

SUPPLEMENTAL QUESTIONNAIRE

R.15-01-008, 2024 Annual Report

[San Diego Gas & Electric]

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, San Diego Gas & Electric 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 the major initiatives and studies from SDG&E's 2022 Compliance Plan. For additional details on projects and studies related to SB 1371, please refer to the 2022 Compliance Plan ([Natural Gas Leakage Abatement Rulemaking | San Diego Gas & Electric \(sdge.com\)](#)).

- Chapter 1 – Increased Leak Survey
- Chapter 2 – Blowdown Reduction Activities
- Chapter 4 – Recordkeeping IT Project
- Chapter 5 – Geographic Tracking
- Chapter 6 – Electronic Leak Survey
- Chapter 7 – Damage Prevention Public Awareness
- Chapter 8 – Pipe Fitting Specifications
- Chapter 9 – Repeat Offenders IT Systems
- Chapter 10 – Gas Speciation
- Chapter 11 – Public Leak Maps
- Chapter 13 – Distribution Above Ground Leak Surveys
- 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 Blowdowns:** The volume of Transmission Pipeline blowdowns decreased year-over-year by 64 Mscf or 35.4%. The decrease can be attributed to a decreased average volume per blowdown during 2023 relative to 2022.
- **Transmission M&R Station Blowdowns:** The volume of Transmission M&R Station blowdowns increased year-over-year by 1 Mscf or 50.0%. The increase in emissions can be attributed to increased inspection activity at the stations during 2023 relative to 2022.
- **Transmission Compressor Station Compressor Emissions:** Emissions decreased year-over-year by 687 Mscf or 33.1%. Emissions decreased because the total pressurized operating hours decreased and the average pressurized operating mode emission factor decreased during 2023 relative to 2022.
- **Transmission Compressor Station Blowdowns:** Emissions increased year-over-year by 918 Mscf or 95.3%. The increase can be attributed to an increased average volume per blowdown during 2023 relative to 2022.
- **Transmission Compressor Station Component Fugitive Leaks:** Emissions decreased year-over-year by 78 Mscf or 13.4%. The decrease in emissions can be attributed to the continued efforts to detect and repair leaks >1,000 ppm during quarterly CARB Oil and Gas Rule surveys.
- **Transmission Compressor Station Storage Tank Leaks and Emissions:** Emissions decreased by 0.14 Mscf or 100% year-over-year because there was no tank venting during 2023.
- **Distribution Main and Service Pipeline Leaks:** Emissions increased by 2,687 Mscf or 22.4% year-over-year. The increase can be attributed to an increase in the average number of leak-days and average volume per leak in 2023 relative to 2022.
- **Distribution Main and Service Pipeline Damages:** Emissions decreased by 1,138 Mscf or 14.5% year-over-year. The decrease can be attributed to reductions in Excavation and Natural Force damages. SDG&E's Damage Prevention Program is helping reduce excavation damages.
- **Distribution Main and Service Pipeline Blowdowns:** Emissions increased by 10 Mscf or 24.4% year-over-year. The increase can be attributed to an increase in blowdown events during 2023 relative to 2022.

- **Distribution M&R Station Leaks & Emissions**: Emissions increased by 9,898 Mscf or 14.0% year-over-year because the number of stations increased and the emission estimate is derived using a population-based methodology.
- **Distribution M&R Blowdowns**: Emissions increased year-over-year by 1 Mscf or 5.9%. The increase in emissions can be attributed to increased blowdown activities at the stations during 2023 relative to 2022.
- **Customer Meter Leaks**: Emissions increased by 725 Mscf or 0.6% year-over-year because the number of meters increased and the emission estimate is derived using a population-based methodology.
- **Customer Meter Damages**: Emissions decreased by 302 Mscf or 18.2% year-over-year. The decrease in emissions can be attributed to a 9.3% decrease in damage events.
- **Customer Meter Vented Emissions**: Emissions decreased by 7 Mscf or 11.1% year-over-year. The decrease in emissions can be attributed to the 10.4% decrease in blowdown events 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 2022
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.
Pipe Fitting Specifications	Distribution Mains and Services; Customer Meter Set Assemblies (MSAs)	22	• Required manufacturers' thread fabrication process and product to 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.
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- 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:

SDG&E has no additional improvements in reporting to share at this time.

- 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:

SDG&E 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:

SDG&E appreciates the opportunity to submit baseline adjustment proposals. SDG&E submitted its proposal to the CPUC for Appendix 3 on April 30, 2024.