

From: [REDACTED]
To: [PSC Public Comment](#)
Cc: [REDACTED]
Subject: RNG Coalition Comments on Docket 2024-00125
Date: Wednesday, August 14, 2024 10:28:45 AM
Attachments: [241408 Public Comments on Docket 2024-00125 - RNG Coalition.pdf](#)



Good morning,

Please see attached comments from RNG Coalition for submittal in PSC Docket 2014-00125. We appreciate the opportunity to provide public comment in this proceeding and are happy to answer any follow-up questions based on the attached.

Best,

Sam

Sam Lehr
Manager of Sustainability and Markets Policy
Coalition for Renewable Natural Gas





August 14, 2024

By: Electronic Communication

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

Re: Docket 2024-00125, Public Comments of Coalition for Renewable Natural Gas on Proposed LG&E Changes to LGDS to Accommodate Renewable Natural Gas

Dear Ms. Bridwell:

Coalition for Renewable Natural Gas (“RNG Coalition”) submits the following public comments to the Kentucky Public Service Commission (“PSC”) which reiterate concerns regarding Louisville Gas and Electric’s (“LG&E”) previously filed in Docket TFS2024-00136.

RNG Coalition is a non-profit association of companies and organizations dedicated to the advancement of RNG as a clean, green, alternative, and domestic energy and fuel resource. RNG Coalition includes 350 companies and organizations that represent more than 95% of the total volume of RNG in North America throughout the value chain of RNG – from waste feedstock, such as landfills, dairy, wastewater treatment, to refined biomethane that is interchangeable with geologic natural gas. RNG Coalition members have been exploring RNG projects in Kentucky including in the LG&E service territory and are constructing projects elsewhere in the Commonwealth.

As stated in our previous filing, our organization’s goal is to ensure that beneficial renewable natural gas (“RNG”) can be used off of the LG&E system to the maximum extent possible. We reiterate that the following changes in the terms

and conditions and gas quality provisions of LG&E's Local Gas Delivery Service ("LGDS") would be problematic for RNG producers seeking to invest in Kentucky, and are not in line with precedent and best practices seen in other jurisdictions:

1. The proposed minimum heating value of 1,030 BTU per cubic feet is too high and could foreclose most RNG development. RNG is dry gas, *i.e.*, gas that does not contain the so-called "tanes," propane, ethane, etc., found in geologic natural gas. In the absence of the "tanes," RNG Coalition recommends that the heating value for RNG be based only on minimum levels, and that the minimum heating value be lowered from one-thousand and thirty (1,030) BTU per cubic feet as proposed to nine hundred fifty (950) BTU per cubic feet. Attached as Exhibit A is a spread sheet containing examples of how other distribution and pipeline transmission systems have addressed BTU levels. As you can see in Column D, the LG&E minimum heating value is out of touch with those standards.
2. The proposed Wobbe Index levels—a minimum of 1,336 and a maximum of 1,381—are too high. RNG Coalition recommends only minimum levels for RNG, specifically a minimum Wobbe Index of 1,250.
3. RNG Coalition notes that existing gas quality constituents were changed and numerous new gas quality constituents added. It has been RNG Coalition's experience that proposed constituent levels often piggyback off of constituent levels set in other states, such as California, without any further analysis of whether those constituent levels are appropriate for a specific system, such as LG&E. Such an approach forecloses RNG development and at a minimum adds costs without ensuring reliable pipeline operations.
4. RNG Coalition questions LG&E's prohibition of the delivery of RNG to its system by truck. In RNG Coalition's knowledge and belief, no state has ever prohibited RNG's injections by truck and other states, such as Florida and North Carolina, have specifically recognized that RNG can be delivered by truck.
5. LG&E's hazardous waste language prohibits RNG from feedstocks, such as landfills, containing hazardous wastes and requires the RNG Operator to certify to that fact. Many landfills are very old and the wastes previously disposed almost impossible to ascertain. Without more specificity, the

certification will be very difficult to provide. RNG Coalition and its members have dealt with that issue at the Federal Energy Regulatory Commission – *see* March 6, 2020 filing by Northwest Pipeline in FERC Docket No. RP20-531 – and recommends the following language in lieu of that proposed:

Company prohibits the delivery of RNG to Transporter from any landfill permitted under the Resource Conservation and Recovery Act Subtitle C (42 U.S.C. § 6921 – 6932), whether by the United States Environmental Protection Agency or a state under a program authorized by the United States Environmental Protection Agency (“Hazardous Waste Landfills”). A Hazardous Waste Landfill includes all continuous land and structures, and other appurtenances and improvements, on the land used for the treatment, transfer, storage, resource recovery, and disposal or recycling of hazardous waste. RNG Operator of a RNG Receipt Point delivering RNG into Transporter’s system shall certify in writing to Transporter that the RNG is not being produced from landfill gas collected from a Hazardous Waste Landfill before delivering the RNG into Company’s pipeline system.

RNG Coalition appreciates the opportunity to file public comments in Docket 2024-00125 which reiterate our previously expressed concerns with LG&E’s tariff. Our staff remains available to answer any questions, provide additional information, or otherwise assist PSC in their decision.

Regards,

/s/

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EXHIBIT A

Column D – Examples of Minimum BTU Levels on Other Transmission and Distribution Systems

| | Min. Heat Value (BTU/ft3) | Max. Heat Value (BTU/ft3) | Wobbe (Max.) |
|---|---------------------------|---------------------------|--------------|
| | | | |
| <i>Transmission</i> | | | |
| <u>Alliance (Enbridge/Pembina)</u> | 962 | | |
| <u>Gas Transmission NW (TransCanada)</u> | 995 | | |
| <u>Northwest Pipeline (Williams)</u> | 985 | | |
| <u>Westcoast Energy (Enbridge)</u> | 966 | | |
| <u>Black Hills Energy</u> | 900 | 1100 | |
| | | | |
| <i>Distribution</i> | | | |
| <u>Cascade (OR Sch 800)</u> | 985 | 1100 | 1390 |
| <u>NW Natural</u> | 985 | 1155 | 1400 |
| <u>SoCal Gas (Rule 30)</u> | 990 | 1150 | 1385 |
| <u>Piedmont Natural Gas</u> | 980 | 1100 | 1370 |
| <u>CenterPoint (MN PUC Docket 20-434)</u> | 975 | 1100 | 1400 |
| <u>Eversource (CT PURA Docket 19-07-04)</u> | 970 | 1110 | 1400 |
| <u>CNG SCG (CT PURA Docket 19-07-04)</u> | 970 | 1110 | 1400 |
| <u>NGA + GTI NY Interconnect Guide</u> | 970 | 1110 | 1400 |
| NWGA Biomethane Standard | 985 | | |
| Missouri PSC | 980 | 1100 | 1370 |

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