BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

Order Instituting Rulemaking to Adopt
Biomethane Standards and Requirements,
Pipeline Open Access Rules, and Related
Enforcement Provisions.

Rulemaking 13-02-008
(Filed February 13, 2013)

SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E)
MOTION FOR PARTY STATUS

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Dated:  June 20, 2014

I. **BACKGROUND**

On February 13, 2013, the Commission opened a rulemaking concerning biomethane standards and requirements to address the requirements of Assembly Bill (AB) 1900 (States. 2012, Ch. 602). On May 2, 2013, the assigned Commissioner and Administrative Law Judge issued a Scoping Memo and Ruling established that Phase I of this rulemaking would focus on establishing the standards and requirements relating to the safe introduction of biomethane into the natural gas pipeline systems of the California gas utilities. As summarized in the Amended Scoping Memo and Ruling: “These efforts resulted in the adoption of Decision (D.) 14-01-034, which provides that as long as the biomethane meets the utility’s existing gas quality...
requirements, and the concentration limits for 17 constituents of concern that may be found in biomethane, that biomethane is allowed to flow into the utility’s gas pipeline system.”

The Amended Scoping Memo and Ruling established the scope of Phase II of this rulemaking, stating:

A second phase of this proceeding is being opened by this amended scoping ruling to consider who should bear the costs of meeting the standards and requirements that the Commission adopted in D.14-01-034.

In this second phase of this proceeding, the parties will have the opportunity to file comments and reply comments on who should bear the costs of complying with the Commission-adopted testing, monitoring, reporting, and recordkeeping requirements. This phase will only address these cost issues, and will not be revisiting the standards and requirements that were adopted in D.14-01-034….

In the comments and reply comments, the parties need to: (1) identify the costs that are at issue; and (2) describe the party’s reasoning and justification for why the biogas supplier, the biomethane producer or supplier, the gas utility, or other entity or person, should bear that particular cost.

Additionally, the Amended Scoping Memo and Ruling lists the following four specific issues to be addressed in opening and reply comments:

1. What costs are associated with the testing, monitoring, reporting, and recordkeeping requirements as adopted by D.14-01-034? Are these one-time or ongoing costs?

2. How do these costs compare to the total start-up and operational costs, as appropriate, of the biogas production facility?

3. Should the biogas supplier, biomethane producer or supplier, the gas utility or other entity or person bear particular costs and why? and

4. Are there any other costs that should be considered, and the reasoning why those particular costs should be resolved by the Commission?

On May 23, 2014, parties to this rulemaking filed opening comments.
II. SCE HAS A DIRECT INTEREST IN THIS PROCEEDING

SCE is an investor-owned utility and is engaged primarily in the business of generating, transmitting, purchasing, and selling electric energy in Southern California. As part of its business activities, SCE is also engaged extensively in the purchase and transport of natural gas for electric generation (“EG”). SCE is one of the largest non-core customers on the SoCalGas/SDG&E system, and holds a substantial amount of firm, local transportation capacity to serve its generation needs, and would bear a substantial portion of any costs assigned to ratepayers as a result of this proceeding, costs which will be borne by SCE’s ratepayers. As a result, SCE’s customers have a direct interest in the outcome of this proceeding.

If granted party status, SCE wishes to submit the attached Reply Comments in this proceeding that respond to the cost issues discussed in parties’ May 23, 2014 opening comments.

III. COMMUNICATION AND SERVICE

SCE requests that service of notices, orders and other correspondence in this proceeding should be addressed to:

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V. CONCLUSION

For the reasons stated above, SCE respectfully requests that its Motion For Party Status be granted and that the Commission considers the attached Reply Comments.

Respectfully submitted,

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By: Matthew Dwyer

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June 20, 2014
Appendix A
REPLY COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E)

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Dated:  June 20, 2014
REPLY COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E)

In accordance with the April 9, 2014 Amended Scoping Memo and Ruling of Assigned Commissioner and Administrative Law Judge (Amended Scoping Memo), Southern California Edison (SCE) respectfully submits the following Reply Comments to the cost issues identified in the Amended Scoping Memo.

I. INTRODUCTION

On February 13, 2013, the Commission opened a rulemaking concerning biomethane standards and requirements to address the requirements of Assembly Bill (AB) 1900 (States. 2012, Ch. 602). Phase I of the proceeding addressed the standards and requirements for biomethane relating to the introduction of biomethane into the natural gas pipeline systems of the California gas utilities. The April 9, 2014 Amended Scoping Ruling established the framework for Phase II of the proceeding. This phase “consider[s] who should bear the costs of meeting the standards and requirements that the Commission adopted in D.14-01-034.” SCE did not file comments in Phase I of this proceeding nor did it file opening comments in Phase II. However,  

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1 See generally, Decision (D.)14-01-034.
2 Amended Scoping Memo, at p. 3.
SCE wishes to respond to certain cost allocation arguments made by other parties in their opening comments in Phase II.

II. ARGUMENT

SCE takes no position on the estimates of costs presented by other parties. However, SCE believes that the existing cost allocation rules relating to interconnection of gas supplies should continue to apply to all natural gas suppliers interconnecting with the natural gas pipelines. This not only ensures fair open-access to all new gas supplies on a non-discriminatory basis, but it makes economic sense as well. SCE also believes that producers must bear the cost of fortifying the biomethane to meet the minimum BTU/scf Requirements.

A. Maintaining Non-Discriminatory Access Means All Suppliers Must Be Subject To The Same Costs

As Pacific Gas and Electric Company (PG&E) states in its opening comments, the IOUs are obligated to provide open access to all new gas supplies on a non-discriminatory basis.³

AB 1900 added Public Utilities Code Section 784.⁴ That code section provides as follows:

For each gas corporation, the commission shall adopt pipeline access rules that ensure that each gas corporation provides nondiscriminatory open access to its gas pipeline system to any party for the purposes of physically interconnecting with the gas pipeline system and effectuating the delivery of gas.

Existing cost allocation principles for interconnection of new gas supplies require interconnectors to pay for the full cost of complying with gas quality requirements and the cost

⁴ D.14-01-032, p. 132.
of the interconnection, necessary system modifications or upgrades, and the cost of ongoing
operations and maintenance.⁵

Some parties argue that the cost of interconnection for biomethane suppliers is so
significant that the Commission must abandon these cost allocation rules to the specific benefit
of biomethane suppliers, and shift such costs to IOU customers.⁶ However, requiring one set of
suppliers (non-biomethane suppliers) to incur costs that another (biomethane suppliers) do not
incur is discriminatory and therefore a violation of the Public Utilities Code 784. These parties
justify this shift by asserting it is necessary to reduce costs to biomethane suppliers to facilitate
development of in-state biomethane and support the public’s interest in the reduction of
Greenhouse Gas (GHG).⁷ While SCE recognizes the intent of AB 1900 and the need to reduce
GHG, it is in the public interest to accomplish these goals using the least expensive options
possible. Providing biomethane suppliers unique, preferential interconnection cost exemptions
not only inhibits non-discriminatory access, it also skews the price signals to advantage one
source of “clean” energy over another and will have the undesirable effect of increasing costs
without achieving real environmental benefit. Additionally, it encourages economically
inefficient interconnections because it would fail to require those projects which are more
expensive to connect to pay higher connection costs than those which are less expensive to
connect.

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⁵ Opening Comments Of Southern California Gas Company and San Diego Gas & Electric Company
(SoCalGas/SDG&E Opening Comments”), p. 3. See also Southern California Gas Company and San
Diego Gas and Electric (SoCalGas/SDG&E)’s Rule 39 and Schedule G-CPS – California Producer
Service.

⁶ See e.g., Joint Opening Comments of the Bioenergy Association of California and the California
Associate of Sanitation Agencies on the Amended Scoping Memo Related to Pipeline Biomethane
Cost issues (“Bioenergy Opening Comments”), at pp. 9-10; Opening Comments of the Coalition for
Renewable Natural Gas (“CRNG Opening Comments”), at p. 17; Comments of Waste Management
on Amended Scoping Memo (“Waste Management Opening Comments”), pp. 16-17.

⁷ See e.g., Bioenergy Opening Comments, at pp. 3-4; CRNG Opening Comments, at p. 18; Waste
Management Opening Comments, p. 15.
The Green Power Institute claims that “with perfectly operating markets the ratepayer will be indifferent as to how the costs are apportioned because the bottom line for the ratepayer will be the same.” This is not true. If the costs of interconnections are apportioned to the biomethane supplier the supplier will pass all of the costs to its customers. Other customers of the gas pipeline who do not use the biomethane would be unaffected. However, if costs are apportioned to the natural gas pipeline, then the pipeline would pass the interconnection costs to all of its customers, not just biomethane customers, which would have the effect of raising costs to all consumers to pay for the biomethane that only a few customers may be using. Further, if the costs are allocated to all customers, then there is no incentive for suppliers to bring projects with less expensive interconnections to market instead of more expensive projects. This would inappropriately raise the costs of biomethane to consumers without justification. For the same reasons, SCE believes that the Commission should dismiss Green Power Institute’s recommendation that “the one-time costs required for compliance with the rules and regulations enacted by D.14-01-034 are costs that should be considered part of the utility’s allocated costs”, since following this recommendation would eliminate the price signals relating to the true cost of interconnecting the projects that would encourage lower cost projects over higher cost ones.

There are other potential regulatory structures that could support development of sources of in-state biomethane without altering the cost allocation structure of interconnection for new gas supplies. For example, some parties have suggested that savings from GHG allowances could be used to subsidize the costs of biomethane interconnections. SCE takes no position at this time on what the appropriate structures would be. However, if the Commission ultimately

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9 GPI Opening Comments, p. 3.
10 Waste Management Opening Comments, p. 16; Bioenergy Opening Comments, p. 6; SoCalGas/SDG&E Opening Comments, p. 9. SCE notes that, as SoCalGas/SDG&E points out, the Commission has not yet ruled on the appropriate uses of GHG savings and the Commission would likely issue such a ruling in R.14-03-003. See SoCalGas/SDG&E Opening Comments, p. 9.
agrees to some level of support for biomethane production, it is important that the application of any such subsidies is done in a way consistent with sending appropriate price signals to the market.\textsuperscript{11}

\textbf{B. Producers Should Bear the Cost of Fortifying the Biomethane to Meet the Minimum BTU/scf Requirements}

The Commission decided in Phase I of this proceeding that “[c]onsistent with D.06-09-039, the minimum heating value for gas entering the pipelines of SDG&E and SoCalGas shall remain at 990 btu/scf.”\textsuperscript{12} The Coalition for Renewable Natural Gas states that “… an equitable compromise would be for the IOUs to bear the costs associated with increasing the heating value of biomethane above what it is naturally capable of achieving (950-975 BTU/scf).\textsuperscript{13} This is inconsistent with the general requirement that any party providing natural gas into an IOU system is responsible to assure that the gas meets the IOU’s gas quality specification\textsuperscript{14}. Biomethane producers should be required to bear the all costs required to bring the gas to pipeline quality specifications, including the costs of fortifying the biomethane, in order to appropriately reflect the true cost of these resources in comparison to other renewable projects.

\textbf{III. CONCLUSION}

SCE respectfully requests that the Commission maintain the existing cost allocation rules relating to interconnection of gas supplies for all natural gas suppliers interconnecting with the

\textsuperscript{11} For example, the reductions could be used to provide project specific credits to the interconnections, similar to the line extension allowance currently offered by SoCalGas under SoCalGas Rule 20. By making the allowances project specific, projects generating larger GHG savings to receive larger allowances than those generating smaller savings. This would provide a proper price signal by providing a market preference for projects with the smallest net costs.

\textsuperscript{12} D.14-01-032, Conclusion of Law 21.

\textsuperscript{13} CRNG Opening Comments, pp. 13-14.

\textsuperscript{14} See e.g., Southern California Gas Company, Rule Number 30, Sheets 15-18.
natural gas pipelines, including biomethane suppliers. This not only ensures fair open-access to all new gas supplies on a non-discriminatory basis, but it encourages economic efficiency. SCE also respectfully requests that producers bear the cost of fortifying the biomethane to meet the minimum BTU/scf Requirements.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission’s Rules of Practice and Procedure, I have this day served a true copy of SOUTHERN CALIFORNIA EDISON COMPANY’s (U 338-E) MOTION FOR PARTY STATUS, on all parties identified on the attached service list(s) R.13-02-008. Service was effected by one or more means indicated below:

☒ Transmitting the copies via e-mail to all parties who have provided an e-mail address.

☒ Placing the copies in sealed envelopes and causing such envelopes to be delivered by hand or by overnight courier to the office of the assigned Administrative Law Judge.

ALJ John S. Wong
CPUC, Div of ALJ's
505 Van Ness Ave, Room 5115
San Francisco, CA 94102

☒ Placing copies in properly addressed sealed envelopes and depositing such copies in the United States mail with first-class postage prepaid to all parties for those listed on the attached non-email list.

Executed this June 20, 2014, at Rosemead, California.

/s/ Raquel Ippoliti
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245 MARKET ST., RM. 1255C
SAN FRANCISCO, CA  94177-0001

BEVIN HONG
TRANS CANADA CORPORATION
43 WOODLAND CT.
SAN RAMON, CA  94582

THOMAS M. BRUEN
LAW OFFICES OF THOMAS M. BRUEN, P.C.
1990 NORTH CALIFORNIA BLVD., STE. 620
WALNUT CREEK, CA  94596

PHILLIP MULLER
PRESIDENT
SCD ENERGY SOLUTIONS
436 NOVA ALBION WAY
SAN RAFAEL, CA  94903

C. SUSIE BERLIN
LAW OFFICES OF SUSIE BERLIN
ROBERT RUSSELL
LODI GAS STORAGE, LLC
## State Service

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<td>680 ANDERSEN DR., FOSTER PLZA 10, 5TH FL</td>
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<td>PA</td>
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