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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Establish Policies, Processes, and Rules to Ensure Safe and Reliable Gas Systems in California and Perform Long-Term Gas System Planning.	Rulemaking 24-09-012

ADMINISTRATIVE LAW JUDGES' RULING SEEKING DATA FROM GAS UTILITIES

On May 20, 2022 and November 4, 2022, California's investor-owned gas utilities, Pacific Gas and Electric Company, Southern California Gas Company, San Diego Gas & Electric Company, and Southwest Gas Company (collectively, gas utilities) provided the Commission with spreadsheets containing certain information, including information on pipeline age, material, and assessed risk; gas consumption; and replacement costs. The spreadsheets were part of responses filed in the procedural record of Rulemaking (R.) 20-01-007.

This ruling directs gas utilities to file the responses they filed on May 20, 2022 and November 4, 2022 in R.20-01-007 as a compliance filing in the record of this Rulemaking.

This ruling also directs gas utilities to correct, clarify, and substitute certain information. Gas utilities shall correct distribution pipeline risk by quartile and for the top 5 percent within the top quartile, rather than by alternate percentages as gas utilities previously provided. Gas utilities shall clarify regulatory station locations by category and provide the number of customers served by each

regulatory station.[1] Gas utilities shall substitute the previously ordered planned pipeline replacement information, which no utility provided, with risk scores reflecting how pipelines may be prioritized for replacement.

Gas utilities shall complete and supplement their census tract data spreadsheets with the information described in Appendix A. Further background on how this risk score information relates to the previously directed planned replacement information is provided in Appendix B. Gas utilities shall comply with this ruling by Friday, January 3, 2025.

The Commission has determined that confidential treatment is not warranted for the gas infrastructure data required by this ruling. However, gas utilities may redact certain customer gas consumption data if confidential treatment of that customer information is necessary to protect customer privacy. Regardless of whether gas utilities elect to pursue a confidentiality claim over certain customer gas consumption data, gas utilities shall serve unredacted data on members of the service list with Commission email addresses.

IT IS RULED that:

1. Gas utilities shall file the responses they filed on May 20, 2022 and November 4, 2022 in R.20-01-007 as compliance filings in the record of this Rulemaking.
2. Gas utilities shall complete and supplement their census tract with the information described in Appendix A.

[1] Regulator stations maintain appropriate pipeline pressure and entail significant costs to upgrade or replace. High-pressure regulatory (HPR) stations serving small numbers of customers identified for replacement or retirement were an initial focus of PG&E's Alternative Energy Program to provide electrification alternatives to selected infrastructure upgrades.

3. Confidential treatment is not warranted for the gas infrastructure data required by this ruling.

4. Gas utilities shall serve unredacted data to members of the service list with Commission email addresses.

5. Gas utilities shall comply with this ruling by January 3, 2025.

Dated November 22, 2024, at San Francisco, California.

/s/ ROBYN PURCHIA	/s/ DAVID VAN DYKEN
Robyn Purchia Administrative Law Judge	David Van Dyken Administrative Law Judge

APPENDIX A

INFORMATION TO BE PROVIDED

Gas utilities shall complete and supplement their census tract data and data summaries with the following revisions:

1. *Gas System Census Tract Data with Additional Risk Information*
   Provide a CSV spreadsheet file entitled "Gas System Census Tract Data – utilityname.csv" as ordered in the September 21, 2022 ruling in R.20-01-007, with the following corrections or changes:

A. For all utilities:

Column Name (where to make the change)	**Change Request**
HighestLeakProbMains (formerly HighestRiskMains)[2]	Rename and revise this column to show miles with calculated probability of leak per year in highest 5 percent of distribution main pipelines systemwide. Utilities previously provided data using 4.76 percent.
HighLeakProbMains (formerly HighRiskMains)	Rename and revise this column to show miles with calculated probability of leak per year in highest quartile (25 percent) of distribution main pipelines systemwide. Thus, HighLeakProbMains includes HighestLeakProbMains. Utilities previously provided data using 23.8 percent after the first 4.76 percent.
UpperLeakProbMains (formerly UpperRiskMains)	Rename and revise this column to show miles with calculated probability of leak per year in second highest quartile (25 percent) of distribution main pipelines systemwide. Utilities previously provided data using 23.8 percent.
LowerLeakProbMains (formerly LowerRiskMains)	Rename and revise this column to show miles with calculated probability of leak per year in second lowest quartile of distribution main pipelines systemwide. Utilities previously provided data using 23.8 percent.

[2] Column names and descriptions are slightly revised from previous rulings to avoid confusion between "risk" and "risk score" concepts. Probability of leak may be referred to by some utilities as "risk of failure." The new phrasing refers to the same information as the previous phrasing.

LowLeakProbMains (formerly LowRiskMains)	Rename and revise this column to show miles with calculated probability of leak per year in lowest quartile of distribution main pipelines systemwide. Utilities previously provided data using 23.8 percent.
HighestConsqMains	Revise this column to show miles with calculated probability of serious safety incident given leak, or consequence of failure, in highest 5 percent of distribution main pipelines systemwide. Utilities previously provided data using 4.76 percent.
HighConsqMains	Revise this column to show miles with calculated probability of serious safety incident given leak, or consequence of failure, in highest quartile (25 percent) of distribution main pipelines systemwide. Thus, HighConsqMains includes HighestConsqMains. Utilities previously provided data using 23.8 percent after the first 4.76 percent.
UpperConsqMains	Revise this column to show miles with calculated probability of serious safety incident given leak, or consequence of failure, in second highest quartile (25 percent) of distribution main pipelines systemwide. Utilities previously provided data using 23.8 percent.
LowerConsqMains	Revise this column to show miles with calculated probability of serious safety incident given leak, or consequence of failure, in second lowest quartile (25 percent) of distribution main pipelines systemwide. Utilities previously provided data using 23.8 percent.
LowConsqMains	Revise this column to show miles with calculated probability of serious safety incident given leak, or consequence of failure, in lowest quartile (25 percent) of distribution main pipelines systemwide. Utilities previously provided data using 23.8 percent.
PlanGRCReplaceMains (Miles of distribution main pipeline planned for replacement in 2023 through 2026)	This column is no longer required at this time.
PlanGRCReplaceServices (Miles of service pipeline planned for	This column is no longer required at this time.

replacement or relocation in 2023 through 2026)	
EstGRCReplaceMains (Estimated miles of additional distribution main pipeline planned for replacement in 2023 through 2026)	This column is no longer required at this time.
EstGRCReplaceServices (Estimated miles of additional service pipeline planned for replacement in 2023 through 2026)	This column is no longer required at this time.
GRCReplaceMains2030 (Miles of distribution main pipeline planned for replacement in 2027 through 2030)	This column is no longer required at this time.
GRCReplaceServices2030 (Miles of service pipeline planned for replacement or relocation in 2027 through 2030)	This column is no longer required at this time.
RiskScoreTop200	Provide this new column and place it immediately after the column "MaterialUnk," before existing columns about risk. Column Description: Miles of main distribution pipeline in the census tract with risk score (estimated probability of leak *times* consequences of leak, as calculated for RAMP risk score) in the top 200 miles across the utility.[3] Units or Comments: Miles
RiskScore0201to0400	Provide this new column and place it immediately after the column "RiskScoreTop200." Column Description: Miles of main distribution pipeline in the census tract with risk score (estimated probability of leak *times* consequences of leak, as

[3] For SDG&E, use top 70 miles instead of 200, and adjust definitions and column names accordingly. For Southwest Gas, use top 30 miles instead of 200, and adjust definitions and column names accordingly.

	calculated for RAMP risk score) in the third 200 miles across the utility.[4] Units or Comments: Miles
RiskScore0401to0600	Provide this new column and place it immediately after the column "RiskScore0201to0400." Column Description: Miles of main distribution pipeline in the census tract with risk score (estimated probability of leak, *times* consequences of leak, as calculated for RAMP risk score) in the third 200 miles across the utility.[4] Units or Comments: Miles
RiskScore0601to0800	Provide this new column and place it immediately after the column "RiskScore0401to0600." Column Description: Miles of main distribution pipeline in the census tract with risk score (estimated probability of leak, *times* consequences of leak, as calculated for RAMP risk score) in the fourth 200 miles across the utility.[4] Units or Comments: Miles
RiskScore0801to1000	Provide this new column and place it immediately after the column "RiskScore0601to0800." Column Description: Miles of main distribution pipeline in the census tract with risk score (estimated probability of leak, *times* consequences of leak, as calculated for RAMP risk score) in the fifth 200 miles across the utility.[4] Units or Comments: Miles
RiskScore1001to1200	Provide this new column and place it immediately after the column "RiskScore0801to1000." Column Description: Miles of main distribution pipeline in the census tract with risk score (estimated probability of leak, *times* consequences of leak, as calculated for RAMP risk score) in the sixth 200 miles across the utility. [4] Units or Comments: Miles
RiskScore1201to1400	Provide this new column and place it immediately after the column "RiskScore1001to1200." Column Description: Miles of main distribution pipeline in the census tract with risk score (estimated probability of leak, *times* consequences of leak, as calculated for RAMP risk score) in the seventh 200 miles across the utility.[4] Units or Comments: Miles

[4] For SDG&E, use next 70 miles instead of 200, and adjust definitions and column names accordingly. For Southwest Gas, use next 35 miles instead of 200, and adjust definitions and column names accordingly.

RiskScore1401to1600	Provide this new column and place it immediately after the column "RiskScoreTop200." Column Description: Miles of main distribution pipeline in the census tract with risk score (estimated probability of leak, *times* consequences of leak, as calculated for RAMP risk score) in the eighth 200 miles across the utility.[4] Units or Comments: Miles
RiskScore1601to1800	Provide this new column and place it immediately after the column "RiskScoreTop200." Column Description: Miles of main distribution pipeline in the census tract with risk score (estimated probability of leak, *times* consequences of leak, as calculated for RAMP risk score) in the ninth 200 miles across the utility.[4] Units or Comments: Miles
RiskScore1801to2000	Provide this new column and place it immediately after the column "RiskScoreTop200." Column Description: Miles of main distribution pipeline in the census tract with risk score (estimated probability of leak, *times* consequences of leak, as calculated for RAMP risk score) in the tenth 200 miles across the utility.[4] Units or Comments: Miles
GRCReplaceMainsPrograms	Revise this column to show all main pipeline miles subject to the utility's programs to replace Aldyl-A plastic or aging steel mains. For PG&E, this consists of the Gas Pipeline Replacement Program and Plastic Pipeline Replacement Program. For SoCalGas, this consists of the Vintage Integrity Plastic Plan and Bare Steel Replacement Plan programs. Units or Comments: Miles
HiPressRegs	Provide this new column and place it immediately after the column "HiBranches," before other columns regarding regulator stations. Column Description: Number of high-pressure regulator stations located in the census tract, following the pressure definitions provided for "RegStationType" in the March 1 ruling.
MedPressRegs	Provide this new column and place it immediately after the column "HiPressRegs," before other columns regarding regulator stations. Column Description: Number of medium-pressure regulator stations located in the census tract,

	following the pressure definitions provided for "RegStationType" in the March 1 ruling.
LowPressRegs	Provide this new column and place it immediately after the column "MedPressRegs," before other columns regarding regulator stations. Column Description: Number of low-pressure regulator stations located in the census tract, following the pressure definitions provided for "RegStationType" in the March 1 ruling.
UnkPressRegs	Provide this new column and place it immediately after the column "LowPressRegs," before other columns regarding regulator stations. Column Description: Number of regulator stations located in the census tract not included in HiPressRegs, MedPressRegs, or LowPressRegs.

B. Utility-Specific: In addition to the information requested above for all the utilities, PG&E shall include the following corrections or changes:

Column Name (where to make the change)	**Change Request**
HighestLeakProbMains	Provide at least three significant digits.
PGEHPR (new column)	Provide this new column and place it immediately after the column "UnkPressRegs," before other columns regarding regulator stations. Column Description: Number of regulator stations referred to as high-pressure regulator stations (HPRs) in General Rate Case filings and associated documentation, consistent with the use of the term "HPR" in assessment of potential for avoided replacement within the Alternative Energy Program and related programs.
HighestLeakProbServices (HighestRiskServices)	Rename and revise this column to show miles with calculated probability of leak per year in highest 5 percent of distribution service pipelines systemwide. The utility previously provided data using 4.76 percent.
HighLeakProbServices (formerly HighRiskServices)	Rename and revise this column to show miles with calculated probability of leak per year in highest quartile (25 percent) of distribution service pipelines systemwide. Thus, HighLeakProbServices includes

	HighestLeakProbServices. The utility previously provided data using 23.8 percent after the first 4.76 percent.
UpperLeakProbMains (formerly UpperRiskServices)	Rename and revise this column to show miles with calculated probability of leak per year in second highest quartile (25 percent) of distribution service pipelines systemwide. The utility previously provided data using 23.8 percent.
LowerLeakProbServices (formerly LowerRiskServices)	Rename and revise this column to show miles with calculated probability of leak per year in second lowest quartile of distribution service pipelines systemwide. The utility previously provided data using 23.8 percent.
LowLeakProbServices (formerly LowRiskServices)	Rename and revise this column to show miles with calculated probability of leak per year in lowest quartile of distribution service pipelines systemwide. The utility previously provided data using 23.8 percent.
HighestConsqServices	Revise this column to show miles with calculated probability of serious safety incident given leak, or consequence of failure, in highest 5 percent of distribution service pipelines systemwide. The utility previously provided data using 4.76percent.
HighConsqServices	Revise this column to show miles with calculated probability of serious safety incident given leak, or consequence of failure, in highest quartile (25 percent) of distribution service pipelines systemwide. Thus, HighConsqServices includes HighestConsqServices. The utility previously provided data using 23.8 percent after the first 4.76 percent.
UpperConsqServices	Revise this column to show miles with calculated probability of serious safety incident given leak, or consequence of failure, in second highest quartile (25 percent) of distribution service pipelines systemwide. The utility previously provided data using 23.8 percent.
LowerConsqServices	Revise this column to show miles with calculated probability of serious safety incident given leak, or consequence of failure, in second lowest quartile (25 percent) of distribution service pipelines systemwide. The utility previously provided data using 23.8 percent.

LowConsqServices	Revise this column to show miles with calculated probability of serious safety incident given leak, or consequence of failure, in lowest quartile (25 percent) of distribution service pipelines systemwide. The utility previously provided data using 23.8 percent.

B. Utility-Specific: In addition to the information requested above for all the gas utilities, SoCalGas shall include the following corrections or changes:

Column Name (where to make the change)	**Change Request**
RegStationCustomers	Provide this column, which was marked as "N/A" in the data previously provided. Provide the number of customers served by each station referred to in column "RegStationType," separated by semicolons, similar to the format for RegStationAge. That is, to produce this information, (1) for each regulator station, identify the total number of customers served by that regulator station, regardless of census tract; (2) report that number of customers in this column, in the census tract which the regulator station is located in. To define customers served by a regulator station, follow the format used by PG&E, representing customers downstream of the regulator station. Some customers may be served by more than one regulator station.

SoCalGas shall also submit an unredacted version of its response to the "Risk Assessment Methods" information requirement in the September 21, 2022 ruling in R.20-01-007, unless redaction is necessary to protect customer confidentiality.

C. Utility-Specific: In addition to the information requested above for all the gas utilities, SDG&E shall include the following corrections or changes:

Column Name (where to make the change)	**Change Request**
TractID	Provide the 10-digit census tract ID.
RegStationCustomers	Revise this column to provide the number of customers served by each station referred to in column "RegStationType," separated by semicolons, similar to the format for RegStationAge. That is, to

	produce this information, (1) for each regulator station, identify the total number of customers served by that regulator station, regardless of census tract; (2) report that number of customers in this column, in the census tract which the regulator station is located in. To define customers served by a regulator station, follow the format used by PG&E, representing customers downstream of the regulator station. Some customers may be served by more than one regulator station. The utility previously provided data that showed a number of RegStationCustomers in tracts with no regulator stations, thus not reflecting the intent of this column.

D. Utility-Specific: As an amendment of the information requested above for all the utilities, the Southwest Gas Company shall include the following corrections or changes:

Column Name (where to make the change)	**Change Request**
Risk, consequence, and risk score columns	In light of its lower mileage in California and lower leak rates compared to other California gas utilities, this utility may adjust these columns from the direction given above to reflect risk information feasible using its existing risk and consequence classification systems, as it has done in response to previous rulings.

2. *Corrected Gas System Summary Statistics*
Provide an Excel spreadsheet file with summary statistics entitled "Gas System Summary Statistics – utilityname.csv," with tabs titled "Gas System Census Tract Data," "Consumption Data by Census Tract," and "Consumption Data by Zip Code," as ordered in the September 21, 2022 ruling in R.20-01-007, with the following corrections or changes to the "Gas System Census Tract Data" tab:

Column or Row Name (where to make the change)	**Change Request**
All	Reflect all changes to census tract data requested above.

All	Provide systemwide statistics across all columns, including those for which some row data was marked confidential. In some cases, utilities previously excluded confidential data from systemwide statistics, although it would not compromise confidentiality when aggregated across the utility.
Units (new row)	Provide a new row stating the units for each column, e.g. "leaks per mile per year."
Definition (new row)	Provide a new row with the Commission's definition of each column, per the instant Ruling, the September 21, 2022 Ruling in R.20-01-007 and the March 1, 2022 Ruling in R.20-01-007 as applicable, with any notes or clarifications from the utility necessary to indicate what was provided.

APPENDIX B

MILEAGE CALCULATIONS

In R.20-01-007, gas utilities were ordered to provide the number of miles of gas distribution pipelines they plan to or estimate they will replace between 2023-2026, 2027-2030, and after 2030, respectively by census tract. Gas utilities proactively replace aging steel, Aldyl-A plastic, and other high-risk gas distribution main pipelines by implementing several ratepayer-funded programs overseen by the Commission via general rate cases. In response to this order, the utilities provided none or incomplete, answers, stating that the information is not available because they do not plan their gas replacement pipeline programs that many years in advance.

The gas utilities state that within their gas pipeline replacement programs, they choose which pipeline segments to replace based primarily on risk scores,[5] to replace the riskiest segments first, accounting for the consequences if a leak occurs. PG&E includes such descriptions in their Risk Assessment Mitigation Proceeding report and general rate case applications. SoCalGas prioritizes similarly, according to their filings in rulemaking R.20-01-007. Therefore, a pipeline segment's risk score may be used as a proxy to indicate how soon it will be replaced. PG&E reports risk and consequence scores for distribution mains and services, while SoCalGas and SDG&E report conducting this analysis for mains but not services.

Therefore, as detailed in Appendix A, this ruling requires PG&E, SoCalGas, and SDG&E to report risk score information as a proxy for the

[5] Risk scores are the product of "leak probability" which represents the utility's estimate of the probability of a loss of gas containment (aka leak), and "consequence," which represents the utility's valuation of consequences should such a loss of containment occur, as calculated for the utility's RAMP risk scores.

previously requested planned and estimated pipeline replacement mileage by census tract by time period of expected replacement.

PG&E reports replacing 191 miles of gas distribution pipeline in 2021[6] and SoCalGas reports replacing 217.5 miles of gas distribution pipeline in 2021.[7] Similar quantities are reported for recent years. Thus, PG&E and SoCalGas each replace approximately 200 miles of gas distribution mains each year, subject to utility request and Commission direction via general rate cases. Consonant with their smaller size, SDG&E and Southwest Gas each replace smaller amounts of

[6] 191 miles is the sum of 2021 recorded mileage for Aldyl-A replacement (Plastic Pipeline Replacement Program, MAT Code 14D, 152.4 miles), aging steel replacement (Gas Pipeline Replacement Program, MAT code 14A, 25.9 miles), other main replacement (MAT code 50A, 10.9 miles) and other service replacement (MAT code 50B, 150 services * 0.0094 miles/service = 1.4 miles), as reported in PG&E, *Pacific Gas and Electric Company 2023 General Rate Case Exhibit (PG&E-3), Gas Operations Workpapers Supporting Prepared Testimony Chapters 2-5, Vol 1 of 4*, submitted in PG&E General Rate Case A.21-06-021 for years 2023-2026, p. 4-27 through 4-30. The value 0.0094 miles/service is from PG&E's "Supplemental Data" Excel file, submitted in response to Data Rulings in this proceeding and posted at https://www.cpuc.ca.gov/industries-and-topics/natural-gas/long-term-gas-planning-rulemaking.

[7] 217.5 is the sum of forecasted mileage for Aldyl-A replacement (VIPP, within budget code 277, 92 miles), aging steel replacement (BSRP, within budget code 277, 43 miles), other main replacement (budget codes 252, 253, 255, 267, 278, totaling 23.5 miles) and other service replacement (budget codes 256, 257, 258, 260, totaling 59 miles), see SoCalGas, Exhibit SCG-09-CWP, *Capital Workpapers to Prepared Direct Testimony of Amy Kitson / Travis Sera on Behalf of Southern California Gas Company*, submitted in SoCalGas General Rate Case A.22-05-015 for years 2024-2027, p. 43, and SoCalGas, Exhibit SCG-04-CWP-R, *Revised Capital Workpapers to Prepared Direct Testimony of Mario A. Aguirre on Behalf of Southern California Gas Company*, submitted in SoCalGas General Rate Case A.22-05-015 for years 2024-2027, Work Unit/Activity Level Estimates, p. 45 &ff. Note that SoCalGas' numbers in their "Supplemental Data" file, submitted in response to Data Rulings in this proceeding and posted at https://www.cpuc.ca.gov/industries-and-topics/natural-gas/long-term-gas-planning-rulemaking, are much lower because they did not include Aldyl-A replacement, aging steel replacement, or other service replacement.

distribution mains annually: 70 miles for SDG&E, and 30 miles for Southwest Gas.[8]

This ruling directs PG&E and SoCalGas to report for each census tract, how many miles of gas distribution main in that tract are in the top 200 highest risk score miles of all mains operated by the utility, next 200 highest risk score miles, and so on up to a total of 2,000 miles of distribution mains. SDG&E is to report similarly in 10 sets of 70 miles, and Southwest Gas in 10 sets of 30 miles. This information constitutes a replacement for the previously requested planned and estimated pipeline replacement mileage.

For comparison with the top-5-percent risk and consequence information, note that for PG&E, 5 percent of distribution mains is 2,189 miles.[9] For SoCalGas, 5 percent of distribution mains is 2,584 miles, and for SDG&E, 412 miles. For Southwest Gas, 5 percent of their distribution mains in California is 161 miles.

[8] These amounts approximate SDG&E and SoCalGas' current annual gas distribution main replacement mileage in their relevant programs, as reported in SDG&E, "Supplemental Data" Excel spreadsheet, tab "Distribution Costs and Plans," cell N12; and Southwest Gas, "Supplemental Data" Excel spreadsheet, tab "Distribution Costs and Plans," cell D17. Spreadsheets posted at https://www.cpuc.ca.gov/industries-and-topics/natural-gas/long-term-gas-planning-rulemaking and submitted to the service list in this proceeding on November 4, 2022.

[9] These numbers are based on 2021 total distribution miles data owned by each utility as reported in the "Supplemental Data" Excel files for PG&E, SoCalGas, SDG&E and Southwest Gas, posted at https://www.cpuc.ca.gov/industries-and-topics/natural-gas/long-term-gas-planning-rulemaking. The same data is also included in these utilities' annual filings to PHMSA for 2021, which are also posted at https://www.cpuc.ca.gov/industries-and-topics/natural-gas/long-term-gas-planning-rulemaking. Mileage will vary slightly from year to year.