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Via Electronic Filing

Mark L. Johnson  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
P.O. Box 47250  
Olympia, WA 98504-7250

**RE: Notice of Opportunity to File Written Comments Relating to the Commission's examination of energy decarbonization impacts and pathways for electric and gas utilities to meet state emissions targets, Docket U-210553**

The American Biogas Council (ABC) appreciates the opportunity to comment on the State of Washington Utilities and Transportation Commission's examination of energy decarbonization impacts and pathways for electric and gas utilities to meet state emissions targets, Docket U-210553.

ABC represents nearly 300 businesses and 3000 professionals in Washington and across the US who are dedicated to developing the biogas industry. Our member companies span the entire biogas industry supply chain, including project developers, farms, anaerobic digestion technology, biogas processing equipment providers, wastewater companies, waste managers, utilities, financial firms, and others.

Biogas systems provide sustainable materials management solutions for organic waste (food waste, animal manures, wastewater treatment biosolids, green waste, yard trimmings, and food manufacturing residuals). Biogas systems recycle these materials into renewable energy through the natural anaerobic digestion process, critical agronomic nutrients (nitrogen, phosphorus, potassium, calcium, and sulfur), and a range of high-value products that improve soil health, water quality, and air quality. Biogas systems are unique among renewable energy technologies; they produce biogas 24/7, 365 days a year which can be converted to electricity and heat (at up to 95% efficiency), pipeline quality renewable natural gas (RNG) and many other uses.

The potential for Washington State to grow its biogas industry is enormous. The state currently has 49 operating biogas systems but has the potential to build 231 more, according to our [Biogas State Profile for Washington State](#). These additional systems could:

- Create 5,786 construction jobs and 384 permanent jobs;
- Catalyze at least \$694 million in new capital investments;
- Produce 240 million gallon equivalents of vehicle fuel. (equivalent to removing 1.83 million cars from the road from an emissions perspective); and
- Produce numerous secondary benefits from waste management, odor reduction, more resilient farms, and municipalities, greater soil health, air quality, and more.

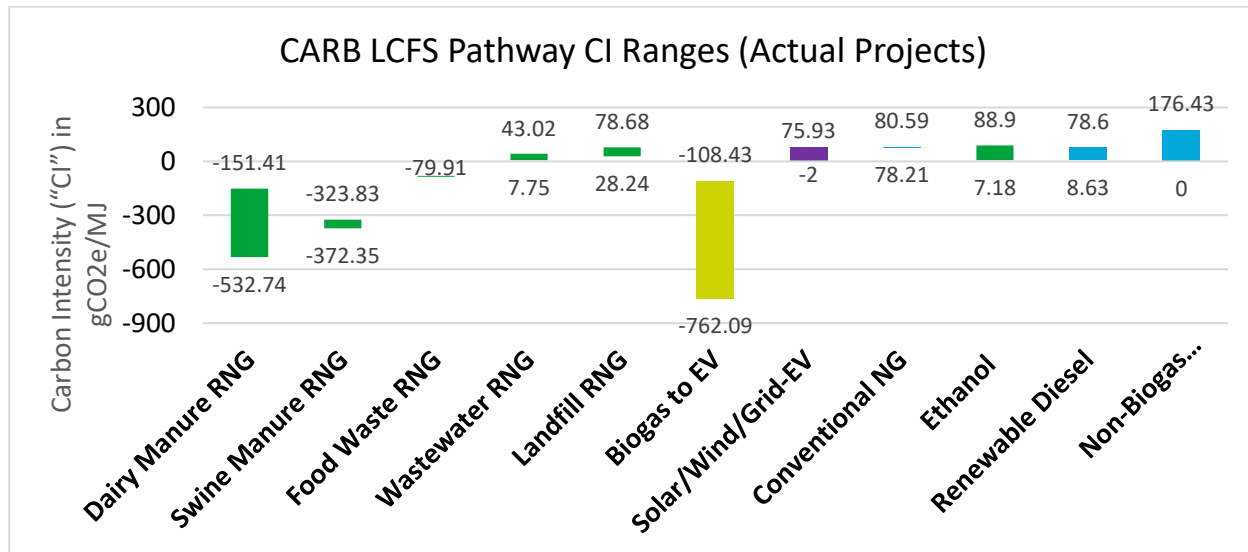
**RESPONSES TO QUESTIONS FOR CONSIDERATION**

a. *How natural gas utilities can decarbonize;*

The ABC urges the Commission to examine the expansion of RNG utilization within the existing natural gas system as a significant component in achieving Washington State's decarbonization goals. Washington is already home to two highly successful systems: the King County wastewater treatment plant, one of the longest operational RNG systems, and the Cedar Hills landfill, one of the largest RNG installations worldwide. Both projects provide RNG that is indistinguishable from other sources of natural gas to their respective local distribution company with no concerns.

The decarbonization benefits of RNG are incredibly significant, so much so that even a small amount injected into a pipeline can have a huge decarbonization benefit. When using RNG with a Carbon Intensity (CI) score of zero, no new net emissions

are released into the atmosphere. For example, a natural gas pipeline carrying 20% RNG with a CI score of -400 effectively results in a carbon-neutral pipeline. When considering the benefits of specific pathways, biogas has clear benefits compared to alternative fuels. The below chart using data from the California Air Resources Board shows the ranges of CI for each type of fuel compared to the two baseline fuels (gasoline and diesel).



*b. The impacts of increased electrification on the ability of electric utilities to deliver services to current natural gas customers reliably and affordably;*

Of the 2200 operational biogas systems currently operating around the country, 91% of them (2000) already generate low-carbon, no-carbon, and carbon-negative electricity around the clock. While providing electricity is something that biogas systems are more than capable of doing, ABC believes that biogas systems should never be unduly restricted or limited in their ability to offer low-carbon RNG to be sold into pipelines. Washington State has myriad natural energy resources available should use them all to fulfill its different energy needs.

*c. The ability of electric utilities to procure and deliver electric power to reliably meet that load;*

Biogas systems are highly effective at providing baseload power that is not intermittent. Additionally, peak shaving with biogas systems is one of the fastest options to meet peak demands, contributing significantly to community resilience, and reducing the need for costly large conventional natural gas peaking plants. Finally, the reliable source of biogas is flexible and can be converted to electricity, heat, renewable natural gas (RNG), or other renewable fuels, depending on what is needed locally.

*e. The costs and benefits to residential and commercial customers, including environmental, health, and economic benefits;*

Although RNG derived from biogas may be more expensive, the value of decarbonization can be worth it. Washington’s legislature has made it clear that customers want decarbonized solutions. Even though there may be an increased cost associated with biogas RNG, only a fraction of the price will be passed on to the ratepayer as a portion of the other types of energy provided to the customer. Also, biogas systems are unique among renewable energy technologies as they offer a wide range of non-energy benefits which technologies such as wind and solar can’t provide: better soil health, displacement of fossil fuel-derived synthetic fertilizers, watershed protection, better farm-community relations, increased crop yields, and more.

*g. Potential regulatory policy changes to facilitate decarbonization of the services that gas companies provide while ensuring customer rates are fair, just, reasonable, and sufficient*

ABC has several basic recommendations for enhancing and facilitating the services that gas companies provide specific to biogas and RNG:

- Ensure that the gas interconnection process and related costs are transparent, predictable, and standardized;

- Ensure that gas utilities are easily able to purchase low-carbon RNG to offset their own carbon footprint;
- Ensure that gas utilities are easily able to purchase low-carbon RNG, and pass the cost and benefits on to gas customers who want to buy renewable natural gas instead of conventional gas; and
- Ensure that electric utilities can buy biogas or RNG to generate electricity or buy biogas-generated electricity directly from a biogas project to sell to electric customers who want to buy renewable electricity.

We appreciate the opportunity to comment and look forward to working with the Commission and other stakeholders throughout this process. Please feel free to contact ABC directly should you have any questions about these comments. ABC's State Policy Manager, Will Higgins, who leads this work for us can be reached at 202-261-1320 or [whiggins@ttcorp.com](mailto:whiggins@ttcorp.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick Serfass". The signature is stylized and cursive.

Patrick Serfass, Executive Director