

Interstate Tariff and 311 SOC Renewable Natural Gas Tariff Language

Pipeline Operator	Date Effective/ Proposed/ Withdrawn	FERC Docket No.	Brief Description	Tariff Sections Impacted	Interconnecting Pipeline Systems	Notes/Comments
EXISTING RNG TARIFF LANGUAGE						
Pacific Gas & Electric Co.	12/15/2015	PR15-13-000 PR15-13-001	PG&E modified SOC Section 3C "Quality of Gas" to reflect the California Public Utilities Commission's December 12, 2014 approval of PG&E's Advice Letter regarding Biomethane projects.	Section 1, Definition of Terms 1.0.0; Section 2, Services, 1.0.0		PG&E filed changes to its Statement of Operating Conditions to modify gas quality provisions (12/31/14)
Eastern Shore Natural Gas Company	11/1/19	RP20-71-000	Revised tariff gas quality specs to accommodate renewable natural gas at receipt points on its system. Heating Value: BTU/SCF - 967-1100 Wobbe Number: BTU/SCF - 1250-1400 CO ₂ % vol: ≤2 O ₂ % vol: ≤0.1 N ₂ % vol: ≤3 Total inerts & vol: ≤4 H ₂ S PPM: ≤4 Siloxanes PPM: ≤1 Total Sulfur PPM: ≤78.5 H ₂ O lbs/MMCF: ≤7	Section 6.2 of the GT&C	Transcontinental Gas Pipe Line Company, LLC, Texas Eastern Transmission, LP, and Columbia Gas Transmission, LLC	Transmittal letter stated that the specifications conform to the least stringent of the quality specs contained in FERC gas tariffs of the upstream pipelines that interconnect with the Eastern Shore system and consistent with FERC's Gas Quality Policy Statement. Approved in E. Shore Natural Gas Co., Docket No. RP20-71-000, Letter Order re: Gas Quality Tariff Provisions (issued Nov. 12, 2019).

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Northwest Pipeline LLC	3/30/2020	RP20-531-000; RP20-531-001	Revises tariff records to: (1) define Renewable Natural Gas (RNG); (2) revise gas quality specifications to allow up to 4% inerts substance level and minimum 970 Btu for RNG.	Sheet Nos. 201, GT&C - Definitions, 6.0.0; 202-E, GT&C - Definitions, 5.0.0; 202-F, GT&C - Definitions, 5.0.0; 204, GT&C - Quality, 2.0.0; 204-A, GT&C - Quality, 2.0.0; 204-B, GT&C - Quality, 2.0.0; 204-C, GT&C - Quality, 2.0.0; 205-A, GT&C - Quality, 3.0.0; 205-B, GT&C - Quality, 5.0.0; 204-D, GT&C - Quality, 2.1.0; 205, GT&C - Quality, 2.1.0	Gas Transmission, NW, Ruby Pipeline L.L.C., Great Basin Gas Transmission Co., as well as LDC service territories for Avista, Cascade, Intermountain Gas, Northwest Natural, Puget Sound Energy, and Southwest Gas.	Northwest first revised its tariff in 2008 to allow it to receive bio-gas or landfill gas, however these changes did not create gas quality specifications specific to bio-gas/biomethane. The changes did specify a gross heating value for delivered gas of at least 985 Btu.

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Southwest Gas Corporation	05/26/2020	PR20-63-000 et al.	Southwest Gas is a Hinshaw pipeline with a blanket certificate of limited jurisdiction to transport natural gas under the NGA akin to a NGPA section 311 pipeline. It supplemented its initial baseline tariff Statement of Operating Conditions with revisions specific to the transportation of RNG in July 2020 that permit the pipeline to impose restrictions on the maximum volume % of certain constituents unique to RNG, or even prohibit their inclusion altogether. These restrictions may be outlined in a separate agreement to guarantee the marketability of the RNG and its acceptance into the transporter's system.	GT&C 1.25	Transwestern, El Paso	To guarantee the merchantability of the RNG and that the RNG may be accepted into Transporter's system, Transporter may limit the maximum quantity by volumetric percentage of, or prohibit, certain ingredients particular to RNG in a separate agreement.
Columbia Gas of Ohio, Inc.	7/31/20	PR20-32-000	Columbia Gas submitted a revised Statement of Operating Conditions. Revisions in the proposed SOC, Section 6.2 would allow the Company and the Customer to agree upon a different specification for halocarbons, provided that (1) Customer has delivered RNG to Company for a period of at least five years prior to the effective date of this section, and (2) Customer demonstrated that RNG meeting the agreed upon specification will not adversely affect the quality of public utility service provided by Company, the operation of Company's equipment nor the operation of the gas-burning equipment of Company's customers.	Section 6 (Quality of Gas). SOC Section 6.2		According to 1.6.36 of SOC, Renewable Natural Gas means gas, consisting primarily of methane, which (1) is derived from biogas produced by landfills, animal farms, wastewater treatment plants, or other sources, and (2) is subsequently processed by removing carbon dioxide, nitrogen, and other constituents in order to convert the biogas into pipeline-compatible gaseous fuel. Company may accept volumes of gas, including renewable natural gas, that fail to meet the quality specifications set forth in this Statement, if Company determines that it can do so without adversely affecting (1) system operations; (2) the operation of the Company's equipment; (3) the operation of gas-burning equipment of Company's other customers; or (4) the quality of public utility service provided by Company.

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Eastern Shore Natural Gas Company	Proposed 07/21/2020 Effective 08/21/20	RP20-1032-000	Eastern Shore Natural Gas Company filed tariff records to establish a new supply lateral firm transportation service and a new supply lateral interruptible transportation service. These new firm and interruptible supply lateral services will allow non-traditional natural gas supply: renewable natural gas, liquefied natural gas, or compressed natural gas supply to interconnect with Eastern Shore's system.	Section 5; Section 8; GT&C: Section 1, 6.1, 6.5, and 6.28	Transcontinental Gas Pipe Line Company, LLC, Texas Eastern Transmission, LP, and Columbia Gas Transmission, LLC ("Columbia")	The new firm and interruptible supply lateral services will allow non-traditional natural gas supply: renewable natural gas, liquefied natural gas, or compressed natural gas supply to interconnect with Eastern Shore's system. Eastern Shore states that its proposed Rate Schedules SLFT and SLIT are designed to allow a customer to receive pipeline quality natural gas from a non-traditional receipt point in either of Eastern Shore's conventional receipt zones and transport that supply to Eastern Shore's mainline system for further transportation on the mainline system. The commission states "approving the proposal will help developers of non-traditional sources of supply access markets on Eastern Shore's system." Commission also granted waiver of 18 C.F.R. § 154.202 (a)(1)(viii): Include workpapers showing the estimated effect on revenue and costs over the twelve-month period commencing on the proposed effective date of the filing.
DTE Gas Company	2/21/21	PR22-14-000	DTE submitted revisions to its Operating Statement to update its rates for interstate transportation service to reflect newly effective rates for comparable intrastate service.	DTE Gas Company, FERC Gas Tariffs, Operating Conditions, Statement of Operating Conditions (8.0.0)		The Staff agrees that this pilot program has been designed to meet the preferences of current customers regarding an affordable renewable gas program that also offsets emissions from their own natural gas usage. In its request, DTE Gas provided marketing and administrative costs, RNG and carbon offset costs, and projected premium collections for the time period of 2020 through 2023, though they do not expect the program to be cost neutral until after 2023. The Commission Staff stated that this pilot program has been designed to meet the preferences of current customers regarding an affordable renewable gas program that offsets emissions from their own natural gas usage.

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Great Basin Gas Transmission Co. (f/k/a Paiute Pipeline)	02/28/2022	RP22-432-001	Revises tariff to enable Great Basin to accept RNG onto its pipeline system at "RNG Receipt Points" and propose and enable the development of RNG in Great Basin's market area while protecting the integrity of Great Basin's system, gas-burning equipment of its customers, and general public. RNG must conform to the gas quality specifications of traditional gas sources and gas quality specifications for processed Biogas, with rights to accept RNG containing not more than 4% by volume of inert substance level and a total gross heating value of not less than 950 Btu, as long as the RNG meets the other requirements in Great Basin's Biomethane Verification Program and Operating Policy. Great Basin may refuse to accept RNG if it will prevent Great Basin from meeting tariff requirements for gas quality at Great Basin Delivery Points through blending with traditional supplies. Tariff language identifies the maximum levels for health-related and pipeline integrity constituents of concern for RNG delivered to an RNG Receipt Point of Great Basin's system. A testing regimen for RNG is also included in the Tariff.	GTC-1. Definitions (Sheet Nos. 70, 71, 72, 73, 74, 75) GTC- 3. Quality, (Sheet Nos. 95, 96, 97, 98, 99, 100) GTC- 18. NAESB WGQ Standards, (Sheet Nos. 218, 219)	Northwest Pipeline LLC, Ruby Pipeline L.L.C., and Tuscarora Gas Transmission Company	Great Basin made a similar filing in RP21-987 to modify Gas Quality Specifications
Kern River Gas Transmission	N/A	N/A	Kern River has an Operating Policy on Biomethane Receipts setting forth the requirements for biomethane on the system, including testing requirements before biomethane can be received and sets forth limits on constituent levels that would render the gas unmerchantable.			The Kern River policy is vulnerable to shipper or other third-party complaint. It contains language in the form of a policy that other operators have been ordered to include in their FERC-regulated tariffs. FERC would not consider the policy to be enforceable because it is not published in the tariff.

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PENDING RNG TARIFF FILINGS						
Intermountain Gas Company	09/12/2023	CP23-541-000	<p>Intermountain Gas submitted an Application for Limited Jurisdiction Blanket Certificate of Public Convenience and Necessity authorizing Intermountain to engage in the transportation of natural gas in interstate commerce to the same extent and in the same manner that intrastate pipelines are authorized to engage in such transportation for the purpose of transporting RNG produced on Intermountain's system to the interstate market.</p> <p>RNG is pipeline-quality biomass-derived biomethane, according to Intermountain Gas and is produced from biomass from livestock operations, landfills, and wastewater treatment plants.</p>	Gas Quality Specifications in Section 5.1 must align with Northwest Pipeline LLC; reference to Biomethane Monitoring Requirements sections	Northwest Pipeline LLC	<p>Intermountain is a local distribution company that provides natural gas service to about 412,422 retail customers and 110 transportation customers in Idaho, subject to the jurisdiction of the Idaho Public Utilities Commission.</p> <p>Exhibit E, Intermountain's updated and revised RNG Facilitation Plan, helps RNG producers evaluate the technical and economic feasibility of a potential project to serve retail and interstate markets. Potential RNG producers can contact Intermountain's Industrial Service Manager ("ISM") under the plan. If the initial query sparks interest, the ISM delivers a Biogas Information Sheet that requires the applicant to give project specifics for an Engineering Feasibility Study ("EFS"). The EFS will define the scope of work, including transportation facilities to connect the RNG production plant to Intermountain's distribution infrastructure. The ISM will prepare a Biomass Facilities Interconnection Agreement ("FIA") if the RNG producer proceeds. The FIA sets RNG facility operation and maintenance fees.</p>

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REJECTED/WITHDRAWN TARIFF FILINGS						
Eastern Gas Transmission and Storage, Inc. f/k/a Dominion Energy Transmission Inc.	Proposed 10/30/20	RP21-144-000	DETI proposed to modify General Terms and Conditions section of tariff by adding definitions for Biogas and Renewable Natural Gas. DETI also proposes to modify the General Terms to include quality specifications applicable to all receipts of gas. On Nov. 30, 2020, the Commission issued an order accepting and suspending Eastern's tariff records subject to refund and the outcome of a technical conference. Ultimately, the commission rejected Eastern's proposed tariff records as unjust and unreasonable.	Quality Specifications in GT&C section 2 Tariff Record 40.2, GT&C Section 1 - Definitions, 1.0.0; Tariff Record 40.3, GT&C Section 2 - Quality, 2.0.0; Tariff Record 40.38, GT&C Section 31 Incorporation of NAESB by Reference, 2.0.0.		On October 30, 2020, Dominion filed revised tariff records to reflect incorporation of RNG standards in its tariff: adding new definitions to Terms and Conditions of RNG-specific quality specifications. Eastern proposed to define RNG as: Biogas that has been processed to remove oxygen, carbon dioxide, nitrogen, and other constituents to meet Pipeline's gas quality standards and prepare the Biogas for pipeline transportation. RNG Coalition and BP supported DETI's efforts to establish RNG quality standards but resist where "DETI's proposals may unintentionally inhibit the development of RNG and the interconnection of facilities to DETI's system... proposals are anticompetitive and impose limitations that would harm RNG producers by deterring market entry and reducing commercial opportunities". Per the revisions, RNG received for transportation on Trunkline's pipeline shall be free of any toxic or hazardous substance that may be hazardous to health, injurious to pipeline facilities or be a limit to merchantability or be contrary to government standards. GT&C Section 13.6(B) provides that Trunkline's acceptance of RNG would be evaluated on a case by case basis, considering the pipeline operating conditions at and downstream of the receipt location. Trunkline further clarified in GT&C Section 13.6(D) that it would prohibit RNG from a landfill containing hazardous waste from being injected into its pipeline system. Trunkline withdrew the proposal without comment on the day protests and interventions were due.
Trunkline Gas Company, LLC	Proposed 11/18/20 Withdrawn 11/30/2020	RP21-224-000	Trunkline submitted revised tariff records to its FERC NGA Gas Tariff sections.	3.0.0 GT&C Section 13; GT&C Quality Section GT&C Section 13.6 (A), (B), (C)		

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Paiute Pipeline Company	07/29/21	RP21-987-000	The Commission rejected Paiute's filing of revised tariff records. The revisions were to modify section 3 of the General Terms and Conditions of its FERC Gas Tariff to define and allow for the receipt and transport of RNG on its pipeline system. Paiute stated that the proposed changes would enable the development of RNG in Paiute's market area while protecting Paiute's system, its customers' gas-burning equipment, and the general public.	GT&C Section 1.37; GT&C 1.38; GT&C Quality Section 3 (3.1, 3.3, 3.4, 3.5)		BP stated that it is inappropriate Paiute to keep a separate set of operating conditions and quality specifications for RNG/Biogas on a website rather than a tariff and requested the Commission require Paiute to refile its proposal to include all relevant details applicable to RNG in the tariff. BP also stated concerns regarding the facilities reimbursement languages proposed in General Terms section, as enforcing broad provisions could limit an RNG developer from interconnecting with a pipeline. The Commission explained that "only natural gas quality and interchangeability specifications contained in a Commission-approved gas tariff can be enforced... Unless these specifications are stated in the tariff, the Commission will not be able to address gas quality and interchangeability concerns."
Florida Gas Transmission Co.	Proposed: 02/27/23 Rejected: 08/25/23	RP23-466	Florida Gas revised tariff records to: (1) add new definitions for Renewable Natural Gas (RNG), Biogas, and RNG Receipt Point. The tariff records filed in this docket were accepted and suspended to be effective August 27, 2023.	Florida Gas Transmission Company, LLC, Fifth Revised Volume No. 1, GT&C § 1 (Definitions) (10.0.0); GT&C § 2 (Quality) (5.0.1).		Tariff language substantially similar to Great Basin Transmission Co. tariff accepted by FERC in 2022. In support of tariff changes, FGT included an RNG Interconnection Whitepaper. FGT did not indicate whether it had conferred with its customers prior to proposing tariff changes. A public hearing will be held in Docket No. RP23-466-000 concerning the lawfulness of Florida Gas' proposed tariff records (pursuant Natural Gas Act sections 4, 5, 8, and 15) The tariff records filed in this docket were accepted and suspended to be effective August 27, 2023, subject to the outcome of a hearing, held in abeyance pending the outcome of a technical conference. FERC ultimately rejected the proposal as unsupported and insufficient to meet the NGA section 4 evidentiary burden indicating that the proposed quality requirements for RNG were fair, reasonable, and devoid of any unjust or discriminatory elements.