



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

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Application of Southern California Gas Company (U 904 G) and San Diego Gas & Electric Company (U 902 G) to Proceed with Phase 2 of their Pipeline Safety Enhancement Plan and Establish Memorandum Accounts to Record Phase 2 Costs.

Application 15-06-013
(Filed June 17, 2015)

**COMMENTS OF SOUTHERN CALIFORNIA GAS COMPANY (U 904 G)
AND SAN DIEGO GAS & ELECTRIC COMPANY (U 902 G) ON
SAFETY AND ENFORCEMENT DIVISION'S ANALYSIS REPORT IN RESPONSE TO
THE APRIL 5, 2016 ASSIGNED COMMISSIONER'S SCOPING MEMO AND RULING**

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Pursuant to the April 5, 2016 Assigned Commissioner's Scoping Memo and Ruling, Southern California Gas Company (SoCalGas) and San Diego Gas & Electric Company (SDG&E) submit the following comments to the Commission's Safety and Enforcement Division's (SED) "Analysis Report and Evaluation of SoCalGas and SDG&E Proposal to Defer Some Approved Pipeline Safety Enhancement Plan Projects and Transmission Integrity Management Program Project."

SoCalGas and SDG&E would like to first thank SED for performing a thorough analysis and evaluation of the six Pipeline Safety Enhancement Plan (PSEP)¹ projects and one Transmission Integrity Management Plan (TIMP) project rescheduled as a result of the limited availability of the Aliso Canyon storage facility. As discussed below, SoCalGas and SDG&E do not oppose the conclusions reached by SED and have already made progress on many of the projects identified in SoCalGas and SDG&E's April 29, 2016, Response to the April 5, 2016 Assigned Commissioner's Scoping Memo.

¹ As a point of clarification, SoCalGas and SDG&E's PSEP was approved in Commission Decision (D.) 14-06-007. The decision referenced by SED – D.12-04-021 – transferred consideration of the PSEP from Rulemaking (R.) 11-02-019 to Application (A.) 11-11-002 and authorized creation of the SoCalGas and SDG&E Pipeline Safety and Reliability Memorandum Accounts.

I. PROJECTS RESCHEDULED BECAUSE OF THE LIMITED AVAILABILITY OF THE ALISO CANYON STORAGE FACILITY

1. Line 3000 East ILI Reassessment

The first series of inline inspections (ILI) for the Line 3000 reassessment from South Needles Compressor Station to Newberry Compressor Station – approximately 116 miles of Non-HCA – was completed on June 17, 2016 using the Magnetic Flux Leakage (MFL) and Caliper ILI tools. To complement the MFL and Caliper ILI tools and improve the overall detection and sizing of the assessment, SoCalGas' Pipeline Integrity Department has planned a second series of ILI in July that will utilize an Ultrasonic (UT) ILI.

2. Line 404 (Section 9) Hydrotest

The Line 404 (Section 9) Hydrotest project involves hydrotesting approximately 0.41 miles of transmission pipe. The Line 404 (Section 9) Hydrotest entered construction on June 13, 2016. SoCalGas expects to perform the hydrotest and return the line to service in July of 2016.

3. Line 406 (Section 3) Hydrotest

The Line 406 (Section 3) Hydrotest project involves hydrotesting approximately 0.43 miles of transmission pipe. The Line 406 (Section 3) Hydrotest entered construction on June 13, 2016. SoCalGas expects to perform the hydrotest and return the line to service in July of 2016.

4. Line 225 Hydrotest

The Line 225 Hydrotest project involves hydrotesting approximately 3.24 miles of transmission pipe. As of the date of filing these comments, the project is expected to enter construction in March of 2017. SoCalGas and SDG&E do not oppose SED's recommendation to conduct additional monthly instrumented leak surveys until the project has been addressed as part of PSEP.

5. Line 404-406 (Somis Station) Replacement

The Line 404-406 (Somis Station) Replacement project involves replacing approximately 0.05 miles of transmission pipe. As of the date of filing these comments, the project is expected to enter construction in May of 2017. SoCalGas and SDG&E do not oppose SED's recommendation to conduct additional monthly instrumented leak surveys until the project has been addressed as part of PSEP.

6. La Goleta Storage Facility Hydrotest

The La Goleta Storage Facility Hydrotest involves hydrotesting approximately 0.31 miles of piping within the La Goleta Storage Facility. As of the date of filing these comments, the hydrotest is expected to enter construction in August of 2017. SoCalGas and SDG&E do not oppose SED's recommendation to conduct additional monthly instrumented leak surveys until the project has been addressed as part of PSEP.

7. Line 127 Replacement

The Line 127 Replacement project involves replacing approximately 16 feet of pipe within the La Goleta Storage Facility. As of the date of filing these comments, the replacement is expected to enter construction in August of 2017. SoCalGas and SDG&E do not oppose SED's recommendation to conduct additional monthly instrumented leak surveys until the project has been addressed as part of PSEP.

II. CONCLUSION

SoCalGas and SDG&E have begun work on the Line 3000 ILI Reassessment, Line 404 (Section 9) Hydrotest, and Line 406 (Section 3) Hydrotest. For the remaining four projects – Line 225 Hydrotest, Line 404-406 (Somis Station) Replacement, La Goleta Storage Facility Hydrotest, and Line 127 Replacement – SoCalGas and SDG&E do not oppose SED's

