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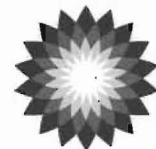
03-RPS-1078

DOCKET

02-REN-1038

DATE SEP 10 2010

RECD. Feb 18 2010



September 10, 2010

California Energy Commission
Re: Docket numbers 02-REN-1038
and Docket number 03-RPS-1078
RPS Proceeding
1516 Ninth Street
Sacramento, CA 95814-5504

**RE: California Energy Commission Fourth Edition Draft of the RPS
Guidebook. Comments of Rob Roush, BP Energy Company.**

Attachment B: Questions Concerning Possible Changes to the Renewables
Portfolio Standard Eligibility Guidebook.

Subsection 3. Biogas Delivery via Injection into the Natural Gas
Pipeline System.

Responses to Questions a., c. and d.

Question a. Should the Energy Commission consider further restricting
the location of eligible biogas production facilities to participate in
the California's RPS? If so, Please suggest reasonable and verifiable
parameters.

Answer to Question a. The CEC should allow RPS eligible renewable
energy to be generated from biogas anywhere within the WECC.

Question c. Should the use of storage facilities be disallowed in the
delivery of biogas to a RPS-eligible biogas electricity generation
facility? If yes, why and under what conditions?

Answer to Question c. Natural gas storage facilities are an integral
part of the interstate natural gas pipeline delivery system. There is
no reason to exclude the storing of biogas along the transportation
path to California. Care must be taken to not double count the storage
of biogas. This can be accomplished by maintaining a biogas storage
inventory balance which accounts for injections and withdrawals of
biogas from a particular storage reservoir.

Question d. Should the use of natural gas storage facilities to store
biogas in a natural gas pipeline system be treated differently than the
transportation of biogas through a natural gas pipeline system? If
yes, please explain.

Answer to Question d. Pipeline transportation agreements typically
have imbalance tolerances in accordance with the tariff of such
pipeline. To the extent a particular pipeline tariff allows for bank
imbalances, then "positive" banking of biogas on a transportation
imbalance should be allowed by the CEC. However, it does not make
sense to "negatively" draft a biogas imbalance from a transportation
imbalance agreement. This would be counting biogas that has yet to be
received by a particular pipeline.

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