

**DOCKETED**

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*Comment Received From: Elizabeth Lopez  
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## **Gas Natural Data**

*Additional submitted attachment is included below.*



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**June 12, 2020**

Mr. Jason Orta  
Supply Analysis Office – Natural Gas Unit  
California Energy Commission  
1516 9th St  
Sacramento, CA 95814

**RE: Pacific Gas and Electric Comments on Proposed Natural Gas Storage Regulations**

Dear Mr. Orta:

Pacific Gas and Electric Company (PG&E) appreciates this opportunity to provide feedback in response to the California Energy Commission's upcoming rulemaking process for natural gas data, and the proposed changes to data collection regulations for underground gas storage projects. PG&E continues to support the collection of daily underground natural gas storage project data on a quarterly basis.

Attached is a mark-up of the language the Commission released with recommendations and additional definitions [*in brackets and italics*] for clarity, and to align the regulation with how operators report to the Energy Information Agency. We also suggest a paragraph recognizing that operational gas is handled through a monthly true-up in the working and total gas volumes rather than being measured and tracked daily. Finally, please note that our comments recognize that the draft proposed language requires reporting only daily volumes rather than more frequent intervals that would be problematic

PG&E continues the collection and reporting of underground natural gas storage project data on a quarterly basis. Please feel free to contact me if you have any questions or concerns.

Sincerely,

[signature goes here, but no sig block necessary given letterhead]

Attachment Below

**Phase 2 Title 20 Rulemaking  
Part 1. Draft Regulation**

**Section 1302 Definitions**

**Proposed definitions:**

() **Base gas** is the volume of gas needed to maintain adequate reservoir pressures and deliverability rates throughout the withdrawal season. Base gas usually is not withdrawn and remains in the reservoir. All native gas is included in the base gas volume.

() **Injections** The volume of daily gas injected into the underground gas storage project.

() **Underground gas storage project** means a project for the injection and withdrawal of natural gas into an underground reservoir for the purpose of storage. An underground gas storage project includes the reservoir used for storage, the confining strata, gas storage wells, observation wells, and any other wells approved for use in the project. An underground gas storage project also includes the wellheads and, to the extent that they are subject to regulation by the Division of Geologic Energy Management, attendant facilities, and other appurtenances.

() **Withdrawals** is the volume of daily gas withdrawn from the underground gas storage project.

() **Working gas** is the volume of daily natural gas in an underground gas storage project available to be withdrawn, not including base gas.

() **Working gas capacity** is total storage capacity of the underground gas storage project minus base gas.

In the following paragraph [*Recommend including as information requested asks for the Maximum Deliverability in Section 1314.c.1.m. Including would also align with how operators report to EIA*].

() **Deliverability** is often expressed as a measure of the amount of gas that came delivered (withdrawn) from a storage facility daily. A facility's deliverability rate varies directly with the total amount of natural gas in the reservoir.

In the following paragraph [*Recommend including as information requested asks for the Total Storage Field Capacity in Section 1314.c.1.l. Including would also align with how operators report to EIA*].

() **Total Storage Field Capacity** is the total volume of natural gas in the storage project (includes both working and base gas). The maximum total storage field capacity is the maximum volume of natural gas that can be stored in a storage project in accordance with its design.

**Section 1314 Natural Gas System Analysis**

c) **Current identification information and current project characteristics for underground gas storage projects.** Owners of underground gas storage projects are required to submit project identification information and project characteristic information to the California Energy Commission on a quarterly basis. Owners of underground gas storage projects are to express working gas capacity and total storage capacity in thousand cubic feet (Mcf) and maximum deliverability in Mcf/day.

(1) Owners of underground gas storage projects are required to submit the most the following information to the California Energy Commission on a quarterly basis:

- (A) Storage Field Name
- (B) Reservoir Name
- (C) Location County
- (D) Type of Facility – Aquifer, Depleted Field, or Salt Formation
- (E) Field Status – either Active or Inactive
- (F) Company Name
- (G) Contact First and Last Name
- (H) Phone Number
- (I) Company Address
- (J) Company Email Address
- (K) Working Gas Capacity (Mcf)
- (L) Total Storage Field Capacity (Mcf)
- (M) Maximum Deliverability (Mcf/day)

(d) **Daily underground gas storage project information.** Owners of underground gas storage projects are required to submit information on base gas, working gas, total gas in storage, withdrawal, and injection for each calendar day. Volumes shall be expressed in Mcf.

In the **note** in parenthesis in the paragraph below, please note that [*There are various volumes of gas that are used in the operations of the gas storage projects that are not accounted for in the daily withdraw information but are reported at the end of a calendar month. This gas use volume is trued-up in the working gas and total gas in storage volumes normally at the end of the calendar month*].

Owners of underground gas storage projects are required to submit the following information for each calendar day on a quarterly basis (**note:** various gas uses such as fuel, blowdowns, or operational use that are not measured on a daily basis should be trued up in the Working Gas and Total Gas in Storage volumes at the end of each calendar month):

- (A) Report Day (Month, Day, and Year)

(B) Base Gas (Mcf)

(C) Working Gas (Mcf)

(D) Total Gas in Storage, which is the sum of base and working gas

(E) Injections (Mcf)

(F) Withdrawals (Mcf)