

SAFETY POLICY DIVISION DATA REQUEST SPD-DR 008

SDG&E/SOCALGAS 2021 RAMP REPORTS- A.21-05-011/014

DATE RECEIVED: JULY 20, 2021

DATE RESPONDED: AUGUST 3, 2021

SEMPRA 2021 RAMP Data Request #8 – Control RSE Calculation, Post-Mitigation LoRE

1) In RAMP-C: Risk Quantification Framework and Risk Spend Efficiency, it is explained that the second LoRE for a control will “reflect the estimated risk if the activity is ceased.” (RAMP-C-26) Given this methodology, it would be expected that the “Post-mitigation LoRE” of a control would be higher than the “Pre-mitigation LoRE” for the Risk Event, as removing the control would increase the likelihood of the risk event.

When reviewing the Tier 1 workpapers provided for Data Request #3, most (but not all) of the chapters (listed below) show controls with “Post-mitigation LoRE’s” that are lower than the “Pre-mitigation LoRE”, contrary to our expectations. Please explain this discrepancy.

Question 01:

Control LoRE’s in Question

SoCalGas

- SCG-Risk-1: Incident Related to a High Pressure System
 - All Controls
- SCG-Risk-2: Excavation Damage (Dig-In) on the Gas System
 - C4, C5, C6, C9, C10, C11, C13, C14, C15-T1, C15-T2, C15-T3, C15-T4, C16-T1, C16-T2, C16-T3, C16-T4, C21, C24, C25, C26, C29, C30, C31, C32, C33, C34, C35, C36
- SCG-Risk-3: Incident Related to the Medium Pressure System (Excluding Dig-In)
 - All Controls
- SCG-Risk-4: Incident Related to the Storage System (Excluding Dig-In)
 - All Controls
- SCG-Risk-5: Incident Involving an Employee
 - All Controls
- SCG-Risk-6: Cybersecurity
 - All Controls
- SCG-Risk-7: Incident Involving a Contractor
 - All Controls

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Question 01:-Continued

SDG&E

- SDG&E-Risk-1: Wildfire Involving SDG&E Equipment
 - C3-T3, C6/M1-T2, C7/M2-T1, C7/M2-T2, C8/M3-T2, C11/M6-T1, C12/M7-T1, C12/M7-T2, C16/M11-T1, C16/M11-T2, C17/M12-T1, C18/M13-T1, C18/M13-T2, C21/M14-T1, C29-T1, C29-T2, C32/M15-T1, C33/M16-T1, C33/M16-T2
- SDG&E-Risk-2: Electric Infrastructure Integrity
 - C1, C3, C4-T1, C4-T2, C4-T3, C10-T1, C10-T2, C10-T3, C11, C13, C14, C15, C16, C18, C20-T1, C20-T2, C20-T3, C20-T4, C20-T5, C20-T6, C20-T7, C20-T8, C21, C23, C24, C28, C29
- SDG&E-Risk-3: Incident Related to the High Pressure System (Excluding Dig-In)
 - All Controls
- SDG&E-Risk-6: Cybersecurity
 - All Controls
- SDG&E-Risk-7: Excavation Damage (Dig-In) on the Gas System
 - C1, C2, C4, C5, C6, C7, C8-T1, C8-T2, C8-T3, C9-T1, C9-T2, C9-T3, C10, C11, C12, C14, C15-T1, C15-T2, C15-T3, C15-T4, C16-T1, C16-T2, C16-T3, C16-T4, C19, C20, C21, C28, C30, C32
- SDG&E-Risk-8: Incident Involving an Employee
 - C14, C15
- SDG&E-Risk-9: Incident Related to the Medium Pressure System (Excluding Dig-In)
 - All Controls

SDG&E and SoCalGas Response 01:

SDG&E and SoCalGas agree with the question's premise that the likelihood of a risk event (LoRE) happening would increase if/when one were to cease performing an existing mitigation (i.e., a control) that had been implemented to decrease the likelihood of the risk event happening.

SDG&E and SoCalGas note that ceasing an existing mitigation, i.e., a mitigation likely represented with a Control ID could mean discontinuing a program that involves conducting work on a cyclical basis (e.g., discontinuing re-inspecting assets to identify required maintenance projects), and it could also mean discontinuing yet-to-be performed projects that are part of a multi-year replacement program. For the former, ceasing an existing mitigation would result in a decrease of existing risk reduction benefits while ceasing the latter would result in the loss of to-be-achieved additional risk reduction benefits. For the sake of consistency in the presentation of risk reduction, including sorting the mitigations by RSE values, SDG&E and SoCalGas treat the change in LoRE as a decrease.

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Question 02:

For the tables *APPENDIX C-1 SDG&E RSE RANKING* and *APPENDIX C-1 SOCALGAS RSE RANKING* please provide for each a reordered table that groups measures by risk chapter, and a new column to tally sum totals by chapter.

SDG&E and SoCalGas Response 02:

Please refer to our response (repeated below) to this same question when asked as Question 2 in SPD DR#6:¹

SPD #6 Question 02:

For the tables *APPENDIX C-1 SDG&E RSE RANKING* and *APPENDIX C-1 SOCALGAS RSE RANKING* please provide for each a reordered table that groups measures by risk chapter, and a new column to tally sum totals by chapter.

SDG&E and SoCalGas Response 02:

The companies provided an excel version of Appendix C-1 to SPD in response to SPD data request #6, question 2, to provide the requestor the ability to perform desired reordering and summations in an efficient and timely manner. For convenience, SDG&E and SoCalGas are separately attaching that Excel spreadsheet to this Response.

¹ SDG&E & SOCALGAS Final response to SPD DR6 in A.21-05-011/014 was emailed July 23, 2021.