

UE-152164



**King County**  
Department of  
Natural Resources and Parks  
Director's Office  
King Street Center  
201 S Jackson St, Suite 700  
Seattle, WA 98104-3855

October 30, 2015

Washington Utilities and Transportation Commission  
P.O. Box 47250  
1300 S. Evergreen Park Dr. SW  
Olympia, WA 98504-7250

Dear Chairman Danner and Commission Members:

I am writing to express support for tariff Schedule 88R filed by Puget Sound Energy (PSE). The proposed tariff schedule would allow companies and organizations to produce biomethane within Puget Sound Energy's service territory, and transport the gas within PSE's gas tariff to consumers.

Encouraging the production and subsequent sale of biomethane offers significant benefits to the environment and for the economy. The movement of biomethane to selected end users has the potential to provide greater economic value for biomethane producers and greenhouse gas reduction benefits for the consumers. Producers of biomethane may also be able to benefit from the economic value of environmental attributes related to the sale of the biogas, such as Renewable Identification Numbers (RINs).

Raw biogas can be generated by landfills, dairy farms, wastewater treatment plants, and through anaerobic and other processes. Historically, much of the biogas that has been generated by landfills and wastewater treatment facilities across the county has been flared into the environment. After raw biogas is "scrubbed" of impurities, the resulting biomethane is interchangeable with pipeline natural gas and can be directly injected into a common carrier natural gas pipeline. The use of such biomethane is a direct offset of other natural gas consumption, with biomethane resulting in an 80% or greater reduction in greenhouse gas emissions, compared to pipeline natural gas.

Puget Sound Energy's proposed tariff schedule includes extensive requirements for gas quality testing by the producer, which includes testing for many constituents beyond the testing typically performed for pipeline natural gas. The tariff-proposed gas constituent testing, and the corresponding gas diversion protocol for out-of-specification biomethane, will ensure that

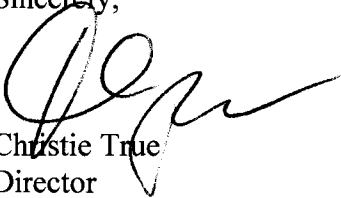
RECEIVED  
REGIONS MANAGEMENT  
2015 NOV 12 AM 8:31  
STATE OF WASH  
UTIL. AND TRANSP  
COMMISSION

biomethane produced does not have any adverse impacts to PSE's system or to PSE's natural gas customers.

For over twenty-five years, King County's South Wastewater Treatment Plant has been producing and injecting biomethane into PSE's natural gas pipelines. To date, this gas has been sold to PSE and has been integrated into PSE's natural gas supply. Upon approval of the tariff schedule, we look forward to the opportunity to contract for the gas to be transported, per PSE's tariff, to a natural gas vehicle fuel consumer. The result will be a significant reduction in greenhouse gas emissions for the vehicles fueled by the end users of the gas, and the potential for increased revenue for King County that would help offset the significant costs associated with producing the biomethane. Beyond King County, we hope the approval of the proposed schedule will encourage others to generate biomethane from biogas, and take advantage of the environmental and potential financial benefits of doing so.

We appreciate the opportunity to comment on this filing, and encourage you to approve Puget Sound Energy's proposed tariff Schedule 88R.

Sincerely,



Christie True  
Director

cc: David Broustis, Energy Manager, Department of Natural Resources and Parks