California Public Utilities Commission
SB 1371 – R.15-01-008 Gas Leak Abatement Workshop
Classifying Unusual Large Leaks

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Safety and Enforcement Division
Risk Assessment Safety Advisory
Proposed Changes to Appendix 8
Summary—Classifying Unusual Large Leaks

Why do we need to change the current definition?

Current Definition: *Any event at a gas storage facility or gas transmission system that results in the uncontrollable release of natural gas to the atmosphere for more than 24 hours.*

The current definition is arbitrary and ambiguous.

Background:
The review of 2018 respondent data turned up instances that warranted separate reporting under the Unusual Large Leaks. The events were filed with PHMSA on form 7100.

- Transmission Pipeline rupture
- Two relatively large releases at M&R Station due to operator error
Proposed Changes to Appendix 8

Summary—Classifying Unusual Large Leaks

How should Unusual Large Leaks be defined for going forward reporting purposes?

– Volume threshold
– Individually based on situation and context
– Duration
– Type of leak
– Other considerations – PHMSA 7100 reporting
Proposed Changes to Appendix 8 Summary—Classifying Unusual Large Leaks

Next Steps:

1. Solicit comments
2. Review party comments
3. Develop and circulate new definition to parties for comment (ASAP)
4. Consider second round of comments
5. Disseminate final Unusual Large Leak definition
   (Hopefully as part of published templates, but no later than May 15, 2019)