

## DOCKETED

<b>Docket Number:</b>	16-RPS-02
<b>Project Title:</b>	Appeal by Los Angeles Department of Water & Power re Renewables Portfolio Standard Certification Eligibility
<b>TN #:</b>	213081
<b>Document Title:</b>	69 Atmos Biomethane Attestations (Bates Nos. LA000807-LA000815)
<b>Description:</b>	N/A
<b>Filer:</b>	Pjoy Chua
<b>Organization:</b>	LADWP
<b>Submitter Role:</b>	Applicant
<b>Submission Date:</b>	8/30/2016 3:49:28 PM
<b>Docketed Date:</b>	8/30/2016

Section III: Supplemental Attestations (continued)

**-All attestations must be submitted with an original signature and initials-**

**2. Fuel Production Facility Attestation**

Name of Facility Applying for RPS Certification: **Valley Generating Station**

Fuel Production Facility Name: **McCarty Road Landfill** **Carter Valley Landfill** **Iris Glen Landfill** **Seneca Landfill** **South Hills Landfill**

Fuel Production Facility Location: **Houston, Texas** **Church Hill, Tennessee** **Johnson City, Tennessee** **Butler County, Pennsylvania** **South Park, Pennsylvania**

Fuel Production Facility Owner: **GSF Energy, LLC.** **Manufactured Methane Corp.** **ESG Biofuels (JC), LLC.** **Lego-V, LP.** **PSA South Hills Landfill Gas Ventures, LLC.**

Pipeline Biomethane Delivering **Kern River Gas Transmission** **Kern River Gas Transmission** **Kern River Gas Transmission** **Kern River Gas Transmission** **Kern River Gas Transmission**

Authorized Officer/Agent of the **Atmos Energy Marketing LLC** **Atmos Energy Marketing LLC** **Atmos Energy Marketing LLC** **Atmos Energy Marketing LLC** **Atmos Energy Marketing LLC**

I am an authorized officer or agent of the above named fuel production facility owner that the renewable fuel consists solely of:

- Choose all that apply, please initial next to each selection
- ☐ Biodiesel
  - ☐ Biogas not delivered via the natural gas pipeline system
  - ☒ Pipeline Biomethane
    - ▶ Applicant must attach a completed fuel delivery attestation
  - ☐ Biomass
  - ☐ Hydrogen

as that term is defined in the California Energy Commission's *Overall Program Guidebook for the Renewable Energy Program* and constitutes an RPS eligible renewable fuel pursuant to the *Renewables Portfolio Standard Eligibility Guidebook*. The produced fuel will be sold for use in the facility applying for RPS certification and the above fuel producer will not sell, trade, give away, claim, or otherwise dispose of any of the attributes separate from the fuel that would prevent the resulting electricity from being compliant with the definition of "green attributes" as defined in the *Overall Program Guidebook for the Renewable Energy Program*. I have read the above information as well as the *Renewables Portfolio Standard Eligibility Guidebook* and the *Overall Program Guidebook for the Renewable Energy Program* and understand the provisions, eligibility criteria, and requirements of these guidebooks and my responsibilities. I acknowledge that the receipt of any pre-certification approval from the Energy Commission for the above facility applying for RPS pre-certification is conditioned on the fuel production facility owner's acceptance and satisfaction of all applicable program requirements as set forth in the *Renewables Portfolio Standard Eligibility Guidebook* and the *Overall Program Guidebook for the Renewable Energy Program*. (see Footnote 1 below)

Authorized Officer/Agent: **David M. Tudor, Atmos Energy Marketing, LLC**

Officer Title: **VP National Accounts**

Signature: 

Date Signed: **8.22.11**

*End of the fuel production facility attestation*

1. The transaction subject of this attestation was executed under the Renewables Portfolio Standard (RPS) Eligibility Guidebook (THIRD Edition), publication #CEC-300-2007-006-ED#-CMF, adopted December 19, 2007.

Section III: Supplemental Attestations (continued)

*-All attestations must be submitted with an original signature and initials-*

**2. Fuel Production Facility Attestation**

Name of Facility Applying for RPS Certification: Harbor Generating Station

Fuel Production Facility Name:	McCarty Road Landfill	Carter Valley Landfill	Iris Glen Landfill	Seneca Landfill	South Hills Landfill
Fuel Production Facility Location:	Houston, Texas	Church Hill, Tennessee	Johnson City, Tennessee	Butler County, Pennsylvania	South Park, Pennsylvania
Fuel Production Facility Owner:	GSF Energy, LLC.	Manufactured Methane Corp.	ESG Biofuels (JC), LLC.	Lego-V, LP.	PSA South Hills Landfill Gas Ventures, LLC.
Pipeline Biomethane Delivering:	Kern River Gas Transmission	Kern River Gas Transmission	Kern River Gas Transmission	Kern River Gas Transmission	Kern River Gas Transmission
Authorized Officer/Agent of the F	Atmos Energy Marketing LLC	Atmos Energy Marketing LLC	Atmos Energy Marketing LLC	Atmos Energy Marketing LLC	Atmos Energy Marketing LLC


I am an authorized officer or agent of the above-noted fuel production facility owner, and hereby attest on behalf of the above-noted fuel production facility owner that the renewable fuel consists solely of:

Choose all that apply, please initial next to each selection	<input type="checkbox"/> Biodiesel
	<input type="checkbox"/> Biogas not delivered via the natural gas pipeline system
	<input checked="" type="checkbox"/> Pipeline Biomethane
	▶ Applicant must attach a completed fuel delivery attestation
	<input type="checkbox"/> Biomass
	<input type="checkbox"/> Hydrogen

as that term is defined in the California Energy Commission's *Overall Program Guidebook for the Renewable Energy Program* and constitutes an RPS eligible renewable fuel pursuant to the *Renewables Portfolio Standard Eligibility Guidebook*. The produced fuel will be sold for use in the facility applying for RPS certification and the above fuel producer will not sell, trade, give away, claim, or otherwise dispose of any of the attributes separate from the fuel that would prevent the resulting electricity from being compliant with the definition of "green attributes" as defined in the *Overall Program Guidebook for the Renewable Energy Program*. I have read the above information as well as the *Renewables Portfolio Standard Eligibility Guidebook* and the *Overall Program Guidebook for the Renewable Energy Program* and understand the provisions, eligibility criteria, and requirements of these guidebooks and my responsibilities. I acknowledge that the receipt of any pre-certification approval from the Energy Commission for the above facility applying for RPS pre-certification is conditioned on the fuel production facility owner's acceptance and satisfaction of all applicable program requirements as set forth in the *Renewables Portfolio Standard Eligibility Guidebook* and the *Overall Program Guidebook for the Renewable Energy Program*. (see Footnote 1 below)

Authorized Officer/Agent: David M. Tucker, Atmos Energy Marketing, LLC.

Officer Title: VP National Accounts

Signature: 

Date Signed: 0.22.11

End of the fuel production facility attestation

1. The transaction subject of this attestation was executed under the Renewables Portfolio Standard (RPS) Eligibility Guidebook (THIRD Edition), publication #CEC-300-2007-006-ED3-CMF, adopted December 19, 2007.

Section III: Supplemental Attestations (continued)

*-All attestations must be submitted with an original signature and initials-*

**2. Fuel Production Facility Attestation**

Name of Facility Applying for RPS Certification: **Haynes Generating Station**

Fuel Production Facility Name:	McCarty Road Landfill	Carter Valley Landfill	Iris Glen Landfill	Seneca Landfill	South Hills Landfill
Fuel Production Facility Location:	Houston, Texas	Church Hill, Tennessee	Johnson City, Tennessee	Butler County, Pennsylvania	South Park, Pennsylvania
Fuel Production Facility Owner:	GSF Energy, LLC.	Manufactured Methane Corp.	ESG Biofuels (JC), LLC.	Lego-V, LP.	PSA South Hills Landfill Gas Ventures, LLC.
Pipeline Biomethane Delivering:	Kern River Gas Transmission	Kern River Gas Transmission	Kern River Gas Transmission	Kern River Gas Transmission	Kern River Gas Transmission
Authorized Officer/Agent of the Facility:	Atmos Energy Marketing LLC	Atmos Energy Marketing LLC	Atmos Energy Marketing LLC	Atmos Energy Marketing LLC	Atmos Energy Marketing LLC

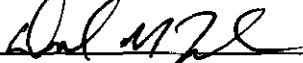
I am an authorized officer or agent of the fuel production facility owner that the renewable fuel consists solely of:

Choose all that apply, please initial next to each selection	<input type="checkbox"/> Biodiesel
	<input type="checkbox"/> Biogas not delivered via the natural gas pipeline system
	<input checked="" type="checkbox"/> Pipeline Biomethane
	► Applicant must attach a completed fuel delivery attestation
	<input type="checkbox"/> Biomass
	<input type="checkbox"/> Hydrogen

as that term is defined in the California Energy Commission's *Overall Program Guidebook for the Renewable Energy Program* and constitutes an RPS eligible renewable fuel pursuant to the *Renewables Portfolio Standard Eligibility Guidebook*. The produced fuel will be sold for use in the facility applying for RPS certification and the above fuel producer will not sell, trade, give away, claim, or otherwise dispose of any of the attributes separate from the fuel that would prevent the resulting electricity from being compliant with the definition of "green attributes" as defined in the *Overall Program Guidebook for the Renewable Energy Program*. I have read the above information as well as the *Renewables Portfolio Standard Eligibility Guidebook* and the *Overall Program Guidebook for the Renewable Energy Program* and understand the provisions, eligibility criteria, and requirements of these guidebooks and my responsibilities. I acknowledge that the receipt of any pre-certification approval from the Energy Commission for the above facility applying for RPS pre-certification is conditioned on the fuel production facility owner's acceptance and satisfaction of all applicable program requirements as set forth in the *Renewables Portfolio Standard Eligibility Guidebook* and the *Overall Program Guidebook for the Renewable Energy Program*. (see Footnote 1 below)

Authorized Officer/Agent: **David M. Tucker, Atmos Energy Marketing, LLC**

Officer Title: **VP National Accounts**

Signature: 

Date Signed: **8.22.11**

*End of the fuel production facility attestation*

1. The transaction subject of this attestation was executed under the Renewables Portfolio Standard (RPS) Eligibility Guidebook (THIRD Edition), publication #CEC-300-2007-006-ED3-CMF, adopted December 19, 2007.

Section III: Supplemental Attestations (continued)

**-All attestations must be submitted with an original signature and initials-**

**2. Fuel Production Facility Attestation**

Name of Facility Applying for RPS Certification: Scattergood Generating Station

Fuel Production Facility Name:	McCarty Road Landfill	Carter Valley Landfill	Iris Glen Landfill	Seneca Landfill	South Hills Landfill
Fuel Production Facility Location:	Houston, Texas	Church Hill, Tennessee	Johnson City, Tennessee	Butler County, Pennsylvania	South Park, Pennsylvania
Fuel Production Facility Owner:	GSF Energy, LLC.	Manufactured Methane Corp.	ESG Biofuels (JC), LLC.	Lego-V, LP.	PSA South Hills Landfill Gas Ventures, LLC.
Pipeline Biomethane Delivering E	Kern River Gas Transmission	Kern River Gas Transmission	Kern River Gas Transmission	Kern River Gas Transmission	Kern River Gas Transmission
Authorized Officer/Agent of the F	Atmos Energy Marketing LLC	Atmos Energy Marketing LLC	Atmos Energy Marketing LLC	Atmos Energy Marketing LLC	Atmos Energy Marketing LLC

I am an authorized officer or agent of the fuel production facility owner that the renewable fuel consists solely of:

Choose all that apply, please initial next to each selection	<input type="checkbox"/> Biodiesel
	<input type="checkbox"/> Biogas not delivered via the natural gas pipeline system
	<input checked="" type="checkbox"/> Pipeline Biomethane
	▶ Applicant must attach a completed fuel delivery attestation
	<input type="checkbox"/> Biomass
	<input type="checkbox"/> Hydrogen

as that term is defined in the California Energy Commission's *Overall Program Guidebook for the Renewable Energy Program* and constitutes an RPS eligible renewable fuel pursuant to the *Renewables Portfolio Standard Eligibility Guidebook*. The produced fuel will be sold for use in the facility applying for RPS certification and the above fuel producer will not sell, trade, give away, claim, or otherwise dispose of any of the attributes separate from the fuel that would prevent the resulting electricity from being compliant with the definition of "green attributes" as defined in the *Overall Program Guidebook for the Renewable Energy Program*. I have read the above information as well as the *Renewables Portfolio Standard Eligibility Guidebook* and the *Overall Program Guidebook for the Renewable Energy Program* and understand the provisions, eligibility criteria, and requirements of these guidebooks and my responsibilities. I acknowledge that the receipt of any pre-certification approval from the Energy Commission for the above facility applying for RPS pre-certification is conditioned on the fuel production facility owner's acceptance and satisfaction of all applicable program requirements as set forth in the *Renewables Portfolio Standard Eligibility Guidebook* and the *Overall Program Guidebook for the Renewable Energy Program*. (see Footnote 1 below)

Authorized Officer/Agent: David M. Tucker, Atmos Energy Marketing, LLC.

Officer Title: VP National Accounts

Signature:

Date Signed:

8.22.11

End of the fuel production facility attestation

1. The transaction subject of this attestation was executed under the *Renewables Portfolio Standard (RPS) Eligibility Guidebook (THIRD Edition)*, publication #CEC-300-2007-006-ED3-CMF, adopted December 19, 2007.

**City of Los Angeles acting by and through the Department of Water and Power**

**Form of Attestation**

The undersigned hereby attests that the product being sold by Atmos Energy Marketing, LLC to City of Los Angeles acting by and through the Department of Water and Power pursuant to the terms of that certain Transaction Confirmation dated August 1, 2010 (the "Transaction") contains the Environmental Attributes from the McCarty Road Landfill, Houston, Texas for the term of 60 months beginning September 2009 ending August 2014.

**Environmental Attributes**

Environmental Attributes means all attributes associated with Green Gas as measured by the number of MMBtus delivered to the Delivery Point including (i) all presently existing or created in the future credits, benefits, emissions reductions offsets, and allowances whosoever entitled, attributable to the Green Gas sold to Buyer, the production of electrical energy from the Green Gas sold to buyer and it's displacement of conventional fuels, including (a) any avoided emission of pollutants to the air, soil or water such as sulfur oxides (Sox), nitrogen oxides (NOx), carbon monoxide (CO) and other pollutants, and (b) any avoided emission of carbon dioxide (CO2), methane (CH4), nitrous oxide, hydroflourocarbons, perfluorocarbons, sulfur hexafluoride and other greenhouse gases that have determined by the United Nations Intergovernmental Panel on Climate Change, or otherwise by law, to contribute to the actual or potential threat of altering the Earth's climate by trapping heat in the atmosphere; and (ii) all rights to the report the ownership of accumulated Environmental Attributes in compliance with federal or state law, if applicable, and to a federal or state agency or any other party, and including reporting rights accruing under Section 1605(b) of The Energy Policy Act of 1992 and any present or future federal state or local law, regulation or bill and national regional, international or foreign emission trading programs. Notwithstanding the foregoing, Environmental Attributes shall not include any present or future federal income tax credits attributable to the production and sale of Green Gas to which the owner of the Facility may be entitled pursuant to applicable federal law.

The undersigned further attests that Atmos Energy Marketing, LLC has not agreed to sell the Environmental Attributes associated with any gas to be delivered to City of Los Angeles acting by and through the Department of Water and Power pursuant to the Transaction to any other party.

Atmos Energy Marketing, LLC

By: 

Name: David Tucker

Title: VP National Accounts

Date: August 15, 2011

**City of Los Angeles acting by and through the Department of Water and Power**

**Form of Attestation**

The undersigned hereby attests that the product being sold by Atmos Energy Marketing, LLC to City of Los Angeles acting by and through the Department of Water and Power pursuant to the terms of that certain Transaction Confirmation dated August 1, 2010 (the "Transaction") contains the Environmental Attributes from the Carter Valley Landfill, Churchill, Tennessee for the term of 59 months beginning September 2009 ending July 31, 2014.

**Environmental Attributes**

Environmental Attributes means all attributes associated with Green Gas as measured by the number of MMBtus delivered to the Delivery Point including (i) all presently existing or created in the future credits, benefits, emissions reductions offsets, and allowances whosoever entitled, attributable to the Green Gas sold to Buyer, the production of electrical energy from the Green Gas sold to buyer and it's displacement of conventional fuels, including (a) any avoided emission of pollutants to the air, soil or water such as sulfur oxides (Sox), nitrogen oxides (NOx), carbon monoxide (CO) and other pollutants, and (b) any avoided emission of carbon dioxide (CO2), methane (CH4), nitrous oxide, hydroflourocarbons, perfluorocarbons, sulfur hexafluoride and other greenhouse gases that have determined by the United Nations Intergovernmental Panel on Climate Change, or otherwise by law, to contribute to the actual or potential threat of altering the Earth's climate by trapping heat in the atmosphere; and (ii) all rights to the report the ownership of accumulated Environmental Attributes in compliance with federal or state law, if applicable, and to a federal or state agency or any other party, and including reporting rights accruing under Section 1605(b) of The Energy Policy Act of 1992 and any present or future federal state or local law, regulation or bill and national regional, international or foreign emission trading programs. Notwithstanding the foregoing, Environmental Attributes shall not include any present or future federal income tax credits attributable to the production and sale of Green Gas to which the owner of the Facility may be entitled pursuant to applicable federal law.

The undersigned further attests that Atmos Energy Marketing, LLC has not agreed to sell the Environmental Attributes associated with any gas to be delivered to City of Los Angeles acting by and through the Department of Water and Power pursuant to the Transaction to any other party.

Atmos Energy Marketing, LLC

By: 

Name: David Tucker

Title: VP National Accounts

Date: August 15, 2011

**City of Los Angeles acting by and through the Department of Water and Power**

**Form of Attestation**

The undersigned hereby attests that the product being sold by Atmos Energy Marketing, LLC to City of Los Angeles acting by and through the Department of Water and Power pursuant to the terms of that certain Transaction Confirmation dated August 1, 2010 (the "Transaction") contains the Environmental Attributes from the Iris Glen Landfill, Johnson City, Tennessee for the term of 54 months beginning March 1, 2010 ending August 31, 2014.

**Environmental Attributes**

Environmental Attributes means all attributes associated with Green Gas as measured by the number of MMBtus delivered to the Delivery Point including (i) all presently existing or created in the future credits, benefits, emissions reductions offsets, and allowances whosoever entitled, attributable to the Green Gas sold to Buyer, the production of electrical energy from the Green Gas sold to buyer and it's displacement of conventional fuels, including (a) any avoided emission of pollutants to the air, soil or water such as sulfur oxides (Sox), nitrogen oxides (NOx), carbon monoxide (CO) and other pollutants, and (b) any avoided emission of carbon dioxide (CO2), methane (CH4), nitrous oxide, hydroflourocarbons, perfluorocarbons, sulfur hexafluoride and other greenhouse gases that have determined by the United Nations Intergovernmental Panel on Climate Change, or otherwise by law, to contribute to the actual or potential threat of altering the Earth's climate by trapping heat in the atmosphere; and (ii) all rights to the report the ownership of accumulated Environmental Attributes in compliance with federal or state law, if applicable, and to a federal or state agency or any other party, and including reporting rights accruing under Section 1605(b) of The Energy Policy Act of 1992 and any present or future federal state or local law, regulation or bill and national regional, international or foreign emission trading programs. Notwithstanding the foregoing, Environmental Attributes shall not include any present or future federal income tax credits attributable to the production and sale of Green Gas to which the owner of the Facility may be entitled pursuant to applicable federal law.

The undersigned further attests that Atmos Energy Marketing, LLC has not agreed to sell the Environmental Attributes associated with any gas to be delivered to City of Los Angeles acting by and through the Department of Water and Power pursuant to the Transaction to any other party.

Atmos Energy Marketing, LLC

By: 

Name: David Tucker

Title: VP National Accounts

Date: August 15, 2011



**City of Los Angeles acting by and through the Department of Water and Power**

**Form of Attestation**

The undersigned hereby attests that the product being sold by Atmos Energy Marketing, LLC to City of Los Angeles acting by and through the Department of Water and Power pursuant to the terms of that certain Transaction Confirmation dated August 1, 2010 (the "Transaction") contains the Environmental Attributes from the Seneca Landfill, Evans City, PA for the term of 54 months beginning May 1, 2011 ending May 31, 2011.

**Environmental Attributes**

Environmental Attributes means all attributes associated with Green Gas as measured by the number of MMBtus delivered to the Delivery Point including (i) all presently existing or created in the future credits, benefits, emissions reductions offsets, and allowances whosoever entitled, attributable to the Green Gas sold to Buyer, the production of electrical energy from the Green Gas sold to buyer and it's displacement of conventional fuels, including (a) any avoided emission of pollutants to the air, soil or water such as sulfur oxides (Sox), nitrogen oxides (NOx), carbon monoxide (CO) and other pollutants, and (b) any avoided emission of carbon dioxide (CO2), methane (CH4), nitrous oxide, hydroflourocarbons, perfluorocarbons, sulfur hexafluoride and other greenhouse gases that have determined by the United Nations Intergovernmental Panel on Climate Change, or otherwise by law, to contribute to the actual or potential threat of altering the Earth's climate by trapping heat in the atmosphere; and (ii) all rights to the report the ownership of accumulated Environmental Attributes in compliance with federal or state law, if applicable, and to a federal or state agency or any other party, and including reporting rights accruing under Section 1605(b) of The Energy Policy Act of 1992 and any present or future federal state or local law, regulation or bill and national regional, international or foreign emission trading programs. Notwithstanding the foregoing, Environmental Attributes shall not include any present or future federal income tax credits attributable to the production and sale of Green Gas to which the owner of the Facility may be entitled pursuant to applicable federal law.

The undersigned further attests that Atmos Energy Marketing, LLC has not agreed to sell the Environmental Attributes associated with any gas to be delivered to City of Los Angeles acting by and through the Department of Water and Power pursuant to the Transaction to any other party.

Atmos Energy Marketing, LLC

By: 

Name: David Tucker

Title: VP National Accounts

Date: August 15, 2011

**City of Los Angeles acting by and through the Department of Water and Power**

**Form of Attestation**

The undersigned hereby attests that the product being sold by Atmos Energy Marketing, LLC to City of Los Angeles acting by and through the Department of Water and Power pursuant to the terms of that certain Transaction Confirmation dated June XX, 2010 (the "Transaction") contains the Environmental Attributes from the PSA South Hills Landfill, South Park, Pennsylvania for the term of 1 month beginning October 1, 2010 ending October 31, 2010.

**Environmental Attributes**

Environmental Attributes means all attributes associated with Green Gas as measured by the number of MMBtus delivered to the Delivery Point including (i) all presently existing or created in the future credits, benefits, emissions reductions offsets, and allowances whosoever entitled, attributable to the Green Gas sold to Buyer, the production of electrical energy from the Green Gas sold to buyer and its displacement of conventional fuels, including (a) any avoided emission of pollutants to the air, soil or water such as sulfur oxides (SOx), nitrogen oxides (NOx), carbon monoxide (CO) and other pollutants, and (b) any avoided emission of carbon dioxide (CO2), methane (CH4), nitrous oxide, hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride and other greenhouse gases that have determined by the United Nations Intergovernmental Panel on Climate Change, or otherwise by law, to contribute to the actual or potential threat of altering the Earth's climate by trapping heat in the atmosphere; and (ii) all rights to the report the ownership of accumulated Environmental Attributes in compliance with federal or state law, if applicable, and to a federal or state agency or any other party, and including reporting rights accruing under Section 1605(b) of The Energy Policy Act of 1992 and any present or future federal state or local law, regulation or bill and national regional, international or foreign emission trading programs. Notwithstanding the foregoing, Environmental Attributes shall not include any present or future federal income tax credits attributable to the production and sale of Green Gas to which the owner of the Facility may be entitled pursuant to applicable federal law.

The undersigned further attests that Atmos Energy Marketing, LLC has not agreed to sell the Environmental Attributes associated with any gas to be delivered to City of Los Angeles acting by and through the Department of Water and Power pursuant to the Transaction to any other party.

Atmos Energy Marketing, LLC

By: 

Name: Carol Pratho

Title: Vice President

Date: November 1, 2010