

SUPPLEMENTAL QUESTIONNAIRE

R.15-01-008, 2025 Annual Report

[San Diego Gas & Electric]

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 the major initiatives and studies from SDG&E's 2022 Compliance Plan for emission years 2023 and 2024. For additional details on projects and studies related to SB 1371, please refer to the 2022 Compliance Plan ([Natural Gas Leakage Abatement Rulemaking | San Diego Gas & Electric \(sdge.com\)](#)).

- Chapter 1 – Increased Leak Survey
- Chapter 2 – Blowdown Reduction Activities
- Chapter 4 – Recordkeeping IT Project
- Chapter 5 – Geographic Tracking
- Chapter 6 – Electronic Leak Survey
- Chapter 7 – Damage Prevention Public Awareness
- Chapter 8 – Pipe Fitting Specifications
- Chapter 9 – Repeat Offenders IT Systems
- Chapter 10 – Gas Speciation
- Chapter 11 – Public Leak Maps
- Chapter 13 – Distribution Above Ground Leak Surveys
- 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 Blowdowns:** Emissions increased year-over-year by 16 Mscf or 13.7%. The increase can be attributed to an increased average volume per blowdown during 2024 relative to 2023.
- **Transmission Pipeline Component Vented Emissions:** Emissions decreased year-over-year by 589 Mscf or 100%. This decrease can be attributed to asset verification and asset data enhancements.
- **Transmission Compressor Station Compressor Emissions:** Emissions decreased by 282 Mscf or 20.3%. 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 decreased year-over-year by 96 Mscf or 5.1%. The decrease can be attributed to a decreased average volume per blowdown during 2024 relative to 2023.
- **Transmission Compressor Station Component Vented Emissions:** Emissions decreased year-over-year by 167 Mscf or 49.7%. This decrease can be attributed to asset verification and asset data enhancements.
- **Transmission Compressor Station Component Fugitive Leaks:** Emissions increased year-over-year by 1,405 Mscf or 279.9%. The increase can be attributed to the increased number of leaks during 2024 relative to 2023.
- **Transmission Compressor Station Storage Tank Leaks and Emissions:** Emissions increased from 0 Mscf to 3 Mscf year-over-year. The increase can be attributed to one pressure release from an LNG tank during 2024 relative to 0 releases during 2023.
- **Distribution Main and Service Pipeline Leaks:** Emissions increased year-over-year by 5,407 Mscf or 36.8%. The increase in emissions can be attributed to an increase in the number of known and unknown leaks during 2024 relative to 2023.
- **Distribution Main and Service Pipeline Damages:** Emissions increased year-over-year by 336 Mscf or 5.0%. The increase can be attributed to an increased number of damages during 2024 relative to 2023.
- **Distribution Main and Service Pipeline Blowdowns:** Emissions increased year-over-year by 20 Mscf or 39.2%. The increase can be attributed to the increased number of blowdowns during 2024 relative to 2023.

- **Distribution M&R Blowdowns**: Emissions increased year-over-year by 3 Mscf or 16.7%. Distribution M&R Blowdowns are a function of inspection activity level and can vary year-to-year.
 - **Distribution M&R Component Leaks**: Emissions decreased year-over-year by 138 Mscf or 17.6%. The year-over-year decrease in emissions can be attributed to a decreased average number of leak-days. All leaks were repaired in one day in 2023 and 2024, but due to the timing of leak detections and the methodology for estimating leak durations, the average number of leak-days was greater in 2023 than in 2024.
 - **Customer Meter Leaks**: Emissions increased year-over-year by 462 Mscf or 0.3% because the number of meters increased and the emission estimate is derived using a population-based methodology.
 - **Customer Meter Damages**: Emissions decreased year-over-year by 539 Mscf or 39.7%. The decrease in emissions can be attributed to a reduction in the average emission volume per damage event in 2024 relative to 2023.
- 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 2022
Blowdown Reduction Activities	Transmission Pipeline	23, 3-7	• The Digital blowdown planning and reporting tool was updated and streamlined to improve the process to review planned blowdown 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:

SDG&E 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:

SDG&E 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:

SDG&E appreciates the opportunity to submit baseline adjustment proposals. SDG&E submitted its proposal to the CPUC for Appendix 5 on April 30, 2025.