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Comments on Natural Gas and RNG Reporting Forms

Thank you for explaining the implementation of the updated natural gas and renewable natural gas reporting requirements. I appreciate the work behind the workshop slides, draft reporting workbook, and data dictionary. Consistent information will be important for understanding Californiaâ€™s changing energy needs, and practical guidance can help reporting entities provide that information accurately.

My name is Roshan Saxena. Iâ€™m a student in Santa Clara County, serve as a youth member of the Santa Clara County Sustainability Commission, and help lead the FUHSD Climate Collective. Iâ€™m commenting in my personal capacity.

With the regulations effective October 1, I encourage the Commission to supplement the draft forms with a few completed examples. One could show how daily natural gas records are organized within a quarterly submission; another could show monthly renewable natural gas production and feedstock data within a quarterly report. These examples should explain the applicable units and how to distinguish a measured zero from missing information or a field that does not apply. That would help prevent apparently complete reports from carrying different meanings.

The workbook already includes fields identifying original and corrected submissions, which is useful. Please clarify whether a correction should replace the full reporting period or only the affected records, and how it should reference the earlier submission. A small consistency check of the data dictionary would also help: the correction-date field under CEC1308PRICE specifies a date format but is labeled Boolean in the DataType column. Aligning those entries before automated validation begins could avoid unnecessary confusion.

As reporting moves to the online portal in 2027, validation should distinguish a value that cannot be accepted from an unusual value that needs review. A clear warning and an opportunity to explain a legitimate outlier would be preferable to encouraging a reporter to change accurate information simply to clear an error.

For public reporting, I support useful aggregate summaries that follow the Commissionâ€™s confidentiality protections. Where such summaries are published, a short note about reporting coverage, missing data, significant revisions, and methodological changes would help readers distinguish changes in the energy system from changes in the underlying reporting.

Finally, the renewable natural gas summaries should explain the limits of the information collected. Production volumes and feedstock information are valuable, but they do not, by themselves, establish a complete lifecycle-emissions assessment.

Thank you for considering these suggestions and for helping make the updated reporting requirements understandable and useful.

Roshan Saxena