



California Energy Commission

DOCKETED
11-RPS-01

TN # 70290

APR. 15 2013

Submitted Electronically:

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April 11, 2013

Chairman Robert B. Weisenmiller, Ph.D.
California Energy Commission
Dockets Office, MS-4
1516 Ninth Street
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Re: Comments to Biomethane Appendices and Forms (Staff Draft, 7th Edition of the RPS Eligibility Guidebook) - Docket No. 11-RPS-01 and 02-REN-1038

Dear Chair Weisenmiller, Commissioners and Staff:

On behalf of the Coalition For Renewable Natural Gas, Inc., we appreciate the opportunity to review and comment on the Appendices and Forms specific to Biomethane from the *Staff Draft* of the RPS Eligibility Guidebook, 7th Edition.

In our initial March 25, 2013 comments on the 7th Edition Guidebook we asked Commission Staff to release drafts of the new S-5 forms for certification. We renew that request and ask that you please provide comment and clarification as to whether facilities with pending applications will be required to resubmit their application using the new forms, or whether the S-5 1A and S-5 1B forms previously submitted for certification and pre-certification of facilities under existing contracts (executed before March 29, 2012) will suffice.

We note that in evaluating the new proposed forms, they do not currently include provisions for parking and storage balances. We recommend an additional section on the form for tracking of stored volumes.

We suggest that requested information regarding the quantities of biomethane transported on each pipeline only be required for submission annually, to allow for tracking on an overall basis and without mention of specific meters. Supporting documentation for each pipeline will be submitted, so tracking of data on an annual basis should be both accurate and appropriate.

The reason for this recommended change is that the path and delivery meter can fluctuate daily due to pipeline congestion. We would propose a table *without* a meter data requirement and

with a requirement for a pipeline report on an annual basis that can be reconciled directly with pipeline support data.

Finally, it is important to note that, in some cases, the maximum volumes for transport contracts are not applicable due to the contracts being interruptible. By interruptible, we are referring to the fact that often our biomethane producers can flow enough gas to fill the capacity available on the pipeline. And, in these instances, the 'maximum volume' would include the aggregate volume of biomethane flowing for multiple contracts utilizing the same pipeline. As such, our members would submit the same maximum volume on each respective application. If the Commission would prefer, our members are willing to fill in the full potential of flow based upon each of their respective contracts instead of listing 'N/A' on the form question regarding 'interruptible contracts'. Your advice on how our members should address this particular issue would be especially helpful.

Again, on behalf of the Coalition For Renewable Natural Gas, Inc. we appreciate the opportunity to comment, make recommendations on the new appendices and forms, and reiterate our request that the new version of the S 5 form be released for review by the industry, prior to final adoption.

We appreciate the Commission and Staff's work towards lifting the current suspension on biomethane, commensurate with the adoption of the *RPS Eligibility Guidebook, 7th Edition*, as soon as reasonably possible.

Sincerely,



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