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 to Reduce Natural Gas
Leakage Consistent with Senate Bill 1371.

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

NATURAL GAS LEAKAGE REPORT OF WEST
COAST GAS COMPANY IN COMPLIANCE WITH
SENATE BILL 1371

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MARCH 15, 2018
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 to Reduce Natural Gas Leakage Consistent with Senate Bill 1371.  

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NATURAL GAS LEAKAGE REPORT OF WEST COAST GAS COMPANY IN COMPLIANCE WITH SENATE BILL 1371

In compliance with Decision No. 17-06-015, West Coast Gas Company ("WCG") hereby respectfully submits its first biennial natural gas leakage report in compliance with Senate Bill 1371 as Attachment A hereto.

Respectfully submitted this 15th day of March, 2018 at San Francisco, California.

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By /s/ James D. Squeri  
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Attorneys for West Coast Gas Company
Executive Summary:

West Coast Gas Company (WCG) 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

West Coast Gas Company (WCG) is a relatively small natural gas distribution company with franchised service territories consisting of Mather, in Sacramento County and Castle Airport in Merced County, California. In addition, WCG services a single customer in Lassen County, California at the Sierra Army Depot. This Army Depot is a Federal Enclave. However, the California Public Utilities Commission has jurisdiction over safety operations. WCG customer base consists of 125 commercial customers and 1272 residential customers. WCG does not serve manufacturing facilities or gas-fired generating stations. WCG annual sales are approximately 2 million therms or 200,000 MMBtu or 200,000 Mcf. WCG Maximum Operating Pressure (MOP) varies from 7 psig in the commercial area of Mather, 45 psig in the residential area of Mather and at the Sierra Army Depot and 17 psig at Castle Airport.

WCG’s 2015 estimate of its annual methane emissions was 508.8 Mcf or an emissions rate of ¼ of 1% of annual sales. In our 2016 response to SED data request for a quantification of annual methane emissions, WCG responded that its methane leakage was reduced by 24% over that estimated in 2015. We know that the primary reason for this material reduction in emissions was repair of a number of Grade 3 underground leaks in the relatively high pressure Mather residential housing area (45 psig). WCG reduced year over year carryover underground leaks from 21 down to 11. Nearly all of the repaired carryover leaks were Grade 3. However, the cost of repair was substantial giving the location – developed housing area. WCG ability to maintain this estimated lower level of methane emissions and its ability to further reduce methane emissions depends on the support it receives from the Commission in recognizing the fact that improvements in its ability to safely operate its gas systems and reduce methane emissions should be included in WCG’s Cost of Service.

The Commission has designated WCG as a “BP Class Category - C” utility. Therefore, WCG is requesting that it be exempt from complying with 9 of the 26 Best Practices identified by the Commission. The majority of the exemptions deal with the fact that WCG does not own nor operate gas facilities that operate at or above 60 psig. In
addition, WCG does not own nor operate transmission level pipe lines and associated equipment or gas storage.

As to budgets for compliance, WCG does not anticipate expending any significant amount of funds on compliance. WCG non-commodity costs, its base rate costs, are relatively fixed. Our current labor force is fixed at 7 employees and labor costs changes are only subject to cost of living increases. We added a new field technician in 2016 and purchased excavation equipment and related transportation equipment for the purpose of addressing methane leaks at any time of the day or night at Mather or Castle. 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 WCG’s cost of service. It has been 5 years, and counting, since WCG’s last general rate case decision and 2 years since it was awarded an attrition allowance. Currently, WCG revenues are not set to cover operating expenses and it therefore does not earn a return on its investments. We simply can’t afford to expend funds on compliance activities that will go into a balancing account that may or may not be recovered at some-point in the future given the opposition to cost recover encountered in our current general rate case. However, we are looking at inexpensive ways of mapping historic leaks and will continue to search for better ways to quantify the amount of methane leakage within the financial limits imposed on WCG.

Best Practice Section:

Best Practice #1-

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.

WCG 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. WCG has expanded its Operations and Maintenance staff by 100%
since 2012. This has allowed WCG to meet or exceed the requirements of 49 CFR Part 192. WCG performs annual leak surveys on all of its gas distribution facilities both above and below ground. Beginning in 2006 WCG began the repair of underground Class 3 leaks and this resulted in a substantial reduction in methane emissions. WCG needs the timely support of the Commission in processing its application for rate relief in order to maintain this level or methane emissions reduction.

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.

WCG 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 global warming. The Commission has set an aspirational goal of reducing methane emissions by 40% by the year 2030. WCG, 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. WCG employees will be informed on the requirements of SB 1371 and SB 1383 as they relate to the operation and maintenance of WCG’s gas distribution system. To that end WCG has created a written policy statement on abating methane leaks and each employee will read the policy and receive instruction on its importance.

West Coast Gas Company
Leak Repair Policy

Grade—Definitions—Leak repair policy.

(To be Included in Operators Qualification Plan and Operations Maintenance and Emergency Plan)

Introduction:

Discovery of a leak can occur by reports from customers, contractors working at Mather or Castle, during routine patrolling by WCG personal, and annual leak surveys. West Cost Gas Company’s (WCG) leak repair policy is to immediately repair all Grade 1 leaks as they are discovered. After all Grade 1 leaks have been repaired, WCG begins to repair Grade 2 leaks based on the criteria below. After repairing all Grade 2 leaks, WCG will begin to repair all Grade 3 leaks based on the prioritizing criteria below. Therefore, WCG not only monitors Grade 3 leaks, it repairs Grade 3 leaks as maintenance resources permit. It should be recognized that repairing Grade 3 leaks in the housing area of Mather is extremely expensive.
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, methane emissions currently contribute more than one-third of today’s anthropogenic (man-made) warming. WCG employees responsible for leak detection, leak repair and contractor monitoring not only contribute to safety and cost reduction, they also have an effect on global warming.

**Leak Classification and Action Plan:**

(1) 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.

(a) Prompt action in response to a Grade 1 leak may require one or more of the following:

(i) Implementation of the gas pipeline company’s emergency plan pursuant 49 C.F.R. § 192.615;
(ii) Evacuating the premises;
(iii) Blocking off an area;
(iv) Rerouting traffic;
(v) Eliminating sources of ignition;
(vi) Venting the area;
(vii) Stopping the flow of gas by closing valves or other means; or
(viii) Notifying police and fire departments.

(b) Examples. Grade 1 leaks requiring prompt action include, but are not limited to:

(i) Any leak, which in the judgment of WCG maintenance personnel at the scene, is regarded as an immediate hazard;
(ii) Escaping gas that has ignited unintentionally;
(iii) Any indication of gas that has migrated into or under a building or tunnel;
(iv) Any reading at the outside wall of a building or where the gas could potentially migrate to the outside wall of a building;
(v) Any reading of eighty percent LEL or greater in an enclosed space;
(vi) Any reading of eighty percent LEL, or greater in small substructures not associated with gas facilities where the gas could potentially migrate to the outside wall of a building; or
(vii) Any leak that can be seen, heard, or felt and which is in a location that may endanger the general public or property.

(2) 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. WCG’s leak repair policy is to repair Grade 2 leaks as soon as Grade 1 leaks have been repaired.

(a) West Coast Gas Company must repair or clear Grade 2 leaks as soon as Grade 1 are repaired by no later than fifteen months from the date the leak is reported (annual leak survey). WCG will repair above ground Grade 2 leaks as they are discovered.

(b) If a Grade 2 leak occurs in a segment of pipeline that is under consideration for replacement, an additional six months may be added to the fifteen months maximum time for repair provided above. WCG policy is to repair Grade 2 leaks as soon after Grade 1 leaks have been repaired. In determining the repair priority, WCG considers the following criteria:

(i) Amount and migration of gas;
(ii) Proximity of gas to buildings and subsurface structures;
(iii) Extent of pavement; and
(iv) Soil type and conditions, such as, moisture and natural venting.

(b) WCG will reevaluate Grade 2 leaks at least once every six months unless repaired earlier or until cleared. The frequency of reevaluation should be determined by the location and magnitude of the leakage condition.

(c) Grade 2 leaks vary greatly in degree of potential hazard. Some Grade 2 leaks, when evaluated by the criteria, will require prompt scheduled repair within the next five working days. Other Grade 2 leaks may require repair within thirty days. Many Grade 2 leaks, because of their location and magnitude, can be scheduled for repair on a normal routine basis with periodic reevaluation as necessary.

(c) When evaluating Grade 2 leaks, WCG considers leaks requiring action ahead of adverse changes in venting conditions, and any leak that could potentially migrate to the outside wall of a building, under adverse soil conditions.

(e) Examples. Grade 2 leaks requiring action within six months include, but are not limited to:
(i) Any reading of forty percent LEL or greater under a sidewalk in a wall-to-wall paved area that does not qualify as a Grade 1 leak and where gas could potentially migrate to the outside wall of a building;
(ii) Any reading of one hundred percent LEL or greater under a street in a wall-to-wall paved area that does not qualify as a Grade 1 leak and where gas could potentially migrate to the outside wall of a building;
(iii) Any reading less than eighty percent LEL in small substructures not associated with gas facilities and where gas could potentially migrate creating a probable future hazard;
(iv) Any reading between twenty percent LEL and eighty percent LEL in an enclosed space;
(v) Any reading on a pipeline operating at thirty percent of the specified minimum yield strength or greater in Class 3 or 4 locations that does not qualify as a Grade 1 leak; or
(vi) Any leak that in the judgment of WCG personnel at the scene is of sufficient magnitude to justify scheduled repair.

(3) 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.

(a) WCG policy is to repair all above ground Grade 3 leaks as soon as discovered and underground Grade 3 leaks after Grade 1 and Grade 2 leaks are repaired. WCG will reevaluate Grade 3 leaks after Grade 1 and 2 leaks are repaired and then begin the process of clearing or repairing Grade 3 leaks within fifteen months of the reporting date (leak survey) if WCG has the resources to do so.

(b) Examples. Grade 3 leaks requiring reevaluation and, if necessary, repair must be cleared or repaired within the 15 month time period after detection include, but are not limited to:

(i) Any reading of less than eighty percent LEL in small gas associated substructures, such as small meter boxes or gas valve boxes; or
(ii) Any reading under a street in areas without wall-to-wall paving where it is unlikely the gas could migrate to the outside wall of a building.
(iii) Any reading of less than 20% LEL in a confined space.

Prioritization of Leak Repairs:

In scheduling leak repairs, WCG will prioritize those repairs based on the safety of its customers and then based on the operating pressure in the area where the leak has occurred. The residential housing area of Mather is a high priority area for safety and, because of its relatively high operating pressure, a leak of similar size in a lower pressure area will produce much less methane emissions over any given time period.
**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.

WCG 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.

WCG 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.

WCG 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.

WCG 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.

WCG 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.

WCG 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.

WCG will 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.

WCG has an Operators Qualification Plan, approved by the CPUC that address BP #10’s requirement. WCG employs 4 Operations and Maintenance technicians who are responsible for the safe operations of WCG’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. WCG’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 WCG’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 WCG’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 into its Compliance Plan.

WCG’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 WCG’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.

WCG’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 WCG’s gas systems.

**Best Practice #14-**

**Formal Job Classifications**
Create new formal job classifications for apprentices, journeymen, 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.

WCG has only 4 covered employees who operate and maintain its gas distribution systems. Therefore, WCG should be exempt from this BP.

**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.

WCG performs Gas Distribution Leak Surveys one each year on all of its gas distribution systems. It has done so for the last 20 years.

**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.

WCG will perform special leak surveys at shorter intervals than one year when results from our annual Distribution Integrity Management Program indicates that the risk of methane emission or increased gas leaks are identified.

**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.

WCG does not need and could not justify the cost of Enhanced Methane Detection. WCG has invested in state-of-the-art hand held leak detection. Therefore, WCG 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 300 psig only). Methane detector technology should be capable of transferring leak data to a central database, if appropriate for location

WCG 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, WCG 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.

WCG 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). WCG 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.

WCG will evaluate alternative methods of quantifying the amount of gas leaked from its distributions systems. WCG will begin the process of geographic mapping all historic leaks along with new leaks as they are detected.
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.
WCG goal it to fix all gas leaks as soon as they are discovered given WCG’s limited resources and the cost of repairing the leaks in developed areas (housing areas as an example where street repairs after a leak repair are very expensive). WCG will repair all Grade 1 and Grade 2 leaks as soon as we find them regardless of the cost. Above ground Grade 3 leaks will be repaired when discovered and underground Grade 3 leaks, which are problematic when they occur is a developed area, will be cleared or repaired after all Grade 1 and 2 are fixed and WCG has the resources to fix them.

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.
WCG has and will continue to use only the best materials in its meter set assemblies, transition fittings, valve fittings and other threaded connectors.

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.
WCG’s regulators are relatively new with an average age of 12 years. WCG has never encounter a venting situation. 90% of the regulators are 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 record of no failures to date.

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. WCG has Damage Prevention Program that includes the Call Before You Dig information program for our customers, membership in USA Underground and a proactive excavator contract monitoring program.

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.

While this PB only refers to excavations near transmission lines and not distribution lines, WCG has its own excavator monitoring protocol in its Damage Prevention Program. See Supplement C.

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.

WCG supports this PB and has maintained information on the excavators who have caused “dig-in” leaks over the years.