

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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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.

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**OPENING COMMENTS OF THE UTILITY REFORM NETWORK
REGARDING RULING ON SB 1221 MAPPING STAFF PROPOSAL**

A Mireille Fall-Fry
Staff Attorney

Marcel Hawiger
Staff Attorney

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Jalal Awan
Energy and Climate Policy Analyst

The Utility Reform Network
360 Grand Avenue, #150
Oakland, CA 94610
Phone: (415) 929-8876
Fax: (415) 912-1422
E-mail: afall@turn.org

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**OPENING COMMENTS OF THE UTILITY REFORM NETWORK
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On February 20, 2025, the Commission issued *Administrative Law Judge’s Ruling on Senate Bill 1221 Mapping Staff Proposal and Directions to Utilities* (“ALJ Ruling on SB1221” or “Ruling”). Commission staff prepared the Recommendations for SB 1221 California Natural Gas System Mapping and Directions to Utilities, Including Information to Be Provided, attached as Appendices A and B (collectively “Staff Proposal on Mapping”) to the ALJ Ruling on SB 1221. On February 27, 2025, the Commission issued an *Email Ruling Partially Granting the Joint IOUs Motion for Extension of Time to Provide Comments to the 2/20/25 ALJ Ruling on Senate Bill 1221 Mapping Staff Proposal* (“Extension”). Pursuant to the Ruling and the subsequent Extension, The Utility Reform Network (“TURN”) submits these opening comments.

I. INTRODUCTION AND SUMMARY OF RECOMMENDATIONS

Senate Bill 1221 (“SB 1221”) requires that, by July 1, 2025, and annually thereafter, each gas corporation submit a map to the California Public Utility Commission (“CPUC” or “Commission”) that includes:

- (1) the location of all potential gas distribution line replacement projects,
- (2) jurisdictional boundaries within the gas corporation’s service territory,
- (3) the boundaries of specified communities, and
- (4) and any other information required by the Commission.¹

On February 20, 2025, the Commission issued the Staff Proposal implementing the SB 1221 mapping requirements.² In response, TURN offers the following recommendations:

- (1) Because the maps will be instrumental in the identification and evaluation of the pilot projects developed in Track 2, the mapping requirements should be comprehensive and ensure that all necessary data is included from the outset,

¹ Public Utilities Code Sec. 661(a).

² Energy Division Staff Proposal for SB 1221 Mapping, February 20, 2025, p. 17.

including but not limited to, Distribution Integrity Management Plans (“DIMP”)-level risk data by pipeline material type.

- (2) Because SB 1221’s mapping requirement applies to all gas corporations until at least January 1, 2030,³ all gas corporations, including smaller utilities, should comply with at least a minimal level (census tract) of mapping.
- (3) The maps should incorporate all foreseeable gas infrastructure replacements, as well as color-coded representation of projects “which have entered the design phase or later,” to identify areas where decommissioning may be a viable alternative to costly replacements.⁴
- (4) The segment attributes should be modified to include an “unknown” parameter for YearInstalled, and to require that the most granular data be used for RiskScore.
- (5) Risk scores should be standardized across utilities to ensure consistency and transparency in identifying pipeline replacement projects.
- (6) The Commission should require ongoing tracking of decommissioned mains and services to monitor long-term infrastructure trends.
- (7) The maps should provide clear data on industrial customers that cannot be feasibly converted to alternative energy sources to inform strategic decarbonization planning.
- (8) ArcGIS should continue to be the mapping platform, with data from each mapping layer available as a readily downloadable CSV (or zipped CSV) file, and maps should be standardized across utilities to improve accessibility and regulatory oversight.

II. RECOMMENDED MODIFICATIONS TO STAFF PROPOSAL

A. Ensure Comprehensive Mapping at Sufficient Granularity

³ Public Utilities Code Sec. 661(c).

⁴Staff Proposal (pp.23,24). TURN understands that the specific color-coded project phase nomenclature may vary by utility — but should typically include concept, feasibility, planning & permitting, engineering & design, procurement, construction, and commissioning & testing phase(s), along with timeline for each phase, where applicable.

Track 1 of Phase 3, implements SB 1221 mapping requirements, while Track 2 is the designation of priority neighborhood decarbonization zones. The success of Track 2 depends on the quality of the data provided in Track 1. It is therefore imperative that all relevant information needed to designate and eventually evaluate these projects is included in the initial mapping phase, rather than requiring utilities to submit additional data later. Because the success of Track 2 pilot projects depends on the level of granularity, accuracy and completeness of data provided in these maps, TURN strongly urges the Commission to require that maps include:

- Service line locations and lengths to better assess decommissioning costs and feasibility;
- Gas infrastructure replacement percentile risk scores (i.e. 0 to 100th percentile of risk), standardized across utilities, to support an equitable assessment of pipeline replacement projects; and
- Data on industrial customers who cannot be converted to electricity, to inform targeted electrification and alternative fuel strategies.

Furthermore, TURN recommends that these data be provided at a sufficient level of granularity to enable future identification of decarbonization zones. While the Staff Proposal requires utilities to submit risk and other pipeline attribute data at the level of California's 9,129 census tracts (see p. 9 of Staff Proposal), TURN recommends requiring more granular DIMP-level data within census tracts since the utilities already foresee distribution pipeline replacement opportunities at a more granular level than census tract(s). TURN's preliminary analysis of PG&E's data (submitted per ALJ Ruling on Feb 9, 2022) shows that more than 70% of PG&E's 3,417 census tracts (i.e. 2,413 census tracts) may include multiple zip codes and each tract may cover about 10 miles of pipeline on average.

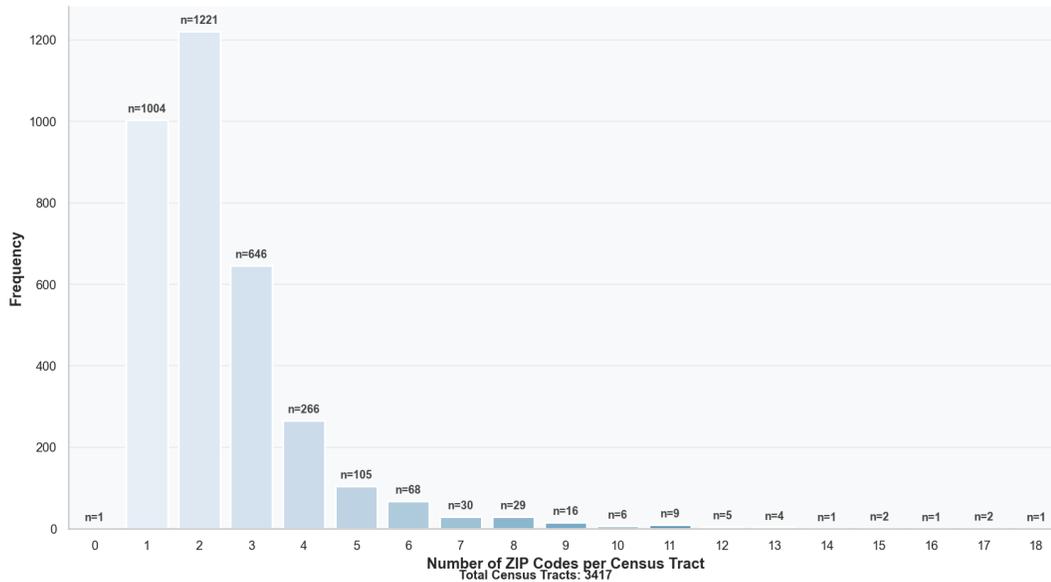


Figure 1 Distribution of zip codes within PG&E's 3,417 census tracts (Source: PG&E data per ALJ Ruling Seeking Data from Gas Utilities (Feb 9, 2022))

This makes census tracts too broad for meaningful risk analysis. In their Risk Assessment and Mitigation Phase (“RAMP”) filings for electric wildfire risk, the utilities provide circuit segment level risk by deciles (dividing total risk across 10 equal parts) for primary, distribution, and service conductors. The Commission’s Safety and Policy Division (“SPD”) [Safety Policy Division Evaluation Report on PG&E 2024 RAMP Application (A.)24-05-008, p. 49] has commented on the “loss of granularity” and “oversimplification” that results from a decile-based categorization of risk.⁵

B. Require Compliance by Small Gas Utilities

TURN agrees that “each gas utility should be responsible for maps covering its own service area and areas where it owns land or infrastructure.”⁶ As noted in the Staff Report, electric utilities currently provide analogous data in their ICA maps and the “[e]lectric distribution lines, circuits, and substations are analogous in scale and function to gas distribution pipelines, pressure districts, and regulator stations, respectively.”⁷ The Staff Report notes that 94 percent of

⁵ Safety Policy Division Evaluation Report on PG&E 2024 RAMP Application (A.)24-05-008, p. 49.

⁶ Staff Report, Section 3.1, p.11.

⁷ Staff Report, Section 2.2, p.6.

California's 9,129 census tracts receive gas service from California's four largest gas utilities and dispenses with the three smaller gas corporations in the remainder of the report. "Staff do not propose that the CPUC direct them to provide gas maps by July 1, 2025."⁸ TURN recognizes Staff's reasoning to not require mapping from smaller investor-owned utilities but urges reconsideration because SB 1221 applies to all gas corporations. SB 1221 does not appear to provide authority to the Commission to exempt any gas utility until 2030.⁹ While smaller utilities may not need to produce highly detailed maps, they should at least provide service territory boundaries to ensure comprehensive statewide mapping and to facilitate showing overlapping electric or gas provider area boundaries.

C. Add Service Lines to Gas Infrastructure

TURN agrees that the information on infrastructure informs the background for planned replacements and, therefore, the maps should include all major categories of gas distribution infrastructure. The pilot projects will be due prior to the first annual map update, so it is imperative that all necessary data points be captured. Accordingly, TURN does not agree that service lengths and paths should not be mapped until needed as part of the decommissioning project. It is possible that avoiding long service line replacements could in and of itself be a viable non-pipeline alternative project or be relevant to the cost-effectiveness analysis of a neighborhood decarbonization zone pilot. Therefore, not having data on service lines could undermine the goals of SB 1221 and of using non-pipeline alternatives in general.

D. Modifications to Segment Attribute Data

TURN recommends two modifications to the required data concerning segment attributes. First, Staff recommends that if the "year installed" (FieldName=Year) date is unknown, the utilities provide "oldest year possible." While it is useful to provide the "oldest year possible," any such segment should also have a flag marking it as "UKN" or "unknown." It may be useful for risk analysis to distinguish between a segment that was actually installed in 1932 and

⁸ Staff Report, Section 3.1, p.9.

⁹ Public Utilities Code Sec. 661(c).

a segment that has been identified as installed in 1932 simply as an estimate because the actual data is missing.

Second, Staff recommends that the risk score, rather than the recommended maximum years of use, be used to predict replacement. TURN supports this approach but recommends an important modification. Staff directs utilities to report risk scores for each segment (FieldName=RiskScore) “as calculated for DIMP or RAMP risk score,” but TURN recommends that the Commission require the utilities to provide the most granular data available for the segment, whether obtained from DIMP or RAMP risk models.¹⁰ TURN assumes that the DIMP model presently provides more granular data. If there is any confusion, an additional parameter should be added to the attributes section to identify precisely the source of the “RiskScore” attribute. Additionally, these risk scores must not be withheld as confidential since that would make comparison of the segments impossible.

E. Implement a Normalized, Uniform Risk Metric

Furthermore, to facilitate the evaluation of risk data, TURN recommends that the risk score should be based on a normalized unit of analysis metric (e.g. leak probability *multiplied by* consequence of leak per meter of Aldyl-A type distribution gas pipeline) that is uniform across utilities; otherwise, percentiles show only the risk score comparison within one utility.¹¹ TURN notes that risk score percentile comparisons across utilities would be largely irrelevant if the absolute risk score unit (or the “unit of analysis”) is not a uniform, normalized metric.¹² Currently, the utilities do not appear to define segments uniformly and

¹⁰ TURN supports Staff’s recommendation to use FieldName=RiskScorePercentile, which ranks risk from the 1st to 100th percentile. PG&E’s data, submitted per the ALJ Ruling (Feb 9, 2022), only provides pipeline miles by quartile within census tracts, which is too broad for effective risk assessment.

¹¹ Staff Proposal, pg. 23 (“Staff recommend that gas utility maps show the risk score of each pipeline segment and the leak probability and consequence components of that score. In addition, risk score units or calibration may differ across utilities, so the risk score percentile should also be shown to facilitate comparison among utilities. Absolute scores will facilitate observation of change over time.”)

use inconsistent methodologies to assess pipeline replacement risk, which means the risk score for each pipeline segment is not readily comparable across census tracts within one utility or between utilities. To facilitate fair and transparent evaluation and comparison, TURN recommends the Commission establish a standardized framework for calculating and reporting risk scores across all gas corporations. Specifically, TURN recommends that:

- The CPUC require a uniform framework for calculating risk scores to enable meaningful comparisons within and across utilities. Moreover, at a minimum, the following fundamental risk related data should be provided to parties, at the pipeline segment level:
 - Underlying data for calculating risk scores i.e. likelihood of failure (LoF) and Consequence of Failure (CoF), and;
 - Underlying data/weights on “Aspects contributing to Risk of Failure” and “Aspects contributing to Consequence of Failure.”¹³
- Pipeline segment risk scores be mapped and categorized consistently to facilitate external analysis.
- The Commission work with stakeholders to establish clear criteria for determining replacement prioritization.

These changes to risk analyses will improve comparability and accountability in pipeline replacement decision-making.

TURN appreciates that it may not be possible to standardize the risk scores prior to the statutory deadline of June 1, 2025, for map submission. If it cannot be done by this date, the Commission should pursue risk score standardization as soon as possible in Phase 2 or 3.

F. Identify Foreseeable Gas Infrastructure Replacements and Decommissioning Opportunities and Track Decommissioned Infrastructure

¹³ R.20-01-007 PGE Response to ALJ Revised Ruling (Atch 5-10): Risk of Failure (SIFs/100,000 years) is weighted by eight threat categories: 1) Corrosion, 2) Equipment Failure, 3) Excavation Damage, 4) Incorrect Operations, 5) Material, Weld, or Joint Failure, 6) Natural Forces, 7) Other Outside Forces, and 8) Other. Similarly, Consequence of Failure may be based on threat category, population density, operating pressure etc.

Potential decommissioning projects should be shown as well as recently decommissioned mains and services to track existing decommissioning activity of all kinds.¹⁴ TURN supports the inclusion of foreseeable gas infrastructure replacements but recommends that the Commission also require identification of potential decommissioning sites. By identifying areas where decommissioning could replace expensive pipeline replacements, the Commission can encourage cost-effective and climate-aligned alternatives. TURN supports mapping requirements that track decommissioned infrastructure. This data is essential for monitoring long-term system trends and ensuring accountability in utility decommissioning decisions. TURN recommends that utilities provide ongoing updates on decommissioned mains and services to facilitate comprehensive regulatory oversight.

G. Identify Difficult to Convert Industrial Customers

TURN agrees with the requirement to show the number and type of customers served by each “service shown on the map.” If possible, TURN recommends that the maps explicitly identify industrial customers who are unlikely to be converted to alternative energy sources. While TURN has not fully researched this issue, one possibility may be to add relevant National Industrial Classification (“NIC”) codes associated with the industrial customers located on a particular service. This information will be critical for evaluating targeted electrification and decarbonization efforts, ensuring that resources are allocated where they can be most effective.

H. Standardize Mapping Formats and Platforms

TURN supports the continued use of ArcGIS for mapping and urges the Commission to require standardized formatting across all utilities. Consistency in labeling, legend usage, and data layers will improve accessibility for stakeholders and enhance the usability of the maps for regulatory decision-making.

¹⁴ TURN notes that in its data submitted per the ALJ Ruling seeking gas utility data (Feb 9, 2022), PG&E provides column “RecentMains” and “RecentServices” identifying miles of pipeline replacement in 2021. As part of SB1221 mapping, utilities should be required to provide more recent (2022-2024) data for “recently decommissioned mains and services.”

III. COMMENTS ON DIRECTIONS TO UTILITIES

TURN agrees with the requirement that utilities be responsible for mapping their own service areas. However, TURN urges the Commission to provide further clarification on:

- The role of data facilitators in ensuring accessibility and usability of the maps;
- Procedures for stakeholders to request additional data or clarifications; and
- Expectations for periodic updates beyond the annual requirement to account for dynamic infrastructure changes.

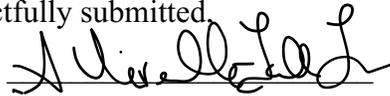
IV. CONCLUSION

TURN appreciates the opportunity to submit these comments and urges the Commission to adopt the recommendations outlined above to ensure SB 1221's mapping requirements are effectively implemented.

Date: March 11, 2025

Respectfully submitted,

By:



A Mireille Fall-Fry

The Utility Reform Network

360 Grand Avenue, #150

Oakland, CA 94610

Phone: (415) 929-8876

Fax: (415) 929-1132

Email: afall@turn.org