

PUBLIC UTILITIES COMMISSION  
505 Van Ness Avenue  
San Francisco CA 94102-3298



**Southern California Gas Company**  
**GAS (Corp ID 904)**  
**Status of Advice Letter 5934G**  
**As of May 6, 2022**

Subject: Joint Advice Letter Documenting Research on Mercury Impacts of Southern California Gas Company, San Diego Gas & Electric Company, Pacific Gas and Electric Company, and Southwest Gas Corporation

Division Assigned: Energy

Date Filed: 01-31-2022

Date to Calendar: 02-02-2022

Authorizing Documents: D2012031

<b>Disposition:</b>	<b>Accepted</b>
<b>Effective Date:</b>	<b>01-31-2022</b>

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

[edtariffunit@cpuc.ca.gov](mailto:edtariffunit@cpuc.ca.gov)

AL Certificate Contact Information:

Gary Lenart

213-244-2424

[GLenart@socalgas.com](mailto:GLenart@socalgas.com)

**PUBLIC UTILITIES COMMISSION**  
505 Van Ness Avenue  
San Francisco CA 94102-3298



To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

The Energy Division of the California Public Utilities Commission has processed your recent Advice Letter (AL) filing and is returning an AL status certificate for your records.

The AL status certificate indicates:

- Advice Letter Number
- Name of Filer
- CPUC Corporate ID number of Filer
- Subject of Filing
- Date Filed
- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)
- Effective Date of Filing
- Other Miscellaneous Information (e.g., Resolution, if applicable, etc.)

The Energy Division has made no changes to your copy of the Advice Letter Filing; please review your Advice Letter Filing with the information contained in the AL status certificate, and update your Advice Letter and tariff records accordingly.

All inquiries to the California Public Utilities Commission on the status of your Advice Letter Filing will be answered by Energy Division staff based on the information contained in the Energy Division's PAL database from which the AL status certificate is generated. If you have any questions on this matter please contact the:

Energy Division's Tariff Unit by e-mail to  
**[edtariffunit@cpuc.ca.gov](mailto:edtariffunit@cpuc.ca.gov)**



**Joseph Mock**  
Director  
Regulatory Affairs

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January 31, 2022

**Advice 5934-G**

(Southern California Gas Company ID U 904-G)

**Advice 3062-G**

(San Diego Gas and Electric Company ID 902-G)

**Advice 4561-G**

(Pacific Gas and Electric Company ID U 39-G)

**Advice 1202-G**

(Southwest Gas Corporation ID 905-G)

Public Utilities Commission of the State of California

**Subject: Joint Advice Letter Documenting Research on Mercury Impacts of Southern California Gas Company, San Diego Gas & Electric Company, Pacific Gas and Electric Company, and Southwest Gas Corporation in Compliance with Executive Director Approval of Joint Extension Request**

**Purpose**

Southern California Gas Company (SoCalGas), San Diego Gas & Electric Company (SDG&E), Pacific Gas and Electric Company (PG&E), and Southwest Gas Corporation (Southwest Gas) (collectively, the Joint Utilities), hereby submit this Advice Letter in compliance with direction provided by the Executive Director of the California Public Utilities Commission (CPUC or Commission) in their Letter Granting the Joint Utilities time to comply with Commission D.20-12-031 to update mercury constituent of concern Lower and Upper Action Limits (UAL/LAL) by January 1, 2022.

**Background**

Ordering Paragraph (OP) 11 of D.20-12-031 states that the Joint Utilities shall provide UAL/LAL specifications in a joint filing to be submitted to the Commission no later than April 1, 2021 for biologicals and January 1, 2022 for ammonia, mercury, and siloxanes. UAL/LAL of hydrogen will be established pursuant to Phase 4 of Rulemaking (R.) 13-02-008.

On December 21, 2021, pursuant to Rule 16.6 of the Commission's Rules of Practice and Procedure, the Joint Utilities filed a letter of extension to comply with OP 11 of D.20-12-031. Specifically, the Joint Utilities requested this extension of time to update the mercury constituent of concern UAL/LAL until adequate research and/or operation data is available to support such limits.

On December 30, 2021, the Joint Utilities submitted their individual Advice Letters with rule modifications per OP 11 of D.20-12-031. The Advice Letters provided UAL/LAL specifications for ammonia and siloxanes, but did not provide specifications for mercury due to inadequate research available. Instead, the Joint Utilities proposed to continue to monitor available literature and gather operational data to support a recommendation in the future.

On January 13, 2022, Executive Director Peterson granted the request of the Joint Utilities to maintain the existing Trigger Level for mercury of 0.08 mg/m<sup>3</sup> while continuing to monitor available literature and gather operational data to support a recommendation to update the UAL/LAL specifications for mercury once sufficient information is available. The letter also ordered until such time as sufficient information is available to update the UAL/LAL specifications for mercury, the Joint Utilities shall submit a Tier 1 Advice Letter on or before December 31 of each calendar year documenting research on mercury impacts on pipeline integrity. For calendar year 2021, the Advice Letter may be submitted on or before January 31, 2022.

The Joint Utilities described the latest research for calendar year 2021 in their respective Advice Letters submitted on December 30, 2021.<sup>1</sup> Pursuant to Executive Director Peterson's order, the Joint Utilities include a description of their research as part of this Advice Letter.

### **Research on Mercury Impacts on Pipeline Integrity for 2021**

Industry research is largely limited to the impact of mercury on infrastructure used for cryogenic operations, where liquefied natural gas equipment shows corrosion, such as brazed aluminum heat exchangers, and as a result a cryogenic limit for mercury was established at 10 ng/m<sup>3</sup> (or 0.00001 mg/m<sup>3</sup> for reference). It is important to note that cryogenic operations are not applicable to the Joint Utilities' service territories in California. Additionally, it is common practice by cryogenic operators to use mercury guard beds to protect equipment integrity from the risks that mercury poses.

The focus of the Joint Utilities is on the effects of mercury on the natural gas pipeline infrastructure and end-user equipment, rather than cryogenic operations. A literature review conducted by the University of Southern California School of Engineering on Mercury in Natural Gas and Biogas<sup>2</sup> concluded that additional studies are necessary to assess the impact of mercury on non-cryogenic end-user equipment. This literature research sponsored by SoCalGas<sup>3</sup> did not identify any specific studies on the effects of mercury or its derivatives in natural gas pipeline systems.

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<sup>1</sup> SoCalGas Advice 5920-G, SDG&E Advice 3050-G, PG&E Advice 4545-G, Southwest Gas Advice 1197-G.

<sup>2</sup> Literature Review on Mercury in Natural Gas and Biogas in the RD&D Annual Report, available at <https://www.socalgas.com/sustainability/research-and-development>.

<sup>3</sup> *Id.*

Recently, the Joint Utilities financially supported an industry study by NYSEARCH (Gap Analysis of Limits of Trace Constituents in RG)<sup>4</sup> with the intent of having mercury included to substantiate developing a LAL and UAL. However, the researchers did not consider future testing of mercury necessary for the next phase of their study on appliances because the industry already had an established cryogenic limit (10 ng/m<sup>3</sup>).

SoCalGas has interconnected numerous renewable gas (RG) projects and collected operational data from a diverse mix of RG gas supplies including dairy, wastewater, and other organic sources. Gas quality in these projects has not shown mercury at a concentration exceeding the current Trigger Level, suggesting that mercury concentration at a level that would present an integrity concern is not a likely occurrence for these RG sources. Landfill RG projects, a likely source of mercury, are not currently interconnected to any of the Joint Utilities' gas systems to facilitate gaining operational experience or performing any field tests. Landfill projects are expected to interconnect within the next two to three years.

The Joint Utilities have no changes in research on mercury impacts on pipeline integrity for calendar year 2021 and will continue to monitor available literature and gather operational data to support a UAL/LAL recommendation once sufficient information is available.

### **Protests**

Anyone may protest this Advice Letter to the Commission. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be submitted expeditiously. The protest must be submitted electronically and must be received within 20 days after the date of this Advice Letter, which is February 20, 2022. Protests should be submitted to the attention of the Energy Division Tariff Unit at:

E-mail: [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

The protest shall also be electronically sent to the Joint Utilities at the addresses shown below on the same date it is electronically delivered to the Commission:

**For SoCalGas:** Attn: Gary Lenart  
Regulatory Tariff Manager  
E-mail: [GLenart@socalgas.com](mailto:GLenart@socalgas.com)  
E-mail: [Tariffs@socalgas.com](mailto:Tariffs@socalgas.com)

**For SDG&E:** Attn: Greg Anderson  
Regulatory Tariff Manager  
E-mail: [GAnderson@sdge.com](mailto:GAnderson@sdge.com)  
E-mail: [SDGETariffs@sdge.com](mailto:SDGETariffs@sdge.com)

**For PG&E:** Attn: Sidney Bob Dietz II  
Director, Regulatory Relations  
c/o Megan Lawson  
E-mail: [PGETariffs@pge.com](mailto:PGETariffs@pge.com)

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<sup>4</sup> See [https://www.nysearch.org/tech-brief\\_4\\_05-2021.php](https://www.nysearch.org/tech-brief_4_05-2021.php).

**For SWG:** Attn: Valerie J. Ontiveroz  
Regulatory Manager/California  
E-mail: [valerie.ontiveroz@swgas.com](mailto:valerie.ontiveroz@swgas.com)

### **Effective Date**

SoCalGas asserts this Advice Letter is subject to Energy Division disposition and should be classified as Tier 1 (effective pending disposition) pursuant to General Order (GO) 96-B. SoCalGas respectfully requests that it be made effective for service on January 31, 2022, which is the date this Advice Letter was submitted.

### **Notice**

A copy of this Advice Letter is being sent to SoCalGas' GO 96-B service list and the Commission's service list in R.13-02-008. Address change requests to the GO 96-B service list should be directed via e-mail to [Tariffs@socalgas.com](mailto:Tariffs@socalgas.com) or call 213-244-2837. For changes to all other service lists, please contact the Commission's Process Office at 415-703-2021 or via e-mail at [Process\\_office@cpuc.ca.gov](mailto:Process_office@cpuc.ca.gov).

*/s/ Joseph Mock*  
Joseph Mock  
Director – Regulatory Affairs



# ADVICE LETTER SUMMARY

## ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.:

Utility type:

ELC       GAS       WATER  
 PLC       HEAT

Contact Person:

Phone #:

E-mail:

E-mail Disposition Notice to:

EXPLANATION OF UTILITY TYPE

ELC = Electric      GAS = Gas      WATER = Water  
PLC = Pipeline      HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #:

Tier Designation:

Subject of AL:

Keywords (choose from CPUC listing):

AL Type:  Monthly     Quarterly     Annual     One-Time     Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL:

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested?  Yes     No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required?  Yes     No

Requested effective date:

No. of tariff sheets:

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected:

Service affected and changes proposed<sup>1</sup>:

Pending advice letters that revise the same tariff sheets:

<sup>1</sup>Discuss in AL if more space is needed.

**Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:**

CPUC, Energy Division  
Attention: Tariff Unit  
505 Van Ness Avenue  
San Francisco, CA 94102  
Email: [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

Name:  
Title:  
Utility Name:  
Address:  
City:  
State: Zip:  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email:

Name:  
Title:  
Utility Name:  
Address:  
City:  
State: Zip:  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email: