

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



Southwest Gas Corporation
GAS (Corp ID 905)
Status of Advice Letter 1134G
As of May 27, 2020

Subject: Ministerial Corrections to Rule No. 22 Biomethane Gas

Division Assigned: Energy

Date Filed: 05-01-2020

Date to Calendar: 05-06-2020

Authorizing Documents: None

Disposition:	Accepted
Effective Date:	05-01-2020

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Valerie Ontiveroz

702-876-7323

valerie.ontiveroz@swgas.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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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



SOUTHWEST GAS CORPORATION

May 1, 2020

Advice Letter No. 1134-G

(U 905 G)

Public Utilities Commission of the State of California

Subject: Ministerial Corrections to Rule No. 22 – Biomethane Gas

Southwest Gas Corporation (Southwest Gas or Company) hereby submits for approval by the California Public Utilities Commission (Commission) revisions to its California Gas Tariff. The tariff sheets being modified as a result of this submission are listed in Attachment A.

Purpose

The purpose of this submission is to correct ministerial typographical errors in the tariff sheets associated with Rule No. 22 – Biomethane Gas. The tariff sheets have been revised to include the following language that was inadvertently omitted or misplaced when Southwest Gas submitted Advice Letter No. 1105 and 1105-A in compliance with Decision 19-05-018:

Sheet No. 277 - Definitions

Lower Action Biomethane Level: Where applicable, a testing level used to screen Gas during the initial gas quality review and as an ongoing screening level during periodic testing **could result in the shut-off of Biomethane Gas supply.**

Trigger Level: Constituents found at or above the Trigger Level require additional periodic testing and analysis ~~could result in the shut-off of Biomethane Gas supply.~~

Sheet No. 279.4

The Biomethane Gas Supplier shall make necessary modifications to lower the collective cancer risk or non-cancer risk below the Lower Action Level and restart pre-injection testing.

This submission will not increase any current rate or charge, cause the withdrawal of service, or conflict with any rate schedule or rule.



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May 1, 2020

Effective Date

Southwest Gas believes this Advice Letter is subject to Energy Division disposition and should be classified as Tier 1 (effective pending disposition) pursuant to General Order (GO) 96-B since this Advice Letter is only correcting ministerial errors. Southwest Gas respectfully requests that the tariff sheets submitted herein be made effective May 1, 2020, which is the date of submission.

Protest

Anyone may protest this Advice Letter to the Commission. The protest must state the grounds upon which it is based with specificity. The protest must be sent no later than 20 days after the date of this Advice Letter submission and shall be sent by letter via U.S. Mail, facsimile, or electronically mailed. The address for mailing or delivering a protest to the Commission is:

ATTN: Tariff Unit
Energy Division
California Public Utilities Commission
505 Van Ness Avenue, 4th Floor
San Francisco, CA 94102
Email: edtariffunit@cpuc.ca.gov
Facsimile: 415-703-2200

Copies should also be mailed to the attention of the Director, Energy Division, Room 4004, at the same address as above and mailed, emailed or faxed to:

Mr. Justin Lee Brown
Senior Vice President/General Counsel
Southwest Gas Corporation
P.O. Box 98510
Las Vegas, NV 89193-8510
Email: justin.brown@swgas.com
Facsimile: 702-364-3452

Notice

Southwest Gas is exempt from the notice requirements set forth in General Rule 4.2 since this Advice Letter will not increase any rate or charge, cause the withdrawal of service, or conflict with any schedule or rule.



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Service

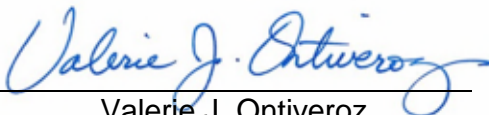
In accordance with GO 96-B, General Rule 7.2, Southwest Gas is mailing copies of this Advice Letter and related tariff sheets to the utilities and interested parties shown on the attached list.

Communications regarding this submission should be directed to:

Valerie J. Ontiveroz
Regulatory Manager/California
Southwest Gas Corporation
P.O. Box 98510
Las Vegas, NV 89193-8510
Telephone: 702-876-7323
Email: valerie.ontiveroz@swgas.com

Respectfully submitted,

SOUTHWEST GAS CORPORATION

By: 
Valerie J. Ontiveroz

Attachments

Distribution List

Advice Letter No. 1134-G

In conformance with GO 96-B, General Rule 4.3

The following individuals or entities have been served by electronic mail:

Elizabeth Echols, Director
Public Advocates Office
elizabeth.echols@cpuc.ca.gov

Pacific Gas & Electric Company
PGETariffs@pge.com

Southern California Gas Company
ROrtiz@SempraUtilities.com

San Diego Gas & Electric Company
SDG&ETariffs@SempraUtilities.com

Robert M. Pocta
Public Advocates Office
California Public Utilities Commission
robert.pocta@cpuc.ca.gov

Nathaniel Skinner
Public Advocates Office
California Public Utilities Commission
nathaniel.skinner@cpuc.ca.gov

Pearlie Sabino
Public Advocates Office
California Public Utilities Commission
pearlie.sabino@cpuc.ca.gov

ATTACHMENT A
Advice Letter No. 1134-G

Cal. P.U.C. Sheet No.	Title of Sheet	Canceling Cal. P.U.C. Sheet No.
4th Revised Sheet No. 277	Rule No. 22 – Biomethane Gas (Continued)	3rd Revised Sheet No. 277
4th Revised Sheet No. 278	Rule No. 22 – Biomethane Gas (Continued)	3rd Revised Sheet No. 278
4th Revised Sheet No. 279.3	Rule No. 22 – Biomethane Gas (Continued)	3rd Revised Sheet No. 279.3
3rd Revised Sheet No. 279.4	Rule No. 22 – Biomethane Gas (Continued)	2nd Revised Sheet No. 279.4

RULE NO. 22

BIOMETHANE GAS

(Continued)

A. DEFINITIONS (Continued)

2. Non-carcinogenic (non-cancer risk or chronic risk):
antimony, copper, hydrogen sulfide, lead, mercaptans
(alkyl thiols), methacrolein, and toluene.

(b) Pipeline Integrity Protective Constituents include:
ammonia, biologicals, hydrogen, mercury, and siloxanes.

Group 1 Compound: Any Health Protective Constituent with a concentration below the test detection level or below the Trigger Level.

Group 2 Compound: Any Health Protective Constituent with a concentration at or above the Trigger Level.

Hazardous Waste Landfill: For the purposes of this Rule, hazardous waste landfill shall be given the same definition as provided in the California Health and Safety Code, including facilities permitted by the Department of Toxic Substances Control.

Lower Action Level: Where applicable, a testing level used to screen Biomethane Gas during the initial gas quality review and as an ongoing screening level during periodic testing could result in the shut-off of Biomethane Gas supply.

Merchantability: The ability to purchase, sell or market Biomethane Gas.

OEHHA: Office of Environmental Health Hazard Assessment.

Trigger Level: Constituents found at or above the Trigger Level require additional periodic testing and analysis.

Upgrading: Increasing the percentage of methane in Biogas by removing carbon dioxide and other trace components to achieve pipeline quality gas (Biomethane Gas).

Upper Action Level: A testing level that if reached for any Constituent results in immediate shut-off of Biomethane Gas supply.

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RULE NO. 22

BIOMETHANE GAS
(Continued)

B. BIOMETHANE GAS SPECIFICATIONS

1. Biomethane Gas must meet the gas quality specifications identified in this Rule, Section A of Rule No. 2, Description of Service, and Section B of Rule No. 21, Transportation of Customer-Secured Natural Gas, of this California Gas Tariff, as adopted and periodically updated by the Commission.
2. Biomethane Gas received into the Company's system shall conform to the following quality specifications at the time of receipt:
 - a. Biomethane Gas must be free from bacteria, pathogens, dust, sand, dirt, gums, oils, and/or any other substances at levels that would be injurious to the Company's facilities, and/or to render the gas unmerchantable.
 - b. Biomethane Gas delivered into the Company's system at the point(s) of receipt shall be at a pressure that can be integrated into the Company's system.
 - c. Delivery Temperature: Biomethane Gas delivery temperature is not to be below 40 degrees Fahrenheit or above 120 degrees Fahrenheit.
 - d. Biomethane Gas Interchangeability: Biomethane Gas shall be interchangeable with the gas in the Company's receiving pipeline. Biomethane Gas shall have a minimum Wobbe Number of 1280. Biomethane Gas shall meet American Gas Association's Lifting Index, Flashback Index and Yellow Tip Index interchangeability indices for high methane gas relative to a typical composition of gas in the Company's system serving the area. Acceptable specification ranges are: * Lifting Index (IL); IL <= 1.06; * Flashback Index (IF); IF <= 1.2; * Yellow Tip Index (IY); IY >= 0.8.
 - e. Inert gases: Biomethane Gas supplied shall not contain greater than 4% of total combined inert compounds, which includes maximums of 0.2% oxygen, 3% nitrogen; 2% carbon dioxide, and any other inert gas by total volume.
 - f. Hydrogen Sulfide: Biomethane Gas shall contain no more than 0.25 grains of hydrogen sulfide, measured as hydrogen sulfide, per 100 standard cubic feet (4 parts per million (ppm) by volume of hydrogen sulfide).

RULE NO. 22

BIOMETHANE GAS

(Continued)

B. BIOMETHANE GAS SPECIFICATIONS (Continued)

6. Source-specific Biomethane Gas Testing shall vary based on the source of the Biomethane Gas: (Continued)

- d. Biomethane Gas suppliers that certify that their biogas is sourced only from dairy, animal manure, agricultural waste, forest residues, and/or commercial food processing waste, and products that contain siloxanes are not used at their facilities in any way that allows siloxanes to enter the biomethane, shall have reduced siloxanes testing requirements, as described in Section C.1.g of this Rule. If the certification identified by the Biomethane Gas supplier no longer applies, then the Biomethane Gas supplier must notify the Company and the full siloxanes testing requirements shall apply.

C. BIOMETHANE GAS TESTING

1. Pre-Injection Testing

- a. Prior to the injection of Biomethane Gas, the Biomethane Gas supplier shall conduct two tests over a two to four week period for the Constituents identified for that Biomethane Gas source in Section B.6 of this Rule.
- b. Testing will be performed by the Biomethane Gas supplier using independent certified third party laboratories. The Company shall be notified of the Biomethane Gas sampling and tests and have the option to observe the samples being taken. Test results will be shared with the Company within five (5) calendar days of the test results being received by the Biomethane Gas supplier.
- c. If during pre-injection testing Health Protective Constituents are found at or above the Trigger Level, the Biomethane Gas' collective cancer risk or non-cancer risk must be calculated. The collective cancer risk or non-cancer risk is the sum of all Health Protective Constituent concentrations above the Trigger Level, as specified in Section C.2.c.(i) of this Rule. If the collective cancer risk or non-cancer risk from Group 2 Compounds is at or above the Lower Action Level (the cancer risk Lower Action Level is ≥ 10 in a million and the non-cancer risk Lower Action Level is a hazard index of ≥ 1), the Biomethane Gas

RULE NO. 22

BIOMETHANE GAS

(Continued)

C. BIOMETHANE GAS TESTING *(Continued)*

1. Pre-Injection Testing *(Continued)*

- c. cannot be injected into the Company's pipeline system. The Biomethane Gas Supplier shall make necessary modifications to lower the collective cancer risk or non-cancer risk below the Lower Action Level and restart pre-injection testing.
- d. If all the Health Protective Constituents in the Biomethane Gas are found to be below the Trigger Level or the collective cancer risk and non-cancer risk from the Group 2 Compounds are found to be below the Lower Action Level in both pre-injection tests, the Biomethane Gas may be injected into the Company's pipeline system subject to all other requirements set forth in this Rule.
- e. If during pre-injection testing Pipeline Integrity Protective Constituents are found at or above levels equivalent to the Lower Action Level, the Biomethane Gas may not be injected into the Company's pipeline system. The Biomethane Gas supplier shall make necessary modifications to lower the levels of the Pipeline Integrity Protective Constituents to levels below the Lower Action Level equivalent and restart pre-injection testing.
- f. If during pre-injection testing Pipeline Integrity Protective Constituents are found below levels equivalent to the Lower Action Level, the Biomethane Gas may be injected into the Company's pipeline system subject to all other requirements set forth in this Rule.
- g. Per Section B.6.d of this Rule, Biomethane Gas certified for reduced siloxane testing will be as follows:
 - (i) If the pre-injection testing for siloxanes does not exceed the Trigger Level per Section B.4 of this Rule, then no periodic siloxanes testing is required under Section C.2.d of this Rule.
 - (ii) If the pre-injection testing for siloxanes level exceeds the Trigger Level per Section B.4 of this Rule, then quarterly testing is required for one year, and if none of those samples are above the Lower Action Level per Section B.4 of this Rule, then no periodic siloxanes testing is required under Section C.2.d of this Rule.

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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 proposed¹:

Pending advice letters that revise the same tariff sheets:

¹Discuss 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

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

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