

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Address Natural
Gas Distribution Utility Cost and Revenue Issues
Associated with Greenhouse Gas Emissions

Rulemaking 14-03-003
(Filed March 13, 2014)

MOTION OF COALITION FOR RENEWABLE NATURAL GAS FOR PARTY STATUS

Dated: May 7, 2014

DAVID A. COX
Attorney
Coalition For Renewable Natural Gas
1017 L Street, #513
Sacramento, CA 95814
david@rngcoalition.com

JOHANNES D. ESCUDERO
Executive Director
Coalition For Renewable Natural Gas
1094 Tanland Drive, #102
Palo Alto, CA 94303
johannes@rngcoalition.com

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Adopt
Biomethane Standards and Requirements,
Pipeline Open Access Rules, and Related
Enforcement Provision

MOTION OF COALITION FOR RENEWABLE NATURAL GAS FOR PARTY STATUS

I. Introduction

Pursuant to Rules 1.4 and 11.1 of the California Public Utilities Commission’s (Commission) Rules of Practice and Procedure, the Coalition For Renewable Natural Gas (“RNGC” or “Coalition”) respectfully moves for party status in this proceeding (R.14-03-003).

II. Discussion

Coalition For Renewable Natural Gas is a nonprofit organization and trade association dedicated to the increased utilization of renewable natural gas (RNG, pipeline quality biogas, or biomethane). RNG is a clean, ultra low-carbon, renewable energy resource utilized in the generation of renewable electricity, thermal heat and alternative transportation fuel.

The Coalition represents each sector of the RNG industry: waste collection, management and recycling companies, renewable energy developers, engineers, financiers, technology manufacturers and service providers, gas marketers, gas transporters, environmental advocates, research organizations, organized labor, law firms and utilities.

It is important to understand is that RNG is molecularly and substantively natural gas. The distinction and difference is their respective source of origin. Whereas natural gas is a fossil-based natural resource, RNG is produced by the organic decomposition of waste (primarily from landfills, waste water treatment plants, commercial food waste and agricultural digesters).

In the US there are approximately 600 landfills, for example, that have developed RNG projects on-site. However, there are only 42 developed High-BTU (or pipeline quality) projects that are currently operational. Current natural gas pipeline standards (tariffs) in other states do not differentiate between renewable natural gas and fossil fuel natural gas. As such, RNG projects have continuously introduced RNG into natural gas pipelines, including distribution pipelines. In fact, most of the High BTU RNG produced in the US is transported via common carrier (natural gas) pipelines.

The Coalition is involved as an advocate in international, federal and state legislation and regulation that addresses or affects climate change, renewable energy and clean air objectives. The Coalition was instrumental in the introduction, passage and regulatory implementation of landmark legislation (AB 1900, Gatto - 2012) that will allow RNG from

California landfills to be transported in-State via natural gas pipelines for the first time since 1988.

The Coalition seeks to participate in Rulemaking 14-03-003 to ensure that policies, programs, rules and tariffs established by the proceeding, necessary for natural gas investor-owned utilities to comply with the California Air Resources board's (CARB) greenhouse gas (GHG) cap-and-trade program, do not negatively impact the ability of the RNG industry to conduct business that will collectively benefit California's environment, economy, municipal utilities and rate-paying consumers alike.

III. Service

Services of notices, orders, and other communications and correspondence in this proceeding should be directed to the Coalition For Renewable Natural Gas at the addresses set forth below:

Johannes D. Escudero
Executive Director
Coalition For Renewable Natural Gas
1094 Tanland Drive, #102
Palo Alto, CA 94303
Phone: (916) 520-4764
Email: Johannes@rngcoalition.com

David A. Cox
Attorney and Director of Operations
Coalition For Renewable Natural Gas
1017 L Street, #513
Sacramento, CA 95814
Phone: (916) 678-1592
Email: David@rngcoalition.com

IV. Conclusion

For the reasons stated above, the Coalition For Renewable Natural Gas respectfully requests the Commission grant this Motion for Party Status.

Respectfully signed and submitted on May 7, 2014.

DAVID A. COX
_____/DC/_____
Attorney
Coalition For Renewable Natural Gas
1017 L Street, #513
Sacramento, CA 95814

JOHANNES D. ESCUDERO
_____/JE/_____
Executive Director
Coalition For Renewable Natural Gas
1094 Tanland Drive, #102
Palo Alto, CA 94303