DATE RESPONDED: MAY 15, 2015

1. Has San Diego Gas and Electric Company ("SDG&E") conducted any studies quantifying the methane/natural gas leaking from its natural gas system? If so please provide an explanation and description of the study and appropriate documentation of what was done, and the costs associated with quantification of leaks.

#### **SDG&E** Response:

Coordination of research programs are managed by SoCalGas. Please refer to the response to Question 1 in Data Request EDF-SCG-DR-02.

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2. Has SDG&E implemented technologies, or performed evaluations of the appropriateness of individual technologies, to quantify the methane/natural gas leaking from its natural gas system? If so please provide an explanation and description of the technology and appropriate documentation of what was done, and the costs associated with quantification of leaks.

#### **SDG&E** Response:

SDG&E has implemented technologies to quantify the methane/natural gas leaking from individual components in its natural gas system, namely using high-flow samplers. However, SDG&E as mentioned in response to Question 1 in Data Request EDF-SCG-DR-02 continues to be engaged in collaborative research to develop methane quantification technologies. Also as stated in response to EDF-SCG-DR-01 Question 2, "Plans to quantify emissions will be more clearly delineated once the CPUC adopts rules and procedures in Phase 2 of the Rulemaking 15-01-008, including requirements for quantification."

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3. Has SDG&E hired or contracted with a third party to conduct studies or implement technologies quantifying the methane/natural gas leaking from individual leaks anywhere in the natural gas system? If so please provide an explanation and appropriate documentation of what was done and the costs associated with the technology and contacts.

#### **SDG&E** Response:

Yes, SDG&E has contracted with a third party to conduct leak survey studies as part of the annual mandatory Green House Gas reporting as required by Subpart W. Note that Subpart W requirements only apply to specific facilities in the system and not the entire natural gas system. In addition, SDG&E employ high flow samplers to quantify leaks where we need to for compliance purposes. Appropriate documentation can be provided upon request when additional time is provided.

SDG&E has not hired or contracted with a third party to implement technologies to quantify the methane/natural gas leaks from individual components or pipes from the natural gas system. However, SDG&E has participated in studies such as CARB/GTI study to develop leak rate factors for various system facilities that also involved quantification of a sample of certain types of system leaks.

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4. Please explain and provide the appropriate documentation showing to what extent the technical and supervisory personnel at SDG&E coordinate with Southern California Gas Company about leak prevention, detection, and repair best practices, methods used or any other sharing of information about addressing leaks.

#### **SDG&E** Response:

See response to Question 4 in Data Request EDF-SCG-DR-02