BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Adopt Rules and Procedures for Commission-Regulated Natural Gas Pipe Lines and Facilities to Reduce Natural Gas Leakage Consistent with Senate Bill 1371.

NATURAL GAS LEAKAGE REPORT OF ALPINE NATURAL GAS OPERATING COMPANY NO. ONE LLC IN COMPLIANCE WITH SENATE BILL 1371

Michael Lamond, CFO
P.O. Box 550
Stockton, California  95252
Telephone: (209) 772-3006
Facsimile: (209) 772-3008
Email: mike@alpinenaturalgas.com

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Before the Public Utilities Commission of the State of California

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Rulemaking 15-01-008 (Filed January 15, 2015)

Natural Gas Leakage Report of Alpine Natural Gas Operating Company No. One LLC in Compliance with Senate Bill 1371

In compliance with Decision No. 17-06-015, Alpine Natural Gas Operating Company No. One (“Alpine”) hereby respectfully submits its first biennial natural gas leakage report in compliance with Senate Bill 1371 as Attachment A hereto.

Respectfully submitted this 22nd day of March 2018 at Valley Springs, California.

Michael Lamond, CFO
P.O. Box 550
Stockton, California 95252
Telephone: (209) 772-3006
Facsimile: (209) 772-3008
Email: mike@alpinenaturalgas.com

By __________________________
ATTACHMENT A

ALPINE NATURAL GAS LEAKAGE REPORT
Executive Summary:

Alpine Natural Gas Operating Company No. One LLC (“Alpine”) hereby submits its first biennial SB 1371 Compliance Filing as is required by Decision 17-06-015. This filing is broken down into three sections as follows:

1. Executive Summary
2. Best Practice Section
3. Supplemental Section

Alpine is a small natural gas distribution company with one franchised service territory in Calaveras County California. Alpine’s customer base consists of 27 commercial-retail customers and 1575 residential customers. Alpine does not serve manufacturing facilities or gas-fired generating stations. Alpine’s distribution system of, 38.42-mile main pipeline, consists nearly entirely of P.E. pipe, with only 28 feet of steel pipe that lies in and just prior to its single vaulted Pressure Regulating Station. Alpine’s annual sales are approximately 600,000 Therms or 60,000 Mscf of natural gas. Alpine’s Maximum Operating Pressure (MAOP) is 60 psig while its normal operating pressure is maintained at 42 psig. Alpine’s 2016 estimate of its annual methane emissions was 244.46 Mscf or an emissions rate of 4/10 of 1% of annual sales.

Alpine’s Leak detection procedures and repair as discovered policy continues to result in improved operations and emission reduction. Historically Grade I below ground hazardous leaks occur primarily as third-party excavation damage. The incidence rate appears to be decreasing. Grade 2 leaks are rare. No leaks are awaiting future repair. Grade 3 leaks are above ground non-hazardous leaks found on threaded pipe fittings on Meter Set Assemblies (MSA). The leak detection procedures including in house leak surveys of all service lines and MSA’s provide our experienced operators the opportunity to successfully decrease the number of fugitive emissions from MSA’s.

The Commission has designated Alpine as a “BP Class Category - C” utility. Therefore, Alpine is requesting that it be exempt from complying with 16 of the 26 Best Practices identified by the Commission. Most of the exemptions deal with Alpine’s small size and the fact that Alpine does not own nor operate gas facilities that operate above 60 psig. In addition, Alpine does not own nor operate transmission level pipe lines and associated equipment or gas storage.

As to budgets for compliance, Alpine does anticipate expending funds on compliance. Alpine’s non-commodity costs, its base rate costs, are increasing. Our labor force continues to consist of 2 Operator Qualified employees but the addition of two field technicians since 2013 provide them the assistance needed to maintain a safe reliable natural gas distribution system. We are
considering adding a third Qualified Operator to maintain or ability to promptly respond to all odor or leak Calls twenty-four hours a day. We have invested in trained labor and all the equipment necessary to locate and repair gas leaks in the most accurate and cost-effective manner. However, these additional labor expenses and investments have not yet been reflected in Alpine’s cost of service.

Alpine has never filed for a general rate case decision since inception in 2000.

**Best Practice Section:**

**Best Practice # 1–**

*Compliance Plan;* Each company is of a different size and has a different business model. Compliance Plans will require Companies to include those Best Practices (BPs) mandated by the Commission, noting applicable exemptions and alternatives, and any additional measures proposed by each Company to abate natural gas leakage and minimize methane emissions. However, companies must submit a Compliance Plan for approval by the CPUC, in consultation with CARB, to ensure that they are complying with the decisions of this proceeding and SB 1371. The Compliance Plan filing also incorporates many requirements for other BPs including policies and procedures, recordkeeping, training, experienced/trained personnel. In addition, other specific requirements in many leak detection, leak repair and leak prevention BPs are incorporated into the Compliance Plan filing.

Alpine believes that methane emission reductions within its service territories can only be achieved by the rapid detection of distribution leaks and limiting the duration of Class 2 and Class 3 leaks. Alpine has expanded its Operations and Maintenance staff by 100% since 2013. This has allowed Alpine to meet or exceed the requirements of 49 CFR Part 192. Alpine performs periodic leak surveys on all of its gas distribution facilities both above and below ground.

**Best Practice # 2–**

*Written company policies,* referencing both SB 1371 (2014, Leno) and SB 1383 (2016, Lara), are needed to guide company activities and ensure effective implementation to abate natural gas leakage and minimize methane emissions.

Alpine supports the Commission’s efforts to reduce methane emissions and recognizes that methane, which is the largest component of natural gas, is up to 28 times more harmful than carbon dioxide in causing heat trapping in the atmosphere. The Commission has set an aspirational goal of reducing methane emissions by 40% by the year 2030. Alpine, and its employees, support the Commission’s efforts to reduce gas emissions and aware of the potency of methane, the primary component of natural gas, as a greenhouse gas.
Alpine employees will be informed on the requirements of SB 1371 and SB 1383 as they relate to the operation and maintenance of Alpine’s gas distribution system. To that end Alpine has created a written policy statement on abating methane leaks and each employee will read the policy and receive instruction on its importance. Alpine’s OME policy 1371 includes the language from SB 1371 below:

*Methane (CH4) is a hydrocarbon and the primary component of natural gas. Methane is also a potent and abundant greenhouse gas (GHG), which makes it a significant contributor to climate change, especially in the near term (10–15 years). Methane is emitted during the production and transport of coal, natural gas, and oil. Emissions also result from livestock and other agricultural practices and from the decay of organic waste in municipal solid waste landfills and certain wastewater treatment systems. Methane is the second most abundant GHG after carbon dioxide (CO2), accounting for 14 percent of global emissions. Though methane is emitted into the atmosphere in smaller quantities than CO2, its global warming potential (i.e., the ability of the gas to trap heat in the atmosphere) is 25 times greater. As a result, it is estimated, methane emissions currently contribute more than one-third of today's anthropogenic (man-made) warming.*

Alpine’s Leak Repair Policy is to “Find it and Fix it”. Discovery of a leak can occur by and including; reports from customers, contractors working at in or around distribution system, during routine patrolling by Alpine personal, and annual leak surveys. Alpine leak repair policy is to immediately repair all Grade 1 leaks as they are discovered.

In addition, Alpine does have a policy to repair all Grade 2 and Grade 3 leaks upon discovery. Where conditions do not allow for prompt repair Grade 2 are monitored and repaired within six months and Grade 3 not to exceed 15 months.

*Alpine employees responsible for leak detection, leak repair and contractor monitoring not only contribute to safety and cost reduction, they also have an effect by minimizing emissions to the atmosphere.*

**Best Practice # 3 –**

*Pressure Reduction Policy:*  
Written company policy stating that pressure reduction to the lowest operationally feasible level in order to minimize methane emissions is required before non-emergency venting of high-pressure distribution (above 60 psig), transmission and underground storage infrastructure consistent with safe operations and considering alternative potential sources of supply to reliably serve customers. Exact wording TBD by the company and approved by the CPUC, in consultation with CARB, as part of Compliance Plan filing.

*Alpine should be exempt from this Best Practice because* it does not own nor operate any high-pressure distribution (above 60 psig), transmission and underground storage facilities.
Best Practice # 4—

**Project Scheduling Policy**
Written company policy stating that any high pressure distribution (above 60 psig), transmission or underground storage infrastructure project that requires evacuating methane will build time into the project schedule to minimize methane emissions to the atmosphere consistent with safe operations and considering alternative potential sources of supply to reliably serve customers. Projected schedules of high pressure distribution (above 60 psig), transmission or underground storage infrastructure work, requiring methane evacuation, shall also be submitted to facilitate audits, with line venting schedule updates TBD. Exact wording TBD by the company and approved by the CPUC, in consultation with CARB, as part of the Compliance Plan filing.

*Alpine should be exempt from this Best Practice because it does not own nor operate any high-pressure distribution (above 60 psig), transmission and underground storage facilities.*

Best Practice # 5—

**Methane Evacuation Procedures**
Written company procedures implementing the BPs approved for use to evacuate methane for non-emergency venting of high pressure distribution (above 60 psig), transmission or underground storage infrastructure and how to use them consistent with safe operations and considering alternative potential sources of supply to reliably serve customers. Exact wording TBD by the company and approved by the CPUC, in consultation with CARB, as part of the Compliance Plan filing.

*Alpine should be exempt from this Best Practice because it does not own nor operate any high-pressure distribution (above 60 psig), transmission and underground storage facilities.*

Best Practice # 6—

**Methane Evacuation Work Orders Policy**
Written company policy that requires that for any high pressure distribution (above 60 psig), transmission or underground storage infrastructure projects requiring evacuating methane, Work Planners shall clearly delineate, in procedural documents, such as work orders used in the field, the steps required to safely and efficiently reduce the pressure in the lines, prior to lines being vented, considering alternative potential sources of supply to reliably serve customers. Exact wording TBD by the company and approved by the CPUC, in consultation with CARB, as part of the Compliance Plan filing.

*Alpine should be exempt from this Best Practice because it does not own nor operate any high-pressure distribution (above 60 psig), transmission and underground storage facilities.*
Best Practice # 7–

*Bundling Work Policy*

Written company policy requiring bundling of work, whenever practicable, to prevent multiple venting of the same piping consistent with safe operations and considering alternative potential sources of supply to reliably serve customers. Company policy shall define situations where work bundling is not practicable. Exact wording TBD by the company and approved by the CPUC, in consultation with CARB, as part of the Compliance Plan filing.

*Alpine should be exempt from this Best Practice because* it does not own nor operate any high-pressure distribution (above 60 psig), transmission and underground storage facilities. There are very few, if any circumstances where bundling is necessary or practical.

Best Practice # 8–

*Company Emergency Procedures*

Written company emergency procedures which describe the actions company staff will take to prevent, minimize and/or stop the uncontrolled release of methane from the gas system or storage facility consistent with safe operations and considering alternative potential sources of supply to reliably serve customers. Exact wording TBD by the company and approved by the CPUC, in consultation with CARB, as part of the Compliance Plan filing.

Alpine has a written emergency plan that is in conformance with 49 CFR §192.615.

Best Practice # 9–

*Recordkeeping*

Written Company Policy directing the gas business unit to maintain records of all SB 1371 Annual Emissions Inventory Report methane emissions and leaks, including the calculations, data and assumptions used to derive the volume of methane released. Records are to be maintained in accordance with G.O. 112 F and succeeding revisions, and 49 CFR 192. Currently, the record retention time in G.O. 112 F is at least 75 years for the transmission system. 49 CFR 192.1011 requires a record retention time of at least 10 years for the distribution system. Exact wording TBD by the company and approved by the CPUC, in consultation with CARB, as part of the Compliance Plan filing.

Alpine currently has an appendix to its OME to maintain, as a permanent record, all materials related to SB 1371’s Annual Emissions Inventory Reports for at least 10 years.
**Best Practice # 10–**

*Minimize Uncontrolled Natural Gas Emissions training*

Training to ensure that personnel know how to use company emergency procedures which describe the actions staff shall take to prevent, minimize and/or stop the uncontrolled release of natural gas from the gas system or storage facility. Training programs, to be designed by the Company and approved by the CPUC, in consultation with CARB, as part of the Compliance Plan filing. If integration of training and program development is required with the company’s General Rate Case (GRC) and/or Collective Bargaining Unit (CBC) processes, then the company shall file a draft training program and plan with a process to update the program once finalized into its Compliance Plan.

Alpine has an Operators Qualification Plan, approved by the CPUC that address BP #10’s requirement. Alpine employs 2 Operations and Maintenance technicians who are Operator Qualified and responsible for the safe operations of Alpine’s gas distribution systems. Their primary task is to prevent the unintended emission of gas and to limit the emission of gas when an unintended leak occurs in order to protect people and property. Alpine’s Operator Qualification Plan (OQ Plan) prescribes requirements for evaluating the qualifications of all persons performing certain operating and maintenance tasks listed in this OQ Plan on Alpine’s gas pipeline system. It was created to comply with pipeline safety regulations at Title 49 Code of Federal Regulations (CFR), Part 192, Sub part N.

**Best Practice # 11–**

*Methane Emissions Minimization Policies Training*

Ensure that training programs educate workers as to why it is necessary to minimize methane emissions and abate natural gas leaks. The training programs, to be designed by the Company and approved by the CPUC, in consultation with CARB, as part of the Compliance Plan filing. If integration of training and program development is required with the company’s GRC and/or CBC processes, then the company shall file a draft training program and plan with a process to update the program once finalized into its Compliance Plan.

The language in BP #2 (*italicized* and *underlined*) will be added to Alpine's Operators Qualification Plan.

**Best Practice # 12–**

*Knowledge Continuity Training Programs*

Knowledge Continuity (Transfer) Training Programs to ensure knowledge continuity for new methane emissions reductions best practices as workers, including contractors, leave and new workers are hired. Knowledge continuity training programs to be designed by the Company and approved by the CPUC, in consultation with CARB, as part of the Compliance Plan filing. If integration of training and program development is required with the company’s GRC and/or CBC processes, then the
company shall file a draft training program and plan with a process to update the program once finalized

Alpine’s OQ Plan assures that any new employees who operate and maintain the gas distribution systems will be trained and tested in all aspects of the prevention and mitigation of methane emissions from Alpine’s gas systems.

**Best Practice # 13–**

*Performance Focused Training Programs*

Create and implement training programs to instruct workers, including contractors, on how to perform the BPs chosen, efficiently and safely. Training programs to be designed by the Company and approved by the CPUC, in consultation with CARB, as part of the Compliance Plan filing. If integration of training and program development is required with the company’s GRC and/or CBC processes, then the company shall file a draft training program and plan with a process to update the program once finalized into its Compliance Plan.

Alpine’s OQ Plan will assure that all employees and any contractors who operate and maintain the gas distribution systems will be trained and tested in all aspects of the prevention and mitigation of methane emissions from Alpine’s gas systems.

**Best Practice # 14–**

*Formal Job Classifications*

Create new formal job classifications for apprentices, journeyman, specialists, etc., where needed to address new methane emissions minimization and leak abatement best practices, and filed as part of the Compliance Plan filing, to be approved by the CPUC, in consultation with CARB.

*Alpine should be exempt from this Best Practice.* Alpine has only 2 covered employees who operate and maintain its gas distribution systems. Creating a formal job classification for apprentices and journeymen employees where Alpine’s total operations workforce is four seems unnecessary and unduly expensive. 50% of Alpine’s field operations employees are Qualified Operators. The laborer field operations employees assist the two OQ and therefore exposed to the covered tasks of a gas operator. Overtime opportunity, experience and training may lead to becoming a Qualified Operator but creating a formal job classification is not justified.

**Best Practice # 15–**

*Gas Distribution Leak Surveys*

Utilities should conduct leak surveys of the gas distribution system every 3 years, not to exceed 39 months, in areas where G.O. 112-F, or its successors, requires surveying every 5 years. In lieu of a system-wide three-year leak survey cycle, utilities may propose and justify in their Compliance Plan filings, subject to Commission approval, a risk-assessment based, more cost-effective methodology for conducting gas distribution pipeline leak surveys at a less frequent interval. However, utilities shall always meet the minimum requirements of G.O. 112-F, and its successors.
Alpine should be exempt from this Best Practice. Alpine performs Gas Distribution Leak Surveys each year for Business Districts and every five years on the remainder of the gas distribution system including each MSA. Increasing Leak Surveys on a three-year cycle is currently under review. The need to increase the frequency of Leak Surveys does not currently appear to exist.

Best Practice # 16–  
**Special Leak Surveys**  
Utilities shall conduct special leak surveys, possibly at a more frequent interval than required by G.O. 112-F (or its successors) or BP 15, for specific areas of their transmission and distribution pipeline systems with known risks for natural gas leakage. Special leak surveys may focus on specific pipeline materials known to be susceptible to leaks or other known pipeline integrity risks, such as geological conditions. Special leak surveys shall be coordinated with transmission and distribution integrity management programs (TIMP/DIMP) and other utility safety programs. Utilities shall file in their Compliance Plan proposed special leak surveys for known risks and proposed methodologies for identifying additional special leak surveys based on risk assessments (including predictive and/or historical trends analysis). As surveys are conducted over time, utilities shall report as part of their Compliance Plans, details about leakage trends. Predictive analysis may be defined differently for differing companies based on company size and trends.

Alpine should be exempt from this Best Practice. Alpine does not have facilities of continued surveillance or known leaks being monitored. The need for special leak surveys on a less than twenty-year-old PE gas distribution system is not indicated. In addition, with no history of main pipeline leaks and an active Distribution Integrity Management Program that monitors threats on the pipeline, the risk of methane emission increasing, would be identified and current procedures will correct any abnormal operating conditions.

Best Practice # 17–  
**Enhanced Methane Detection**  
Utilities shall utilize enhanced methane detection practices (e.g. mobile methane detection and/or aerial leak detection) including gas speciation technologies.

Alpine should be exempt from this Best Practice. Alpine does not need and could not justify the cost of Enhanced Methane Detection. Alpine has invested in state-of-the-art hand held leak detection. Therefore, Alpine should be exempt from this BP.

Best Practice # 18–  
**Stationary Methane Detectors**  
Utilities shall utilize Stationary Methane Detectors for early detection of leaks. Locations include: Compressor Stations, Terminals, Gas Storage Facilities, City Gates, and Metering & Regulating (M&R) Stations (M&R above ground and pressures above
Methane detector technology should be capable of transferring leak data to a central database, if appropriate for location.

**Alpine should be exempt from this Best Practice.** Alpine does not own or operate Compressor Stations, Terminals, Gas Storage Facilities, City Gates, and Metering & Regulating (M&R) Stations (M&R above ground and pressures above 300 psig only). Therefore, Alpine should be exempt from this BP.

**Best Practice # 19–**

**Above Ground Leak Surveys**
Utilities shall conduct frequent leak surveys and data collection at above ground transmission and high pressure distribution (above 60 psig) facilities including Compressor Stations, Gas Storage Facilities, City Gates, and Metering & Regulating (M&R) Stations (M&R above ground and pressures above 300 psig only). At a minimum, above ground leak surveys and data collection must be conducted on an annual basis for compressor stations and gas storage facilities.

**Alpine should be exempt from this Best Practice.** Alpine does not own or operate Compressor Stations, Gas Storage Facilities, City Gates, and Metering & Regulating (M&R) Stations (M&R above ground and pressures above 300 psig only). Alpine performs leak surveys of all natural gas facilities underground and above ground once each year.

**Best Practice # 20–**

**Quantification & Geographic Tracking**
Utilities shall develop methodologies for improved quantification and geographic evaluation and tracking of leaks from the gas systems. Utilities shall file in their Compliance Plan how they propose to address quantification. Utilities shall work together, with CPUC and ARB staff, to come to agreement on a similar methodology to improve emissions quantification of leaks to assist demonstration of actual emissions reductions.

**Alpine should be exempt from this Best Practice.** Alpine will evaluate alternative methods of quantifying the amount of gas leaked from its distributions systems. Alpine’s distribution system is in one distinct geographic area within a single zip code.

**Best Practice # 21–**

**“Find It/Fix It”**
Utilities shall repair leaks as soon as reasonably possible after discovery, but in no event, more than three (3) years after discovery. Utilities may make reasonable exceptions for leaks that are costly to repair relative to the estimated size of the leak.

Alpine currently has a find it and fix it upon discovery gas leak policy. Where conditions do not allow immediate repair, Alpine’s policy also complies with requirement to repair all leaks within three (3) years of discovery.
Best Practice # 22–
**Pipe Fitting Specifications**
Companies shall review and revise pipe fitting specifications, as necessary, to ensure tighter tolerance/better quality pipe threads. Utilities are required to review any available data on its threaded fittings, and if necessary, propose a fitting replacement program for threaded connections with significant leaks or comprehensive procedures for leak repairs and meter set assembly installations and repairs as part of their Compliance Plans. A fitting replacement program should consider components such as pressure control fittings, service tees, and valves metrics, among other things.

*Alpine should be exempt from this Best Practice.* Alpine has and will continue to use only the best materials in its meter set assemblies, transition fittings, valve fittings and other threaded connectors. Employee training and awareness has greatly minimized the threat of unintended leaks in and around MSA and piping.

Best Practice # 23–
**Minimize Emissions from Operations, Maintenance and Other Activities**
Utilities shall minimize emissions from operations, maintenance and other activities, such as new construction or replacement, in the gas distribution and transmission systems and storage facilities. Utilities shall replace high-bleed pneumatic devices with technology that does not vent gas (i.e. no-bleed) or vents significantly less natural gas (i.e. low-bleed) devices. Utilities shall also reduce emissions from blowdowns, as much as operationally feasible.

Alpine has one pressure regulating station. The annual venting of gas for maintenance has been determined to be de minimis. Alpine’s remaining regulators are comprised entirely of small capacity spring-loaded house regulators. We do not believe that replacement with no-bleed or low-bleed regulators could in anyway be cost effective given our size and record of no failures to date. Training of operators to limit fugitive emissions during operations such as meter sets and construction activities will emphasize minimizing emissions. Methods for quantifying and recording all emissions during operations and maintenance activities are being currently considered.

Best Practice # 24–
**Dig-Ins / Public Education Program**
Dig-Ins – Expand existing public education program to alert the public and third-party excavation contractors to the Call Before You Dig – 811 program. In addition, utilities must provide procedures for excavation contractors to follow when excavating to prevent damaging or rupturing a gas line.

Alpine has a Damage Prevention Program that includes the Call Before You Dig information program for our customers, membership in USA Underground and a
proactive excavator monitoring program. Expanding current Public Education programs considering Alpine’s size may be cost prohibitive.

Best Practice # 25–

Dig-Ins / Company Standby Monitors

Dig-Ins – Utilities must provide company monitors to witness all excavations near gas transmission lines to ensure that contractors are following utility procedures to properly excavate and backfill around transmission lines.

Alpine should be exempt from this Best Practice because Alpine does not own or operate transmission pipelines. This BP only refers to excavations near transmission lines and not distribution lines.

Best Practice # 26–

Dig-Ins / Repeat Offenders

Utilities shall document procedures to address Repeat Offenders such as providing post-damage safe excavation training and on-site spot visits. Utilities shall keep track and report multiple incidents, within a 5-year period, of dig-ins from the same party in their Annual Emissions Inventory Reports. These incidents and leaks shall be recorded as required in the recordkeeping best practice. In addition, the utility should report egregious offenders to appropriate enforcement agencies including the California Contractor’s State License Board. The Board has the authority to investigate and punish dishonest or negligent contractors. Punishment can include suspension of their contractor’s license.

Alpine should be exempt from this Best Practice. While Alpine supports identifying and reporting egregious repeat offenders, considering Alpine’s size, the documenting of procedures addressing repeat offenders is unnecessarily burdensome. Alpine does maintain information on the excavators who have caused “dig-in” excavation damage over the years. The relatively small database of excavators does allow for the identifying and recording of offenders and subsequent one on one interaction to correct future offences by the damaging party.

Supplemental Section:

Alpine’s OME Policy 1371 is attached below:
SCOPE AND PURPOSE
This procedure was implemented because of the passage of California Senate Bill (SB) 1371 (2014, Leno) and SB 1383 (2016, Lara). Alpine supports the CPUC’s efforts to reduce methane emissions and recognizes that methane, which is the largest component of natural gas, as a Greenhouse Gas (GHG) harmful to the atmosphere.

Alpine and its employees, in its support of the Commissions efforts to reduce gas emissions, create this policy to comply with the Requirements of both SB 1371 and 1383 as they relate to the operation and maintenance of Alpine’s gas distribution system. In this regard Alpine acknowledges the gas emissions to the atmosphere include; Operations like valve opening, purging and venting, Excavation Damage and Fugitive emissions found at Meter Set Assemblies (MSA’s)

The purpose of Alpine’s Compliance with SB 1371 and SB 1383 includes developing a Methane Leakage Abatement Plan to guide company activities and ensure effective implementation to abate natural gas leakage and minimize methane emissions. The Commissions D.17-06-015 included:

- Development and submitting a Compliance Plan
- Awareness of CPUC, 2030 Target of 40% methane reduction
- 26 Best Practices (BP) for planning, leak detection/repair and worker training
- Annual reporting of gas emissions; from damage, operations or fugitive.

Alpine’s Leakage Abatement Plan integrates the OME maintenance and operations procedures including; Leak Investigation, Leak Survey, Leak Grading and Leak Repair in addition to training in the Operator Qualification Plan and Alpine’s Integrity Management Plan that includes threat assessment to assess the threats and risks to the integrity of Alpine’s Natural Gas Distribution System.

INTRODUCTION-COMPLIANCE
Alpine’s OME policy 1371 includes the language from SB 1371 below:

Methane (CH4) is a hydrocarbon and the primary component of natural gas. Methane is also a potent and abundant greenhouse gas (GHG), which makes it a significant contributor to climate change, especially in the near term (10–15 years). Methane is emitted during the production and transport of coal, natural gas, and oil. Emissions also result from livestock and other agricultural practices and from the decay of organic waste in municipal solid waste landfills and certain wastewater treatment systems. Methane is the second most abundant GHG after carbon dioxide (CO2), accounting for 14 percent of global emissions. Though methane is emitted into the atmosphere in smaller quantities than CO2, its global warming potential (i.e., the ability of the gas to trap heat in the atmosphere) is 25 times greater. As a result, it is estimated, methane emissions currently contribute more than one-third of today’s anthropogenic (man-made) warming.

Alpine’s Leak Repair Policy is to “Find it and Fix it”. Discovery of a leak can occur by and including; reports from customers, contractors working at in or around distribution system, during routine patrolling by Alpine personal, and annual leak surveys. Alpine leak repair policy is to immediately repair all Grade 1 leaks as they are discovered.

In addition, Alpine does have a policy to repair all Grade 2 and Grade 3 leaks upon discovery. Where conditions do not allow for prompt repair Grade 2 are monitored and repaired within six months and Grade 3 not to exceed 15 months.
Alpine employees responsible for leak detection, leak repair and contractor monitoring not only contribute to safety and cost reduction, they also have an effect by minimizing emissions to the atmosphere.

RESPONSIBILITY
The System Administrator and Operator Qualified personnel are responsible for compliance with the provisions of this procedure and the development and implementation of required actions.

Operator Qualification
These activities are not a covered task under the Operator Qualification Plan, however, see OQ Plan for specific covered tasks and associated qualification requirements for duties related to this Plan.

Plan Evaluation
Alpine’s Management annually performs a threat assessment for Integrity Management beginning calendar year 2018 atmospheric emissions from; operations, excavation dig-ins and MSA fugitive leaks will be reviewed and quantified annually.

Reporting
PHMSA annual Leak Report 7100 is collected to update distribution system data.

Annual Leak Abatement Report filed with SED each June including current report Templates and spreadsheets.

Plan Revision
Plan is evaluated every two years (Biennially)

RELEVANT APPENDICES
TBD

RELATED PROCEDURES
615-a Odor and Leak Calls
605-B11 Leak Investigation
465 External Corrosion Control – Monitoring
Internal Corrosion Measurement
605-B1 General Pipeline Repair
605 B5-7 Startup-Shutdown-Purging
605-D Safety Related Conditions
625 Odorization
709 Record Keeping
723 Leakage Surveys
751 Prevention of Accidental Ignition
615 Public Awareness Plan
614 Damage Prevention
Operator Qualification Plan
Integrity Management Plan
New Construction- including Service Line and Main Pipeline Installation
New Meter Set Installations and Replacement
Regulator Station Maintenance
Emergency Plan