using the following general evaluation criteria to determine if the tracking work is performing at expected levels:

Methane Sensor

Sensor Specifications

Measurement Range: 0-100% LEL (Lower Explosive Limit)
Accuracy: +/- 3% Full Scale (LEL)
Minimum Detection Limit: 2% LEL
Calibration Interval: 6 Months
Sensor Life: 3 to 5 Years

Electrical Specifications

Electrical Classification: Class 1, Division 2 or better
Power Input: 10-30 Volts DC
Data Output: RS232/RS485 Modbus
Analog Output: 4-20 mA
Battery Life: Integrated Battery 6 Months or more

Communications Module

Electrical Specifications

Electrical Classification: Class 1, Division 2 or better
Power Input: 10-30 Volts DC
Data Input: RS232/RS485 Modbus
Analog Input: 4-20 mA
Battery: Internal/External
Antenna: Integrated/External

Communications System

System Specifications

Data Reporting Interval: 1 Hour
Alarm Reporting: 2-5 Minutes

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(A.16-09-005)**

(DATA REQUEST TURN-SCGC-12)

Date Requested: July 3, 2017

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Communications Capability: 1 or 2-way Half Duplex/Full Duplex
Encryption: AES 128/256

- 12.6.3.3. **The attached supporting documents include Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024.** Yes. See attachments “Q12.6.3.3 SoCalGas Methane Sensor Pilot Executive Summary.pdf” and “Q12.6.3.3 SDG&E Methane Sensor Pilot Executive Summary.pdf.”
- 12.6.3.4. Not applicable.

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(A.16-09-005)**

(DATA REQUEST TURN-SCGC-12)

Date Requested: July 3, 2017

Date Responded: September 5, 2017

QUESTION 12.7:

These questions are directed at Chapter 7 of the Applicants testimony.

- 12.7.1. Please provide an organization chart for SoCalGas and for SDG&E. Each organization chart should delineate both the PSEP organizational units such as Program Management Office, Construction, Engineering, etc., and non-PSEP organizational units that provide support to PSEP.

RESPONSE 12.7.1:

Refer to the organizational charts for SoCalGas and SDG&E as of March, 2016, which delineate PSEP organizational units. In addition, for the non-PSEP organizational units that provide support to PSEP, note that PSEP is supported by several SoCalGas/SDG&E organizational units. The support level needed in any timeframe may vary depending on the nature and stage of projects. Therefore, non-PSEP organizational unit data is shown on a Full-Time Equivalent (FTE) basis.

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(A.16-09-005)**

(DATA REQUEST TURN-SCGC-12)

Date Requested: July 3, 2017

Date Responded: September 5, 2017

QUESTION 12.7.2:

With respect to the statement on pages 1-2: “Because they were not attributable to individual projects, these support costs are tracked and charged to PSEP GMA IOs based on the GMA activity undertaken: (1) Program Management Office (PMO); (2) Construction; (3) Engineering; (4) Environmental; (5) Supply Management; (6) Gas Control; (7) Non-PMO General Administration; (8) Communication and Outreach and (9) Training.”

- 12.7.2.1. For each of the nine activities listed, please state whether the positions are staffed with employees, contractors, or a mixture of employees and contractors.
- 12.7.2.2. For each of the nine activities listed, please state the number of employees and/or contractors that were associated with each activity area and whether their time base was full time or part time.
- 12.7.2.3. For each of the nine activities listed, please state whether the employees and/or contractors that complete the associated tasks are or are not dedicated exclusively to PSEP activities or activities directly in support of PSEP activities.
- 12.7.2.4. For each of the nine activities listed, to the extent that any employee and/or contractor is not dedicated exclusively to PSEP activities or activities directly in support of PSEP activities, please provide the fraction of the employee/contractor’s time base that is dedicated to PSEP activities or activities directly in support of PSEP activities.

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RESPONSE 12.7.2.1:

12.7.2.1.

Activity	Position Type
Program Management Office (PMO)	Employees/Contractors
Construction	Employees/Contractors
Engineering	Employees/Contractors
Environmental	Employees
Supply Management	Employees/Contractors
Gas Control	Employees
Non-PMO General Administration	Employees/Contractors
Communication and Outreach	Employees
Training	Employees

12.7.2.2: The table below shows the number of Full-Time Equivalent (FTE) employees and contractors that charge the nine GMA activities. Note that the employees charge GMA when it is not appropriate to charge their time to a specific PSEP project. The following is Employee and Contractor data for the month of March 2016.

<u>Activity</u>	<u>Employee FTEs</u>	<u>Contractor FTEs</u>	<u>Full-Time/ Part-Time</u>
Program Management Office (PMO)	20	13	Full-Time, Part-Time
Construction	25	13	Full-Time
Engineering	27	18	Full-Time
Environmental	3	0	Full-Time
Supply Management	14	23	Full-Time
Gas Control	2	0	Full-Time
Non-PMO General Administration	13	21	Full-Time
Communication and Outreach	3	0	Full-Time
Training	3	0	Part-Time

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12.7.2.3.

<u>Activity</u>	<u>Dedicated Exclusively to PSEP?</u>
Program Management Office (PMO)	No
Construction	Yes
Engineering	Yes
Environmental	Yes
Supply Management	Yes
Gas Control	Yes
Non-PMO General Administration	Yes
Communication and Outreach	No
Training	No

12.7.2.4.

For the activities listed below that are not dedicated exclusively to PSEP, the fraction of time spent in support of PSEP varies depending on the need for the support activity. For example, multiple PSEP training classes may be scheduled in a given month requiring dedicated training resources, but other months may have fewer classes scheduled, thus requiring less training resources. The following is Employee and Contractor data for the month of March 2016.

Activity	Employee FTEs	Employee Headcount Charging GMA	Employee/Headcount Percentage	Contractor FTEs	Contractor Headcount Charging GMA	Contractor/Headcount Percentage
PMO	20	53	38%	13	13	100%
Communications and Outreach	3	13	23%	0	N/A	N/A
Training	3	25	25%	0	N/A	N/A

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QUESTION 12.7.3:

With respect to the statement on page 7: “For example, bulk ordering was an early effort to develop material requirements at a program level versus ordering project-by-project. A team was formed to review upcoming projects and develop material needs for long lead items such as pipe, fittings, and valves. This effort led to the successful procurement of bulk material with favorable prices compared to individual purchase.”

- 12.7.3.1. Please provide examples of costs savings generated by bulk purchases for projects.
- 12.7.3.2. Was the cost savings sufficient to offset the increased cost of warehousing?
- 12.7.3.3. Please provide studies, evaluations or cost effectiveness assessments that confirm this.
- 12.7.3.4. Have the changes employed by PMO improved the timing for obtaining materials for projects in the field?
- 12.7.3.5. Please provide evidence that this is the case.

RESPONSE 12.7.3.1:

- 12.7.3.1. **The following response includes Confidential and Protected Information Pursuant to PUC Section 583, GO 66-C, and D.16-08-024.**
 - Purchase Order 4400102102 (Bulk Pipe Purchase; [REDACTED] Purchase Order value of \$17,275,854; Estimated cost avoidance of \$353,343)
 - Purchase Order 4400100958 (Bulk Valve Purchase; [REDACTED] Purchase Order value of \$826,448; Estimated cost avoidance of \$31,944)
 - Purchase Order 4400103822 (Bulk Fitting Purchase; [REDACTED]; Purchase Order value of \$480,094; Estimated cost avoidance of \$65,327)
- 12.7.3.2. See the response to TURN-SCGC Q12.7.3.5.
- 12.7.3.3. Not Applicable.

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12.7.3.4. Yes.

12.7.3.5. SoCalGas/SDG&E elected to order material in bulk and store it at the material yards, to deliver materials to jobsites faster and reduce jobsite delays and the associated construction change orders.

As stated in Direct Testimony (Phillips) at pages 22-23, materials for PSEP projects are acquired in a manner designed to minimize costs and maximize timely delivery. While PSEP materials and equipment are procured in accordance with Company standards and practices, each specific project may have different execution strategies to achieve the objective to minimize costs for customers. Generally, materials and equipment are purchased by an agent for SoCalGas or SDG&E, with payment made through existing SoCalGas or SDG&E systems. Further, to take advantage of previous efforts to vet and engage vendors, SoCalGas and SDG&E's Approved Manufacturers List (AML) is utilized.

Where possible, SoCalGas/SDG&E acquires PSEP materials by aggregating material needs from multiple projects, thereby making periodic buys for larger quantities of materials. These coordination efforts better enable SoCalGas and SDG&E to obtain favorable pricing. Project-specific purchases are undertaken to account for specific design parameters. Generally, for project-specific purchases, multiple purchases are executed at each major design phase to address time constraints and reduce costs. For example, long lead time items are identified early for sourcing. As appropriate, items may be transferred between projects to reduce last-minute buys and shipping costs. Regardless of the type of order, material bids are designed to obtain multiple quotes to identify best-pricing options, promote collaboration with select firms for efficiency of process, and encourage the development of local resources and sourcing.

Due to the large volume of projects being executed concurrently, implementation of the PSEP requires a high amount of warehouse space to store materials. Two separate material yards were established in Fontana and Bakersfield. These locations provide centralized hubs to serve as receipt points for material shipments and staging areas for project materials. The Supply Management team accumulates individual project material requirements and, where possible, executes bulk purchases through a competitive solicitation process. This provides better pricing through economies of scale and avoids multiple purchases with duplicative transactional steps. Once received, the bulk material is staged by project for delivery to jobsites.

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QUESTION 12.7.4:

With respect to the statement on page 8: “Project Controls and Technology provides project control oversight and reporting, working with the execution teams to develop project schedules, update project costs and maintain the master project schedule.” and “The QA/QC team implements and manages the PSEP quality plan. The team facilitates SoCalGas and SDG&E’s understanding and adherence to PSEP procedures and processes across the program. The QA/QC group provides a check of the processes and documentation at key points in the project work process, performs periodic inspections, and reviews to verify compliance with the PSEP procedures and quality plan.”

- 12.7.4.1. Please provide all formal documents providing the Project Controls and Technology group’s project control oversight and reporting for the following projects: Line 1005 Replacement, Line 2001 West A (Sec 1, 2, 3) Hydrotest, and Line 45-120 Replacement.
- 12.7.4.2. Please provide the QA/QC group’s check of the processes and documentation at key points in the project work process for the following projects: Line 1005 Replacement, Line 2001 West A (Sec 1, 2, 3) Hydrotest, and Line 45-120 Replacement.

RESPONSE 12.7.4:

- 12.7.4.1. There is no “Line 2001 West A (Sec 1, 2, 3) Hydrotest” project. SoCalGas and SDG&E interpret this reference to mean the Line 2000 West Sec (1, 2, 3) Hydrotest project. **The attached supporting documents include Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024.** A copy of the reports developed by or using data provided by Project Controls for oversight of projects are provided in response to Question 12.2.1.1 (e.g., the 30-Day Lookahead, Monthly P6 Master Schedule, Cost Report, Project Status Report, PM Bi-Weekly Planned vs Forecast, Project Schedules, and the Project Cashflow Report). In addition, attached are Project Schedules and Cashflow Reports from throughout the project lifecycle for the requested projects: Line 1005 Replacement, Line 2000 West Sec (1, 2, 3) Hydrotest, and Line 45-120 Section 1 Replacement.
- 12.7.4.2. **The attached supporting documents include Confidential and Protected Materials**

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Pursuant to PUC Section 583, GO 66-C, and D.16-08-024. See the PSEP Quality Plan and Quality Reports provided in the attachment folder.

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QUESTION 12.7.5:

With respect to the statement: “The Training GMA includes PSEP training-related activities such as costs incurred to develop and provide onboarding training, expenditures for PSEP trainers, Instructional Design, and training of field personnel supporting PSEP specific projects.”

- 12.7.5.1. Are the Applicants providing training to contractors?
- 12.7.5.2. If the answer to the previous question is “yes,” why do the Applicants feel it is necessary to train contractors when presumably they are hired because of their expertise?

RESPONSE 12.7.5.1:

- 12.7.5.1. Yes.
- 12.7.5.2. As with SoCalGas/SDG&E employees, it is necessary to train contractors to confirm an understanding of and maintain compliance with SoCalGas and SDG&E procedures (i.e., Gas Standards) and PSEP procedures (i.e., work process map).

As stated in Direct Testimony (Phillips) at page 9, SoCalGas/SDG&E’s training goal is to achieve consistency and compliance. The vendors attend training to enhance their ability to complete assigned tasks following SoCalGas/SDG&E processes and procedures. Development of this knowledge base among the many vendors that PSEP utilizes promotes efficiency and quality. The training supports compliance with applicable laws, regulations, and established procedures and policies.

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(DATA REQUEST TURN-SCGC-12)

Date Requested: July 3, 2017

Date Responded: September 5, 2017

QUESTION 12.7.6:

With respect to the statement on page 10: “In addition to the PSEP GMA support costs, direct project support personnel allocate their time to the specific projects. These individuals are part of the “project team” and support the overall efforts to execute the project.” There are examples of project support activities listed on pages 10-11.

- 12.7.6.1. For each of the examples of project support personnel presented on pages 10-11, please identify the organizational unit from which each direct project support employee or contractor is assigned to a specific PSEP project.
- 12.7.6.2. For each of the employees or contractors identified in the response to the previous question, is their first or base organizational unit from which they are assigned to the project dedicated to PSEP activities or activities directly in support of PSEP activities?
- 12.7.6.3. If the answer to the previous question is “no,” for any employee or contractor, please identify their first or base organizational unit and the percentage of their time base that is dedicated to PSEP activities or activities directly in support of PSEP activities.
- 12.7.6.4. Does a team formed for one project get assigned as a team to another project or would the team ultimately be disbanded with the team members separately assigned to other projects?
- 12.7.6.5. Is the bulleted list of examples of project support activities a good complete representation of the key elements that are present on a project team?
- 12.7.6.6. If the answer to the previous question is “no,” please identify the missing elements from the list.

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(DATA REQUEST TURN-SCGC-12)

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RESPONSE 12.7.6.1:

12.7.6.1.

<u>Examples from Chapter VII, Pages 10-11</u>	<u>Base Organizational</u>
Project Managers	PSEP
Project Engineers	PSEP
Designers	PSEP
Project (Control) Schedulers	Major Projects
Cost Engineers	Major Projects
Business Analysts	PSEP
Permitting and Land Services	PSEP
Environmental	Environmental Services
Material Coordinators	PSEP
Construction	PSEP
Community Outreach	External Affairs
Document Control	PSEP

12.7.6.2.

<u>Example from Chapter VII, Pages 10-11</u>	<u>Employee Primarily in Support of PSEP?</u>	<u>Base Organization Primarily in Support of PSEP?</u>
Project Managers	Yes	PSEP
Project Engineers	Yes	PSEP
Designers	Yes	PSEP
Project (Control) Schedulers	Yes	No
Cost Engineers	Yes	No
Business Analysts	Yes	PSEP
Permitting and Land Services	Yes	PSEP
Environmental	Yes	No
Material Coordinators	Yes	PSEP
Construction	Yes	PSEP
Community Outreach	Yes	No
Document Control	Yes	PSEP

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12.7.6.3.

<u>Example from Chapter VII, Pages 10-11</u>	<u>Base Organizational Unit</u>	<u>Employee Percentage in Support of PSEP</u>
Project (Control) Schedulers	Major Projects	100%
Cost Engineers	Major Projects	100%
Environmental	Environmental Services	100%
Community Outreach	External Affairs	100%

12.7.6.4.

Project teams work multiple PSEP projects simultaneously. At completion of a given project, these teams are already actively engaged in other PSEP projects. PSEP Project Execution is organized by portfolio (Transmission, Northwest Distribution, Southeast Distribution, SDG&E, Valves) and typically the Execution team members remain the same for their respective portfolios. There may be slight differences in the makeup of the Construction component of project teams as well as other support (e.g., Field Operations, Environmental, Community Outreach) depending on the geographic location of the project.

12.7.6.5.

Yes

12.7.6.6.

Not applicable.

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(DATA REQUEST TURN-SCGC-12)

Date Requested: July 3, 2017

Date Responded: September 5, 2017

QUESTION 12.7.7:

With respect to the statement on page 12: “As an example, based on analysis performed in March of 2016, these initial efforts have enabled an estimated savings of approximately \$27 million in combined (incremental) “overheads” versus the normal utility (incremental and non-incremental) overheads, thus reducing the overall costs for SoCalGas PSEP projects.”

- 12.7.7.1. Please provide a copy of the analysis performed in March 2016 complete with all of its workpapers and any spreadsheets intact with formulas and data.
- 12.7.7.2. Please provide an explanation of the approach that was taken in the March 2016 analysis and why the Applicants believe that it is a valid means to measure the impact of PSEP GMA on costs.

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RESPONSE 12.7.7.1:

- 12.7.7.1. The attached supporting documents include Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024. See attached spreadsheets for formulas and calculations.
- 12.7.7.2. Below is the formula in estimating the potential PSEP GMA savings.

Estimated PSEP GMA potential savings = (Estimated non-incremental overheads) – (estimated SoCalGas loaded GMA)

$$\$27M = \$48M - \$21M$$

To calculate the estimated non-incremental overheads for PSEP projects, Accounting manually calculated the application of the historical overhead planning rate to the loading base, by month, for each grouping of internal orders (Transmission/Distribution – Capital and Transmission/Distribution – O&M). The loading base for application of overheads is identified in the Costing Sheet tab; the historical planning rates are identified in the Planning Rates tab. The cost element extraction was based on PSEP project internal order numbers. Based on this method, an estimated non-incremental overhead of \$48M was derived.

For the estimated SoCalGas-loaded GMA costs, GMA-associated direct costs by PSEP project internal order numbers was extracted from SAP. An estimated loader rate was applied to the GMA direct costs to calculate SoCalGas loaded GMA costs of \$21M. The net difference is the estimated PSEP GMA potential savings.

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(DATA REQUEST TURN-SCGC-12)

Date Requested: July 3, 2017

Date Responded: September 5, 2017

QUESTION 12.8:

These questions are directed at Chapter 8 of the Applicants testimony.

- 12.8.1. **With respect to the statement on page 2: “PSEP GMA costs are tracked via internal order numbers. As these costs are incurred, they are direct charged to these distinct internal orders numbers. The pro-rated costs are then allocated to PSEP projects. The percentage basis allocated to the project varies according to the overall portfolio of PSEP projects, but is determined by total PSEP GMA costs divided by total PSEP projects costs to get the GMA percentage.**
- 12.8.1.1. How frequently is the GMA percentage calculated?
- 12.8.1.2. Is the GMA percentage calculated based on recorded costs or projected costs?
- 12.8.1.3. If the GMA percentage is based on recorded costs, please state the period upon which the GMA calculation(s) for the period subject to the application was based upon.

RESPONSE 12.8.1:

- 12.8.1.1. Since March 2017, on a monthly-basis.
- 12.8.1.2. Projected costs.
- 12.8.1.3. Not applicable.

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(DATA REQUEST TURN-SCGC-12)

Date Requested: July 3, 2017

Date Responded: September 5, 2017

QUESTION 12.8.2:

With respect to the statement on page 2: “The GMA costs are tracked as nine supporting functions for PSEP: (1) Program Management Office (PMO); (2) Construction; (3) Engineering; (4) Environmental; (5) Supply Management; (6) Gas Control; (7) Non-PMO General Administration; (8) Communication and Outreach and (9) Training.”

- 12.8.2.1. For each of the nine activities listed, please state whether the positions are staffed with employees, contractors, or a mixture of employees and contractors.
- 12.8.2.2. For each of the nine activities listed, please state the number of employees and/or contractors that were associated with each activity area and whether their time base was full time or part time.
- 12.8.2.3. For each of the nine activities listed, please state whether the employees and/or contractors that complete the associated tasks are or are not dedicated exclusively to PSEP activities or activities directly in support of PSEP activities.
- 12.8.2.4. For each of the nine activities listed, to the extent that any employee and/or contractor is not dedicated exclusively to PSEP activities or activities directly in support of PSEP activities, please provide the fraction of the employee/contractor’s time base that is dedicated to PSEP activities or activities directly in support of PSEP activities.

RESPONSE 12.8.2:

- 12.8.2.1. See response to TURN-SCGC Q12.7.2.1.
- 12.8.2.2. See response to TURN-SCGC Q12.7.2.2.
- 12.8.2.3. See response to TURN-SCGC Q12.7.2.3.
- 12.8.2.4. See response to TURN-SCGC Q12.7.2.4.

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THE SAFETY ENHANCEMENT EXPENSE BALANCING ACCOUNTS, AND
THE SAFETY ENHANCEMENT CAPITAL COST BALANCING ACCOUNTS
(A.16-09-005)**

(DATA REQUEST TURN-SCGC-12)

Date Requested: July 3, 2017

Date Responded: September 5, 2017

QUESTION 12.8.3:

With respect to the statement on page 5: “The PSEP GMA IO numbers are different from project-specific IO numbers. Project costs have their own set of unique IO numbers and are tracked separately. Dedicated employees supporting the PSEP GMA functions charge their labor and non-labor expenses to the PSEP GMA IO numbers according to the support activities. For contractors supporting GMA, the costs are direct billed via invoices to SoCalGas and SDG&E. The invoices are received by Accounts Payable, reviewed and assigned by the GMA department heads, processed, and then direct charged to the appropriate PSEP GMA IO numbers.”

- 12.8.3.1. Are all of the employees who charge their labor and non-labor expenses to either the PSEP GMA IO number or to the PSEP project-specific IO numbers entirely dedicated to PSEP activities?
- 12.8.3.2. If the answer to the previous question is “no,” please identify how many employees that charge labor and non-labor expenses to either the PSEP GMA IO number or to the PSEP project-specific IO numbers are split between PSEP and non-PSEP activities.
- 12.8.3.3. For these employees identified in response to the previous question, please identify what portion of their labor and non-labor expenses have been charged to either the PSEP GMA IO number or to the PSEP project-specific IO numbers.
- 12.8.3.4. Please explain how the Applicants accounts for the each portion of the employee time if an employee is split between PSEP and non-PSEP activities.

**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-12)

Date Requested: July 3, 2017

Date Responded: September 5, 2017

RESPONSE 12.8.3:

- 12.8.3.1. No.
- 12.8.3.2. 252 in March 2016.
- 12.8.3.3. Labor = 21.15%
Non-labor = 2.43%
- 12.8.3.4. PSEP has its own unique Internal Order numbers (IOs) for GMA and projects-specific IOs which are distinctly different from non-PSEP activities and IOs. When employees split their time between PSEP and non-PSEP activities, the employees charge their time to the respective IOs, as appropriate.

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

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

I, Hugo Mejia, do declare as follows:

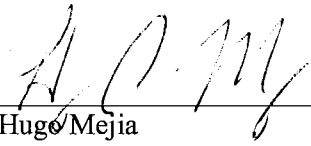
1. I am the Project and Execution Manager in the Major Projects, Regulatory Compliance and Controls for San Diego Gas and Electric Company (“SDG&E”) and Southern California Gas Company (“SoCalGas”) designated by Jimmie Cho, Senior Vice President, Gas Operations and System Integrity for SDG&E and SoCalGas. I have been delegated authority to sign this declaration by Mr. Cho. I have reviewed the Response of SoCalGas and SDG&E to the Twelfth Data Request of The Utility Reform Network (TURN) and Southern California Generation Coalition (SCGC) in the Pipeline Safety and Enhancement Plan (PSEP) 2016 Reasonableness Review A.16-09-005 proceeding, submitted concurrently herewith (Response to TURN-SCGC’s Twelfth 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 Twelfth 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 31st day of August, 2017, at Los Angeles, California.



Hugo Mejia
Project and Execution Manager

ATTACHMENT A

SoCalGas and SDG&E Request Confidential Treatment of the Following Information in Their Response to TURN-SCGC's Twelfth 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 Twelfth 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 Twelfth 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).

SDG&E and SoCalGas designated certain commercially-sensitive information as confidential in their response to TURN-SCGC's Twelfth 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:

- (4) This information includes market sensitive data that, if disclosed, would put SoCalGas at a competitive disadvantage in negotiating future contracts. In addition, portions of this information are derivative of confidential proprietary information of third parties. Disclosure of this information would put both SoCalGas and third-party vendors at a competitive disadvantage and, ultimately, could deter third-party vendors from doing business with SoCalGas in the future.

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>Q12.2.1.1_A01 CONFIDENTIAL Apr Metrics_KPIs_Updates: pp.1 Q12.2.1.1_A01 CONFIDENTIAL Feb Metrics_KPIs_Updates: pp.1 Q12.2.1.1_A01 CONFIDENTIAL Mar Metrics_KPIs_Updates: pp.1 Q12.2.1.1_A02 CONFIDENTIAL ESC final_2015-05: pp.1-3,12,16,18,23-26,27 Q12.2.1.1_A02 CONFIDENTIAL ESC final_2012-11-19: pp.1,16-21 Q12.2.1.1_A02 CONFIDENTIAL ESC final_2012-12-17: pp.1 Q12.2.1.1_A02 CONFIDENTIAL ESC final_2013-04: pp.3-4,17-18 Q12.2.1.1_A02 CONFIDENTIAL ESC final_2013-05: pp.3-4,19 Q12.2.1.1_A02 CONFIDENTIAL ESC final_2013-06: pp.1,3,17 Q12.2.1.1_A02 CONFIDENTIAL ESC final_2013-07: pp.1,3,19-20 Q12.2.1.1_A02 CONFIDENTIAL ESC final_2013-08: pp.1,3,17 Q12.2.1.1_A02 CONFIDENTIAL ESC final_2013-09: pp.1,4 Q12.2.1.1_A02 CONFIDENTIAL ESC final_2013-10: pp.1,4,33-40 Q12.2.1.1_A02 CONFIDENTIAL ESC final_2013-12: pp.1,4,6,22 Q12.2.1.1_A02 CONFIDENTIAL ESC final_2014-01: pp.1,7,19-20 Q12.2.1.1_A02 CONFIDENTIAL ESC final_2014-02: pp.1,6 Q12.2.1.1_A02 CONFIDENTIAL ESC final_2014-04: pp.1,6 Q12.2.1.1_A02 CONFIDENTIAL ESC final_2014-05: pp.1,20,39 Q12.2.1.1_A02 CONFIDENTIAL ESC final_2014-06: pp.1,5-6,9 Q12.2.1.1_A02 CONFIDENTIAL ESC final_2014-07: pp.1,3,5,7,15-16,30 Q12.2.1.1_A02 CONFIDENTIAL ESC final_2014-08: pp.1,12,21-24 Q12.2.1.1_A02 CONFIDENTIAL ESC final_2014-09: pp.1,11,20-23 Q12.2.1.1_A02 CONFIDENTIAL ESC final_2014-10: pp.1,25-30,32 Q12.2.1.1_A02 CONFIDENTIAL ESC final_2014-11: pp.1-3,11,17,21-26 Q12.2.1.1_A02 CONFIDENTIAL ESC final_2014-12: pp.1-3,8,12,17,19,21,23-27 Q12.2.1.1_A02 CONFIDENTIAL ESC final_2015-01: pp.1-3,8,13,18,20,26-29 Q12.2.1.1_A02 CONFIDENTIAL ESC final_2015-02: pp.1-3,12,16,18,23-25,27 Q12.2.1.1_A02 CONFIDENTIAL ESC final_2015-03: pp.1-3,12,16,18,23-26,28 Q12.2.1.1_A02 CONFIDENTIAL ESC final_2015-04: pp.1-3,12,16,18,23,26-30-31 Q12.2.1.1_A02 CONFIDENTIAL ESC final_2015-05: pp.1-3,13-17,20,24,28-33 Q12.2.1.1_A02 CONFIDENTIAL ESC final_2015-06: pp.1-3,11,15,20-24 Q12.2.1.1_A03 CONFIDENTIAL SP 0703 Proc Std Procedure: pp.17-20,26-29,35-36,40-41,47-54 Q12.2.1.1_A04 CONFIDENTIAL PSEP Eng Bulletin 0001-Pipe Strd Sel List: pp.2-3 Q12.2.1.1_A04 CONFIDENTIAL PSEP Eng Bul 0005-Mtl MSP Sample Desc: pp.2 Q12.2.1.1_A04 CONFIDENTIAL PSEP Qual Risk Compl Bul 002-Mtl Doc Guidelines: pp.17,26 Q12.2.1.1_A12 CONFIDENTIAL PSEP Monthly Progress Report_FEB_2015: pp.2</p>

		<p>Q12.2.1.1_A13 CONFIDENTIAL PSEP Feb 2015 Cost Report: pp.1</p> <p>Q12.2.1.1_A13 CONFIDENTIAL PSEP Jan 2015 Cost Report: pp.1-2</p> <p>Q12.2.1.1_A13 CONFIDENTIAL PSEP Mar 2015 Cost Report: pp.1-2</p> <p>Q12.2.1.1_B03 CONFIDENTIAL PM Bi-Weekly Minutes_2015_01_07: pp.2</p> <p>Q12.2.1.1_B03 CONFIDENTIAL PM Bi-Weekly Minutes_2015_02_04: pp.2</p> <p>Q12.2.1.1_B03 CONFIDENTIAL PM Bi-Weekly Minutes_2015_03_18: pp.4</p> <p>Q12.2.1.1_C01 CONFIDENTIAL L38-539 Sched Current Feb 2015: pp.12-13</p> <p>Q12.2.1.1_C01 CONFIDENTIAL L38-539 Sched Current Mar 2015: pp.12-13</p> <p>Q12.2.1.1_C01 CONFIDENTIAL L49-14_Sched Current Feb 2015: pp.3-4</p> <p>Q12.2.1.1_C01 CONFIDENTIAL L49-14_Sched Current Jan 2015: pp.4</p> <p>Q12.2.1.1_C01 CONFIDENTIAL L49-14_Sched Current Mar 2015: pp.3-4</p> <p>Q12.2.1.1_C01 CONFIDENTIAL Schedule L36-9-09 N Sec 2B_Jan 2015: pp.5</p> <p>Q12.2.1.1_C04 CONFIDENTIAL 36-9-09 North Sec2B_191_EC_Bill of Mtls: pp.1</p> <p>Q12.2.1.1_C04 CONFIDENTIAL 38-539_191_EC Bill of Materials1: pp.1-2</p> <p>Q12.2.1.1_C04 CONFIDENTIAL 38-539_191_EC Bill of Materials2: pp.1-3</p> <p>Q12.2.1.1_C04 CONFIDENTIAL 38-539_191_EC Bill of Materials3: pp.1-3</p> <p>Q12.2.1.1_C05 CONFIDENTIAL SAP Report 2: pp.1-10</p> <p>Q12.2.3.2 CONFIDENTIAL 5660040012-49-14-WA1: pp.3-7,9,13-14,23,29,34</p> <p>Q12.2.3.2 CONFIDENTIAL 5660040012-49-14-WA2: pp.1,3-5,7-12,14,16-18</p> <p>Q12.2.3.2 CONFIDENTIAL 5660040043-1005 WA1: pp.3,5,11-15,32</p> <p>Q12.2.3.2 CONFIDENTIAL 5660040043-1011-WA1: pp.3-6,11-14,25-26</p> <p>Q12.2.3.2 CONFIDENTIAL 5660040043-1015N-WA1: pp.3,5-7-8,11-14,24-25,29</p> <p>Q12.2.3.2 CONFIDENTIAL 5660040043-1015N-WA2: pp.1</p> <p>Q12.2.3.2 CONFIDENTIAL 5660040043-1015S-WA1: pp.3,5-8,10,12-13,24-25,29</p> <p>Q12.2.3.2 CONFIDENTIAL 5660040043-2000W-S2-WA1: pp.3,5-6,10,13,15,21,24,30-32,37</p> <p>Q12.2.3.2 CONFIDENTIAL 5660040043-2000W-S3-WA1: pp.3,5,10,13,15,17,29-31,36</p> <p>Q12.2.3.2 CONFIDENTIAL 5660040043-2000W-S3-WA3: pp.2-3</p> <p>Q12.2.3.2 CONFIDENTIAL 5660040043-2000W-WA1: pp.3,5,10,13,15,17,29-31,36</p> <p>Q12.2.3.2 CONFIDENTIAL 5660040043-2000W-WA3: pp.2</p> <p>Q12.2.3.2 CONFIDENTIAL 5660040043-36909N2B-WA1: pp.3,5,8,11-13</p> <p>Q12.2.3.2 CONFIDENTIAL 5660040043-36909N2B-WA3: pp.1</p> <p>Q12.2.3.2 CONFIDENTIAL 5660040043-36-9-09N-6A-WA1: pp.3,5,11-15,32</p> <p>Q12.2.3.2 CONFIDENTIAL 5660040043-406-S1-WA1: pp.1,5-6,8,11-14</p> <p>Q12.2.3.2 CONFIDENTIAL 5660040043-406-S1-WA2: pp.4</p> <p>Q12.2.3.2 CONFIDENTIAL 5660040043-406-S2-S2A-WA1: pp.3,5-7,14,16-19,24,40</p> <p>Q12.2.3.2 CONFIDENTIAL 5660040043-406-S5-WA1: pp.3,5-6,11-12,14,25-26,30</p> <p>Q12.2.3.2 CONFIDENTIAL 5660040043-PDRSTOR-PH-4-5-WA1: pp.3,5,11,13-14</p>
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Vendor information	<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 "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>DATA REQUEST RESPONSE: Q12.2.6, Q12.3.1.3, Q12.5.1.2, Q12.5.2.1-2, Q12.7.3.1 Q12.2.1.1_A01 CONFIDENTIAL Apr Metrics_KPIs_Updates: pp.1,12,18 Q12.2.1.1_A01 CONFIDENTIAL Feb Metrics_KPIs_Updates: pp.1,13,16-17 Q12.2.1.1_A01 CONFIDENTIAL Mar Metrics_KPIs_Updates: pp.1,11,13,17-18 Q12.2.1.1_A02 CONFIDENTIAL ESC final_2015-05: pp.1-3,12,16,18,23-26 Q12.2.1.1_A02 CONFIDENTIAL ESC final_2012-11-19: pp.1-8,13-14,16-21 Q12.2.1.1_A02 CONFIDENTIAL ESC final_2012-12-17: pp.1-4,7-11,13 Q12.2.1.1_A02 CONFIDENTIAL ESC final_2013-04: pp.3,17-18,27,29,38 Q12.2.1.1_A02 CONFIDENTIAL ESC final_2013-05: pp.3,6-7,12,22 Q12.2.1.1_A02 CONFIDENTIAL ESC final_2013-06: pp.1,3,7,24 Q12.2.1.1_A02 CONFIDENTIAL ESC final_2013-07: pp.1,3,7,14,18,19-20 Q12.2.1.1_A02 CONFIDENTIAL ESC final_2013-08: pp.1,3,8,15,17,20,22 Q12.2.1.1_A02 CONFIDENTIAL ESC final_2013-09: pp.1,4,8,13,17 Q12.2.1.1_A02 CONFIDENTIAL ESC final_2013-10: pp.1,4,7,14,17,19,32-40 Q12.2.1.1_A02 CONFIDENTIAL ESC final_2013-12: pp.1,4,6,11,13,16-17,24 Q12.2.1.1_A02 CONFIDENTIAL ESC final_2014-01: pp.1,7,9,14 Q12.2.1.1_A02 CONFIDENTIAL ESC final_2014-02: pp.1,6,10,13 Q12.2.1.1_A02 CONFIDENTIAL ESC final_2014-04: pp.1,6,11 Q12.2.1.1_A02 CONFIDENTIAL ESC final_2014-05: pp.1,11,15,39 Q12.2.1.1_A02 CONFIDENTIAL ESC final_2014-06: pp.1,5-6,9,14 Q12.2.1.1_A02 CONFIDENTIAL ESC final_2014-07: pp.1,3,5,7,12,15-16,1820,30 Q12.2.1.1_A02 CONFIDENTIAL ESC final_2014-08: pp.1,8,12,18,21-24 Q12.2.1.1_A02 CONFIDENTIAL ESC final_2014-09: pp.1,11,16,20-23</p>

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<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>pp.1,6-7,15,24-45</p> <p>Q12.1.1.3 CONFIDENTIAL Mar 2015 Support Organizations Charging PSEP Report: pp.1-11</p> <p>Q12.2.1.1_A01 CONFIDENTIAL Apr Metrics_KPIs_Updates: pp.1</p> <p>Q12.2.1.1_A01 CONFIDENTIAL Feb Metrics_KPIs_Updates: pp.1,16</p> <p>Q12.2.1.1_A01 CONFIDENTIAL Mar Metrics_KPIs_Updates: pp.1</p> <p>Q12.2.1.1_A02 CONFIDENTIAL ESC final_2015-05: pp.1-3,12,16,18-19,23-26</p> <p>Q12.2.1.1_A02 CONFIDENTIAL ESC final_2012-11-19: pp.1,6,16-21</p> <p>Q12.2.1.1_A02 CONFIDENTIAL ESC final_2012-12-17: pp.1-2,6</p> <p>Q12.2.1.1_A02 CONFIDENTIAL ESC final_2013-04: pp.3,5,17-18</p> <p>Q12.2.1.1_A02 CONFIDENTIAL ESC final_2013-05: pp.3</p> <p>Q12.2.1.1_A02 CONFIDENTIAL ESC final_2013-06: pp.1,3,26</p> <p>Q12.2.1.1_A02 CONFIDENTIAL ESC final_2013-07: pp.1,3,19-20</p> <p>Q12.2.1.1_A02 CONFIDENTIAL ESC final_2013-08: pp.1,3,17</p> <p>Q12.2.1.1_A02 CONFIDENTIAL ESC final_2013-09: pp.1,4,14</p> <p>Q12.2.1.1_A02 CONFIDENTIAL ESC final_2013-10: pp.1,4,10,33-40</p> <p>Q12.2.1.1_A02 CONFIDENTIAL ESC final_2013-12: pp.1,4,6,18</p> <p>Q12.2.1.1_A02 CONFIDENTIAL ESC final_2014-01: pp.1,7</p> <p>Q12.2.1.1_A02 CONFIDENTIAL ESC final_2014-02: pp.1,6</p> <p>Q12.2.1.1_A02 CONFIDENTIAL ESC final_2014-04: pp.1,6</p> <p>Q12.2.1.1_A02 CONFIDENTIAL ESC final_2014-05: pp.1,39</p> <p>Q12.2.1.1_A02 CONFIDENTIAL ESC final_2014-06: pp.1,5-6,9</p> <p>Q12.2.1.1_A02 CONFIDENTIAL ESC final_2014-07: pp.1,3,5,7,15-16,30</p> <p>Q12.2.1.1_A02 CONFIDENTIAL ESC final_2014-08: pp.1,12,21-24</p> <p>Q12.2.1.1_A02 CONFIDENTIAL ESC final_2014-09: pp.1,11,20-23</p> <p>Q12.2.1.1_A02 CONFIDENTIAL ESC final_2014-10: pp.1,19-20,25-30,32</p> <p>Q12.2.1.1_A02 CONFIDENTIAL ESC final_2014-11: pp.1-3,11,17,21-26</p> <p>Q12.2.1.1_A02 CONFIDENTIAL ESC final_2014-12: pp.1-3,8,12,17,19,21,23-27</p> <p>Q12.2.1.1_A02 CONFIDENTIAL ESC final_2015-01: pp.1-3,8,13,18,20,26-29,33</p> <p>Q12.2.1.1_A02 CONFIDENTIAL ESC final_2015-02: pp.1-3,12,16,18-19,23-25,27</p> <p>Q12.2.1.1_A02 CONFIDENTIAL ESC final_2015-03: pp.1-3,12,16,18-19,23-26,28</p> <p>Q12.2.1.1_A02 CONFIDENTIAL ESC final_2015-04: pp.1-3,12,16,18,23,26-30</p> <p>Q12.2.1.1_A02 CONFIDENTIAL ESC final_2015-05_updated: pp.1-3,13,17,20,24,28-32</p> <p>Q12.2.1.1_A02 CONFIDENTIAL ESC final_2015-06: pp.1-3,11,15,20-24</p> <p>Q12.2.1.1_A03 CONFIDENTIAL SP 0204 WPM Overview: pp.1,11-13,15-16</p> <p>Q12.2.1.1_A03 CONFIDENTIAL SP 0505 CAD Standards: pp.1</p> <p>Q12.2.1.1_A03 CONFIDENTIAL SP 0507 Basis of Design: pp.1</p> <p>Q12.2.1.1_A03 CONFIDENTIAL SP 0509 Design Verification and Squad Check Plan: pp.1</p>
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<p>Intellectual Property/ Trade Secrets: (e.i. Software, Certificates)</p>	<p>Derivatives of vendor pricing information have been marked as confidential protected information. Publicly disclosing derivatives of labor, equipment, material, historical project cost information could lead to a competitive disadvantage and potential loss</p>	<p>DATA REQUEST RESPONSE: Q12.2.5.1, Q12.2.6 Q12.2.3.1 CONFIDENTIAL Target Price Estimates: pp. 1 Q12.2.3.2 CONFIDENTIAL 6160031569_MSA: pp. 78-83,133-135 Q12.2.3.2 CONFIDENTIAL 6160031569-A1: pp. 3-8 Q12.2.3.2 CONFIDENTIAL 6160031569-A3: pp. 5-12,24-25</p>

	<p>of market share for those vendors and have a negative impact on the interests of customers.</p> <p>Trade Secrets: Gov't Code §§ 6254(k), 6254.7(d), 6255(a); Evid. Code § 1060; Civil Code § 3426 et seq.;</p> <p>Competitive Data: Gov't Code §§ 6254(k), 6254.7(d), 6255(a); Evid. Code § 1060; Civil Code § 3426 et seq.; GO 66-C § 2.2(b).</p>	<p>Q12.2.3.2 CONFIDENTIAL 6160031616: pp. 77-83,199-121 Q12.2.3.2 CONFIDENTIAL 6160031629: pp. 78-84,138-139 Q12.2.3.2 CONFIDENTIAL 6160031629-A2: pp. 5-12,25-26 Q12.2.3.2 CONFIDENTIAL 6160031630: pp. 77-82,122-123 Q12.2.3.2 CONFIDENTIAL 6160031630-A2: pp. 5-10,23-24 Q12.2.3.3 CONFIDENTIAL Performance Partner Bid Evaluation: pp. 1-25 Q12.4.5.1 CONFIDENTIAL Table 13 - Major Cost Adjustments: pp. 1 Q12.5.3.2A CONFIDENTIAL 05_Pricing_Sheet: pp. 1 Q12.5.3.2B CONFIDENTIAL 05_Pricing_Sheet.Completed: pp. 1 Q12.5.3.2C CONFIDENTIAL Final_Proposal: pp. 7 Q12.5.3.2C CONFIDENTIAL Pricing_Sheet: pp. 1 Q12.6.3.3 CONFIDENTIAL SDGE Methane Sensor Pilot Executive Summary: pp. 1 Q12.6.3.3 CONFIDENTIAL SoCalGas Methane Sensor Pilot Exec Summary: pp. 1 Q12.7.7.1a CONFIDENTIAL Overheads: Tabs: BW-Cap_T, BW-O&M_T, BW-Cap_D, BW-O&M_D, OHMatrix, Planning Rates, Costing Sheet Q12.7.7.1b CONFIDENTIAL Overheads: Tabs 1) GMA by KOB1 Mar PTD, 3) GMA Loaded Summary</p>
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