

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

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

(CalPA Data Request-03 Amendment 3)

Date Requested: December 20, 2018

Date Responded: January 9, 2019

Date Amended: January 28, 2019

2nd Amended Response Submitted: February 20, 2019

3rd Amended Response Submitted: March 11, 2019

4th Amended Response Submitted: April 1, 2019

QUESTION 01:

Please find the attached excel worksheet DR03-Q1 in which the Public Advocates Office is requesting the following data:

- Column E: The date of the most recent pressure test prior to PSEP conducted on the respective segment presented in Column B.
- Column F: The duration of the most recent pressure test prior to PSEP conducted on the respective segment presented in Column B.
- Column G: If the date requested in Column E is not available, please provide a brief explanation on why it is not available, and a time estimate on when it can be made available.
- Column H: The engineering start point of the segment presented in Column B in units of feet.
- Column I: The engineering end point of the segment presented in Column B in units of feet.
- Column J: Describe the water availability at the time of the pressure test dated in Column E. Examples include: below freezing, insufficient water resources etc.
- Column K: The percentage of the Maximum Allowable Operating Pressure (MAOP) the segment was tested to for the pressure test dated in Column E. When calculating this percent, divide the pressure the pipe was tested at corresponding to the date in Column E, by the MAOP at the time when Sempra determined the segment qualified for PSEP.

Cells in Columns J and K may be left blank only for segments that do not satisfy any of the following conditions prior to PSEP activities:

1. The most recent pressure test date (Column E) is between January 1, 1956 and June 30, 1961;
2. Duration of the most recent pressure test (Column F) is greater than 1 hour; and
3. The Original % SMYS (Column D) is greater than or equal to 30%.

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RESPONSE 01:

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

The attachment, as amended on April 1, 2019 and noted in red strikethrough, supersedes the versions provided in response to CalPA DR-03 Amendments 2 and 3, dated March 20 and February 20, 2019, respectively. The prior amendments corrected inadvertent errors in the spreadsheet and certain values in column D were revised. This amendment, Amendment 4, dated April 1, 2019, corrects additional inadvertent errors in the spreadsheet and revises certain values in column D. Preparation of the data in the manner requested by Cal PA requires SoCalGas and SDG&E personnel to compile data extracted from different time periods and manually combine the data together. Since the attachment is comprised of data from different time periods, differences will arise between segments as asset updates (additions, retirements, repairs and other changes) are processed and operational changes (i.e., High Consequence Area (HCA), Maximum Allowable Operating Pressure (MAOP), and class location) occur. The compilation was prepared by personnel manually and is not reflective of any current extract out of the pipeline database, but rather is a compilation of the specific data from different periods, as requested by Cal PA.

See the attached spreadsheet for responses to Columns E, F, G, H, I, and K. To respond to this question SoCalGas and SDG&E have added rows to the table and provided detail at the segment level, not at the project level, because the values and determinants CalPA has requested vary along the length of a pipeline project. For example, pipe segments that make up a pipeline project vary in terms of pipe vintage, maximum allowable operating pressure (MAOP), testing dates, start and end points, etc. In addition, the Specified Minimum Yield Strength (SMYS) value listed in Table 1 in the workpapers, represents the highest percentage of SMYS of the project's Category 4 Criteria pipe; therefore, some pipe segments in the project may have a different SMYS. In responding to this question, SoCalGas and SDG&E have noted in red in Column D the Original SMYS value for segments that had a SMYS that differed from the highest percentage of Category 4 Criteria pipe.

SoCalGas and SDG&E have interpreted the question posed for Column J "Describe the water availability at the time of the pressure test dated in Column E. Examples include: below freezing, insufficient water resources etc.," as referring to the industry standards 1955 ASA B31.8 and 841.412 (c) which provide the specific requirements and conditions for hydrostatic testing.

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SoCalGas and SDG&E do not have specific documentation detailing water availability between 1956 and 1961. The response in Column J indicates “yes” if the medium used for pressure testing was water, or “no” if another medium was used for the pressure tests that meet the following conditions:

1. The most recent pressure test date (Column E) is between January 1, 1956 and June 30, 1961;
2. Duration of the most recent pressure test (Column F) is greater than 1 hour; and
3. The Original % SMYS (Column D) is greater than or equal to 30%.