SUPPLEMENTAL QUESTIONNAIRE

R.15-01-008, 2025 Annual Report

[Southern California Gas Company]

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, 2025 Annual Report

Date: [6/13/25]

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, 2025 Annual Report.

1. **Please provide the following for the period from January 1, 2024 to December 31, 2024:**

    a. **Describe any current projects or studies related to SB 1371.**

Response:

Listed below are major initiatives and studies from SoCalGas's 2022 Compliance Plan for emission years 2023 and 2024. For additional details on projects and studies related to SB 1371, please refer to SoCalGas's 2022 Compliance Plan (R. 15-01-008 – Natural Gas Leakage Abatement Rulemaking | SoCalGas).

- Chapter 1 – Leak Inventory Reduction
- Chapter 2 – Increased Leak Survey
- Chapter 3 – Blowdown Reduction Activities
- Chapter 4 – Large Leak Prioritization
- Chapter 7 – Record Keeping IT Project
- Chapter 8 – Geographic Tracking
- Chapter 9 – Competency Based Training Development
- Chapter 10 – Training Facility Enhancements
  Chapter 12 – Stationary Methane Detectors
- Chapter 13 – Electronic Leak Survey
- Chapter 14 – Aerial Monitoring
- Chapter 15 – Damage Prevention Public Awareness
- Chapter 16 – Pipe Fitting Specifications
- Chapter 17 – Repeat Offenders IT Systems
- Chapter 18 – Accelerated Leak Repair – Transmission
- Chapter 19 – Gas Speciation
- Chapter 20 – Public Leak Maps
- Chapter 22 – Vapor Collection Systems
- Chapter 23 – Distribution Above Ground Leak Survey
- Chapter 24 – Storage Above Ground Leak Survey
- Chapter 25 – Distribution Above Ground Leak Repair
- 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 Damages:** Emissions decreased by 7,481 Mscf or 100%. The reduction occurred because there weren't any damages that were reportable under this category for emission year (EY) 2024. Notably, a mudslide caused an Unusual Large Leak from a Transmission Pipeline during 2024, and the details of this leak are discussed in the "Unusual Large Leak" section of this document.

- **Transmission Pipeline Blowdowns:** Emissions decreased by 2,639 Mscf or 22%. The reduction can be attributed to decreased project activity and a reduction in the average volume released per pipeline blowdown during 2024 relative to 2023.

- **Transmission Pipeline Component Vented Emissions:** Emissions increased year-over-year by 552 Mscf or 46.1%. This increase can be attributed to asset verification and asset data enhancements.

- **Transmission M&R Station Blowdowns:** Emissions increased year-over-year by 1,330 Mscf or 58.9%. The increase can be attributed to an increase in project activity.

- **Transmission M&R Station Component Fugitive Leaks:** Emissions decreased year-over-year by 100 Mscf of 23.3%. The year-over-year decrease can be attributed to a decrease in average leak-days in 2024 relative to 2023.

- **Transmission M&R Station Component Vented Emissions:** Emissions decreased by 770 Mscf or 38.3%. The increase can be attributed to asset verification and asset data enhancements.

- **Transmission Compressor Station Compressor Emissions:** Emissions decreased year-over-year by 2,180 Mscf or 15.2%. On average, compressors operated less in 2024 than in 2023. The decrease in average operating hours contributed to the decrease in emissions year-over-year.

- **Transmission Compressor Station Blowdowns:** Emissions increased year-over-year by 2,971 Mscf or 27.1% because the average blowdown volume during 2024 was larger than during 2023.

- **Transmission Compressor Station Component Vented Emissions:** Emissions increased year-over-year by 2,644 or 90.5%. This increase can be attributed to asset verification and asset data enhancements.

- **Transmission Compressor Station Component Fugitive Leaks:** Emissions decreased year-over-year by 3,520 Mscf or 41.2%. Emissions decreased because the total leak count and average number of leak-days decreased year-over-year. The decrease in leak counts may be related to the continued efforts to detect and repair leaks ≥1,000 ppm during CARB Oil and Gas quarterly leak surveys.

- **Transmission Compressor Station Storage Tank Leaks & Emissions:** Emissions decreased by 165 Mscf or 100% year-over-year. No emissions were released during 2024 because no condensate was collected in the tanks during 2024.

- **Distribution Main and Service Pipeline Leaks:** Estimated EY 2024 emissions are greater than EY 2023 emissions by 46,677 Mscf or 9.9%. Notably, updates to EY 2023 data were completed to remove leaks or move leaks to different Appendix sections based on additional details that were collected since the EY 2023 Report was initially filed. Because the Emission Year 2023 data have undergone these updates, there is not currently an accurate comparison between Emission Years 2023 and 2024.

- **Distribution Main and Service Pipeline Damages:** Emissions increased year-over-year by 865 Mscf or 1.3%. Although leak counts decreased year-over-year, emissions are nearly equivalent because the average volume per damage in 2024 was higher than in 2023. The increase in average damage volume can be attributed to several large third-party excavation damages during EY 2024.

- **Distribution Main and Service Pipeline Blowdowns:** Emissions decreased year-over-year by 83 Mscf or 16.6%. The decrease can be attributed to a reduction in the average blowdown volume during 2024 relative to 2023.

- **Distribution M&R Blowdowns:** Emissions decreased year-over-year by 7 Mscf or 5.7%. Distribution M&R Blowdowns are a function of inspection activity level and can vary year-to-year.

- **Distribution M&R Component Emissions:** Emissions decreased year-over-year by 20 Mscf or 6.0%. Emissions decreased because one less pneumatic device was in operation during 2024 relative to 2023.

- **Distribution M&R Component Leaks:** Emissions increased by 585 Mscf or 9.8% year-over-year. Emissions increased because more leaks were identified during 2024 relative to 2023.

- **Customer Meter Leaks:** Emissions decreased year-over-year by 28,443 Mscf or 5.3%. The reduction can be attributed to fewer known and unknown leaks in 2024 relative to 2023.

- **Customer Meter Damages:** Emissions decreased by 1,506 Mscf or 8.4% year-over-year. The decrease can be attributed to a reduced number of damages in 2024 relative to 2023.

- **Customer Meter Vented Emissions:** Emissions increased year-over-year by 822 Mscf or 114.8%. The increase can be attributed to the larger number of blowdowns that occurred during 2024 relative to 2023.

- **Underground Storage Leaks and Emissions:** Emissions from surface equipment leaks decreased by 103 Mscf or 36.0%. The decrease can be attributed to a reduction in the number of leaks from surface equipment and a reduction in the average number of leak-days in 2024 relative to 2023. The decrease in leak counts may be related to the continued efforts to detect and repair leaks ≥1,000 ppm during CARB Oil and Gas quarterly leak surveys.

- **Underground Storage Compressor Vented Emissions:** Emissions decreased year-over-year by 1,588 Mscf or 34.0%. On average, compressors operated less in 2024 than in 2023. The decrease in average operating hours contributed to the decrease in emissions year-over-year.

- **Underground Storage Blowdowns:** Emissions decreased by 794 Mscf or 36.7%. The decrease can be attributed to a reduction in the number of blowdowns at the Storage Fields during 2024 relative to 2023.

- **Underground Storage Component Vented Emissions:** Emissions decreased year-over-year by 1,241 Mscf or 58.4% because the counts of gas-powered pneumatics were reduced at Honor Rancho and Aliso Canyon.

- **Underground Storage Compressor and Component Fugitive Leaks:** Emissions from surface equipment leaks decreased year-over-year by 7,053 Mscf or 33.0% because fewer leaks were identified in 2024 relative to 2023. The decrease in leak counts may be related to the continued efforts to detect and repair leaks ≥1,000 ppm during CARB Oil and Gas quarterly leak surveys.

- **Unusual Large Leak:** Emissions increased by 137,835 Mscf year-over-year. The Unusual Large Leak was caused by a mudslide that damaged a Transmission Pipeline.

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 2024
Blowdown Reduction Activities	Transmission Pipeline	23, 3-7	• The Digital blowdown planning and reporting tool was further updated and streamlined to improve the process to review planned blowdown projects.
Aerial Monitoring /Aerial Methane Mapping (AMM)	Distribution Mains and Services; Customer Meter Set Assemblies (MSAs)	16, 17, 20a	• A customer leak tracking system was set up to follow up with customers and confirm leak closure. • SoCalGas R&D performed work to quantify the reduction of incomplete combustion emissions from customer infrastructure. SoCalGas anticipates implementing a workflow by Q4 2025 to quantify reductions for each customer.
Leak Inventory Reduction/ Leak Repair	Distribution Mains and Services	21	• SoCalGas reached agreeable blanket permit conditions with over 30 municipalities, which helps expedite leak repair activities in their public right of ways.
Geographic Tracking	High Pressure Pipelines	9, 20b	• SoCalGas completed the review, validation and mapping of approximately 940 right of way (RoW) agreements, covering 383 miles of 22 high-pressure pipelines. This work helps to make RoW information available for leak survey, repair, and replacement projects.

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:

SoCalGas completed enhancements to Transmission asset data within its work management systems, which helped to refine equipment counts used in the Annual Emissions Report.

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:

SoCalGas appreciates the opportunity to suggest new tables for the Joint Report, and 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:

SoCalGas appreciates the opportunity to submit baseline adjustment proposals. SoCalGas submitted its proposal to the CPUC for Appendix 2 on February 28, 2025.