

SDG&E

**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 SDG&E R15-01-008 2017 June Report**

3/31/2017

Appendix 2

Rev. 3/31/17

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):

Note - Definitions in Data Request SDG&E R15-01-008 2017 June Report

The following question in the above mentioned data request is answered using the spreadsheets in this Appendix (#2):

(6) Calculable or estimated fugative emissions and non-graded gas leaks, as defined in Data Request SDG&E R15-01-008 2017 June Report.

Notes:

Use a formula-derived value with the formula used in the Annual Emissions column. Do not use a copy and paste-as-value.

At the end of Annual Emissions Column, add a summation total in a cell for a column total, and then highlight orange.

Facilities emissions that are based on a population count times an emission factor (See Appendix 9 for guidance).

Response:

Transmission M&R Station Total Leaks and Emissions:

Number of Stations	Station Classification	Emission Factor (Mscf/yr/station)	Annual Emission (Mscf)	Explanatory Notes / Comments
20	D	12.2	244	
15	T	1,554.8	23,322	
	Sum Total		23,566	

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At the end of Annual Emissions Column, add a summation total in a cell for a column total, and then highlight orange.

Response:

Transmission M&R Station Blowdowns:

ID	Geographic Location	Number of Blowdown Events	Annual Emissions (Mscf)	Explanatory Notes / Comments
Pressure Limiting Station Insp.	SDG&E Territory	87	1.74	Annual Insp. Vented gas = 20 scf/insp.
Pneumatic Device Insp.	SDG&E Territory	12	0.01	Biannual Insp. Pneumatic Devices with avg. gas vent = 1 scf/insp.
Drip Operations	SDG&E Territory	2	1.88	Pipeline Drip accumulation approx. emissions, bleed rate = 11,300 cfh for 5min per device
Relief Valve Insp.	SDG&E Territory	11	0.22	Annual test with Nitrogen. Only gas vented is volume of gas in valve @ 20 scf/insp.
		Sum Total	3.86	

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 Notes:

Use a formula-derived value with the formula used in the Annual Emissions column. Do not use a copy and paste-as-value.

At the end of Annual Emissions Column, add a summation total in a cell for a column total, and then highlight orange.

The emissions captured on this tab represent the emissions associated with the operational design and function of the component. Any intentional release of natural gas for safety or maintenance purposes should be included on the Blowdowns worksheet.
 Response:

Transmission M&R Station Component Vented Emissions:

ID/Number of Devices	Geographic Location	Device Type	Bleed Rate	Manufacturer	Number of Days Emitting	Annual Emissions (Mscf)	Explanatory Notes / Comments	Emission Factor (Mscf/day/dev)
3	SDG&E Territory	P	I	Misc.	366		Intermittent Bleed Pneumatic NA Devices emissions are included in Trans-to-trans Emission Factor of 1,554.8 Mscf/Station/Year	0.0576
1	SDG&E Territory	P	I	Misc.	366	21.08	Producers - Intermittent Bleed Pneumatic Devices. Use EF for Intermittent Bleed Pneumatics = 0.0576 Mscf/day/dev	0.0576
2	SDG&E Territory	P	H	Bristol	366		High Bleed Pneumatic Devices NA emissions are included in Trans-to-trans Emission Factor of 1,554.8 Mscf/Station/Year	0.4457
					Sum Total	21.08		

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The following question in the above mentioned data request is answered using the spreadsheets in this Appendix (#2):

(6) Calculable or estimated emissions and non-graded gas leaks, as defined in Data Request SDG&E R15-01-008 2017 June Report

Notes:

Use a formula-derived value with the formula used in the Annual Emissions column. Do not use a copy and paste-as-value.

At the end of Annual Emissions Column, add a summation total in a cell for a column total, and then highlight orange.

The emissions captured on this tab represent the emissions associated unintentional leaks that if repaired would not leaking. If the component is releasing gas or "bleeding" as a result of its design or function then it is not to be captured in this tab.

Response:

Transmission M&R Station Component Fugitive Leaks:

ID	Geographic Location	Device Type	Bleed Rate	Manufacturer	Discovery Date (MM/DD/YY)	Repair Date (MM/DD/YY)	Number of Days Leaking	Annual Emissions (Mscf)	Explanatory Notes / Comments
510000423658	92114	C	NA	NA	1/7/2016	1/7/2016	7	NA	Component leaks at Transmission M&R Stations - Emissions are included in Transmission M&R Facilities Emission Factor of 1,554.8 Mscf/Station/Year
510000446565	91950	Other	NA	NA	4/20/2016	4/20/2016	111	NA	Component leaks at Transmission M&R Stations - Emissions are included in Transmission M&R Facilities Emission Factor of 1,554.8 Mscf/Station/Year
510000475512	92028	C	NA	NA	11/17/2016	11/17/2016	322	NA	Component leaks at Transmission M&R Stations - Emissions are included in Transmission M&R Facilities Emission Factor of 1,554.8 Mscf/Station/Year
510000485470	92131	C	NA	NA	12/2/2016	12/2/2016	337	NA	Component leaks at Transmission M&R Stations - Emissions are included in Transmission M&R Facilities Emission Factor of 1,554.8 Mscf/Station/Year
Sum Total							0		

Note: Selection for "Other" types of component leaks was removed as a selection category. Suggest adding this category back into the list of Device Type.