

SUPPLEMENTAL QUESTIONNAIRE

R.15-01-008, 2026 Annual Report

[Gill Ranch Storage LLC.]

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 partial fulfillment of 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, 2026 Annual Report

Date: [6/12/26]

The following data have been prepared to comply with Senate Bill 1371 (Leno, 2014), Section 2, Article 3, Order Instituting Rulemaking (OIR) 15-01-008, and to provide responses to Data Request R. 15-01-008, 2026 Annual Report.

1. Please provide the following for the period from January 1, 2025 to December 31, 2025:

a. Describe any current projects or studies related to SB 1371.

We continue to conduct our quarterly LDAR (Leak Detection and Repair) inspections as part of our ongoing compliance efforts under SB 1371; however, there are no new projects or studies to report for this period.

b. Describe the activity changes between the previous year's reporting and the current year's reporting that affected the change in the total emissions. For example, changes in maintenance activities may have changed blowdown emissions from previous years and resulted in changes to total emissions.

We continued blowing down compressors when not in use to eliminate the potential for gas leakage. Our process requires that compressor unit pressure is below 620psi to start. Rather than blowing down to atmosphere to get below 620psi for startup, we equalize each compressor with the upstream pressure, which is less than 620psi. This prevented us from having to blowdown gas to atmosphere for start up 226 times during calendar year 2025. Based on the 2025 numbers, the average compressor blowdown was roughly 32.39 Mscf in volume. Preventing these 226 blowdowns through our equalization process resulted in roughly 7320.14 Mscf is emissions savings. In addition, we continued our practice to reduce pressure in any piping/equipment as low as possible before commencing any blowdowns that may be required for maintenance purposes.

c. Describe advances in abatement efforts, similar to the executive summary in the best practices reporting.

There were no new abatement initiatives during this reporting period beyond the operational improvements described in Question B, including proactive compressor blowdowns and pressure equalization to minimize emissions during shutdown and startup.

d. Describe improvements in reporting that are not discernable by reviewing the reporting data. For example, report the installation of a new data management or leak tracking system.

There were no new improvements in reporting systems or processes during this reporting period.

e. For smaller utilities, confirm if there were no leaks in distribution mains and services pipelines.

No leaks were found in distribution mains or service pipelines during our biannual leak surveys conducted on May 6, 2025, and November 25, 2025.

f. Identify any additional tables to be included in the Joint Report. Staff will place these tables in an appendix.

N/A

2. Does the utility propose a 2015 baseline adjustment or emission factor change? If so, please describe. Can the utility adhere to the following timeline:

- a. Deadline for requests for baseline adjustments, methodology changes, including new emission factors: April 30, 2026.**
- b. Agency Review Meetings: May 1 through July 31, 2026.**
- c. Final Decision: August 29, 2026.**

Response: Gill Ranch does not propose a 2015 baseline adjustment or emission factor change at this time.

[Gill Ranch Storage LLC.], [June 01, 2026]

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, Lenc

In Response to Data Request, R15-01-008 - 2026 June Repo

Appendix 1; Rev. 03/26/2026

Notes

Emissions included in the Report are based on miles of transmission pipeline. Therefore provide the miles of transmission pipeline in your system here.

The following data on transmission pipeline leaks is **for information purposes** and will not be used to report transmission pipeline leak emissions this year.

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

Transmission Pipeline Leaks:

ID	Geographic Location	Pipe Material	Pipe Size (nominal)	Pipe Age (months)	Pressure (psi)	Leak Grade	Above Ground or Below Ground	Discovery Date (MM/DD/YY)	Repair Date (MM/DD/YY)	Scheduled Repair Date (MM/DD/YY)	Reason for Not Scheduling a Repair	Number of Days Leaking	Emission Factor (Mscf/Day)	Annual Emissions (Mscf)	Explanatory Notes / Comments
27 MILE TRANSMISSION PIPELINE	93637	PC	30"	187	1415	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	NO LEAKS WERE FOUND DURING THE BI-ANNUAL LEAK SURVEYS OF THE PIPELINE AND NO LEAKS WERE CAUSED BY 3RD PARTY DAMAGES. NO LEAKS WERE FOUND TO THE 223 COMPONENTS ON THE ABOVE GROUND FACILITIES LOCATED ON THE 27 MILE PIPELINE DURING THE QUARTERLY LEAK INSPECTIONS. PIPE SIZE: 30 " (762MM) OD * 0.506" (12.9 MM) WT MATERIAL GRADE: API 5L GRADE X-70M PSL 2
													Sum total	0	

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 - 2026 June Report
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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

ID	Geographic Location	Damage Type	Pipe Material	Pipe Size (nominal)	Pipe Age (months)	Pressure (psi)	Leak Grade	Above Ground or Below Ground	Discovery Date (MM/DD/YY)	Repair Date (MM/DD/YY)	Number of Days Leaking	Emission Factor (Mscf/Day)	Annual Emissions (Mscf)	Explanatory Notes / Comments
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Sum total	0
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[Gill Ranch Storage LLC.], [Nune 01, 2026]

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 - 2026 June Report

Appendix 1; Rev. 03/26/2026

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 reported under the column Methane Abatement (Mscf) are for information purposes only, and should be seperated from the emissions reported under the column for Annual Emissions (Mscf).

Transmission Pipeline Blowdowns:

ID	Geographic Location	Number of Blowdown Events	Reason	Emission Reduction Strategy	Annual Emissions (Mscf)	Explanatory Notes / Comments	Methane Abatement (Mscf)
27 MILE TRANSMISSION PIPELINE	93637	0					
Total					0		

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 - 2026 June Report
Appendix 1; Rev. 03/26/2026

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 intential release of natural gas for safety or maintenance purposes should be included in the Blowdowns worksheet.

Transmission Pipeline Component Vented Emissions:

Total Number of Devices	Device Type	Bleed Rate	Manufacturer	Emission Factor (Mscf/day)	Annual Emission (Mscf)	Explanatory Notes / Comments
0						
				Sum total	0	

**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
In Response to Data Request, R15-01-008 - 2026 June Report
Appendix 1; Rev. 03/26/2026**

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

ID	Geographic Location	Device Type	Bleed Rate	Manufacturer	Discovery Date (MM/DD/YY)	Repair Date (MM/DD/YY)	Number of Days Leaking	Emission Factor (Mscf/day)	Annual Emission (Mscf)	Explanatory Notes / Comments
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Sum total	0
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[Gill Ranch Storage LLC,], [June 01, 2026]
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 - 2026 June Report
Appendix 1; Rev. 03/26/2026

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.

Transmission Pipeline Odorizers:

ID	Geographic Location	Number of Units	Emission Factor (Mscf/yr)	Annual Emission (Mscf)	Explanatory Notes / Comments
27 MILE TRANSMISSION PIPELINE	93637	0			
			Sum total	0	Provided as an example.

Appendix 1; Rev. 03/26/2026

Header column "Comment" boxes displayed below for reference.	
Column Heading	Description and Definition of Required Contents (IF not self-explanatory)
Pipeline Leaks	
ID	
Geographic Location	GIS, zip code, or equivalent
Pipe Material	PB = cathodically protected steel, bare PC = cathodically protected steel, coated UB = unprotected steel, bare UC = unprotected steel, coated
Pipe Size (nominal)	
Pipe Age (months)	
Pressure (psi)	MOP = maximum operating pressure over the past year
Leak Grade	1 = grade 1 2 = grade 2 2+ = grade 2+ 3 = grade 3 AH = Above Ground Hazardous synonymous with Grade 1. AN = Above Ground Non-Hazardous AM = Above Ground Non-Hazardous Minor (akin to grade 3 below ground leak). N = non-graded or ungraded
Above Ground or Below Ground	A = above ground B = below ground
Discovery Date (MM/DD/YY)	
Repair Date (MM/DD/YY)	Date that the pipeline repair stopped the leak. Any associated blowdowns resulting from the repair should be included in the blowdowns tab.
Scheduled Repair Date (MM/DD/YY)	If leak is open, specify the scheduled date of repair, or type "M," signifying that the leak is being monitored with no scheduled date of repair. Then, provide the reason for not scheduling a repair in Column for that purpose.
Reason for Not Scheduling a Repair	If not scheduled for repair (e.g. with a "M" for monitoring the leak in Scheduled Repair Date), then provide the reason for not scheduling a repair.
Number of Days Leaking	If the leak was discovered by survey in the year of interest, then assume leaking from January 1st of subject year <u>thru</u> repair date or December 31st of subject year, whichever is earlier. (E.G. Days Leaking = Repair - Jan 1st + 1 day.) (For days leaking for leaks carried over use January 1st as start date for emissions calculations.) For O&M discovered leaks, assume that the leak begins with the discovery date <u>thru</u> repair date or December 31st of subject year, whichever is earlier.
Emission Factor (Mscf/Day)	
Annual Emissions (Mscf)	

Appendix 1; Rev. 03/26/2026

Header column "Comment" boxes displayed below for reference.	
Column Heading	Description and Definition of Required Contents (IF not self-explanatory)
Explanatory Notes / Comments	
All Damages	
ID	
Geographic Location	GIS, zip code, or equivalent
Damage Type	E = excavation damage N = natural force damage O = other outside force damage
Pipe Material	PB = cathodically protected steel, bare PC = cathodically protected steel, coated UB = unprotected steel, bare UC = unptotected steel, coated
Pipe Size (nominal)	
Pipe Age (months)	
Pressure (psi)	MOP = maximum operating pressure over the past year
Leak Grade	1 = grade 1 2 = grade 2 2+ = grade 2+ 3 = grade 3 N = non-graded or ungraded
Above Ground or Below Ground	AH = above ground, hazardous AN = above ground, non-hazardous B = below ground
Discovery Date (MM/DD/YY)	
Repair Date (MM/DD/YY)	
Number of Days Leaking	If date and time stamp are reliable and used consistently by respondent, then emissions may be calculated based on actual time leaking. E.G. Repair time - damage event time = duration of event. If respondent has average or historical leak duration based on the nature and circumstances of damages, then these may be applied to like damage events. The emissions factors should be adequately supported and explained in the filing. If actual time stamps and historical averages are not available, then whole days should be used in the engineering calculation. The leak begins with the damage event date thru repair date or December 31st of subject year, whichever is later. E.G. Days Leaking = Repair date - date of damage + 1 day.
Emission Factor (Mscf/Day)	

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Header column "Comment" boxes displayed below for reference.	
Column Heading	Description and Definition of Required Contents (IF not self-explanatory)
Annual Emissions (Mscf)	
Explanatory Notes / Comments	Provide method of calculation and example of formula. Explain how any EF's used were derived.
Tab: Blowdowns	
ID	
Geographic Location	GIS, zip code, or equivalent
Number of Blowdown Events	
Reason	Maintenance (M) Repair or Replacement (R) Integrity Management (IM) Pressure Reduction or Deactivation (PR) Other (O) In the case of Other(O), please provide a description of the reason.
Emission Reduction Strategy	Drafting (D) Cross Compression (XC) Gas Capture (GC) Flaring or Thermal Oxidation (FTO) Project Bundling (PB) Multiple Methods (M) None (N) Other (O) In the case of Multiple Methods (M), please list each method. In the case of Other (O), please provide a description of the strategy.
Annual Emissions (Mscf)	
Explanatory Notes / Comments	
Methane Abatement (Mscf)	
Tab: Component Vented Emissions	
Total Number of Devices	
Device Type	P = pneumatic device H = Hydraulic valve operator T = turbine valve operator PR = pressure relief valve O = other devices

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Header column "Comment" boxes displayed below for reference.	
Column Heading	Description and Definition of Required Contents (IF not self-explanatory)
Bleed Rate	L = low bleed I = intermittent bleed H = high bleed NA = not applicable
Manufacturer	
Emission Factor (Mscf/day)	
Annual Emissions (Mscf)	Because the emissions are a factor of design or function, these emissions counted for the entire year. E.G. 365 days times the actual volume emitting if known, or the approved Emissions Factor.
Explanatory Notes / Comments	Note whether the emissions are based on actual volumetric measures.
Component Fugitive Leaks	
ID	
Geographic Location	GIS, zip code, or equivalent
Device Type	P = pneumatic device H = Hydraulic valve operator T = turbine valve operator PR = pressure relief valve O = other devices
Bleed Rate	L = low bleed I = intermittent bleed H = high bleed NA = not applicable
Manufacturer	
Discovery Date (MM/DD/YY)	List the actual discovery date. If the leak was discovered in the year of interest, then we will assume the component was leaking from the beginning of the year for emissions reporting purposes, or prior survey date if surveyed previously within the year of interest.
Repair Date (MM/DD/YY)	Date that the component repair stopped the leak. Any associated blowdowns as a result of the repair should be included in the blowdowns tab.
Number of Days Leaking	Assume Leaking from January 1 of subject year or prior survey date, whichever is later, thru the repair date (if repaired in year of interest) or December 31 of subject year, whichever is earlier. For O&M discovered leaks, assume that the leak begins with the discovery date thru repair date or December 31st of subject year, whichever is earlier.
Emission Factor (Mscf/day)	
Annual Emissions (Mscf)	

Appendix 1; Rev. 03/26/2026

Header column "Comment" boxes displayed below for reference.	
Column Heading	Description and Definition of Required Contents (IF not self-explanatory)
Explanatory Notes / Comments	
Odorizers	
ID	
Geographic Location	GIS, zip code, or equivalent
Number of Units	
Emission Factor (Mscf/yr)	
Annual Emission (Mscf)	All of the emissions from the odorizing process and equipment.
Explanatory Notes / Comments	

[Gill Ranch Storage LLC.], [June 01, 2026]

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 2026 June Report
Appendix 7; Rev. 03/26/2026

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

Use the Population based emission factor if facility is not surveyed. Use Leaker based emission factor if facility is surveyed, and report only the found leaking components.

Underground Storage Facility Leaks and Emissions:

[illegible]

[Gill Ranch Storage LLC.], [June 01, 2026]

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 2026 June Report

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Notes:

Enter either the initials of the facility to be included in the "ID" column or the name be provided along with the zip code in the "Geographic Location."

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 compressor. Any intentional release of natural gas for safety or maintenance purposes should be included on the Blowdowns worksheet.

- Previous Reporting Changes:
- 1) New Column for Measurement Frequency - See box comments.
 - 2) Added new column for Emission Factor: Measurement Date - Pressurized Operations.
 - 3) Added a fourth compressor operating mode "Offline". In addition, a measurement of emissions (EF) should be taken during Offline mode, to ensure that no emissions are emanating from the system.
 - 4) Alternate emissions measurement method, where applicable and measured by the operator:
 - 5) Alternate emissions measurement method, where applicable and measured by the operator:
 - Blowdown and Isolation valves
 - 6) Measure centrifugal compressor emissions additional columns added for these emissions:
 - Dry seals
 - Wet seals
 - Wet seal oil degassing vents in Pressurized Idle mode

Transmission Compressor Vented Emissions:

ID	Geographic Location	Compressor Type	Prime Mover	Number of Cylinders	Number of Seals	Seal Type	Measurement Frequency	Emission Factor: Measurement Date - Pressurized Operations	Operating Mode: Pressurized Operating (hours)	Operating Mode: Pressurized Idle (hours)	Operating Mode: Depressurized Idle (hours)	Operating Mode: Offline (Hours)	Emission Factor: Pressurized Operating(scf/hr)	Emission Factor: Pressurized Idle (scf/hr)	Emission Factor: Depressurized Idle (scf/hr)	Emission Factor: Pressurized Operating - Rod Packing (scf/hr)	Emission Factor: Pressurized Operating - Blowdown Valve (scf/hr)	Emission Factor: Pressurized Idle - Rod Packing (scf/hr)	Emission Factor: Pressurized Idle - Blowdown Valve (scf/hr)	Annual Emissions (Mscf)	Explanatory Notes / Comments
Hypothetical values used to provide an example.													1127	0	0	7633	3.703041096	0	0	30.49	GRS has a totalizer that measures total volume emitted for the year. This number was used to calculate the Emission Factor in Column N by dividing that total volume by hours in the year.
Unit C-210	93637	R	E	6	6	W	A	1/1/2026	1474	0	0	7286	0.638291096	0	0	5.26				5.26	
Unit C-220	93637	R	E	6	6	W	A	1/1/2026	231	0	0	8529	4.793894977	0	0	39.47				39.47	
Unit C-240	93637	R	E	6	6	W	A	1/1/2026	1190	0	0	7570	1.78318379	0	0	14.68				14.68	
Unit C-250	93637	R	E	6	6	W	A	1/1/2026	1075	0	0	7685	1.78318379	0	0	14.68				14.68	

[Gill Ranch Storage LLC.], [June 01, 2026]

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, 2026 June Report
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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

Underground Storage Blowdowns:

ID	Geographic Location	Source	Compressor Type	Number of Blowdown Events	Annual Emissions (Mscf)	Explanatory Notes / Comments
C-210	93637 C	R		59	146.284	START UP AND MAINTENANCE BLOWDOWNS
C-220	93637 C	R		82	275.829	START UP AND MAINTENANCE BLOWDOWNS
C-230	93637 C	R		15	198.587	START UP AND MAINTENANCE BLOWDOWNS
C-240	93637 C	R		54	329.127	START UP AND MAINTENANCE BLOWDOWNS
C-250	93637 C	R		52	216.185	START UP AND MAINTENANCE BLOWDOWNS
Well 201	93637 W	N/A		2	220.729	MAINTENANCE BLOWDOWN
Well 206	93637 W	N/A		4	363.406	MAINTENANCE BLOWDOWN
Well 101	93637 W	N/A		2	507.991	MAINTENANCE BLOWDOWN
Well 103	93637 W	N/A		3	532.555	MAINTENANCE BLOWDOWN
Well 104	93637 W	N/A		1	284.685	MAINTENANCE BLOWDOWN
PIT-3008	93637 O	N/A		2	181.096	MAINTENANCE BLOWDOWN
PIT-3000	93637 O	N/A		32	930.781	START UP AND MAINTENANCE BLOWDOWNS
PIT-3001	93637 O	N/A		2	23.353	MAINTENANCE BLOWDOWN
FIT-301	93637 O	N/A		2	148.629	MAINTENANCE BLOWDOWN
FIT-302	93637 O	N/A		2	145.478	MAINTENANCE BLOWDOWN
PR-701	93637 O	N/A		1	237.751	MAINTENANCE BLOWDOWN
PIT-1132	93637 O	N/A		2	114.167	MAINTENANCE BLOWDOWN
PIT-1232	93637 O	N/A		1	53.901	MAINTENANCE BLOWDOWN
PIT-1332	93637 O	N/A		1	59.199	MAINTENANCE BLOWDOWN
				319	4969.733	

[Gill Ranch Storage LLC.], [June 01, 2026]

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Appendix 7; Rev. 03/26/2026

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.

Underground Storage Component Vented Emissions (See note above):

Quantity	Geographic Location	Device Type	Bleed Rate	Manufacturer	Pressure (psi)	Survey Date (MM/DD/YY)	Number of Days Emitting	Emission Factor, Engineering or Manufacturer's based Estimate of Emissions (Mscf/day)	Annual Emissions (Mscf)	Explanatory Notes / Comments
PCV-8110	93637	P	L	FISHER	110		0	0.216	0	0 Emissions since 2020, Controller is operating using Air
PCV-8410	93637	P	L	FISHER	110		0	0.216	0	1 Emissions since 2020, Controller is operating using Air
PCV-7710	93637	P	L	FISHER	110		0	0.216	0	2 Emissions since 2020, Controller is operating using Air
PCV-7810	93637	P	L	FISHER	110		0	0.216	0	3 Emissions since 2020, Controller is operating using Air
PCV-7510	93637	P	L	FISHER	110		0	0.216	0	4 Emissions since 2020, Controller is operating using Air
PCV-7610	93637	P	L	FISHER	110		0	0.216	0	5 Emissions since 2020, Controller is operating using Air
PCV-7110	93637	P	L	FISHER	110		0	0.216	0	6 Emissions since 2020, Controller is operating using Air
PCV-7210	93637	P	L	FISHER	110		0	0.216	0	7 Emissions since 2020, Controller is operating using Air
PCV-7310	93637	P	L	FISHER	110		0	0.216	0	8 Emissions since 2020, Controller is operating using Air
PCV-7410	93637	P	L	FISHER	110		0	0.216	0	9 Emissions since 2020, Controller is operating using Air
									0	

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.

Appendix 7; Rev. 03/26/2026

The number of days leaking may be more than 365 days due to including the estimation function of the leak occurring at half the number of days between the prior survey date and the discovery date.

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

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 th

12/31/2025

1/1/2025

21.92

[Gill Ranch Storage LLC.], [June 01, 2026]
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 2026 June Report
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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 California Air Resources Board (CARB):
Note - Definitions in Data Request, R15-01-008 2026 June Report

The following question in the above mentioned data request is answered using the spreadsheets in this Appendix (#7):
(6) Calculable or estimated emissions and non-graded gas leaks, as defined in Data Request R15-01-008 2026 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

Underground Storage Dehydrator Vented Emissions:

ID	Geographic Location	Type of Dehydrator (Glycol or Desiccant)	Vapor Recovery Unit or Thermal Oxidizer (Y/N)	Annual Volume of Gas Withdrawn (Mscf)	Emission Factor (Y/N)	Engineering Estimate (Y/N)	Annual Emissions (Mscf)	Explanatory Notes / Comments
DEHY 1/DEHY 2	93637	GLYCOL	Y	13810659	0	N	N/A	

Appendix 7; Rev. 03/26/2026

Header column "Comment" boxes displayed below for reference.	
Column Heading	Description and Definition of Required Contents (IF not self-explanatory)
Storage Leaks & Emissions	
ID	
Geographic Location	GIS, zip code, or equivalent
Source	W/C = wellhead connector W/V = wellhead valve W/PRV = wellhead pressure relief valve W/OEL = wellhead open-ended line W/F = wellhead flange W/O = wellhead other C = casing P = pipeline O = other
Number of Sources	
Discovery Date	Report Discovery Date if calculating wellhead component emissions using Leaker EFs
Repair Date	Report Discovery Date if calculating wellhead component emissions using Leaker EFs
Number of Days Leaking	Calculate Number of Days Leaking using the formula: Repair Date minus Discovery Date + 1 day
Emission Factor (Mscf/yr)	
Annual Emissions (Mscf)	
Explanatory Notes / Comments	
Compressor Vented Emissions	
ID	
Geographic Location	GIS, zip code, or equivalent
Compressor Type	C = centrifugal R = reciprocating
Prime Mover	E = electric motor C = internal combustion engine
Number of Cylinders in Compressor	
Number of Seals	
Seal Type	W = wet D = dry O = other
Measurement Frequency	A - Annual Q - Quarterly M - Monthly W - Weekly D - Daily
Emission Factor: Measurement Date - Pressurized Operations	
Operating Mode: Pressurized Operating (hours)	
Operating Mode: Pressurized Idle (hours)	
Operating Mode: Depressurized Idle (hours)	
Operating Mode: Offline (Hours)	
Emission Factor: Pressurized Operating (scf/hr)	

Emission Factor: Pressurized Idle (scf/hr)	Use these EF columns as well as the columns for the Compressor Measurements noted in Columns R thru AB when they are applicable. If the data is not captured by the operator, then add a note explaining why the applicable measurement data was not recorded or available in the Explanatory Notes / Comments column.
Emission Factor: Depressurized Idle (scf/hr)	
Emission Factor: Pressurized Operating - Rod Packing (scf/hr)	These are new columns for reporting year 2020 of 2019 data. These only apply to operators who during their operations and surveys of compressor stations measure their Compressor Vented Emissions for these components of the compressor. Not all gas operators measure vented emissions and establish flow rates for vented emissions while at the various modes of operation. The current regulations require an annual
Emission Factor: Pressurized Operating - Blowdown Valve (scf/hr)	
Emission Factor: Pressurized Idle - Rod Packing (scf/hr)	
Emission Factor: Pressurized Idle - Blowdown Valve (scf/hr)	
Annual Emissions (Mscf)	
Explanatory Notes / Comments	
Blowdowns	
ID	
Geographic Location	GIS, zip code, or equivalent
Source	W = wellhead rework C = compressor P = pipeline O = other
CompressorType	C = centrifugal R = reciprocating
Number of Blowdown Events	
Annual Emissions(Mscf)	
Explanatory Notes / Comments	
Component Vented Emissions	
ID	
Geographic Location	GIS, zip code, or equivalent
Device Type	C = connector OE = open-ended line M = meter P = pneumatic device PR = pressure relief valve V = valve O = other devices
Bleed Rate	L = low bleed I = intermittent bleed H = high bleed NA = not applicable
Manufacturer	
Pressure (psi)	MOP = maximum operating pressure over the past year
Survey Date (MM/DD/YY)	
Number of Days Emitting	Because the emissions are a factor of design or function, these emissions counted for the entire year.

Emission Factor, Engineering or Manufacturer's based Estimate of Emissions (Mscf/day)	Explain in the comment column the basis for your emission estimate.
Annual Emissions (Mscf)	
Explanatory Notes / Comments	
Compressor and Component Fugitive Leaks	
ID	
Geographic Location	GIS, zip code, or equivalent
Device Type	C = connector OE = open-ended line M = meter P = pneumatic device PR = pressure relief valve V = valve O = other devices
Bleed Rate	L = low bleed I = intermittent bleed H = high bleed NA = not applicable
Manufacturer	
Pressure (psi)	MOP = maximum operating pressure over the past year
Discovery Date (MM/DD/YY)	List the actual discovery date. If the leak was discovered in the year of interest, then we will assume the component was leaking from the beginning of the year for emissions reporting purposes.
Repair Date (MM/DD/YY)	Date that the component repair stopped the leak. Any associated blowdowns as a result of the repair should be included in the blowdowns tab.
Prior Survey Date (MM/DD/YY)	Before the discovery date of the leak, there was a "Prior Survey Date" when the compressor station was tested and no leak was found. There should be records as to when the compressor station was last surveyed. If the survey spanned two or more days, enter the final date. Note, a facility level survey date is sufficient to establish the prior survey date.

Number of Days Leaking	The algorithm that is used for determining the number of days leaking should conform to the following guidance: For the number days leaking prior to the date of discovery (survey date in the year of interest), calculate the number of days between the Discovery Date and the Prior Survey Date then divided by 2. [Dividing by 2 approximates the average time leaking between the leak discovery and the prior survey date. See below guidance when a leak is discovered in a prior period and repaired in the year of interest.] (Discovery Date – Prior Survey Date)/2 Calculate the number of days leaking after discovery (survey) date, by subtracting the discovery date from the repair date, unless the leak has not been repaired, where the number of days should be calculated by subtracting the discovery date from December 31 of the year of interest.* (Repair Date – Discovery Date), unless repair date greater than 12/31/XX then use 12/31/XX) --- Days Leaking = (Repair Date - Discovery Date) + (Discovery Date - Prior Survey Date)/2 +1 * [This requires tracking the leak across different years, because the leak could be minor and conceivably span more than year before getting repaired. Therefore, in the cases where a leak is carried over to a subsequent year, an annual calculation should be made to reflect that the number of days leaking in the prior year have already been reported in the annual emissions inventory. In subsequent years the carried over leaks should reflect a beginning date of January 1 of the year of interest.]
Emission Factor or Engineering Estimate (Mscf/day)	
Emissions (Mscf)	
Explanatory Notes / Comments	
Dehydrator Vented Emissions	
ID	
Geographic Location	GIS, zip code, or equivalent
Type of Dehydrator (Glycol or Desiccant)	
Vapor Recovery Unit OR Thermal Oxidizer (Y/N)	In order to claim 0 emissions, a Vapor Recovery Unit OR thermal oxidizer must be used 100% of the time during operation
Annual Volume of Gas Withdrawn (Mscf)	
Emission Factor (Y/N)	If the glycol dehydrator has a Vapor Recovery Unit (VRU) or a thermal oxidizer, the emission factor is 0. If using a desiccant dehydrator, the emission factor is 2.23E-03 mt CH₄/MMscf
Engineering Estimate (Y/N)	If using an engineering estimate, please include an attachment of methodology or software used as a separate document. Record the annual emissions
Annual Emissions (Mscf)	For dehydrators using an emission factor, annual emissions are calculated by multiplying annual volume of gas withdrawn and the emission factor For dehydrators using an engineering estimate, record the annual emissions
Explanatory Notes / Comments	

[Company Name], [Date Submitted]

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, 2026 June Report

Appendix 8; Rev. 03/26/2026

Notes:
Please round all natural gas emissions to nearest Mscf.
As a reminder, please use the latest version of each of the worksheets.

Summary Tables:

System Categories	Emission Source Categories	Fugitive or Vented	For Informational and Reference Purposes Only: Original 2015 Baseline Emissions (Mscf)	Approved 2015 Baseline Emissions [Mscf]	Proposed Adjusted 2015 Baseline Emissions (Mscf)	2024 Total Annual Volume of Leaks & Emissions (Mscf)	2024 Total Annual Count of Leak & Emission Items	2025 Total Annual Volume of Leaks & Emissions (Mscf)	2025 Total Annual Count of Leak & Emission Items	Emission Change for Year Over Year Comparison from 2024 to 2025 (Mscf)	Percentage Change for Year Over Year Comparison from 2024 to 2025	Count Change for Year Over Year Comparison from 2024 to 2025	Percentage Change for Year Over Year Comparison from 2024 to 2025	Emission Change for Year Over Year Comparison from 2015 to 2025 (Mscf)	Percentage Change for Year Over Year Comparison from 2015 to 2025	Explanation for Significant Percentage Change for Year Over Year Comparison from 2024 to 2025
Transmission Pipelines	Pipeline Leaks	Fugitive								-	#DIV/0!	-	#DIV/0!	0	#DIV/0!	
	All Damages	Fugitive								-	#DIV/0!	-	#DIV/0!	0	#DIV/0!	
	Blowdowns	Vented								-	#DIV/0!	-	#DIV/0!	0	#DIV/0!	
	Component Vented Emissions	Vented								-	#DIV/0!	-	#DIV/0!	0	#DIV/0!	
	Component Fugitive Leaks	Fugitive								-	#DIV/0!	-	#DIV/0!	0	#DIV/0!	
Transmission M&R Stations	Odorizers	Vented								-	#DIV/0!	-	#DIV/0!	0	#DIV/0!	
	Station Leaks & Emissions	Fugitive								-	#DIV/0!	-	#DIV/0!	0	#DIV/0!	
Transmission Compressor Stations	Blowdowns	Vented								-	#DIV/0!	-	#DIV/0!	0	#DIV/0!	
	Compressor Emissions	Vented								-	#DIV/0!	-	#DIV/0!	0	#DIV/0!	
	Compressor Leaks	Fugitive								-	#DIV/0!	-	#DIV/0!	-	#DIV/0!	
	Blowdowns	Vented								-	#DIV/0!	-	#DIV/0!	-	#DIV/0!	
	Component Vented Emissions	Vented								-	#DIV/0!	-	#DIV/0!	-	#DIV/0!	
	Component Fugitive Leaks	Fugitive								-	#DIV/0!	-	#DIV/0!	-	#DIV/0!	
Distribution Main & Service Pipelines	Storage Tank Leaks & Emissions	Vented								-	#DIV/0!	-	#DIV/0!	-	#DIV/0!	
	Pipeline Leaks	Fugitive								-	#DIV/0!	-	#DIV/0!	-	#DIV/0!	
	All Damages	Fugitive								-	#DIV/0!	-	#DIV/0!	-	#DIV/0!	
	Blowdowns	Vented								-	#DIV/0!	-	#DIV/0!	-	#DIV/0!	
	Component Vented Emissions	Vented								-	#DIV/0!	-	#DIV/0!	-	#DIV/0!	
Distribution M&R Stations	Component Fugitive Leaks	Fugitive								-	#DIV/0!	-	#DIV/0!	-	#DIV/0!	
	Station Leaks & Emissions	Fugitive								-	#DIV/0!	-	#DIV/0!	-	#DIV/0!	
	All Damages	Fugitive								-	#DIV/0!	-	#DIV/0!	-	#DIV/0!	
Customer Meters	Blowdowns	Vented								-	#DIV/0!	-	#DIV/0!	-	#DIV/0!	
	Meter Leaks	Fugitive								-	#DIV/0!	-	#DIV/0!	-	#DIV/0!	
	All Damages	Fugitive								-	#DIV/0!	-	#DIV/0!	-	#DIV/0!	
Underground Storage	Vented Emissions	Vented								-	#DIV/0!	-	#DIV/0!	-	#DIV/0!	
	Storage Leaks & Emissions	Fugitive	0			0	0	0	0	-	#DIV/0!	-	#DIV/0!	-	#DIV/0!	Compressor emissions are continuously monitored and reported as total annual emissions (via SCADA totalizer). Previously, emissions were estimated using a single point-in-time scf/hr value multiplied by 8,760 hours, which likely overestimated actual venting emissions. This methodology has been updated for the current year.
	Compressor Vented Emissions	Vented	5822.48			766.84	5	105	5							
	Blowdowns	Vented	3734			5257	309	4669.733	319	(662) (587)	(86.3%) (11.2%)	-	0.0%	(5,717.48)	935.73	(98.2%) 25.1%
	Component Vented Emissions	Vented	866.3			0	0	0	0	-	#DIV/0!	-	#DIV/0!	(866.30)	(100.0%)	
	Compressor and Component Fugitive Leaks	Fugitive	2592.74			11.27	1	21.92	2	11	94.5%	1	100.0%	(2,570.82)	(99.2%)	Storage contracts fluctuate over time which results in changes to start-up and shutdown intervals. This is the reason for the increase in emissions for 2025.
Unusual Large Leaks	Dehydrator Vent Emissions	Fugitive	0			0	0	0	0	-	#DIV/0!	-	#DIV/0!	-	#DIV/0!	
	(Description)					0	0	0	0	-	#DIV/0!			-	#DIV/0!	
Total			13015.52			6035.11	NA	4796.653	NA	(1,238)	-21%	NA	NA	(8,218.87)	(63.1%)	

[Gill Ranch Storage LLC.], [June 01, 2026]

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,
In Response to Data Request, R15-01-008, 2026 June Report
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System Wide Leak Rate Data

1/1/2025 - 12/31/2025

The highlighted cells show the volumes that are summed together as the throughput for calculating the system wide leak rate.

Gas Storage Facilities:

Average Close of the Month Cushion Gas Storage Inventory (Mscf)	Average Close of the Month Working Gas Storage Inventory (Mscf)	Total Annual Volume of Injections into Storage (Mscf)	Total Annual Volume of Gas Used (Mscf)	Total Annual Volume of Withdrawals from Storage (Mscf)	Explanatory Notes / Comments
3,543,307	17,152,820	13,325,900	24,679	13,810,659	

Transmission System:

Total Annual Volume of Gas Used (Mscf)	Total Annual Volume of Gas Transported to or for Customers* in State (Mscf)	Total Annual Volume of Gas Transported to or for Customers* out of State (Mscf)	Total Annual Volume of Gas Transported to utility-owned or third-party storage fields for injection into storage (Mscf)	Explanatory Notes / Comments
N/A	N/A	N/A	N/A	

Distribution System:

Total Annual Volume of Gas Used (Mscf)	Total Annual Volume of Gas Transported to or for Customers* in State (Mscf)	Total Annual Volume of Gas Transported to or for Customers* out of State (Mscf)	Explanatory Notes / Comments
N/A	N/A	N/A	GRS HAS NO DISTRIBUTION SYSTEMS

*The term customers includes anyone that the utility is transporting gas for, including customers who purchase gas from the utility.

Customers can be anyone including residential, businesses, other utilities, gas transportation companies, etc.

[Gill Ranch Storage LLC.], [June 01, 2026]

**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,**

In Response to Data Request, R15-01-008, 2026 June Report

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Summary Tables:

Natural Gas Properties	Average Mole Percent	Explanatory Notes / Comments
Methane	92.188	
Carbon Dioxide	0.905	
Ethane	5.758	
C3+	0.527	
C6+	0.008	
Oxygen	0	
Hydrogen	0	
Sulfur	0	
Water	0	
Carbon Monoxide	0	
Particulate Matter	0	
Inert Gas	0.493	
Odorant	0	