

**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.**

**Data Request**

STATE OF CALIFORNIA

EDMUND G. BROWN JR., *Governor*

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298  
April 5, 2019

To: Title - Name  
[Company Name](#)

From: Ed Charkowicz  
(415) 703-2421  
[Ed.charkowicz@cpuc.ca.gov](mailto:Ed.charkowicz@cpuc.ca.gov)



Re: **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.**  
**DATA REQUEST: [Company Name] R15-01-008 2019 Annual Report**  
**Due Date: June 17, 2019**

Dear Mr. /Ms. XXX,

**Please Note: This data request, “[Company Name] R15-01-008 2019 Annual Report”, supersedes the prior data requests issued for this purpose/**

As you are aware, Senate Bill 1371, Leno (attached), was signed into law by Governor Brown on September 21, 2014. SB 1371 seeks to reduce methane leaks and associated greenhouse gas emissions from California utility gas systems. Methane has been determined to be a greenhouse gas many times more potent than carbon dioxide. Pursuant to SB 1371, the California Public Utilities Commission (CPUC), in cooperation with the California Air Resources Board (ARB) launched Rulemaking R.15-01-008 on January 22 2015. The data requested today is being requested pursuant to Commission decision D.17-06-015 issued June 19, 2017.

Please carefully review the specifics of the data request. If you have any questions, do not hesitate to contact the Commission's Safety and Enforcement Division via email ([ed.charkowicz@cpuc.ca.gov](mailto:ed.charkowicz@cpuc.ca.gov)) or telephone (415) 703-2421.

Please submit your Data Response on or before **June 17, 2019** to Ed Charkowicz ([ed.charkowicz@cpuc.ca.gov](mailto:ed.charkowicz@cpuc.ca.gov)) and Terrel Ferreira ([terrel.ferreira@arb.ca.gov](mailto:terrel.ferreira@arb.ca.gov)). Please submit the Data Response on USB drives or DVDs to the following individuals:

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Ed Charkowicz  
Safety and Enforcement Division  
California Public Utilities  
Commission  
2nd Floor  
505 Van Ness Ave.  
San Francisco, Ca. 94102

Terrel Ferreira  
Industrial Strategies Division  
California Air Resources Board  
1001 I Street, Sacramento, CA 95812

Consistent with the Administrative Law Judge Ruling dated March 31, 2017 issuing this data request:

1. Parties shall also submit responses in this proceeding through the "Supporting Documents" Feature on the Commission's Electronic Filing System. Instructions for Using the Supporting Documents" Feature is contained in (<http://docs.cpuc.ca.gov/SearchRes.aspx?docformat=ALL&DocID=158653546>). (The documents submitted through the Supporting Document feature are for information only and are not part of the formal file (i.e. "record") unless accepted into the record by the Administrative Law Judge.)
2. Parties shall use the Naming Convention for Electronic Submission of Supporting Documents. (<http://docs.cpuc.ca.gov/SearchRes.aspx?docformat=ALL&DocID=100902765>).
3. All documents submitted through the "Supporting Documents" Feature shall be in PDF/A format.
4. Parties shall also submit all Template Appendices in Excel format on DVD or USB drive directly to Ed Charkowicz and Terrel Ferreira.

Note: Until further notice, the "Supporting Documents" do not appear on the "Docket Card". In order to find the supporting documents that are submitted electronically, go to:

- Online documents, choose: "E-filed Documents",

- Select “Supporting Document” as the document type, ( do not choose testimony)
- Type in the proceeding number and hit search.

Please refer all technical questions regarding submitting supporting documents to:

- Kale Williams ([kale.williams@cpuc.ca.gov](mailto:kale.williams@cpuc.ca.gov)) 415 703- 3251 and
- Ryan Cayabyab ([ryan.cayabyab@cpuc.ca.gov](mailto:ryan.cayabyab@cpuc.ca.gov)) 415 703-5999

If for any reason, you are unable to complete the data request by this date, please provide a written explanation no later than 5:00 pm on May 15, 2019, why you cannot meet the response date and when you can provide the information. After you have reviewed this data request, I will be available to coordinate logistics and to answer clarifying questions.

Thank you for your cooperation.

Sincerely,

Ed Charkowicz  
Public Utilities Rates Analyst  
Risk Assessment Unit  
Safety and Enforcement Division  
California Public Utilities  
Commission (415) 703-2421  
[ed.charkowicz@cpuc.ca.gov](mailto:ed.charkowicz@cpuc.ca.gov)

## **DEFINITIONS AND INSTRUCTIONS**

**(Please Read Carefully) [Any Changes here based on parties comments?]**

- A. "You", "your", "responding party", and "respondent" refers to **[Company Name]**.
- B. "Data" refer to any and all documents, work papers, reports, reference materials, spreadsheets, diskettes and any other papers or files in the respondent's possession, or in the possession of its agents, staff or representatives, including all written, recorded or graphic matters, however produced or reproduced, records, notes, summaries, schedules, contracts or diaries, reports, forecasts or appraisals, memoranda of telephone or in person conversations by or with any person, or any other memoranda, correspondence, letters, mail, e-mail, attachments to e-mail and all other forms of correspondence (however recorded), telegraphs, telexes or cables – whether presently in electronic or hard-copy form.
- C. "Person" means, in the plural as well as the singular, any natural person, association, partnership, corporation, or other form of legal entity, including all representatives of any such person.
- D. In answering each request, please reiterate the text of the data request to which the respondent is responding.
- E. Please provide responses electronically via e-mail or DVD. For data available only in hard copy, please scan and send it electronically, if possible. If this is not practical and hard copies must be sent, state on your email response when the hard copy response was sent.
- F. For any response that requires computation and/or calculation, please provide any and all relevant calculations in supporting spreadsheets within the respective Appendix in Excel format.
- G. If any response refers to specific source document(s), please identify the source documents(s), specify the pages that are referenced and provide copies of the source documents(s).

- H. Provide the name and title of the person(s) who responded to the question(s) and his or her employer.
- I. “Pipeline” means all parts of those physical facilities through which gas moves in transportation, including pipe, valves, and other appurtenances attached to pipe, compressor units, metering stations, regulator stations, delivery stations, holders, and fabricated assemblies.”<sup>1</sup>
- J. “Leak” is defined as unintentional escape of gas from the pipeline.”<sup>2</sup> SB 1371 uses the words “leaks and leaking components”. Some examples of leaking components are defective or worn gaskets, seals, valve packing, relief valves, pumps, compressors, etc.
- K. “Hazardous Leak” means gas leak that represents an existing or probable hazard to persons or property and requires immediate repair or continuous action until the conditions are no longer hazardous.”<sup>3</sup>
- L. “Graded Leaks” – Gas leaks which are hazardous, or which could potentially become hazardous as described below:
- i. A "Grade 1" leak is a leak that represents an existing or probable hazard to persons or property and requiring prompt action, immediate repair, or continuous action until the conditions are no longer hazardous.<sup>4</sup>
  - ii. A "Grade 2" leak is a leak that is recognized as being not hazardous at the time of detection but justifies scheduled repair based on the potential for creating a future hazard.<sup>5</sup>
  - iii. A "Grade 3" leak is a leak that is not hazardous at the time of detection and can reasonably be expected to remain not hazardous.<sup>6</sup>
- M. “Non-Graded Leaks” or “Ungraded Leaks” – Utility company leak grading programs usually apply to leaks below ground level or

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<sup>1</sup> Refer to 49 CFR 192.3

<sup>2</sup> Refer to instructions for completing PHMSA form F7100.1-1 (rev. 5-2015)

<sup>3</sup> Refer to 49 CFR 192.1001 and instructions for completing PHMSA form F7100.1-1 (rev. 5-2015)

<sup>4</sup> Refer to G.O. 112F for more information

<sup>5</sup> Refer to G.O. 112F for more information

<sup>6</sup> Refer to G.O. 112F for more information

near ground level. Consequently, it is possible to have hazardous and non-hazardous Non-Graded, or Ungraded Leaks above ground. In the annual report template appendices, all types of hazardous and non-hazardous leaks have been accounted for and are tracked. Refer to the Comment Box in the "Leak Grade" column of the appendices for the correct codes to use when reporting leaks.

- N. "All Damages" is damage caused by external forces such as dig-ins, accidents and natural forces like settlement, land movement, floods or earthquakes.
- O. "Vented Emissions" (or "Emissions" as used in this data request) are releases of gas to the atmosphere which occur during the course of operations or maintenance. Some examples are:
  - i. Purging (a.k.a. "blowdown") gas prior to hydro-testing a line.
  - ii. Releases of gas which are a design function of equipment such as gas emitting from relief valve vents or pneumatic equipment.
  - iii. Releases of gas caused by operations, maintenance, testing, training, etc.
- P. "System-Wide Leak and Emission Rate Data" - These data are requested in Appendix 8 of this data request. After the data are submitted by the utilities and Independent Storage Providers (ISPs), the CPUC and ARB will analyze them to determine how best to develop System-Wide Leak and Emission Rates for the various types of facilities and systems.
- Q. "Unusual Large Leak"- 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.

## DATA REQUEST

Provide a Document Index that includes all requested documents relevant to this request. Uniquely number each document for identification.

Pursuant to SB 1371, Leno - Natural gas: leakage abatement (See Public Utilities Code § 975, Article 3), and in partial fulfillment of scoping memo objectives in this proceeding, the California Public Utilities Commission (CPUC) requests that the following information be submitted to the CPUC and the State Air Resources Board (ARB) on or by June 17, 2019.

Completion of the attached Report Template and Appendices is required to comply with this Data Request. **You are required to provide all information requested in this Data Request AND the Appendices of the Report Template.**

- (1) A summary of changes to utility leak and emission management practices from January 1st, to December 31st of the previous calendar year. The report must include a detailed summary of changes, including the reasoning behind each change and an explanation of how each change reduces methane leaks and emissions.
- (2) A list of new graded and ungraded gas leaks discovered, tracked by geographic location in a Geographic Information System (GIS) or best equivalent, by grade, component or equipment, pipe size, schedule and material, pressure, age, date discovered and annual volume of gas leaked for each, by month, from January 1st through December 31st of the previous calendar year.
- (3) A list of graded and ungraded gas leaks repaired, tracked by geographic location in a Geographic Information System (GIS) or best equivalent, by month, from January 1st through December 31st of the previous calendar year. Include the grade, component or equipment, pipe size, schedule and material, pressure, age, date discovered, date of repair, annual volume of gas leaked for each and the number of days from the time the leak was discovered until the date of repair.
- (4) A list of ALL open graded and ungraded gas leaks, regardless of when they were found, tracked by geographic location in a Geographic Information System (GIS) or best equivalent that are being monitored, or are scheduled to be repaired, by month, from January 1st through December 31st of the previous calendar year. Include the grade, component or equipment, pipe size, schedule and material, pressure, age, date discovered, scheduled date of repair, and annual volume of gas leaked for each.

- (5) System-wide gas leak and emission rate data, along with any data and computer models used in making that calculation, for the 12 months ending December 31st, of the reporting year.
- (6) Calculable or estimated emissions and leaks for the 12 months ending December 31st of the reporting year, using the categories, engineering estimates, emission factors and activity factors in the appendices sent with this data request.

Reporting Deadline: The above information shall be reported no later than June 17, 2019.

**(END OF ATTACHMENT 2)**



**Attachment 3**

**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.**

**Annual Report Template**

[Company Name]

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**Natural Gas Leakage Abatement Report**

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.

And In Response to Data Request  
[Company Name] R15-01-008 2019 Annual  
Report

**By:**

**Date: 6/17/19**

## Introduction

The following data<sup>7</sup> 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 our responses to Data Requests [Company Name] R15-01-008 2019 Annual Report.

Pursuant to SB 1371, Leno - Natural gas: leakage abatement, the California Public Utilities Commission (CPUC) requests that the following information be transmitted to the CPUC and the State Air Resources Board (ARB):

- (1) A summary of changes to utility leak and emission management practices from January 1st, 2018 to December 31st, 2018. The report must include a detailed summary of changes, including the reasoning behind each change and an explanation of how each change will reduce methane leaks and emissions.

Response:

[Expand Section as Needed]

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<sup>7</sup> As described in Data Request [Company Name] R15-01-008 2018 Annual Report

(2) A list of new graded and ungraded gas leaks discovered, tracked by geographic location in a Geographic Information System (GIS) or best equivalent, by grade, component or equipment, pipe size, schedule and material, pressure, age, date discovered and annual volume of gas leaked for each, by month, from January 1<sup>st</sup>, 2018 through December 31<sup>st</sup>, 2018.

Response:

See Appendices

(3) A list of graded and ungraded gas leaks repaired, tracked by geographic location in a Geographic Information System (GIS) or best equivalent, by month, from January 1<sup>st</sup>, 2018 through December 31<sup>st</sup>, 2018. Include the grade, component or equipment, pipe size, schedule and material, pressure, age, date discovered, date of repair, annual volume of gas leaked for each and the number of days from the time the leak was discovered until the date of repair.

Response:

See Appendices

(4) A list of ALL open graded and ungraded leaks, regardless of when they were found, tracked by geographic location in a Geographic Information System (GIS) or best equivalent that are being monitored, or are scheduled to be repaired, by month, from January 1<sup>st</sup>, 2018 through December 31<sup>st</sup>, 2018. Include the grade, component or equipment, pipe size, schedule and material, pressure, age, date discovered, scheduled date of repair, and annual volume of gas leaked for each.

Response:

See Appendices

(5) System-wide gas leak and emission rate data, along with any data and computer models used in making that calculation, for the 12 months ending December 31<sup>st</sup>, of the reporting year.

Response:

See Appendices

(6) Calculable or estimated emissions and non-graded gas leaks, as defined in Data Request [Company Name] R15-01-008 2018 Annual Report for the 12 months ending December 31<sup>st</sup>, 2018.

Response:

See Appendices

**(END OF ATTACHMENT 3)**