



Public Utility District No. 1 of Klickitat County

October 24, 2019

State of Washington
Utilities and Transportation Commission
RE: Public Utility District #1 of Klickitat County
RNG Programmatic Design and Pipeline Safety Standards Comments
Docket U-190818

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UTIL. AND TRANSP.
COMMISSION

Dear Commissioners:
For your consideration and on behalf of Klickitat PUD, we have the following comments regarding Docket U-190818

Concerning RNG Quality Standards:

9. Should the Commission consider adopting uniform standards or provide general guidance for RNG quality?

Comments from KPUD: ***Klickitat PUD does not want special consideration nor discrimination concerning RNG. Pipelines have gas quality requirements codified in their tariffs. Producers should be treated equally without regard to the source of the gas and should meet the requirements of that tariff. Klickitat PUD's facility is proof that RNG can be produced that is fungible with fossil-fuel natural gas that exists in the pipeline without detriment to the pipeline or the pipeline's customers.***

10. Concerning item 10, RNG Standards recommended by the American Biogas Council, California Public Utility Commission and the Northeast Gas Association Interconnect Guide for RNG for New York State,

Klickitat PUD reiterates that Klickitat PUD does not want special consideration nor discrimination concerning RNG. Pipelines have gas quality requirements codified in their tariffs. Producers should be treated equally without regard to the source of the gas and should meet the requirements of that tariff. Klickitat PUD's facility is proof that RNG can be produced that is fungible with fossil-fuel natural gas that exists in the pipeline without detriment to the pipeline or the pipeline's customers. Of the three standards that were presented, the standards presented by the American Biogas Council would provide protection for existing pipeline systems and consumers while encouraging development of RNG and protecting the environment.

Sincerely,

Kevin Ricks
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