

**SOUTHERN CALIFORNIA GAS COMPANY  
SAN DIEGO GAS & ELECTRIC COMPANY**

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

**(1<sup>st</sup> DATA REQUEST FROM TURN)**

**DATE RECEIVED: 4-15-19**

**DATE RESPONDED: 4-30-19**

---

**QUESTION 1:**

The April 15, 2019 Joint utility response to protests makes the following claim:

*“Applicants have received an additional 55 letters of support, which are attached to this Reply (see Attachment A). Altogether, these 91 letters come from a broad range of stakeholders – local government, small business customers, chambers of commerce, environmental organizations, educational and research institutions, and technology companies.” (Reply to protests, page 7)*

- a. Please provide copies of all correspondence between either applicant and each of the 91 organizations relating to the request for letters of support. This request should include funding from Sempra energy, corporate affiliates or any entities serving as agents of the applicants.
- b. Indicate which of these 91 organizations have received any charitable or program funding from either applicant, Sempra Energy, or any affiliate of the applicants since 2010. For every organization that received such funding, indicate the amounts and reason for the transfer of funds.
- c. Indicate whether any staff, management, executives or officers of either applicant serve on the boards of any of the 91 organizations.

**RESPONSE 1:**

- a. SoCalGas and SDG&E object to the request as outside the scope of this proceeding, seeking irrelevant information, and overbroad.
- b. SoCalGas and SDG&E object to the request as outside the scope of this proceeding, seeking irrelevant information, and overbroad and unduly burdensome.
- c. SoCalGas and SDG&E object to the request as outside the scope of this proceeding, seeking irrelevant information, and overbroad.

**SOUTHERN CALIFORNIA GAS COMPANY  
SAN DIEGO GAS & ELECTRIC COMPANY**

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

**(1<sup>st</sup> DATA REQUEST FROM TURN)**

**DATE RECEIVED: 4-15-19**

**DATE RESPONDED: 4-30-19**

---

**QUESTION 2:**

The April 15, 2019 Joint utility response to protests makes the following claim:

*“With respect to out-of-state RNG, Applicants clarify that they will only procure RNG where there is a pipeline pathway flowing to the Applicants’ systems.” (page 4)*

- a. Provide a definition of “a pipeline pathway flowing to the Applicants’ systems”.
- b. Would this restriction allow delivery through an in-kind gas swap?
- c. How would this requirement apply to contracts for “renewable attributes” (page 4)?
- d. Are there any sources located within North America that would not be able to demonstrate the availability of “a pipeline pathway flowing to the Applicants’ systems.”? If so, identify any specific sources and the reasons why they would not be eligible under the proposed criteria.

**RESPONSE 2:**

- a. SoCalGas intends to procure RNG supplies that are consistent with the California Air Resource Board’s (CARB) Cap-and-Trade Regulations for biomass fuel exemption. CARB offers two methods to demonstrate that the RNG is received by the reporting entity. 1) A physical delivery of the RNG to the facility where the fuel is combusted. Evidence would include “nomination and allocation reports, as applicable, showing the fuel moving along pipelines towards the source of combustion.” 2) A delivery via in-kind gas swap, where the RNG is purchased from the producer and demonstration of receipt of the RNG may be established through “a chain of contractual arrangements” pursuant to section 95131(i)(2)(D) of the mandatory reporting requirements (MRR) and confirmed by a third-party Verifier. For more information see the MRR section 95131(i)(2)(D)<sup>1</sup> and CARB’s “Biomass-Derived Fuels Guidance” document.<sup>2</sup>

---

<sup>1</sup> <https://ww2.arb.ca.gov/mrr-regulation>

<sup>2</sup> [https://www.arb.ca.gov/cc/reporting/ghg-rep/guidance/biomass.pdf?\\_ga=2.141399547.811515534.1555522948-1932771030.1509043080](https://www.arb.ca.gov/cc/reporting/ghg-rep/guidance/biomass.pdf?_ga=2.141399547.811515534.1555522948-1932771030.1509043080)

**SOUTHERN CALIFORNIA GAS COMPANY  
SAN DIEGO GAS & ELECTRIC COMPANY**

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

**(1<sup>st</sup> DATA REQUEST FROM TURN)**

**DATE RECEIVED: 4-15-19**

**DATE RESPONDED: 4-30-19**

- 
- b. Yes, see response (a) above.
- c. In the context of the RNG Tariff, “renewable attributes” refers to the environmental and social benefits associated with the production of RNG. An in-kind gas swap, under CARB’s description, allows for the separation of renewable attributes and the physical gas where RNG is “purchased from the source, but different molecules of natural gas are actually combusted at the facility.”<sup>3</sup> Such an arrangement is a common practice in the natural gas industry and determined by regulators as an allowable method in the LCFS program, RFS program, and Cap-and-Trade program.
- d. To the best of SoCalGas’ and SDG&E’s knowledge, there are facilities that produce biogas throughout North America that do not interconnect directly or indirectly to a local distribution pipeline, opting to instead utilize their fuels onsite or for purposes other than pipeline injection. It is not the intent of SoCalGas and SDG&E to enter into renewable attribute contracts with such entities for the RNG Tariff.

---

<sup>3</sup> CARB’s “Biomass-Derived Fuels Guidance” at page 10.

**SOUTHERN CALIFORNIA GAS COMPANY  
SAN DIEGO GAS & ELECTRIC COMPANY**

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

**(1<sup>st</sup> DATA REQUEST FROM TURN)**

**DATE RECEIVED: 4-15-19**

**DATE RESPONDED: 4-30-19**

---

**QUESTION 3:**

The April 15, 2019 Joint utility response to protests makes the following claim:

*“Gas Acquisition intends to purchase as much RNG in-state as feasible.” (page 4)*

- a. Will the applicants commit to a minimum portion of the RNG being sourced from in-state sources?
- b. Have the applicants conducted any feasibility studies to determine the amount of in-state RNG that may be available and cost-effective to support customer subscriptions under this program?

**RESPONSE 3:**

- a. SoCalGas and SDG&E have not proposed this to be a criterion of the RNG Tariff.
- b. SoCalGas and SDG&E have not conducted any feasibility studies to determine the amount of in-state RNG that may be available and cost-effective to support customer subscriptions under the RNG Tariff. SoCalGas and SDG&E included references to general research studies on the availability of supply in the Application A.19-02-015, chapter 3, section 2 – “Renewable Natural Gas Supply.”

**SOUTHERN CALIFORNIA GAS COMPANY  
SAN DIEGO GAS & ELECTRIC COMPANY**

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

**(1<sup>st</sup> DATA REQUEST FROM TURN)**

**DATE RECEIVED: 4-15-19**

**DATE RESPONDED: 4-30-19**

---

**QUESTION 4:**

The April 15, 2019 Joint utility response to protests makes the following claim:

*“The California Air Resources Board’s Cap-and-Trade regulations require all eligible gas to be “new’ fuel associated with either an increase in biogas production capacity, or with recovery of fuel that was previously vented or destroyed without producing useful energy. Gas Acquisition intends to acquire Cap-and-Trade compliant gas to ensure environmental benefits and to allow customers to account for their greenhouse gas reductions.” (page 3)*

- a. The Cap-and-Trade regulations do not apply this requirement to contracts executed prior to January 1, 2012. Will the applicants commit not to procure any RNG that involves resale from a grandfathered contract initially executed prior to January 1, 2012?
- b. Will applicants agree that any existing supply of RNG would be ineligible under the requirements of Ca Code of Regulations §95852.1.1(a)(2)? If not, please explain what existing sources would be eligible.
- c. Have the applicants sought any advice from the Air Resources Board regarding the interpretation of the requirements for “new” fuel pursuant to §95852.1.1(a)(2)? If so, provide copies of any correspondence.

**RESPONSE 4:**

- a. SoCalGas and SDG&E have not proposed this to be a criterion of the RNG Tariff.
- b. SoCalGas and SDG&E have proposed to purchase RNG that is consistent with the biomass fuels exemption under the Cap-and-Trade regulations, enforced by CARB. See CA Code of Regulations §95852.1.1(a) for specific eligibility criteria.
- c. Yes. See attached correspondence by SoCalGas seeking advice about the requirements for “new” fuel pursuant to §95852.1.1(a)(2).



TURN-01 Attachments.zip

**SOUTHERN CALIFORNIA GAS COMPANY  
SAN DIEGO GAS & ELECTRIC COMPANY**

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

**(1<sup>st</sup> DATA REQUEST FROM TURN)**

**DATE RECEIVED: 4-15-19**

**DATE RESPONDED: 4-30-19**

---

**QUESTION 5:**

How do the applicants propose to prevent the double counting of any environmental attributes or product claims associated with RNG procured to serve subscribers?

**RESPONSE 5:**

SoCalGas and SDG&E intend for the RNG Tariff program to be supplied by RNG that is compliant with CARB's exemption for biomass fuels, pursuant to §95852.1.1(a). In addition, the Mandatory Reporting of Greenhouse Gas Emissions, Subarticle 4, requires reporting entities to obtain services of an accredited verification body to comprehensively verify reported emissions, including review of accounting data and interviews with data providers.

**SOUTHERN CALIFORNIA GAS COMPANY  
SAN DIEGO GAS & ELECTRIC COMPANY**

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

**(1<sup>st</sup> DATA REQUEST FROM TURN)**

**DATE RECEIVED: 4-15-19**

**DATE RESPONDED: 4-30-19**

---

**QUESTION 6:**

Would the proposed tariff allow subscribers to use the RNG as fuel for conventional gas-fired electric generation such as fuel cells, microturbines, or other combustion technologies? If so, would the electricity generated by these facilities be eligible under the state's Renewable Portfolio Standard?

**RESPONSE 6:**

The proposed RNG Tariff does not place any restrictions on its use as a fuel for electric generation. Facilities wishing to utilize the RNG Tariff to generate Renewable Energy Credits or otherwise comply with the state's Renewable Portfolio Standard, would need to meet the eligibility requirements and processes for certifying eligible renewable energy resources for California's Renewables Portfolio Standard (RPS).