

PUBLIC UTILITIES COMMISSION  
505 Van Ness Avenue  
San Francisco CA 94102-3298



**Southern California Gas Company**  
**GAS (Corp ID 904)**  
**Status of Advice Letter 5792G**  
**As of August 27, 2021**

Subject: Modifications to Rule No. 45 to Provide Lower and Upper Action Level Specifications,  
Pursuant to Decision (D.) 20-12-031

Division Assigned: Energy

Date Filed: 04-01-2021

Date to Calendar: 04-05-2021

Authorizing Documents: D2012031

**Disposition:**

**Signed**

**Effective Date:**

**05-01-2021**

Resolution Required: Yes

Resolution Number: G-3585

Commission Meeting Date: None

CPUC Contact Information:

[edtariffunit@cpuc.ca.gov](mailto:edtariffunit@cpuc.ca.gov)

AL Certificate Contact Information:

Ray Ortiz

213-244-3837

[ROrtiz@socalgas.com](mailto:ROrtiz@socalgas.com)

**PUBLIC UTILITIES COMMISSION**  
505 Van Ness Avenue  
San Francisco CA 94102-3298



To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

The Energy Division of the California Public Utilities Commission has processed your recent Advice Letter (AL) filing and is returning an AL status certificate for your records.

The AL status certificate indicates:

- Advice Letter Number
- Name of Filer
- CPUC Corporate ID number of Filer
- Subject of Filing
- Date Filed
- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)
- Effective Date of Filing
- Other Miscellaneous Information (e.g., Resolution, if applicable, etc.)

The Energy Division has made no changes to your copy of the Advice Letter Filing; please review your Advice Letter Filing with the information contained in the AL status certificate, and update your Advice Letter and tariff records accordingly.

All inquiries to the California Public Utilities Commission on the status of your Advice Letter Filing will be answered by Energy Division staff based on the information contained in the Energy Division's PAL database from which the AL status certificate is generated. If you have any questions on this matter please contact the:

Energy Division's Tariff Unit by e-mail to  
**[edtariffunit@cpuc.ca.gov](mailto:edtariffunit@cpuc.ca.gov)**



**Joseph Mock**  
Director  
Regulatory Affairs

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[JMock@socalgas.com](mailto:JMock@socalgas.com)

April 1, 2021

Advice No. 5792  
(U 904 G)

Public Utilities Commission of the State of California

**Subject: Modifications to Rule No. 45 to Provide Lower and Upper Action Level Specifications, Pursuant to Decision (D.) 20-12-031**

**Purpose**

Pursuant to Ordering Paragraph (OP) 11 in D.20-12-031 (the Decision), *Adopting the Standard Renewable Gas Interconnection and Operating Agreement*, Southern California Gas Company (SoCalGas) hereby submits this Tier 2 Advice Letter to modify Rule No. 45, Standard Renewable Gas Interconnection, and provide lower and upper action level specifications for biologicals in Renewable Gas.

**Background**

Rulemaking (R.) 13-02-008 was opened on February 13, 2013, to implement Assembly Bill (AB) 1900 (Gatto, 2012) which required the California Public Utilities Commission (Commission or CPUC) to take certain action with respect to biogas and biomethane. Health and Safety Code § 25421(c) required the Commission to adopt biomethane standards that specify the concentration of allowable constituents in biomethane injected into a common carrier pipeline. The adoption of the biomethane standards is to ensure the protection of human health, and to ensure pipeline and pipeline facility integrity and safety.

Health and Safety Code Section § 25421(a) specifies that the process for creating and updating biomethane standards starts with the Office of Environmental Health Hazard Assessment (OEHHA), in consultation with the California Air Resources Board (CARB) and other agencies, that shall compile a list of constituents of concern that could pose risks to human health and that are found in biogas at concentrations that significantly exceed the concentrations of those constituents in natural gas. This review and update

procedure is to take place every five years, or earlier if new information becomes available.

D.14-01-034 adopted the original biomethane standards pursuant to the process established by AB 1900. OP 7 of D.14-01-034 requires the Joint Utilities to file an application at the Commission to formally update biomethane standards within five years from the effective date of the Decision. Additionally, OP 8 of D.14-01-034 states that either OEHHA or CARB can send a letter to the Commission requesting updates to the biomethane standards if they deem necessary prior to the five-year mark. OP 9 of D.14-01-034 requires the Joint Utilities to specify the lower and upper action levels for ammonia, biologicals, hydrogen, mercury, and siloxanes as part of the process of updating biomethane standards for the first time.

The Joint Utilities requested and received a waiver of their filing obligation by the Commission's Executive Director on December 10, 2018, given that CARB had not published any updated guidance for constituents of concern at that time. OP 11 of D.20-12-031 ordered the Joint Utilities to specify lower and upper action levels for ammonia, biologicals, hydrogen, mercury, and siloxanes as soon as practicable as CARB had not published updated guidance in response to OEHHA's report of January 2020.

OP 11 of the Decision states:

Pacific Gas and Electric Company, Southwest Gas Corporation, Southern California Gas Company, and San Diego Gas & Electric Company shall provide upper and lower action level specifications in a joint filing to be submitted to the Commission no later than April 1, 2021 for biologicals and January 1, 2022 for ammonia, mercury, and siloxanes. Upper and lower action levels of hydrogen will be established pursuant to Phase 4 of this proceeding.

Pursuant to direction provided by Energy Division staff on March 19, 2021, the Joint Utilities were instructed to submit separate advice letters instead of a joint submittal. This allows each utility to submit their own tariff sheet modifications, which would not be possible with a joint advice letter.

### **Proposed Revisions to Rule No. 45**

#### **Rationale for Eliminating Biologicals as an Integrity Protective Constituent**

Since 2012, SoCalGas has participated in multiple projects with the Gas Technology Institute (GTI), commissioning five studies, with the support of other operators, around microbially induced corrosion (MIC). As a result of those privately conducted studies, GTI developed a rapid and accurate genetic based testing method, known as

quantitative polymerase chain reaction method or qPCR.<sup>1</sup> Using this methodology, SoCalGas performed extensive testing on incoming producers of Renewable Gas between 2012 and 2019. SoCalGas performed in-situ testing by inserting a corrosion coupon at one of these receiving points where biological results were evident. Inserted coupons were inspected in regular intervals for evidence of MIC. Renewable Gas was also tested for biologicals at the same time. No evidence of MIC was observed in the coupons, and the level of biologicals measured was at or below  $4 \times 10^4$ /scf.

Additionally, GTI has collected many data points since 2009 from multiple sources of Renewable Gas and Natural Gas, reaching the conclusion that levels of biologicals observed in Natural Gas are similar than those observed in Renewable Gas and that the MIC has been effectively removed by the renewable gas cleanup technology.

Based on these results, SoCalGas is requesting to eliminating the specification for Biological upper action level and lower action level, and simply require testing at pre-injection testing before startup at levels lower than observed during in-situ testing.

#### Requested Revisions to Rule No. 45

In accordance with OP 11, SoCalGas proposes the following updates to Rule No. 45 for trigger level, lower action level and upper action levels for biological constituents as listed below.

- Delete Biologicals from Table 1, Maximum Constituent Concentrations (Sheet 28)
- Delete Note 7 in Table 1, Maximum Constituent Concentrations (Sheet 28)

To implement these updates for biological constituents and to ensure the renewable gas is commercially free of bacteria, SoCalGas requests approval to amend Rule No. 45 and add the following language in the Pre-injection Testing Procedure:<sup>2</sup>

#### K.5.e.ii.b) Biologicals (Sheets 32 and 33)

(i) Renewable Gas must be commercially free of bacteria which cause corrosion, also referred to as biologicals.

(ii) To ensure Renewable Gas is commercially free of biologicals, the Interconnector will test for total bacteria including but not limited to Acid-producing Bacteria (APB), Sulfate-reducing Bacteria (SRB), and Iron-oxidizing Bacteria (IOB) by quantitative polymerase Chain Reaction (qPCR) method during pre-injection testing. If the total bacteria results are at or below  $4 \times 10^4$ /scf, then

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<sup>1</sup> qPCR: quantitative Polymerase Chain Reaction, genetic MIC identification method developed by the GTI using the National Association of Corrosion Engineers (NACE) Standards TM0106-2006 and TM0212-2018.

<sup>2</sup> See Attachment A for an updated version of Rule No. 45.

Renewable Gas may be injected into the Utility's system subject to all other requirements set forth in this Rule.

### **Protest**

Anyone may protest this Advice Letter to the Commission. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be submitted expeditiously. The protest must be made in writing and must be received within 20 days of the date of this Advice Letter, which is April 21, 2021. The address for mailing or delivering a protest to the Commission is:

CPUC Energy Division  
Attention: Tariff Unit  
505 Van Ness Avenue  
San Francisco, CA 94102

A copy of the protest should also be sent via e-mail to the attention of the Energy Division Tariff Unit ([EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)). Due to the COVID-19 pandemic and the shelter at home orders, SoCalGas is currently unable to receive protests or comments to this Advice Letter via U.S. mail or fax. Please submit protests or comments to this Advice Letter via e-mail to the address shown below on the same date it is mailed or e-mailed to the Commission.

Attn: Ray B. Ortiz  
Tariff Manager - GT14D6  
555 West Fifth Street  
Los Angeles, CA 90013-1011  
Facsimile No.: (213) 244-4957  
E-mail: [ROrtiz@socalgas.com](mailto:ROrtiz@socalgas.com)

### **Effective Date**

SoCalGas believes this Advice Letter is subject to Energy Division disposition and should be classified as Tier 2 (effective after staff approval) pursuant to General Order (GO) 96-B. SoCalGas respectfully requests that this submittal be approved on May 1, 2021, which is 30 calendar days after the date submitted.

### **Notice**

A copy of this Advice Letter is being sent to SoCalGas' GO 96-B service list and the Commission's service list in R.13-02-008. Address change requests to the GO 96-B service list should be directed via e-mail to [Tariffs@socalgas.com](mailto:Tariffs@socalgas.com) or call 213-244-2837. For changes to all other service lists, please contact the Commission's Process Office at 415-703-2021 or via e-mail at [Process\\_Office@cpuc.ca.gov](mailto:Process_Office@cpuc.ca.gov).

/s/ Joseph Mock  
Joseph Mock  
Director – Regulatory Affairs

Attachments



# ADVICE LETTER SUMMARY

## ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.:

Utility type:

ELC       GAS       WATER  
 PLC       HEAT

Contact Person:

Phone #:  
E-mail:  
E-mail Disposition Notice to:

EXPLANATION OF UTILITY TYPE

ELC = Electric      GAS = Gas      WATER = Water  
PLC = Pipeline      HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #:

Tier Designation:

Subject of AL:

Keywords (choose from CPUC listing):

AL Type:  Monthly     Quarterly     Annual     One-Time     Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL:

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested?  Yes     No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required?  Yes     No

Requested effective date:

No. of tariff sheets:

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected:

Service affected and changes proposed<sup>1</sup>:

Pending advice letters that revise the same tariff sheets:

<sup>1</sup>Discuss in AL if more space is needed.



**Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:**

CPUC, Energy Division  
Attention: Tariff Unit  
505 Van Ness Avenue  
San Francisco, CA 94102  
Email: [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

Name:  
Title:  
Utility Name:  
Address:  
City:  
State: Zip:  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email:

Name:  
Title:  
Utility Name:  
Address:  
City:  
State: Zip:  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email:

ATTACHMENT A  
Advice No. 5792

Cal. P.U.C. Sheet No.	Title of Sheet	Cancelling Cal. P.U.C. Sheet No.
Revised 58724-G	Rule No. 45, STANDARD RENEWABLE GAS INTERCONNECTION, Sheet 28	Original 58070-G
Revised 58725-G	Rule No. 45, STANDARD RENEWABLE GAS INTERCONNECTION, Sheet 32	Original 58074-G
Revised 58726-G	Rule No. 45, STANDARD RENEWABLE GAS INTERCONNECTION, Sheet 33	Original 58075-G
Revised 58727-G	TABLE OF CONTENTS	Revised 58488-G
Revised 58728-G	TABLE OF CONTENTS	Revised 58723-G

Rule No. 45

Sheet 28

STANDARD RENEWABLE GAS INTERCONNECTION

(Continued)

K. Renewable Gas Quality and Specifications (Continued)

2. a. (Continued)

Table 1 (Continued)						
Maximum Constituent Concentrations						
Hydrogen	0.10%	TBD <sup>5</sup>	TBD <sup>5</sup>	X	X	X
Mercury	0.08 mg/m <sup>3</sup>	TBD <sup>5</sup>	TBD <sup>5</sup>	X	X	X
Siloxanes <sup>8</sup>	0.01 mg Si/m <sup>3</sup>	0.1 mg Si/m <sup>3</sup>	TBD <sup>5</sup>	X	X	X

**Notes:**

1. Base Utility Gas Specifications are identified in K1.
2. Health Protective Constituents (HPC) are shown in Table V-3 of the CARB/OEHHA Report.
3. Integrity Protective Constituents are shown in Section 4.4.3.3 of D.14-01-034 and identified as pipeline integrity protective constituents.
4. Other organic sources, includes all Biogas sources other than landfill and dairy manure, including but not limited to, a sewage treatment plant or wastewater plant ("Publicly Owned Treatment Works" or "POTW").
5. The Lower and Upper Action Levels will be established in the next update proceeding.
6. Testing requirement will be the stricter of the stated Renewable Gas values or other tariff requirements.
7. The Interconnector that meets this Rule's Section K.4.b certification requirements shall have reduced siloxanes testing requirements. Utility, at its discretion and at its own cost, may still test pursuant to Utility's applicable tariff rules. If the Utility test results show the siloxane levels exceed the Lower Action Level, the full siloxane testing requirements will apply as described in this Rule.

(Continued)

(TO BE INSERTED BY UTILITY)  
 ADVICE LETTER NO. 5792  
 DECISION NO. 20-12-031

ISSUED BY  
**Dan Skopec**  
 Vice President  
 Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)  
 SUBMITTED Apr 1, 2021  
 EFFECTIVE May 1, 2021  
 RESOLUTION NO. \_\_\_\_\_

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STANDARD RENEWABLE GAS INTERCONNECTION

(Continued)

K. Renewable Gas Quality and Specifications (Continued)

5. Testing (Continued)

e. Pre-Injection Testing Procedure (Continued)

ii. Integrity Protective Constituents

If any Integrity Protective Constituents are above the Lower Action Level, the Renewable Gas may not be injected into the Utility's system. The Interconnector shall make necessary modifications to lower the levels of the Integrity Protective Constituents to levels below the Lower Action Level equivalent and restart pre-injection testing.

If Integrity Protective Constituents are at or below the Lower Action Level, the Renewable Gas may be injected into the Utility's system subject to all other requirements set forth in this Rule.

a) Reduced Siloxanes Testing

Pursuant to Section K.4.b Renewable Gas certified for reduced siloxanes testing will be as follows:

- (i) If the pre-injection testing siloxanes levels are at or below the Trigger Level, then no periodic testing for siloxanes is required.
- (ii) If the pre-injection testing siloxanes level exceeds the Trigger Level, then quarterly testing for siloxanes is required for one year, and if none of those samples are above the Lower Action Level, then no periodic testing for siloxanes is required.
- (iii) If the siloxanes are above the Lower Action Level, then the Renewable Gas certification for reduced testing is no longer applicable and the Interconnector will be required to comply with the periodic testing requirements for siloxanes.
- (iv) Utility, at its discretion and at its own cost, may still test pursuant to Utility's applicable tariff rules. If the Utility test results show the siloxanes levels exceed the Lower Action Level, this Rule's full siloxanes testing requirements will apply.

b) Biologicals

- (i) Renewable Gas must be commercially free of bacteria which cause corrosion, also referred to as biologicals.

(Continued)

(TO BE INSERTED BY UTILITY)  
ADVICE LETTER NO. 5792  
DECISION NO. 20-12-031

ISSUED BY  
**Dan Skopec**  
Vice President  
Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)  
DATE FILED Apr 1, 2021  
EFFECTIVE May 1, 2021  
RESOLUTION NO. \_\_\_\_\_



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 58083-G

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(TO BE INSERTED BY UTILITY)

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 DECISION NO. 20-12-031

ISSUED BY

**Dan Skopec**  
 Vice President  
 Regulatory Affairs

(TO BE INSERTED BY CAL. PUC)

SUBMITTED Apr 1, 2021  
 EFFECTIVE May 1, 2021  
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(Continued)

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ISSUED BY  
**Dan Skopec**  
 Vice President  
 Regulatory Affairs

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