

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

In the Matter of:
Informational Proceeding and Preparation of the
California Energy Commission 2005
Integrated Energy Policy Report and

Order Instituting Rulemaking to Establish
Policies and Rules to Ensure Reliable,
Long Term Supplies of Natural Gas to California

Energy Commission
Docket No. 04-IEP-01

CPUC Docket No. R.04-01-025
Notice of Workshop on Natural
Gas Quality Issues

**COMMENTS OF
KERN RIVER GAS TRANSMISSION COMPANY AND
QUESTAR SOUTHERN TRAILS PIPELINE COMPANY
ON REPORT ON THE JOINT WORKSHOP ON GAS QUALITY STANDARDS**

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Date: April 25, 2005

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Pursuant to the December 23, 2004 Ruling of the Presiding Administrative Law Judge, and accompanying Notice of Joint Workshop, Kern River Gas Transmission Company (“Kern River”) and Questar Southern Trails Pipeline Company (“Southern Trails”) submit the following comments on the Report on the Joint Workshop on Natural Gas Quality Standards issued by the California Public Utilities Commission (“Commission”) and the California Energy Commission (“CEC”) on April 4, 2005 (“Report”).

I. GAS QUALITY AS A NATIONAL ISSUE

The Report provides a compilation of the views of the various stakeholders on the potential modifications to the current gas quality specifications, as expressed at the workshop, even setting forth specific proposed modifications advanced by certain parties and soliciting

comment thereon.¹ Kern River and Southern Trails have significant concerns about the solicitation of comments on specific proposed modifications to the currently tariffed gas quality standards, and perhaps additional advancement toward the adoption of any changes while, concurrently, the Federal Energy Regulatory Commission (“FERC”) is pursuing the same issues on a national basis.

As noted in the Report (at p.10), one of the primary concerns raised by stakeholders who participated in the workshop was:

Should California follow the FERC’s lead and support or acquiesce to the implementation of a nationwide standard? On this particular issue, it is yet unclear what form such a federal standard would take, and whether or not that standard would address California’ concerns.

The fact is, despite the reservation expressed in the Report as to the progress made by FERC in its efforts to address the issue of gas quality, FERC has taken significant steps towards reaching resolution of such issues on a nationwide basis. In particular, FERC has put out for comment two white papers prepared by the Natural Gas Council addressing gas quality (hydrocarbon drop out)² and interchangeability³ and received responses from over three dozen industry participants, including such major players as the American Gas Association, the Interstate Natural Gas Association of America, and the Independent Producers Petroleum Association of America. A consistent theme running throughout the comments submitted to FERC was the endorsement of

¹ Specifically, the Commission and the CEC have solicited comments on the proposals submitted by Southern California Gas Company and Calpine Corporation.

² See *White Paper on Liquid Hydrocarbon Drop Out in Natural Gas Infrastructure*, NGC+ Working Group (February 28, 2005).

³ See *White Paper on Natural Gas Interchangeability and Non-Combustion End Use*, NGC+ Interchangeability Working Group (February 28, 2005).

the white papers as the technical foundation for more discussion. FERC has taken heed of such sentiment and has scheduled a technical conference on May 17, 2005.⁴

In addition, regardless of which specifications FERC ultimately approves, a large sector of the industry favors the incorporation of those standards into the tariffs of interstate natural gas pipelines, such as Kern River and Southern Trails. Consequently, should the Commission and the CEC proceed with the adoption of a set of gas quality standards with which interstate pipelines serving the state would need to comply, then they place the interstate pipelines in an untenable situation of being asked to comply with two sets (i.e., state and federal) of what might be conflicting regulations.

FERC is progressing towards resolution of the issues surrounding gas quality specifications. Given the interconnected nature of the gas transmission grid across the country, it is essential that California acts in concert with, and not opposed to, the gas quality specifications which are determined by FERC. Accordingly, Kern River and Southern Trails respectfully submit that the Commission and the CEC should await conclusion of the FERC process and its resolution of the gas quality specifications which should be adhered to by interstate pipelines. If at such time, the Commission and the CEC determine that additional steps must be taken to address any California specific concerns, then this process which the Commission and the CEC are currently embarked can be reconvened.

II. GAS QUALITY AS A STATE ISSUE

While, for the most part, as noted above, the issues of gas quality specifications are being dealt with on a national level, and the Commission and CEC should await the conclusion of

⁴ Kern River and Southern Trails would note that the proposal advance by SoCalGas is similar to that that currently being advanced at the national level by NGC+, while Calpine's proposal is significantly more restrictive. Kern River and Southern Trails cannot support Calpine's proposal.

that process prior to advancing changes to the utilities' tariffed standards, there is one aspect of the gas quality issue on which the Commission and CEC can proceed to act – changes to the California Air Resources Board (“CARB”) standards. The CARB standards are a California specific issue.

To this end SoCalGas has proposed that the current CARB compositional standard be replaced with a standard setting the minimum methane number at 80, to be reduced to a MN 73 on or before January 1, 2008. As noted in Report (at p. 35), “consensus held that methane number is a viable performance standard for natural gas motor fuel, and stakeholders interest in changing the CARB Standard almost uniformly support its adoption as a determination of quality.” Kern River and Southern Trails strongly concur. The use of a 80 MN standard is more readily achievable by gas suppliers while protecting the performance of the currently existing CNG vehicle fleet.

Respectfully submitted,

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April 25, 2005

CERTIFICATE OF SERVICE

I, Melinda LaJaunie, certify that I have on this 25th day of April 2005 caused a copy of the foregoing **R.04-01-025/04-IEP-01 COMMENTS OF KERN RIVER GAS TRANSMISSION COMPANY AND QUESTAR SOUTHERN TRAILS PIPELINE COMPANY ON REPORT ON THE JOINT WORKSHOP ON GAS QUALITY STANDARDS** to be served on the parties on the attached service list via Hand Delivery, U.S. Mail and/or Electronic Mail.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 25th day of April 2005 at San Francisco, California.

S/Melinda LaJaunie
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