

<b>DOCKETED</b>	
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<b>Project Title:</b>	SMUD's Cogeneration Pipeline Project
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<b>Document Title:</b>	2023 SMUD Cogeneration Pipeline Annual Compliance Report
<b>Description:</b>	2023 SMUD Cogeneration Pipeline Annual Compliance Report
<b>Filer:</b>	Ashley Gutierrez
<b>Organization:</b>	California Energy Commission
<b>Submitter Role:</b>	Commission Staff
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March 15, 2024

DPG 24-218

Ashley Gutierrez  
Compliance Project Manager  
California Energy Commission  
715 P Street, MS-2000  
Sacramento, CA 95814

**RE: SMUD Cogeneration Pipeline Project (92-AFC-2PC) Annual Compliance Report #28 for Calendar Year 2023**

Dear Ms. Gutierrez:

Sacramento Municipal Utility District (SMUD) is pleased to provide you with the 28th annual compliance report for the SMUD Cogeneration Pipeline Project covering calendar year 2023. The California Energy Commission (CEC) approved the original pipeline project on May 11, 1994, and approved the Cosumnes Power Plant (CPP) pipeline extension on September 9, 2003. SMUD completed construction on the original pipeline in November 1995 and the CPP pipeline extension in September 2004.

The following information is provided in accordance with the requirements of the Commission Decision.

**1. Summary of the Current Project Operating Status and Significant Changes to Facility Operation**

**Project Operating Status:** SMUD is maintaining the gas transmission agreement with PG&E which allows PG&E to continue serving two local manufacturing facilities in Sacramento: Air Products and Chemicals (APC) and Procter & Gamble Chemical facility (PGC).

**Significant Changes to Facility Operation:** No significant changes to report for the year 2023.

**2. Documents and Submittals Required as Verification of Conditions**

**Pipeline Inspections** (CEC Condition HAZMAT-8): SMUD visually inspects the pipeline right-of-way at six-month intervals, and two-month intervals for those

areas near railroads and highway crossings per SMUD procedure GPO-OM-008, Patrolling of Pipelines, and in accordance with 49 CFR 191-192. Sample documentation for the 2023 inspections can be found in **Attachment 1**.

**Painting Maintenance of Aboveground Facilities** (CEC Condition VIS-4): Condition VIS-4 requires maintenance of aboveground facilities to the extent that painted surfaces are in good condition. Sample documentation of Above ground piping inspections can be found in **Attachment 1**.

**Monitoring During Excavation** (CEC Condition HAZMAT-8): It is standard procedure for Gas Pipeline Operations personnel to stand-by during any excavation activities that may impact the integrity and safe operation of the pipeline. Sample documentation of 2023 excavation monitoring is included in **Attachment 2**.

**Participation in the One-Call System** (CEC Condition HAZMAT-8): The SMUD gas pipeline continues to subscribe to the One-Call Notification Program, Underground Service Alert (USA), and began participating on March 31, 1996. Sample documentation in **Attachment 3** refers to USA tickets responded to in 2023.

**Use of Internal Line Inspection to Monitor Pipeline Conditions** (CEC Condition HA ZMAT-8): SMUD Engineering completed a thorough review of the Fall 2018 In-Line Inspection (ILI) results for Line 700A, Line 700B and Line 800C. The findings revealed anomalous conditions that do not pose an immediate threat to the gas transmission pipeline. The next scheduled ILI will take place in 2024.

**Implementation of Proper Blow-down Procedures** (CEC Condition HAZMAT-8): SMUD performed isolation and blowdown of the inspection tool launch barrel at Carson Ice Meter and Regulator Station in preparation for an in-line inspection survey of Line 800C. See **Attachment 4** for the 2023 Greenhouse Gas Reporting Memo.

**2023 Right of Way (ROW) Maintenance:** SMUD Gas Pipeline Operations monitored and patrolled along the entire pipeline Right of Way in 2023.

### **3. Cumulative Listing of Changes to the Facility as a Result of the Commission's Post-Certification Change/Amendment Process**

**Pipeline Segment Relocation:** CEC approved an amendment to the SMUD Cogeneration Pipeline Project, 92-AFC-2PC, on March 1, 2001, to allow relocation of a 4,900-foot section of SMUD's 20-inch Line 700B between the Campbell Soup Cogeneration Facility and Fruitridge Road. SMUD commenced installation of 5,125 feet of new pipeline on June 25, 2001 and completed construction on September 28, 2001.

**Pipeline Segment Relocation:** CEC approved an amendment to the SMUD Cogeneration Pipeline Project, 92-AFC-2PC, on September 14, 2007, to allow relocation of a 3,200-foot section of SMUD's 20-inch Line 700A around the proposed Cosumnes River Boulevard Interchange. SMUD commenced installation of 3,401 feet of new pipeline on June 22, 2009 and completed construction on October 29, 2009.

**Pipeline Segment Relocation:** CEC approved an amendment to the SMUD Cogeneration Pipeline Project, 92-AFC-2PC, on July 9, 2009, to allow relocation of an ISO-foot section of SMUD's 20-inch Line 700A at County roads 102 and 29 in Yolo County California. SMUD commenced installation of 155 feet of new pipeline on September 14, 2009 and completed construction on October 26, 2009.

**Digester Gas Injection:** CEC approved an amendment to the Cosumnes Power Plant Project, 0 1-AFC-1 9C, on November 2, 2011. The approval allows the injection of digester gas into the natural gas supply line serving the Cosumnes Power Plant. Construction of the project was completed on January 13, 2012.

**SMUD Cogeneration Pipeline Project – Amendment:** CEC approved an amendment to the SMUD Cogeneration Pipeline Project, 92-AFC-2PC, on December 5, 2019, to allow for the installation of two new service connections on the SMUD Pipeline near the Procter & Gamble Cogeneration Project site. The project was completed in 2020.

## 5. Explanation of Missed Submittal Deadlines

SMUD is not aware of any missed submittal deadlines in 2023.

## 6. Filings Made or Permits Issued by other Governmental Agencies

Annual Report for Calendar Year 2023 Natural or other Gas Transmission and Gathering Systems, U.S. DOT, PHMSA, required by 49 CFR Part 191 with a due date of March 15, 2023.

## 7. Soil-2

No projects occurred in 2023 related to Soil-2 CEC condition but SMUD continues to monitor for erosion near the pipeline.

## 8. Projection of Project Compliance Activities Scheduled During 2023

In accordance with Condition of Certification HAZMAT-8, visual inspections, Participation in Underground Service Alert (USA), inspection during excavation activities, proper Blow-down procedures will be documented and reported. In accordance with Condition of Certification VIS-4, the status of maintenance painting of above ground facilities will be documented and reported.

In accordance with the 2020 Pipes Act, SMUD is developing a fugitive emissions reduction program, including quantifying all known emissions and the effectiveness of our efforts to reduce/eliminate fugitive emissions.

Please contact Cindy Chang, Regulatory Coordinator Generation at [cindy.chang@smud.org](mailto:cindy.chang@smud.org) if there are any questions regarding this submittal.

Respectfully,

Francis Christensen  
Manager, Gas Pipeline  
SMUD Power Generation

Enclosures:

Attachment 1, 2023 Pipeline Inspections & Patrol Samples  
Attachment 2, 2023 GPO Excavation Standby Samples  
Attachment 3, 2023 USA Ticket Samples  
Attachment 4, 2023 Greenhouse Gas Reporting Memo