

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking on the  
Commission's Own Motion to Revise  
General Order 58A to Comply with  
Decision 14-01-034.

Rulemaking 16-07-006  
(Filed July 14, 2016)

**COMMENTS OF THE OFFICE OF RATEPAYER ADVOCATES  
ON THE PROPOSED REVISED GENERAL ORDER 58A**

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## **I. INTRODUCTION**

On July 14, 2016, the California Public Utilities Commission (“Commission”) issued an Order Instituting Rulemaking (“R.”) 16-07-006 on the Commission’s own motion to revise General Order (“GO”) 58-A<sup>1</sup> to comply with Ordering Paragraph 15 of Decision (“D.”) 14-01-034,<sup>2</sup> which implemented Assembly Bill (“AB”) 1900, and led to the Commission adopting standards and requirements, pipeline open access rules, and related enforcement provisions for biomethane. GO 58-A was last revised in 1992.

R.16-07-006 established the schedule for filing comments on the proposed changes to GO 58-A. The Office of Ratepayer Advocates (“ORA”) submits these comments pursuant to that schedule.

The revisions R.16-07-006 proposes would adopt standards for “constituents of concern” found in biomethane, as directed by D.14-01-034 and Section 25421<sup>3</sup> of the California Health and Safety Code (“Health and Safety Code”). Health and Safety Code Section 25421 requires, in part, that the Commission adopt standards reasonably necessary to ensure the protection of human health and pipeline facility integrity and safety for constituents of concern that may be found in biomethane. D.14-01-034 implemented Health and Safety Code Section 25421.

## **II. R.16-07-006 PROPOSED CHANGES TO GO 58-A**

R.16-07-006 proposes revisions to GO 58-A based on the joint recommendations of the Commission’s Safety and Enforcement Division (“SED”) and Energy Division (“ED”).

ORA’s recommendations relate to one Subsection in the “Definitions” portion of the Rulemaking, specifically, what the Rulemaking identifies as Subsection 2.b of GO 58-A relating to biomethane.

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<sup>1</sup> GO 58-A, Standards for Gas Service in the State of California, sets forth the Commission’s rules governing gas service. It applies to all public utilities furnishing gas and operating under the jurisdiction of the Commission.

<sup>2</sup> R.13-02-008 which implements the biomethane tasks in AB 1900 requires the Commission to adopt policies and programs that promote in-state production and distribution of biomethane.

<sup>3</sup> <http://www.leginfo.ca.gov/cgi-bin/displaycode?section=hsc&group=25001-26000&file=25420-25422>.

The new Subsection 2.b the Rulemaking proposes is as follows:

b. Biomethane

Biomethane is interchangeable with natural gas and is produced by processing or upgrading biogas to increase the percentage of methane in the gas by removing carbon dioxide and other trace components to meet the standards for injection into a common carrier pipeline. Biomethane does not include biogas collected from a hazardous waste landfill, as defined in Health and Safety Code Section 25117.1.<sup>4</sup>

ORA supports setting environmental quality standards for biomethane gas, and agrees with the Commission’s SED and ED recommendations. The Commission and natural gas utilities have undergone, and are undergoing, significant efforts to ensure natural gas pipeline system integrity. To ensure GO 58-A reflects those efforts, ORA recommends that Subsection 2.b be changed to read (ORA’s proposed new text is underlined):<sup>5</sup>

Biomethane that meets pipeline quality specifications is interchangeable with natural gas and is produced by processing or upgrading biogas to increase the percentage of methane in the gas by removing carbon dioxide and other trace components to meet the standards for injection into a common carrier pipeline. Biomethane does not include biogas collected from a hazardous waste landfill, as defined in Health and Safety Code Section 25117.1.

If biomethane is not held to the same quality standard as natural gas, internal corrosion could occur and cause an increased safety risk. With the modification ORA recommends, the definition of biomethane is better aligned with California’s natural gas safety objectives, consistent with Senate Bill (“S.B.”) 705.<sup>6</sup>

### III. CONCLUSION

ORA recommends the Commission adopt ORA’s proposed change to have the biomethane meet pipeline quality specifications in the revised GO 58-A.

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<sup>4</sup> R.16-07-006, p. 3.

<sup>5</sup> Specifications similar to PG&E Gas Rule 21 and SoCal Gas Rule 30.

<sup>6</sup> [http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill\\_id=201120120SB705](http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201120120SB705).

Respectfully submitted,

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