SOUTHERN CALIFORNIA GAS COMPANY
SAN DIEGO GAS & ELECTRIC COMPANY

APPLICATION FOR NATURAL RENEWABLE GAS TARIFF
(A.19-02-015)

(DATA REQUEST PUBLIC ADVOCATES OFFICE-A.19-02-015-SCG-002)

DATE RECEIVED: 5-17-19
DATE RESPONDED: 5-31-19

Reference responses to "DATA REQUEST PUBLIC ADVOCATES OFFICE A.19-02-015-SCG-001"

QUESTION 1:

The response to 12(b) states "…in lieu of a specific methodology, SoCalGas and SDG&E will align with CARB's approach for California's Cap and Trade program. GHG emissions from combustion of eligible biomass fuels will result in zero GHG emissions as per Section 95852.2 of the Regulations for the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms." Please verify that SoCalGas and SDG&E will consider all eligible biomass fuels to result in GHG emissions of 0 g CO_2e per unit combusted for the purposes of the RNG Tariff program.

RESPONSE 1:

Yes, SoCalGas and SDG&E plan to source biomass fuels that will be eligible for California's Cap-and-Trade program, under which such eligible biomass fuels will be considered to result in zero GHG emissions.

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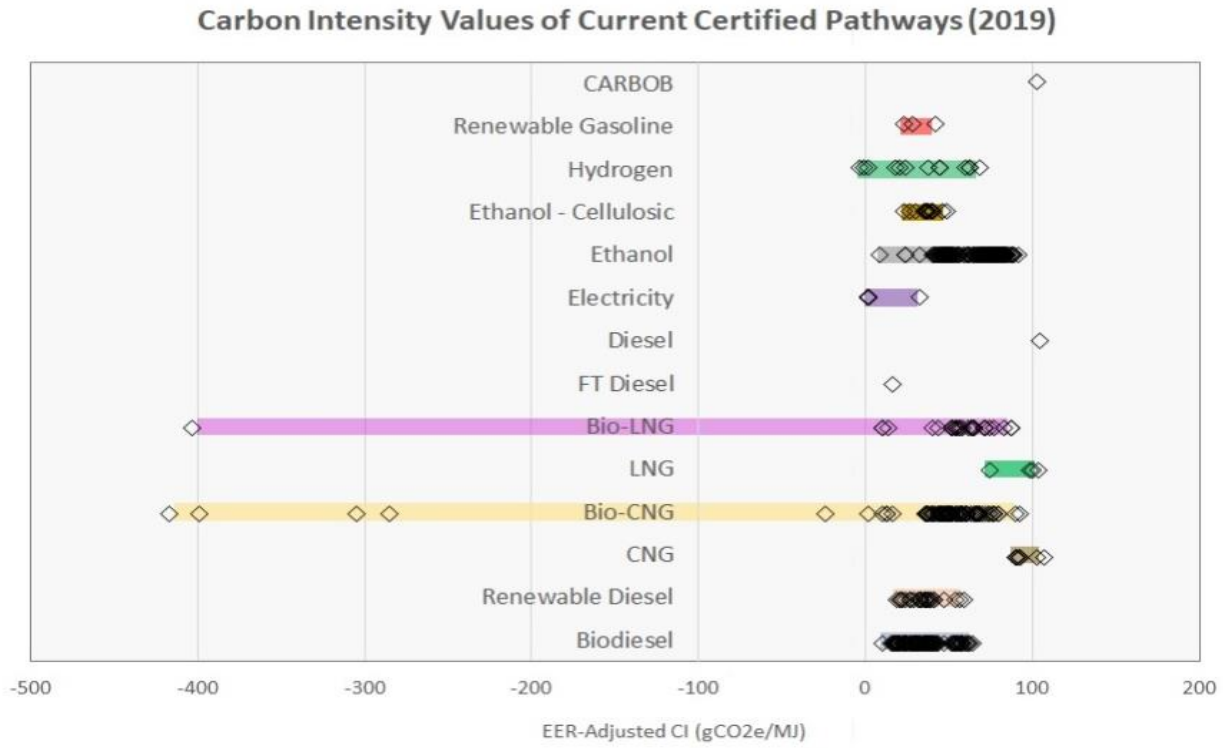
QUESTION 2:

The response to 11 states "lifecycle analysis of GHG emissions for RNG has only been applied to the transportation sector, as used in California's LCFS program and the EPA's RFS program. There is no such framework for non-transportation end-uses of RNG."

a. Do SoCalGas and SDG&E consider the chemical process of combustion to occur differently in transportation end-uses as opposed to other end-uses? If so, please explain.

b. In its LCFS program, CARB certifies the carbon intensity of various fuel types, including varieties of RNG, using an analysis of a fuel's production on the pathway from well to wheels (see the table below). CARB states that "[t]he wide range of carbon intensities is due to the lifecycle emissions methodology of the LCFS, variations in feedstock types, origin, raw material production processing efficiencies, and transportation all contribute to an individual producer's fuel pathway [carbon intensity]." [question continued on following page]



The alternative fuel's CI value is divided by its Energy Economy Ratio (EER) in order to obtain the EER-adjusted CI value, representing the emissions which occur from the use of alternative fuel per MJ of conventional fuel displaced.

Each marker represents an individual certified fuel pathway carbon intensity (CI), adjusted by the Energy Economy Ratio (EER). The lent of each bar indicates the range of carbon intensity that may be achieved by a fuel pathway. The wide range of carbon intensities is due to the lifecycle emissions methodology of the LCFS, variations in feedstock types, origin, raw material production processing efficiencies, and transportation all contribute to an individual producer's fuel pathway CI. All valid CI values shown here are certified including the legacy, Tier 1, Tier 2, and the Lookup Table.

Will SoCalGas and SDG&E prioritize the procurement of RNG from producers that achieve relatively lower carbon intensities (gCO_2e/MJ), due to factors including but not limited to "variations in feedstock types, origin, raw material production processing efficiencies, and transportation?"

RESPONSE 2:

a. No, SoCalGas and SDG&E do not consider the "chemical process of combustion" for renewable natural gas that meets pipeline gas quality standards to occur differently in transportation end-uses versus other end-uses.

b. SoCalGas and SDG&E will not strictly prioritize lower carbon intensity RNG for purposes of a stationary as opposed to NGV transportation demand given the fact that there are currently no incentives available for stationary usage and therefore no advantage in purchasing lower carbon intensity RNG that is likely to be more expensive for customers. Notwithstanding, SoCalGas and SDG&E included carbon intensity as one of several important factors in evaluating RNG supply. These factors include, but are not limited to, the following: cost, fuel availability, fuel production reliability and contract duration.

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QUESTION 3:

The response to Question 6 to states: "SoCalGas will be following existing procurement best practices, policies and procedures to contact, solicit and secure RNG from suppliers for the RNG Tariff. Gas Acquisition will also leverage knowledge gained from their recent experience administering a Request for Offers for delivery of RNG for its utility-owned CNG stations."

a. Regarding the recent experience administrating a Request for Offer, how many bids were there, and where were the suppliers located?

RESPONSE 3:

THE HIGHLIGHTED INFORMATION CONSTITUTES CONFIDENTIAL AND PROTECTED MATERIAL PURSUANT TO D.17-09-023 AND THE ACCOMPANYING CONFIDENTIALITY DECLARATION

a. SoCalGas received 8 qualifying bids. The table below indicates the supplier name and location of known supplies (SoCalGas assumes in its response that the data request is interested in the location of the supplier's RNG sources and not the primary office location of the supplier). Disclosing the source locations of the suppliers' RNG was not a requirement of the RFO. The table below represents SoCalGas' understanding of the supply locations for each RFO respondent.

No.	Supplier Name	Location of RNG Supply
1	[redacted]	[redacted]
2	[redacted]	[redacted]
3	[redacted]	[redacted]
4	[redacted]	[redacted]
5	[redacted]	[redacted]
6	[redacted]	[redacted]
7	[redacted]	[redacted]
8	[redacted]	[redacted]