From:Kouchi, Roger (UTC)To:UTC DL Records CenterSubject:FW: UTC Public Comment about Docket UG-152164Date:Tuesday, February 09, 2016 1:25:24 PM

Review Status:	Not Reviewed	Submitted Date:	02/09/2016
Name:	Alan Newman	Address:	DEpartment of Ecology, Air Quality Program Ms 47600
City:	Olympia	State:	Washington
Zip Code:	98504-7600	Email Address:	anew461@ecy.wa.gov
Primary Phone:	360-407- 6810	Secondary Phone:	
Utility Company Name:	Docket UG- 152164	Support the Filing Issue:	Undecided
Contact Method:	None		

Comments:

1. PSE has proposed to include the most extensive list of contaminants of concern included in the California AB-1900 based proposal. As proposed by PSE, any potential supplier of biomethane would be subject to the same extensive list of potential Health Contaminants of Concern as the gas from the most contaminated source, municipal landfills. The Report to the California Public Utilities Commission authored by the California Air Resources Board and California Office of Health Hazard Assessment shows that biogas/biomethane from dairy and municipal wastewater treatment digestors does not contain most of the potential Health Contaminants of Concern.

Since this proposed tariff will become a model for use by the other gas distribution companies in Washington, the Commissions should request PSE revise their proposal to include reduced lists of Health contaminants of Concern to be analyzed by these cleaner sources of biomethane. Biomethane has been demonstrated and accepted as widely available fuel source to reduce the replace fossil methane, reduce the rate of growth in the use of fossil methane and reduce the adverse climate impacts from the use of fossil fuels in general. The commission needs to assure that their actions do not impede the use of this more climate change friendly source of methane.

The CARB report contains many recommendations to the CPUC. One overarching recommendation was "Given the broader public benefits from the increased use of biomethane, we recommend that the CPUC explore ways to minimize the testing cost burden to the biomethane producer, while at the same time ensuring that reasonable and prudent testing is conducted to protect both public health and pipeline integrity and safety."

2. How does PSE intend on applying this tariff if PSE is the end user of the biomethane? This could be for PSE to provide biomethane for sale to gas customers (for heating not vehicle fuel) or for sale to customers of its proposed LNG facility in Tacoma.

From: UTC Public Involvement [mailto:DoNotReply@utc.wa.gov]
Sent: Tuesday, February 09, 2016 11:25 AM
To: Cupp, John (UTC) <jcupp@utc.wa.gov>; Kouchi, Roger (UTC) <rkouchi@utc.wa.gov>; Hoyt, Sheri (UTC) <shoyt@utc.wa.gov>
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A comment has been submitted from the UTC's web site. Please review the comment at <u>http://utcpubcommentsadmin</u>