SUPPLEMENTAL QUESTIONNAIRE

R.15-01-008, 2024 Annual Report

[Southern California Gas Company]

Rulemaking (R.) 15-01-008 to Adopt Rules and Procedures Governing Commission Regulated Natural Gas Pipelines and Facilities to Reduce Natural Gas Leaks Consistent with Senate Bill 1371, Leno.

In partial fulfillment of Rulemaking (R.) 15-01-008 to Adopt Rules and Procedures Governing Commission Regulated Natural Gas Pipelines and Facilities to Reduce Natural Gas Leaks Consistent with Senate Bill 1371, Leno.

In Response to Data Request R15-01-008, 2024 Annual Report

Date: [7/1/24][1]

The following data have been prepared to comply with Senate Bill 1371 (Leno, 2014), Section 2, Article 3, Order Instituting Rulemaking (OIR) 15-01-008, and to provide responses to Data Request R. 15-01-008, 2024 Annual Report.

[1] On June 3, 2024, Southern California Gas Company received from the Commission's Safety Policy Division an extension to file this report by July 1, 2024.

1. **Please provide the following for the period from January 1, 2023 to December 31, 2023:**

    a. **Describe any current projects or studies related to SB 1371.**

Response:

Listed below are major initiatives and studies from SoCalGas's 2022 Compliance Plan. For additional details on projects and studies related to SB 1371, please refer to SoCalGas's 2022 Compliance Plan (R. 15-01-008 – Natural Gas Leakage Abatement Rulemaking | SoCalGas).

- Chapter 1 – Leak Inventory Reduction
- Chapter 2 – Increased Leak Survey
- Chapter 3 – Blowdown Reduction Activities
- Chapter 4 – Large Leak Prioritization
- Chapter 7 – Record Keeping IT Project
- Chapter 8 – Geographic Tracking
- Chapter 9 – Competency Based Training Development
- Chapter 10 – Training Facility Enhancements
- Chapter 12 – Stationary Methane Detectors
- Chapter 13 – Electronic Leak Survey
- Chapter 14 – Aerial Monitoring
- Chapter 15 – Damage Prevention Public Awareness
- Chapter 16 – Pipe Fitting Specifications
- Chapter 17 – Repeat Offenders IT Systems
- Chapter 18 – Accelerated Leak Repair – Transmission
- Chapter 19 – Gas Speciation
- Chapter 20 – Public Leak Maps
- Chapter 22 – Vapor Collection Systems
- Chapter 23 – Distribution Above Ground Leak Survey
- Chapter 24 – Storage Above Ground Leak Survey
- Chapter 25 – Distribution Above Ground Leak Repair
- RD&D Summary #16 – Sub-Surface Migration Model and Plastic Piping Slow Crack Leak-Rate Growth
- RD&D Summary #17-1 – Evaluation of New Technologies for Leak Detection, Localization, and Specialization
- RD&D Summary #17-2 – Aerial Leak detection and Quantification Technologies
- RD&D Summary #18 – Evaluation of Stationary Methane Detectors
- RD&D Summary #20a-1 – Develop Company-Specific Emission Factors
- RD&D Summary #20a-2 – Evaluation of New Technologies for Leak Quantification
- RD&D Summary #20a-3 – Quantification of Through-Valve Leakage on Large Compressor Valves

- RD&D Summary #22 – Investigate Designs, Specifications, Tolerances and Sealing Compounds for Threaded Fittings and Joints
- RD&D Summary #23-1 Evaluation of Technologies to Mitigate Gas Blowdowns & Equipment Vented Emissions
- RD&D Summary #23-2 – Evaluate Component Emission Reductions Opportunities

b. Describe the activity changes between the previous year's reporting and the current year's reporting that affected the change in the total emissions. For example, changes in maintenance activities may have changed blowdown emissions from previous years and resulted in changes to total emissions.

Response:

- **Transmission Pipeline Damages:** The volume of Transmission Pipeline damage emissions decreased by 17,619 Mscf or 70.2% year-over-year because the damages that occurred during calendar year 2023 were significantly smaller than the damage that occurred during calendar year 2022.

- **Transmission Pipeline Blowdowns:** Emissions decreased by 7,034 Mscf or 37.4% year-over-year. The reduction can be attributed to SoCalGas's continued efforts to release less gas during planned Transmission Pipeline blowdown projects.

- **Transmission Compressor Station Compressor Emissions:** Emissions increased year-over-year by 3,667 Mscf or 34.3%. This increase can be attributed to an increase in the number of pressurized operating hours during 2023 relative to 2022.

- **Transmission Compressor Station Blowdowns:** The volume of Transmission Compressor Station blowdowns decreased year-over-year by 1,562 Mscf or 12.5%. The decrease in emissions can be attributed to a decrease in the average blowdown volume between 2022 and 2023.

- **Transmission Compressor Component Fugitive Leaks:** Emissions increased year-over-year by 4,509 Mscf or 108.7%. The increase in emissions year-over-year is driven by a longer estimated average leak duration during Emission Year 2023 relative to 2022. The average estimated leak duration in 2022 was 57 days, and the average duration in 2023 was 124 days. Although leak repair durations can vary based on a variety of factors, the current equation for estimating leak-days is also contributing to the increase in leak-days year-over-year. In the 2023 Emission Year data set, the current equations are estimating more than 365 leak-days for 90 leaks, whereas there aren't any in the Emission Year 2022 data set with more than 365 leak-days.

- **Distribution Main and Service Pipeline Leaks:** Emissions increased year-over-year by 7,414 Mscf or 1.6%. The year-over-year change in emissions is minimal after the updates to the Emission Year 2022 data were completed during August 2024. The updates corrected for leaks that were not reported as repaired in the initial Emission Year 2022 filing and were not reported as continuing or repaired in the

Emission Year 2023 filing. Updates were also completed to move leaks to different Appendix sections based on additional details that were collected since the Emission Year 2022 Report was initially filed. Because the Emission Year 2022 data have undergone these updates, there is not currently a true apples-to-apples comparison between Emission Years 2022 and 2023.

- **Distribution Main and Service Pipeline Damages:** Emissions decreased year-over-year by 11,904 Mscf or 15.7%. This decrease can be attributed to SoCalGas's Damage Prevention Program.

- **Distribution Main and Service Pipeline Blowdowns:** Emissions increased by 230 Mscf or 84.9% during 2023 relative to 2022. The increase can be attributed to larger average blowdowns during 2023 relative to 2022.

- **Distribution M&R Blowdowns:** Emissions increased by 6 Mscf or 5.1% during 2023 relative to 2022. Distribution M&R Blowdowns are a function of inspection activity level and can vary year-to-year.

- **Distribution M&R Component Emissions:** Emissions increased year-over-year by 42 Mscf or 14.3%. The increase in emissions can be attributed to the installation of two new pneumatic devices relative to 2022.

- **Distribution M&R Component Leaks:** Emissions decreased by 396 Mscf or 6.2%, and leak counts decreased by 10.7% year-over-year. The reduction can be attributed to SoCalGas's continued efforts to reduce fugitive leaks at Distribution M&R Stations. For example, SoCalGas has increased the greasing and exercising of valves during inspections to reduce leakage.

- **Customer Meter Leaks:** Emissions increased year-over-year by 70,566 Mscf or 15.2%. The significant year-over-year increase in emissions is driven by the increase in leak counts. MSA inspection/survey activities did not significantly increase year-over-year. Variations in leak counts can occur without particular operational drivers.

- **Customer Meter Damages:** Emissions increased by 1,767 Mscf or 11.0% year-over-year. The increase in emissions can be attributed to upticks in damages caused by Other Outside Forces and Natural Forces.

- **Customer Meter Vented Emissions:** Emissions decreased by 704 Mscf or 49.6% year-over-year. The decrease can be attributed to a decrease in project activity at customer sites.

- **Underground Storage Leaks and Emissions:** Emissions from surface equipment leaks increased by 22.0% year-over-year, and leak counts from surface equipment decreased by 7.3%. Emissions increased year-over-year because the average number of days leaking increased from 5 to 7 days.

- **Underground Storage Compressor Vented Emissions:** Emissions increased year-over-year by 463 Mscf or 11.0%. The increase can be attributed to an increase in pressurized operating hours coupled with a slight increase in the average pressurized operating EF.

- **Underground Storage Blowdowns:** Emissions increased year-over-year by 218 Mscf or 11.2%. The increase can be attributed to an increase in compressor start-ups at Honor Rancho.

- **Underground Storage Component Vented Emissions:** Emissions decreased by 236 Mscf or 10.0% year-over-year because devices were removed during 2022 and 2023.

- **Underground Storage Compressor and Component Fugitive Leaks:** Emissions from surface equipment leaks increased year-over-year by 12,135 Mscf or 131.5%. The increase in emissions is driven by increased leak survey activities at the storage fields during 2023 relative to 2022.

c. Describe advances in abatement efforts, similar to the executive summary in the best practices reporting.

Response:

Title	Emission Source	Mandatory Best Practice(s)	Advances in Abatement Efforts During Emission Year 2023
Blowdown Reduction Activities	Transmission Pipeline	23, 3-7	• The Digital blowdown planning and reporting tool was updated and streamlined to improve the process to review planned blowdown projects.
Aerial Monitoring /Aerial Methane Mapping (AMM)	Distribution Mains and Services; Customer Meter Set Assemblies (MSAs); Compressor Stations	16, 17, 20a	• Compared to 2022, SoCalGas reduced cost by approximately 40% per Mscf eliminated by completing the majority of one-time capital investment projects and benefitting from the 2nd generation sensor that detects more emissions per square mile flown.
Leak Inventory Reduction/ Leak Repair	Distribution Mains and Services	21	• SoCalGas continued to reduce the leak inventory during 2023 by accelerating leak repair beyond 2022 levels.
Pipe Fitting Specifications	Distribution Mains and Services;	22	• Required manufacturers' thread fabrication process and product to

	Customer Meter Set Assemblies (MSAs)		conform to the National Pipe Thread (NPT) tolerances. • Developed and implemented a training program for QC inspection team focusing on updated material standards. • Required manufacturers to demonstrate higher level of thread quality. • Conducted quarterly inventory studies to continue generating metrics and monitor thread quality and NPT thread tolerance from manufacturers. • Coordination and data exchange with R&D group on various thread-related studies to continually improve facilitation of program recommendations.

d. Describe improvements in reporting that are not discernable by reviewing the reporting data. For example, report the installation of a new data management or leak tracking system.

Response:

SoCalGas developed a Distribution Main and Service leak tracking dashboard that helps to identify opportunities to maximize emissions reductions, fix leaks expeditiously, and reduce costs.

e. For smaller utilities, confirm if there were no leaks in distribution mains and services pipelines.

Response:

Not applicable.

f. Identify any additional tables to be included in the Joint Report. Staff will place these tables in an appendix.

Response:

SoCalGas appreciates the opportunity to suggest new tables for the Joint Report but is not recommending the addition of any tables at this time.

2. Does the utility propose a 2015 baseline adjustment or emission factor change? If so, please describe. Can the utility adhere to the following timeline:

a. Solicit Baseline Proposals: February 5 through April 30, 2024.

b. Agency Review Meetings: April 30 through July 31, 2024.

c. Final Decision by August 31, 2024.

Response:

SoCalGas appreciates the opportunity to submit baseline adjustment proposals. SoCalGas submitted its proposal to the CPUC for Appendix 6 on February 21, 2024, and SoCalGas submitted its proposals to the CPUC for Appendices 3, 4, and 7 on April 30, 2024.