



Lodi Gas Storage, L.L.C.
A Rockpoint Gas Storage Company
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June 15, 2026

Mr. Gary Ermann
Safety Policy Division
California Public Utilities Commission
505 Van Ness Ave.
San Francisco, CA 94102
Gary.Ermann@cpuc.ca.gov

VIA ELECTRONIC MAIL

**RE: Lodi Gas Storage, L.L.C.
R15-01-008 2026 Annual Report**

Dear Mr. Ermann:

Lodi Gas Storage, L.L.C. (LGS) respectfully submits this 2026 Annual Report to the California Public Utilities Commission (CPUC) pursuant to R15-01-008. The attached 2026 Annual Report is comprised of this cover letter and the following documents:

- Supplemental Questionnaire R.15-01-008 2026 Annual Report
- Appendix 1 – Transmission Pipelines
- Appendix 7 – Underground Storage
- Appendix 8 – Summary Tables

If you have any questions, or require more information, please contact me at greg.clark@rockpointgs.com or at (209) 368-9277 x3.

Sincerely,

Signed by:

5A3122A4501D4A7...

Gregory N. Clark
Senior Compliance Manager

Enclosures (Supplemental Questionnaire, Appendix 1, Appendix 7, Appendix 8)

cc: File #S3.03
A. Mrowka (Andrew.Mrowka@arb.ca.gov)
A. Anderson, S. Aycock, J. Bartlett, D. Carrion, K. Peterson (via e-mail)

SUPPLEMENTAL QUESTIONNAIRE

R.15-01-008, 2026 Annual Report

Lodi Gas Storage, L.L.C.

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: 6/15/26

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.
 - 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.
 - c. Describe advances in abatement efforts, similar to the executive summary in the best practices reporting.
 - 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.
 - e. For smaller utilities, confirm if there were no leaks in distribution mains and services pipelines.
 - f. Identify any additional tables to be included in the Joint Report. Staff will place these tables in an appendix.
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:

1. The specific elements of the supplemental questionnaire data request are provided as follows:
 - a. Lodi Gas Storage, L.L.C. (LGS) did not have any projects or studies related to SB 1371 during the 2025 calendar year.
 - b. LGS performed transmission pipeline maintenance and performed mainline valve replacements during the 2025 calendar year. This resulted in a year over year increase in transmission pipeline blowdown emissions of 3,932 MCF.

LGS experienced a leak from the body bleed port of a 12" ball valve during the 2025 calendar year. This resulted in a year over year increase in underground storage leaks and emissions of 438 MCF.

- c. LGS has continued implementation of SB 1371 Best Practices during the 2025 calendar year, with the intent of minimizing methane emissions to the environment.
 - d. N/A – LGS did not implement improvements that are not discernable by reviewing the reporting data.
 - e. N/A – LGS does not own or operate any distribution pipelines.
 - f. N/A – LGS did not include any additional tables in its R15-01-008 Annual Report. Please note that Appendix 1, Appendix 7, and Appendix 8 have been included as part of the R15-01-008 Annual Report.
2. LGS is not proposing a 2015 baseline adjustment or an emission factor change.

Lodi Gas Storage, L.L.C., June 15, 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:

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
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There were no transmission pipeline leaks during the period January 1 - December 31, 2025.

Sum total 0

Lodi Gas Storage, L.L.C., June 15, 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 Damage (3rd party dig-ins, natural disasters, etc.):

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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The transmission pipeline did not incur any form of damage during the period January 1 - December 31, 2025.

Sum total 0

Lodi Gas Storage, L.L.C., June 15, 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)
1	95220	4	M	PB	1.78	Preventive maintenance	0.00
2	94585	6	M	PB	1.35	Preventive maintenance	0.00
3	95220	6	M	PB	4130.59	Mainline Valve Replacements	0.00
Total					4134		

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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 intentional 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
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There were no transmission pipeline component vented emissions during the period January 1 - December 31, 2025.

Sum total 0

Lodi Gas Storage, L.L.C., June 15, 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

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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

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 not to be captured in this tab.

Transmission Pipeline Component Fugitive Leaks:

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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There were no transmission pipeline component fugitive leaks during the period January 1 - December 31, 2025.

Sum total 0

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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.
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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.

Transmission Pipeline Odorizers:

ID	Geographic Location	Number of Units	Emission Factor (Mscf/yr)	Annual Emission (Mscf)	Explanatory Notes / Comments
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There were no transmission pipeline odorizer emissions during the period January 1 - December 31, 2025.

Note that the odorizer injection system is operated /managed by PG&E within their meter station.

	Sum total	0
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 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:

ID	Geographic Location	Source	Number of Sources	Discovery Date (MM/DD/YY)	Repair Date (MM/DD/YY)	Number of Days Leaking	Emission Factor (Mscf/day/dev)	Annual Emissions (Mscf)	Explanatory Notes / Comments
Q1	95220 O		1	3/5/2025	3/5/2025	1	N/A	433.3300	Engineering Estimate - leak on body bleed port of 12" Midland ball valve
LDAR Q2	94585 W/V		3	6/18/2025	6/23/2025	6	0.1080	1.9440	
LDAR Q2	95220 W/V		4	6/12/2025	6/18/2025	7	0.1080	3.0240	
LDAR Q3	94585 W/C		3	8/11/2025	8/11/2025	1	0.0288	0.0864	
LDAR Q4	95220 W/V		1	12/8/2025	12/10/2025	3	0.1080	0.3240	
Sum Total								439	

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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

CPUC Staff strongly encourage more frequent measurement of the following compressor vented emissions. Compliance minimum is once annually, though Staff suggest the minimum frequency should be quarterly and measured at roughly the same time each quarter (e.g. on or around the component survey given mode of operation). More frequent measurements, e.g. monthly would be better due to the temporal changes in conditions that effect emissions. The more frequent measurements also provide an opportunity to detect worn rod packing or seals, which exacerbate emissions, and with timely awareness of suboptimal operations gas operators have an opportunity for accelerating maintenance to correct worn parts. The following steps for reporting more frequent measurements in 2019 are outlined in the adjacent cell, and should be provided if available.

Transmission Compressor Vented Emissions:

Use these EF columns as well as the columns for the Compressor Measurements noted in Columns Q thru T 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.

The Columns P thru T were added to the template and should be used for the indicated measured compressor emissions, which include Centrifugal compressors in accordance with OGR and your operating practice.

For the 2025 data reporting of compressor vented emissions: Where more than one measurement was taken during the year (e.g. after a maintenance cycle*, monthly, or quarterly), use the measured EF multiplied by the activity hours that occurred during the corresponding period. For example, if the compressor measurement was taken quarterly, then the measured EF should be multiplied by the activity hours that occurred in the respective quarter, and the same for more frequent measurements (e.g. monthly, weekly etc.). For each compressor devote one row per measurement period (see example provided). In the case of a single annual measurement EF, then that EF would apply to the activity hours for each respective mode for the entire year (which is consistent with prior year reporting practice).

* If a measurement is taken after a maintenance cycle and no other measurements were taken during the remainder of the year, then use this measured EF for the activity hours occurring after the measurement date thru 12/31/xx. The activity hours prior to the maintenance of the compressor from the beginning of the year should use the previously measured EF, even if the EF was measured in the prior year.

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
1000	94585	R	C	4	4	W	A	9/19/2025	2052	6684	24	N/A	385	0	0	385	0	N/A	0	790	
2000	94585	R	C	4	4	W	A	9/19/2025	1117	7643	0	N/A	385	0	0	385	0	N/A	0	430	
3000	94585	R	C	4	4	W	A	9/19/2025	1303	7457	0	N/A	315	0	0	315	0	N/A	0	411	
4000	94585	R	C	6	6	W	A	9/19/2025	1591	7100	69	N/A	473	0	0	473	0	N/A	0	753	

2,384

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**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

Underground Storage Blowdowns:

ID	Geographic Location	Source	Compressor Type	Number of Blowdown Events	Annual Emissions (Mscf)	Explanatory Notes / Comments
1000	94585 C		R	2	21.46	Preventive maintenance, Blowdown to fix LDAR leaks
2000	94585 C		R	3	29.61	Preventive maintenance, Blowdown to fix LDAR leaks
3000	94585 C		R	2	35.74	Preventive maintenance, Blowdown to fix LDAR leaks
4000	94585 C		R	4	81.06	Preventive maintenance, Blowdown to fix LDAR leaks

Sum Total **168**

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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

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
N/A										Quarterly LDAR conducted in 2025. Component leak emissions captured on Compressor & Component Leaks worksheet.
								Sum Total	0	

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Notes:

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.

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 not to be captured in this tab.

Please include emissions from leaks found with concentrations below 10,000ppm, and include in the total emissions column. Please use the associated emission factors provided in Appendix 9, Emission Factors.

Underground Storage: Compressor and Component Fugitive Leaks (see note above):

12/31/2025 1/1/2025

ID	Geographic Location	Device Type	Bleed Rate	Manufacturer	Pressure (psi)	Discovery Date (MM/DD/YY)	Repair Date (MM/DD/YY)	Prior Survey Date (MM/DD/YY)	Number of Days Leaking	Emission Factor or Engineering Estimate (Mscf/day)	Emissions (Mscf)	Explanatory Notes / Comments
LDAR Q1	95220 V	NA	varies		1060	03/30/25	04/07/25	11/13/24	78	0.3562	82.82	Includes 3 components
LDAR Q1	95220 C	NA	varies		1060	03/30/25	04/07/25	11/13/24	78	0.1342	93.60	Includes 9 components
LDAR Q1	94585 V	NA	varies		1018	03/24/25	03/31/25	11/13/24	74	0.3562	183.26	Includes 7 components
LDAR Q1	94585 C	NA	varies		1018	03/24/25	03/31/25	11/13/24	74	0.1342	29.59	Includes 3 components
LDAR Q2	95220 V	NA	varies		1060	06/12/25	06/16/25	03/24/25	45	0.3562	16.03	Includes 1 component
LDAR Q2	95220 C	NA	varies		1060	06/12/25	06/17/25	03/24/25	46	0.1342	49.39	Includes 8 components
LDAR Q2	94585 C	NA	varies		1018	06/16/25	06/24/25	03/24/25	51	0.1342	82.13	Includes 12 components
LDAR Q3	95220 V	NA	varies		1060	08/06/25	08/07/25	06/12/25	30	0.3562	10.51	Includes 1 component
LDAR Q3	95220 C	NA	varies		1060	08/06/25	08/15/25	06/12/25	38	0.1342	45.29	Includes 9 components
LDAR Q3	94585 C	NA	varies		1018	08/08/25	08/15/25	06/12/25	37	0.1342	34.29	Includes 7 components
LDAR Q3	95220 V	NA	varies		1060	08/06/25	12/31/25	06/12/25	176	0.3562	62.51	Includes 1 component. CARB Oil & Gas Rule Delay of Repair, leak not repaired by year end 2025.
LDAR Q4	95220 V	NA	varies		1060	12/08/25	12/11/25	08/06/25	66	0.3562	188.07	Includes 8 components
LDAR Q4	95220 C	NA	varies		1060	12/08/25	12/11/25	08/06/25	66	0.1342	53.14	Includes 6 components
LDAR Q4	94585 V	NA	varies		1018	12/11/25	12/11/25	08/06/25	65	0.3562	68.92	Includes 3 components
LDAR Q4	94585 C	NA	varies		1018	12/10/25	12/11/25	08/06/25	65	0.1342	61.06	Includes 7 components
LDAR Q4	95220 V	NA	varies		1060	12/08/25	12/31/25	08/06/25	86	0.3562	30.63	Includes 1 component. CARB Oil & Gas Rule Delay of Repair, leak not repaired by year end 2025.
Sum Total											1,091	

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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**

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
ZZZ-3300	95220	Glycol	Y	4,383,255.38	0	N		Petrex dehydrator with electric driven glycol circulation pumps
ZZZ-4300	95220	Glycol	Y	4,383,255.38	0	N		Petrex dehydrator with electric driven glycol circulation pumps
PHASE 1	94585	Glycol	Y	2,887,946.29	0	N		QB Johnson dehydrator with electric driven glycol circulation pumps
BBC-5150	94585	Glycol	Y	5,775,892.58	0	N		QB Johnson dehydrator with electric driven glycol circulation pumps
Sum Total							0	

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 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	126	126		0		0		-	#DIV/0!	-	#DIV/0!	-126	(100.0%)	
	All Damages	Fugitive								-	#DIV/0!	-	#DIV/0!	0	#DIV/0!	
	Blowdowns	Vented	87	87		202		4134		3,932	1,946.5%	-	#DIV/0!	4,047	4,651.7%	Preventive maintenance, mainline valve replacements
	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!	
	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!	0	#DIV/0!	
Transmission Compressor Stations	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!	
	Storage Tank Leaks & Emissions	Vented								-	#DIV/0!	-	#DIV/0!	0	#DIV/0!	
	Pipeline Leaks	Fugitive								-	#DIV/0!	-	#DIV/0!	0	#DIV/0!	
Distribution Main & Service Pipelines	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!	
	Station Leaks & Emissions	Fugitive								-	#DIV/0!	-	#DIV/0!	0	#DIV/0!	
Distribution M&R Stations	All Damages	Fugitive								-	#DIV/0!	-	#DIV/0!	0	#DIV/0!	
	Blowdowns	Vented								-	#DIV/0!	-	#DIV/0!	0	#DIV/0!	
	Meter Leaks	Fugitive								-	#DIV/0!	-	#DIV/0!	0	#DIV/0!	
Customer Meters	All Damages	Fugitive								-	#DIV/0!	-	#DIV/0!	0	#DIV/0!	
	Vented Emissions	Vented								-	#DIV/0!	-	#DIV/0!	0	#DIV/0!	
	Storage Leaks & Emissions	Fugitive	0	0		1		439		438	43,800.0%	-	#DIV/0!	439	#DIV/0!	Leak from body bleed port of 12" Midland ball valve
Underground Storage	Compressor Vented Emissions	Vented	99	2383		1950		2384		434	22.3%	-	#DIV/0!	1	0.0%	
	Blowdowns	Vented	182	182		450		168		(282)	(62.7%)	-	#DIV/0!	-14	(7.7%)	
	Component Vented Emissions	Vented	1144	0		0		0		-	#DIV/0!	-	#DIV/0!	0	#DIV/0!	
	Compressor and Component Fugitive Leaks	Fugitive	0	1144		1225		1091		(134)	(10.9%)	-	#DIV/0!	-53	(4.6%)	
	Dehydrator Vent Emissions	Fugitive	0	0		0		0		-	#DIV/0!	-	#DIV/0!	0	#DIV/0!	
Unusual Large Leaks	(Description)									-	#DIV/0!	-	#DIV/0!	0	#DIV/0!	
Total			1638	3922		3828	NA	8216	NA	4,388	115%	NA	NA	6,578.00	401.6%	

Lodi Gas Storage, L.L.C., June 15, 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 8; Rev. 03/26/2026**

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
11,350,000	22,743,982	18,422,291	306,232	17,488,954	

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
	17,488,954		18,422,291	Gas flow in transmission pipeline is bi-directional

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

*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.

Lodi Gas Storage, L.L.C., June 15, 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

Appendix 8; Rev. 03/26/2026

Summary Tables:

Natural Gas Properties	Average Mole Percent	Explanatory Notes / Comments
Methane		Natural gas meets PG&E specifications
Carbon Dioxide		Natural gas meets PG&E specifications
Ethane		Natural gas meets PG&E specifications
C3+		Natural gas meets PG&E specifications
C6+		Natural gas meets PG&E specifications
Oxygen		Natural gas meets PG&E specifications
Hydrogen		Natural gas meets PG&E specifications
Sulfur		Natural gas meets PG&E specifications
Water		Natural gas meets PG&E specifications
Carbon Monoxide		Natural gas meets PG&E specifications
Particulate Matter		Natural gas meets PG&E specifications
Inert Gas		Natural gas meets PG&E specifications
Odorant		Natural gas meets PG&E specifications