

From: [PSC Public Comment](#)
To: [REDACTED]
Subject: RE: American Biogas Council Comments on Tariff TFS2024-00136.
Date: Thursday, May 2, 2024 10:44:00 AM
Attachments: [image001.png](#)

Case No. 2024-00125

Thank you for your comments on the application of Louisville Gas and Electric Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2024-00125, in any further correspondence. The documents in this case are available at [View Case Filings for: 2024-00125 \(ky.gov\)](#).

Thank you for your interest in this matter.

From: Jonathan Harding [REDACTED]
Sent: Tuesday, April 30, 2024 10:31 PM
To: PSC Public Comment <PSC.Comment@ky.gov>
Subject: RE: American Biogas Council Comments on Tariff TFS2024-00136.

[REDACTED]

[REDACTED]

Apologies for the double email. I attached the wrong version of comments in the previous email by mistake. Please us the current attachment at the official comments for the American Biogas Council.

Apologies for the inconvenience.

Best,

Jonathan

Jonathan Harding
Manager of State Policy
American Biogas Council

[REDACTED]

The Voice of the US Biogas Industry

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From: Jonathan Harding

Sent: Tuesday, April 30, 2024 9:37 PM

To: psc.comment@ky.gov

Subject: American Biogas Council Comments on Tariff TFS2024-00136.

Good evening,

Please find the American Biogas Council comments attached regarding Tariff TFS2024-00136.

Best,

Jonathan

Jonathan Harding

Manager of State Policy

American Biogas Council



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April 30, 2024

Ms. Linda Bridwell, Executive Director
Kentucky Public Service Commission
P.O. Box 615
211 Sower Boulevard
Frankfort, KY 40602-0515

RE: Docket TFS2024-00136, Comments of the American Biogas Council

Dear Ms. Bridwell,

The American Biogas Council (ABC) appreciates the opportunity to comment on Docket TFS2024-00136. As a representative body for the U.S. biogas industry, we are committed to supporting decarbonization while advocating for the inclusion of viable, low-carbon energy derived from organic waste, which includes renewable natural gas (RNG).

We represent over 400 companies in all parts of the biogas supply chain who are leading the way to a low-carbon future. Our member companies represent municipalities managing wastewater and solid waste infrastructure, utilities, farms, design and engineering firms, construction, and skilled trades, as well as financial, equity, and carbon markets, among others.

In Docket TFS2024-00136, Louisville Gas and Electric has filed changes to its Local Gas Delivery Service, including but not limited to revisions to gas quality specifications and prohibition of deliveries by certain, non-pipeline transportation. These revisions are material changes, with significant impact to biogas, compressed natural gas, and renewable natural gas markets. As drafted, this proposed tariff poses a significant barrier to positive economic impact, and greenhouse gas emission reduction provided by RNG. The tariff proposed a minimum heating value of 1035 BTU per cubic feet which would limit RNG being used within the LG&E system, without any justification by LG&E for why this increased minimum is required. Furthermore, in order to increase the heating value, the most common method is to blend propane into the supply prior to injection. Doing this to a renewable natural gas supply reduces the carbon reducing benefits of this fuel, and places undue burden on RNG producers. In addition, the ABC recommends that LG&E work with providers to accommodate the delivery of RNG by truck, which LG&E's revisions would prohibit. The limitation of delivery by truck creates a disparity within the region, as there are other states, such as Florida and North Carolina, that have explicitly recognized that RNG can be safely delivered via truck. Given the distributed nature of RNG production facilities, it is critical for projects to have access to existing infrastructure, to provide least-cost access not only to natural gas markets, but also emerging markets where RNG is a feedstock (i.e., Hydrogen), while preserving the environmental benefits of the fuel. LG&E's revisions should be thoughtfully considered by the Commission before they are allowed to take effect.

The ABC welcomes the opportunity to work with the Kentucky Public Service Commission throughout this process and will gladly provide additional information supporting our opposition to the changes LG&E is proposing in Docket TFS2024-00136.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick Serfass".

Patrick Serfass, Executive Director

About the American Biogas Council The American Biogas Council is the voice of the US biogas industry dedicated to maximizing carbon reduction and economic growth using biogas systems. We represent more than 400 companies in all parts of the biogas supply chain who are leading the way to a better future by maximizing all the positive environmental and economic impacts biogas systems offer when they recycle organic material into renewable energy and soil products. Learn more online at www.AmericanBiogasCouncil.org, Twitter [@ambiogascouncil](https://twitter.com/ambiogascouncil), and [LinkedIn](#).