SoCalGas, June 13th, 2025
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 June Report
Appendix 9; Rev. 03/27/2025

System Categories	Emission Source Categories	Emission Factor Sources	Description [in natural gas volume]	Explanatory Notes/Comments
Transmission Pipeline	Transmission Pipeline Leaks	Engineering Estimate	Emissions estimated from size of breach / pressure / duration calculation	For 2021, the INGAA Greenhouse Gas Emission Estimation Guidelines for Natural Gas Transmission and Storage - Volume 1 GHG Emission Estimation Methodologies and Procedures (September 28, 2005 - Revision 2) - Table 4-4 study provides the best available estimate of emissions for Transmission Pipeline, which includes emissions from Flanges and Valves. The emissions for the component leaks reported in "Component leaks" worksheet are accounted for by this mileage-based INGAA Emission Factor.
	All damages (as defined by PHMSA)	Engineering Estimate	Emissions estimated either from modelling or size of breach / pressure / duration	
	Transmission Pipeline Blowdowns	Engineering Estimate	Unique equipment volume (corrected for pressure and temperature)	For the Transmission Odor Intensity Test; Annual Emission = Number of Tests * Volume per Test
	Pneumatic Devices - Pneumatic/Hydraulic Valve Operators, and Turbine Valve Operators	MRR	Low Continuous Bleed = 0.0336 Mscf/day/dev Intermittent Bleed = 0.0576 Mscf/day/dev High Continuous Bleed = 0.4457 Mscf/day/dev Hydraulic Valve Operator = TBD Turbine Valve Operator = TBD	
	Pressure Relief Valves	MRR	Pressure relief valve = 0.9518 Mscf/day/dev	
	Odorizer (Odorizer and Gas Sampling Vents)	TCR	1.27 Mscf/yr/odorizer (if manufacturing specs are available, use the manufacting specs instead of the default emission factor)	The following equations adhere to manufacturing specifications: ● For Transmission (BTU) Gas Chromatographs (GCs); Annual Emission = (Number of GCs * Sample Flow + Number of GC Streams * Bypass Flow) * Unit conversion factor. ● For Transmission (Gas Quality) Gas Chromatographs (GCs); Annual Emission = (Number of GCs * Sample Flow + (Number of GCs + Number of Additional Streams) * Flow "Genie") * Unit conversion factor. ● For Odorizer; Annual Emission = Number of strokes * Emission per stroke, where Number of strokes = (Gas Volume * Injection Rate)/(Odorant Density * Pump Stroke Volume) * Unit conversion factor.
Transmission M&R	M&R Stations - Direct Industrial Sales	MRR	# of leaks > 10,000 ppm x Subpart W EF (ref: Table W-3 of Subpart W of Part 98) Direct Sale = 12.2 Mscf/yr/station (ref: Table W-4 of Subpart W of Part 98) **Compressor Components** Continuous Low Bleed = 0.163 Mscf/day/dev Continuous High Bleed = 0.720 Mscf/day/dev Intermittent Bleed = 0.055 Mscf/day/dev **Non-compressor Components** Valve = 0.154 Mscf/day/dev Connector = 0.137 Mscf/day/dev Open-ended line = 0.270 Mscf/day/dev Pressure relief valve = 0.048 Mscf/day/dev Meter = 0.070 Mscf/day/dev Other = 0.098 Mscf/day/dev	
	M&R Stations - Transmission-to-Transmission Company Interconnect	MRR	# of leaks > 10,000 x Subpart W EF (ref: Table W-3 of Subpart W of Part 98) Trans-to-trans = 1554.8 Mscf/yr/stations (ref: Table W-4 of Subpart W of Part 98) **Compressor Components** Continuous Low Bleed = 0.163 Mscf/day/dev Continuous High Bleed = 0.720 Mscf/day/dev Intermittent Bleed = 0.055 Mscf/day/dev **Non-compressor Components** Valve = 0.154 Mscf/day/dev Connector = 0.137 Mscf/day/dev Open-ended line = 0.270 Mscf/day/dev Pressure relief valve = 0.048 Mscf/day/dev Meter = 0.070 Mscf/day/dev Other = 0.098 Mscf/day/dev	● The vented emissions for pneumatic devices reported in the "Component Vented Emissions" worksheet for Transmission M&R Stations are accounted for as part of the station's emission factor, which is 1,554.8 Mscf/yr/station. ● The fugitive emissions for the component leaks reported in "Component Leaks" worksheet for Transmission M&R Stations are accounted for as part of the station's emission factor, which is 1,554.8 Mscf/yr/station.
	Transmission M&R Leaks	MRR	(ref: Table W-4 of Subpart W of Part 98) **Compressor Components** Continuous Low Bleed = 0.163 Mscf/day/dev Continuous High Bleed = 0.720 Mscf/day/dev Intermittent Bleed = 0.055 Mscf/day/dev **Non-compressor Components** Valve = 0.154 Mscf/day/dev Connector = 0.137 Mscf/day/dev Open-ended line = 0.270 Mscf/day/dev Pressure relief valve = 0.048 Mscf/day/dev Meter = 0.070 Mscf/day/dev Other = 0.098 Mscf/day/dev	
	Transmission M&R blowdown	Engineering Estimate	Unique equipment volume (corrected for pressure and temperature)	
Transmission Compressor Stations	Compressor station - Equipment leaks from valves, connectors, open ended lines, pressure relief valves, and meters (using leak detection)	MRR	**Leaker EFs-Compressor Station** **(Component Leaks identified per survey use the following EFs)** # of leaks > 10,000 ppm x Subpart W EF (ref: Table W-3 of Subpart W of Part 98) **Compressor Components** Valve = 0.3562Mscf/day/dev Connector = 0.1342 Mscf/day/dev Open-Ended Line = 0.4145 Mscf/day/dev Pressure Relief Valve = 0.9518 Mscf/day/dev Meter = 0.4639 Mscf/day/dev Other = 0.0984 Mscf/day/dev **Non-compressor components** Valve = 0.1541 Mscf/day/dev Connector = 0.1370 Mscf/day/dev Open-ended line = 0.2705 Mscf/day/dev Pressure relief valve = 0.0482 Mscf/day/dev Meter = 0.0703 Mscf/day/dev Other = 0.0984 Mscf/day/dev	
	Compressor Station - Transmission storage tanks	MRR	Direct measurement of tank vapor vent stack + operating hours (pg 218-219 of Regulation for MRR)	For Transmission Storage Tanks such as Condensate Tanks, Aboveground Waste Condensate Vessels, and Scrubbers, engineering estimation was performed to estimate the annual emissions. Annual Emissions [Mscf/year] = TS x VC x VNG ● TS = Throughput of System [MMscf of dry gas/year] ● VC = Condensate volume per unit volume of dry Natural Gas [gal of liquid/MMscf of dry gas] ● VNG = Volume of Natural Gas vaporized from condensate liquids [Mscf/gal of liquid]
	Compressors (Centrifugal) - Transmission--data collection will require time spent in modes (active, pressurized idle, de-pressurized idle), compressor venting	MRR	Direct measurement x operating hours (operating mode)	
	Compressors (Reciprocating) - Transmission--data collection will require time spent in modes (active, pressurized idle, de-pressurized idle)compressor rod packing venting	MRR	Direct measurement x operating hours (operating mode)	
	Compressor station - Equipment and pipeline blowdowns	MRR	Eq. W - 14A # of blowdowns * piping volume	
	Compressor Station - Natual gas pneumatic device venting	MRR	Low Continuous Bleed = 0.0336 Mscf/day/dev Intermittent Bleed = 0.0576 Mscf/day/dev High Continuous Bleed = 0.4457 Mscf/day/dev	

Distribution Mains and Services Pipelines	Distribution Mains (Below-Ground Leaks)	GRI (1996)	Unprotected Steel Main = 0.1548 Mscf/day/leak Protected Steel Main = 0.0612 Mscf/day/leak Plastic Main = 0.2988 Mscf/day/leak	
	Distribution Mains (Above Ground Leaks) - Not MSA	GRI (1996)	Unprotected Steel Main = 0.1548 Mscf/day/leak Protected Steel Main = 0.0612 Mscf/day/leak Plastic Main = 0.2988 Mscf/day/leak	
	Distribution Service (Below-Ground Leaks)	GRI (1996)	Copper = 0.0226 Mscf/day/leak Unprotected Steel Service = 0.0600 Mscf/day/leak Protected Steel Servce = 0.0276 Mscf/day/leak Plastic Service = 0.0089 Msc/day/leak	
	Distribution Service (Above-Ground Leaks) - Not MSA	GRI (1996)	Copper = 0.0226 Mscf/day/leak Unprotected Steel Service = 0.0600 Mscf/day/leak Protected Steel Servce = 0.0276 Mscf/day/leak Plastic Service = 0.0089 Msc/day/leak	
	Distribution Main, Pressure Relief Valves	MRR	Pressure relief valve = 0.00696 Mscf/day/dev	
	Distribution Mains and Services blowdown	MRR	Equation W-14A , Eq. W-35 , Eq. W-36	● For an Abandoned HIgh/Medium Pressure Pipe and Service; Annual Emission = pi * ((Pipe Diameter)^2)/4 * Blowdown Footage * Pressure conversion factor/Natural Gas Compressibility Factor. Note that for shut-in pressures less than 100 psig, the Natural Gas Compressibility Factor is 1. ● For the Distribution Odor Intensity Test; Annual Emission = Number of Tests * Volume per Test
	All damages (as defined by PHMSA)	MRR	Equation W-14A , Eq. W-35 , Eq. W-36	● For AG Non-hazardous and MSA damages, emissions were estimated based on a company emission factor for the maximum leak rate of AG Non-hazardous based on soap test criteria for above ground facilities: number of days leaking * 4 cfh * 24/1000 = Mcf/damage. ● For AG Hazardous and Below Ground Code 1 damages, emissions were estimated based on engineering calculations using pipe size, damage opening size, and duration. Where an estimate was not made at the time of the event, the emissions were estimated from a population of similar events with respect to pipe material and size. ● For Code 2 and Code 3 damages, the emission factor for Distribution pipeline leaks was used (line 24 and 26).
	Pneumatic Devices - Pneumatic/Hydraulic Valve Operators, and Turbine Valve Operators	Engineering Estimate	Manufacturer Supplied Information (e.g., Bristol, Becker, Moore, etc)	
Distribution M&R Stations	Distribution Above grade M&R Station Leaks (> 300 psi)	GRI (1996)	1,684.5 Mscf/yr/station	
	Distribution Above grade M&R Station Leaks (100 - 300 psi)	GRI (1996)	896.5 Mscf/yr/station	
	Distribution Above grade M&R Station Leaks (< 100 psi)	GRI (1996)	40.6 Mscf/yr/station	
	Distribution Below grade M&R Station Leaks (> 300 psi)	GRI (1996)	12.176 Mscf/yr/station	
	Distribution Below grade M&R Station Leaks (100 - 300 psi)	GRI (1996)	1.840 Mscf/yr/station	
	Distribution Below grade M&R Station Leaks (< 100 psi)	GRI (1996)	0.964 Mscf/yr/station	
	Distribution M&R Station, Leaker Based	MRR	**Leaker EFs** **(Component Leaks identified per survey use the following EFs)** Connector = 0.041Mscf/day/dev Block Valve = 0.013 Mscf/day/dev Control Valve = 0.224 Mscf/day/dev Pressure Relief Valve = 0.006 Mscf/day/dev Orifice Meter = 0.005 Mscf/day/dev Regulator = 0.019 Mscf/day/dev Open-Ended Line = 0.627 Mscf/day/dev	
	M&R Stations - Farm Taps	MRR	# of leaks > 10,000 ppm x Subpart W EF (ref: Table W-3 of Subpart W of Part 98) Farm Tap = 12.2 Mscf/yr/station (ref: Table W-6 of Subpart W of Part 98) **Leaker EFs** (Component Leaks identified per survey use the following EFs) Connector = 0.041Mscf/day/dev Block Valve = 0.013 Mscf/day/dev Control Valve = 0.224 Mscf/day/dev Pressure Relief Valve = 0.006 Mscf/day/dev Orifice Meter = 0.005 Mscf/day/dev Regulator = 0.019 Mscf/day/dev Open-Ended Line = 0.627 Mscf/day/dev	
	Distribution M&R Station Blowdowns	Engineering Estimate	Average Pressure x Average Volume x # of inspections & Maintenance Activities	
	Distribution M&R Station Pneumatics	Engineering Estimate	Manufacturer Supplied Information (e.g., Bristol, Bettis Actuators, etc)	
Commercial, Industrial and Residential Meters	Residential Meters	GRI (1996)	0.148 Mscf/yr/meter	
	Commercial and Industrial Meters	GRI (1996)	0.051 Mscf/yr/meter	
	Vented Emission from MSA	Engineering Estimate	Estimated volume release by MSA and activity type	For Damages: ● For AG Non-hazardous MSA damages, emissions were estimated based on a company emission factor for the maximum leak rate of AG Non-hazardous leaks based on soap test criteria for above ground facilities: number of days leaking * 4 cfh * 24/1000 = Mcf/damage. ● For AG Hazardous MSA damages, emission was estimated based on engineering calculation using pipe size, damage opening size, and duration. Where an estimate was not made at the time of the event, the emissions were estimated from a population of similar events with respect to pipe material and pipe size.
Underground Storage	Dehydrator Vents - Storage (dehydrator vent emissions tab)	GRI (1996)	One of the following three cases per dehydrator facility 1. Glycol dehydrator with VRU and thermal oxidizer = 0 Mscf 2. Glycol dehydrator with no control device = Engineering Estimate 3. Desiccant dehydrator = 2.23E-03 mt CH4/MMscf (Alternative: Eq. 5 in MRR)	
	Storage - piping leakage (compressor and component fugitive leaks tab)	MRR	**Leaker EFs-Storage Station, Gas Service** **(Component Leaks identified per survey use the following EFs)** Connector = 0.1342 Mscf/day/dev Valve = 0.3562 Mscf/day/dev Pressure Relief Valve = 0.9518 Mscf/day/dev Open-Ended Line = 0.4145 Mscf/day/dev Meter = 0.4639 Mscf/day/dev Other = 0.0984 Mscf/day/dev **Population EFs-Storage Wellheads, Gas Service** **(For all un-surveyed components use the following EFs)** Connector = 0.0002 Mscf/day/dev Valve = 0.0024 Mscf/day/dev Pressure Relief Valve = 0.0041 Mscf/day/dev Open Ended Line = 0.0007 Mscf/day/dev	
	Storage - surface casing leakage (storage leaks and emissions tab)	Engineering Estimate	TBD	
	Storage - Wellhead leakage (storage leaks and emissions tab)	MRR	**Leaker EFs-Storage Wellheads, Gas Service** **(Component Leaks identified per survey use the following EFs)** Connector (other than flanges) = 0.0288 Mscf/day/dev Valve = 0.1080 Mscf/day/dev Pressure Relief Valve = 0.0984 Mscf/day/dev Open-Ended Line = 0.0600 Mscf/day/dev Flange = 0.0912 Mscf/day/dev Other = 0.0984 Mscf/day/dev **Population EFs-Storage Wellheads, Gas Service** **(For all un-Surveyed components, use the following EFs)** Connector = 0.0002 Mscf/day/dev Valve = 0.0024 Mscf/day/dev Pressure Relief Valve = 0.0041 Mscf/day/dev Open-Ended Line = 0.0007 Mscf/day/dev	

	Storage - Compressor & blowdowns (Blowdowns tab)	Engineering Estimate	Eq. 13 of MRR (piping volume x # of blowdowns)	
	Storage - Wellhead Rework blowdown and bring-in (Blowdowns tab)	Engineering Estimate	Eq. 9,10,11,12 of MRR	
	Pressure Relief Valves (Component Vented Emissions tab)	MRR	Pressure relief vallve = 0.9518 Mscf/day/dev.	
	Pneumatic Devices - Pneumatic/Hydraulic Valve Operators, and Turbine Valve Operators (Component Vented Emissions tab)	MRR	Low Continuous Bleed = 0.0336 Mscf/day/dev Intermittent Bleed = 0.0576 Mscf/day/dev High Continuous Bleed = 0.4457 Mscf/day/dev Hydraulic Valve Operator = TBD Turbine Valve Operator = TBD	