



STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

621 Woodland Square Loop S.E. • Lacey, Washington 98503

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September 30, 2019

NOTICE OF OPPORTUNITY TO SUBMIT WRITTEN COMMENTS
(By 5 p.m. on October 24, 2019)

and

NOTICE OF WORKSHOP
(Tuesday, October 29, 2019, at 11 a.m.)

Re: Investigation into Renewable Natural Gas Programmatic Design and Pipeline Safety Standards, Docket U-190818

TO ALL INTERESTED PERSONS:

The Washington Utilities and Transportation Commission (Commission) is currently in the process of gathering information related to renewable natural gas (RNG) programmatic design and pipeline safety standards. Engrossed Third Substitute House Bill 1257 both requires and allows utilities to offer RNG service to voluntary customers and all customers, respectively. The Commission seeks input from stakeholders and interested parties on a number of questions, listed below.

Stakeholders and interested persons are invited to provide comments to the Commission on these questions by **Thursday, October 24, 2019**. The Commission also invites interested persons to attend a workshop scheduled for **Tuesday, October 29, 2019**, beginning at 11 a.m.

QUESTIONS FOR CONSIDERATION

RNG Program Structures

1. What level of guidance is needed from the Commission related to the following elements of E3SHB 1257, Sections 13 and 14:
 - General program structure of each section (13 and 14)
 - Eligibility of particular environmental attributes

- Procedures to approve, bank, or transfer environmental attributes

How should that guidance be provided? For example, Policy Statement? Rule? Other?

2. For Section 14 programs, should subscribers be required to pay all costs of RNG, or should any under-collection of section 14 costs be credited toward the RNG program charge authorized by Section 13?
3. What methods should the Commission consider to calculate the 5 percent limit on customer charges for RNG programs authorized in Section 13?
4. How should renewable hydrogen be treated in RNG programs?

RNG Supply and Markets

5. What barriers are there, if any, to accessing and investing in the RNG market, and how can the Commission or regulated utilities address such barriers?
6. Is there an adequate supply of RNG in the current market? Please describe the current market for RNG supply both in and outside Washington state.
7. What is the range of price premiums for RNG and how it compares to prices for conventional natural gas in the current market?

RNG Quality Standards

8. What gas quality standards do companies currently require for interconnection of RNG to their distribution system?
9. Should the Commission consider adopting uniform standards or provide general guidance for RNG quality? If so, what standards or guidance should the Commission adopt?
10. In advance of the workshop, please review the RNG standards recommended by the American Biogas Council (ABC),¹ standards recently adopted by the California Public Utilities Commission,² and the Northeast Gas Association Interconnect Guide for Renewable Natural Gas in New York State.³

¹ Available at <https://americanbiogascouncil.org/resources/rng-purity-recommendation/>.

² Available at <http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M292/K947/292947504.PDF>.

³ Available at https://www.northeastgas.org/pdf/nga_gti_interconnect_0919.pdf.

WRITTEN COMMENTS

Written comments in response to this Notice must be filed with the Commission no later than 5 p.m., Thursday, October 24, 2019. Pursuant to WAC 480-07-250(3), comments must be submitted electronically via the Commission's web portal at www.utc.wa.gov/e-filing, as provided in WAC 480-07-140(5). If you are unable to submit documents via the portal, you may submit your comments by email to the Commission's Records Center at records@utc.wa.gov or by mailing or delivering an electronic copy to the Commission's Records Center on a flash drive, DVD, or compact disc that includes the filed document(s). Comment submissions should include:

- The docket number of this proceeding (U-190818)
- The commenting party's name.
- The title and date of the comment or comments.

The Commission will post all written comments on its website at www.utc.wa.gov.

STAKEHOLDER WORKSHOP

In addition to filing written comments, interested persons are invited to attend a stakeholder workshop on **Tuesday, October 29, 2019, beginning at 11 a.m.**, and continuing, as necessary, until 5 p.m. in the Commission's Richard Hemstad Hearing Room, 621 Woodland Square Loop S.E., Lacey, Washington.

If you have questions about this investigation, please contact Kendra White, Energy Policy Advisor to the Commission, at (360) 701-5363, or by email at kendra.white@utc.wa.gov. If you wish to receive further information on this matter you may (1) call the Commission's Records Center at (360) 664-1234 or, (2) e-mail the Commission at records@utc.wa.gov and ask to be included on the mailing list for Docket U-190818.

MARK L. JOHNSON
Executive Director and Secretary