



# **SOUTHWEST GAS CORPORATION**

December 30, 2024

## **Advice Letter No. 1322-G**

(U 905 G)

Public Utilities Commission of the State of California

### **Subject: Revisions to Rule No. 22 in Compliance with Decision 24-11-009**

Southwest Gas Corporation (Southwest Gas) 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 provided in Attachment A.

### **Purpose**

The purpose of this Advice Letter is to revise Rule No. 22 - Standard Renewable Gas Interconnections to the Utility's Pipeline System (Rule No. 22) pursuant to Ordering Paragraph (OP) 2 Decision (D.) 24-11-009 issued in Application (A.) 23-10-015.

### **Background**

Health and Safety Code Section 25421(e), "...requires the Commission to review and update [biomethane] standards for the protection of human health and pipeline integrity and safety...as well as review and update the [adopted] monitoring, testing, reporting and recordkeeping requirements."<sup>1</sup> Pursuant to OP. 7 in D.14-01-034, Pacific Gas and Electric Company (PG&E), Southern California Gas Company (SoCalGas), San Diego Gas & Electric Company (SDG&E) and Southwest Gas Corporation (Southwest Gas) (collectively, the Joint Utilities) are to either individually or jointly file an application with the Commission every five years from the effective date of D.14-01-034 to update their respective tariffs if new information becomes available or as directed by the Commission so that the Commission may carry out its review and update responsibilities under Health and Safety Code Section 25421(e).

On October 20, 2023, the Joint Utilities filed A.23-10-015 (Application) requesting authorization to incorporate California Air Resources Board's (CARB) constituents of concern (COCs) recommendations into their respective Standard Renewable Gas Interconnection (SRGI) Rules, except for CARB's recommendation regarding source testing when biogas feedstock has multiple sources.

On November 11, 2024, the Commission issued D.24-11-009, which approved the Application with one exception,<sup>2</sup> and directs the Joint utilities to revise their respective

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<sup>1</sup> D.14-01-034 at pgs. 11-12.

<sup>2</sup> D.24-11-009 denies the Joint Utilities request to change D.14-01-034 to permit utilities to file a Tier 2 Advice Letter instead of an application in response to future CARB and Office of Environmental Health Hazard Assessment updates.



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SRGI Rules to implement the CARB 2023 recommendations, adopts an interim carbon monoxide trigger level for bio-synthetic natural gas (bio-SNG), and approves the Joint Utilities' request to modify their respective SRGI Rule to address operational issues.

As described in the Application, the Joint Utilities proposed to incorporate CARB's COC recommendations into their respective SRGI Rules with the exception of CARB's recommendation regarding how to conduct testing when biogas feedstock has multiple sources. For testing when biogas feedstock has multiple gas sources, the Joint Utilities proposed testing all applicable COCs for each feedstock gas source specified by the interconnector, rather than incorporating CARB's recommendation to test only the applicable COCs for the primary feedstock source specified by the interconnector. Regarding the test schedule for the identified COCs, the Joint Utilities proposed to conduct the first test within CARB's recommended three-month timeline, and proposed the following timeline to complete tests for all existing interconnections based on currently available utility resources and the number of renewable gas interconnections, as follows:

- Southwest Gas – Three (3) months;
- PG&E – Twelve (12) months;
- SDG&E – Twelve (12) months;
- SoCalGas – Eighteen (18) months.

This proposal is consistent with CARB's recommendation that testing for all health protective constituents of concern should be completed as soon as feasible or within 12-18 months of tariff approval and approved in D.24-11-009.<sup>3</sup>

### **Proposed Tariff Revisions to Rule No. 22**

In compliance with OP 2 in D.24-11-009, Southwest Gas has modified its Rule No. 22 to include updates to its COCs, address operational issues, include an interim carbon monoxide trigger level for bio-SNG. Other conforming revisions are included to accommodate these revisions.

This Advice Letter will not increase any rate or charge, cause the withdrawal of service, or conflict with any other schedule or rule.

### **Effective Date**

Southwest Gas believes this Advice Letter should be classified as Tier 2 (Effective After Energy Division Disposition) pursuant to OP 2 in D.24-11-009 and General Order (GO) 96-B. Southwest Gas respectfully requests that this Advice Letter be made effective March 1, 2025.

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<sup>3</sup> Conclusion of Law 2 of D.24-11-009 provides as follows: "The Applicants should update their SRGI Rules to reflect the recommendations in the CARB 2023 Report, except for the recommendation on testing from multiple feedstock sources."



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As noted above, Southwest Gas will conduct its test no later than three months after the Energy Division approves the Rule No. 22 tariff modifications.

### **Protest**

Anyone may protest this Advice Letter to the Commission's Energy Division. The protest must state the grounds upon which it is based with specificity and must be sent no later than 20 days after the date of this Advice Letter submission. Protests are to be submitted electronically to the Commission's Energy Division at:

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

In addition, protests and all other correspondence regarding this Advice Letter should be sent electronically to:

Ms. Valerie J. Ontiveroz  
Regulatory Manager/California  
Email: [valerie.ontiveroz@swgas.com](mailto:valerie.ontiveroz@swgas.com)  
[regserve@swgas.com](mailto:regserve@swgas.com)

### **Notice**

Southwest Gas believes it is exempt from the notice requirements set forth in General Rule 4.2 of GO 96-B, since this Advice Letter is being submitted in compliance with D.24-11-009 and will not increase any rate or charge, cause the withdrawal of service, or conflict with any other schedule or rule that are currently in effect.

### **Service**

Service In accordance with GO 96-B, General Rule 7.2, Southwest Gas is serving copies of this Advice Letter to the utilities and interested parties shown on the attached distribution list and on the official service list in R.13-02-008 and A.23-10-015.

Respectfully submitted,  
SOUTHWEST GAS CORPORATION

By:   
Valerie J. Ontiveroz

Attachments

**Distribution List**

Advice Letter No. 1322-G

In conformance with GO 96-B, General Rule 4.3

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ATTACHMENT A  
Advice Letter No. 1322-G

Cal. P.U.C. Sheet No.	Title of Sheet	Canceling Cal. P.U.C. Sheet No.
5th Revised Sheet No. 276	Rule No. 22 – Standard Renewable Gas Interconnections to the Utility’s Pipeline System	4th Revised Sheet No. 276
7th Revised Sheet No. 277	Rule No. 22 – Standard Renewable Gas Interconnections to the Utility’s Pipeline System <i>(Continued)</i>	6th Revised Sheet No. 277
5th Revised Sheet No. 279	Rule No. 22 – Standard Renewable Gas Interconnections to the Utility’s Pipeline System <i>(Continued)</i>	4th Revised Sheet No. 279.3
5th Revised Sheet No. 279.1	Rule No. 22 – Standard Renewable Gas Interconnections to the Utility’s Pipeline System <i>(Continued)</i>	4th Revised Sheet No. 279.1
7th Revised Sheet No. 279.3	Rule No. 22 – Standard Renewable Gas Interconnections to the Utility’s Pipeline System <i>(Continued)</i>	6th Revised Sheet No. 279.3
3rd Revised Sheet No. 279.4.1	Rule No. 22 – Standard Renewable Gas Interconnections to the Utility’s Pipeline System <i>(Continued)</i>	2nd Revised Sheet No. 279.4.1
5th Revised Sheet No. 279.5	Rule No. 22 – Standard Renewable Gas Interconnections to the Utility’s Pipeline System <i>(Continued)</i>	4th Revised Sheet No. 279.5
6th Revised Sheet No. 279.6	Rule No. 22 – Standard Renewable Gas Interconnections to the Utility’s Pipeline System <i>(Continued)</i>	5th Revised Sheet No. 279.6
4th Revised Sheet No. 279.7	Rule No. 22 – Standard Renewable Gas Interconnections to the Utility’s Pipeline System <i>(Continued)</i>	3rd Revised Sheet No. 279.7
5th Revised Sheet No. 279.8	Rule No. 22 – Standard Renewable Gas Interconnections to the Utility’s Pipeline System <i>(Continued)</i>	4th Revised Sheet No. 279.8
3rd Revised Sheet No. 279.9	Rule No. 22 – Standard Renewable Gas Interconnections to the Utility’s Pipeline System <i>(Continued)</i>	2nd Revised Sheet No. 279.8

Cal. P.U.C. Sheet No.	Title of Sheet	Canceling Cal. P.U.C. Sheet No.
3rd Revised Sheet No. 279.10	Rule No. 22 – Standard Renewable Gas Interconnections to the Utility’s Pipeline System <i>(Continued)</i>	2nd Revised Sheet No. 279.10
1st Revised Sheet No. 279.14.15	Rule No. 22 – Standard Renewable Gas Interconnections to the Utility’s Pipeline System <i>(Continued)</i>	Original Sheet No. 279.14.15
4th Revised Sheet No. 279.14.16	Rule No. 22 – Standard Renewable Gas Interconnections to the Utility’s Pipeline System <i>(Continued)</i>	3rd Revised Sheet No. 279.14.16
1st Revised Sheet No. 279.14.17	Rule No. 22 – Standard Renewable Gas Interconnections to the Utility’s Pipeline System <i>(Continued)</i>	Original Sheet No. 279.14.17
1st Revised Sheet No. 279.14.18	Rule No. 22 – Standard Renewable Gas Interconnections to the Utility’s Pipeline System <i>(Continued)</i>	Original Sheet No. 279.14.18
Original Sheet No. 279.14.18.1	Rule No. 22 – Standard Renewable Gas Interconnections to the Utility’s Pipeline System <i>(Continued)</i>	
1st Revised Sheet No. 279.14.19	Rule No. 22 – Standard Renewable Gas Interconnections to the Utility’s Pipeline System <i>(Continued)</i>	Original Sheet No. 279.14.19
1st Revised Sheet No. 279.14.20	Rule No. 22 – Standard Renewable Gas Interconnections to the Utility’s Pipeline System <i>(Continued)</i>	Original Sheet No. 279.14.20
2nd Revised Sheet No. 279.14.21	Rule No. 22 – Standard Renewable Gas Interconnections to the Utility’s Pipeline System <i>(Continued)</i>	1st Revised Sheet No. 279.14.21
2nd Revised Sheet No. 279.14.22	Rule No. 22 – Standard Renewable Gas Interconnections to the Utility’s Pipeline System <i>(Continued)</i>	1st Revised Sheet No. 279.14.22
1st Revised Sheet No. 279.14.23	Rule No. 22 – Standard Renewable Gas Interconnections to the Utility’s Pipeline System <i>(Continued)</i>	Original Sheet No. 279.14.23
1st Revised Sheet No. 279.14.24	Rule No. 22 – Standard Renewable Gas Interconnections to the Utility’s Pipeline System <i>(Continued)</i>	Original Sheet No. 279.14.24

Cal. P.U.C. Sheet No.	Title of Sheet	Canceling Cal. P.U.C. Sheet No.
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1st Revised Sheet No. 279.14.26	Rule No. 22 – Standard Renewable Gas Interconnections to the Utility’s Pipeline System (Continued)	Original Sheet No. 279.14.26
1st Revised Sheet No. 279.14.27	Rule No. 22 – Standard Renewable Gas Interconnections to the Utility’s Pipeline System (Continued)	Original Sheet No. 279.14.27
1st Revised Sheet No. 279.14.28	Rule No. 22 – Standard Renewable Gas Interconnections to the Utility’s Pipeline System (Continued)	Original Sheet No. 279.14.28
1st Revised Sheet No. 279.14.29	Rule No. 22 – Standard Renewable Gas Interconnections to the Utility’s Pipeline System (Continued)	Original Sheet No. 279.14.29
1st Revised Sheet No. 279.14.30	Rule No. 22 – Standard Renewable Gas Interconnections to the Utility’s Pipeline System (Continued)	Original Sheet No. 279.14.30
1st Revised Sheet No. 279.14.31	Rule No. 22 – Standard Renewable Gas Interconnections to the Utility’s Pipeline System (Continued)	Original Sheet No. 279.14.31

RULE NO. 22

Sheet 1

STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM

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Sheet 7

STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)

B. DEFINITIONS

6. Btu Zone or Area

A physically identifiable area of the gas transmission and/or distribution system in which the heating value of the Gas is measured and is representative of the entire area.

7. California Producer or Production

An entity which interconnects with the Utility's pipeline system to deliver Gas produced in California.

8. CARB

California Air Resources Board of the California Environmental Protection Agency.

9. CARB/OEHHA Report

The report entitled Recommendations to the California Public Utilities Commission Regarding Health Protective Standards for the Injection of Renewable Natural into the Common Carrier Pipeline, prepared by Staff of the California Air Resources Board and the Office of Health Hazard Assessment. The CARB/OEHHA Report was submitted in Rulemaking (R.)13-02-008 and adopted in Decision (D.) 14-01-034. In addition, CARB/OEHHA submitted a Supplemental Report in 2023 updating health protective constituents and limits.

10. Clean Renewable Hydrogen

Hydrogen which is produced through a process that results in a lifecycle (*i.e.*, well-to-gate) greenhouse gas emissions rate of not greater than 4 kilograms of CO<sub>2</sub>e per kilogram of hydrogen produced and does not use fossil fuel as either a feedstock or production energy source.

11. Commission (CPUC)

The Public Utilities Commission of the State of California, sometimes referred to as the Public Utilities Commission (PUC), CPUC, or Commission.

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Sheet 9

STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)

B. DEFINITIONS (Continued)

19. Gas

Any mixture of combustible and non-combustible gases used to produce heat by burning that can be accepted into a Utility pipeline without any compromise to operational safety or integrity. It shall include, but not be limited to, natural gas, renewable gas, biomethane, manufactured gas, or a mixture of any or all of the above. It shall meet the Utility's quality specifications, tariffs, rules, and other applicable regulations.

20. Gas Source or Source Feedstock

Sources from which biogas can be produced as identified in Table 1 Maximum Constituent Concentrations:

- Landfills – Biogas derived from Non-Hazardous landfills designated for solid-waste collection from residential, industrial, and commercial entities (Class III landfills as defined in Title 27 of CA Code of Regulations).
- Dairies – Biogas derived from the organic waste produced by dairy operations.
- Sewage Treatment – Biogas derived from the solids removed in wastewater treatment processes.
- Food/Green – Biogas derived from plants, animals, or micro-organisms consumed as food for humans or animals, including any mixed-in biodegradable organic material such as food-soiled paper or cardboard, food wrappers, and egg cartons, and from biodegradable organic material resulting from yard, landscaping, forestry and agricultural activities, consisting of leaves, grass, shrubs, plants, branches, and stumps.
- Other – Biogas derived from other feedstock sources not defined above.

21. Group 1 Compound

Any Health Protective Constituent with a concentration below the Trigger Level.

22. Group 2 Compound

Any Health Protective Constituent with a concentration at or above the Trigger Level.

RULE NO. 22

Sheet 10

STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)

B. DEFINITIONS (Continued)

23. 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 California Department of Toxic Substances Control.

24. Health Protective Constituents

1. Carcinogenic (cancer risk): Any Constituent determined by the State of California to cause cancer, as listed below in Table 1, Maximum Constituent Concentrations.
2. Non-carcinogenic (non-cancer risk or chronic risk): Any Constituent determined by the State of California to cause non-cancer health risk, as listed below in Table 1, Maximum Constituent Concentrations.

25. Heating Value

Total heating value of the gas normally measured on a gross dry higher heating value (HHV) basis (unless otherwise specified), and is defined as the number of British Thermal Units (Btu) evolved by the complete combustion, at constant pressure, of one standard cubic foot of gas with air, the temperature of the gas, air and products of combustion being 60 degrees Fahrenheit and all of the water formed by the combustion reaction being condensed to the liquid state.

26. Integrity Protective Constituents

Constituents that may impact the integrity of the Utility's pipeline system as listed in Table 1 Maximum Constituent Concentrations.

27. Interconnect Capacity

The metering, regulation and odorization daily capacity of the Utility Facilities, which is not necessarily the Takeaway Capacity and is not, nor is it intended to be, any commitment by Utility of Takeaway Capacity.

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Sheet 11

STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)

B. DEFINITIONS (Continued)

28. Interconnection Point

The point where the Utility Facilities and Interconnector's Facilities physically interconnect for delivery of Gas by Interconnector to, and receipt thereof by, Utility.

29. Interconnector's Facilities

The Gas pipeline facilities constructed and operated by an Interconnector up to the Interconnection Point.

30. Issued for Construction (IFC)

Drawings and documents which are used for construction work and activities.

31. Local Government Entity Renewable Gas Interconnector (Government Entity)

A city or county as defined by Article XI of the California Constitution.

32. Lower Action Level

The concentration or measured value of a Constituent, used to screen Renewable Gas during the initial gas quality review and ongoing periodic testing, requiring a shut-off of Renewable Gas supply if exceeded three times in a 12-month period.

33. Merchantability

The ability to purchase, sell, or market Gas. The Gas shall not contain dust, sand, dirt, gums, oils, microbes, bacteria, pathogens and/or other substances at levels that would be injurious to Utility facilities or which would present a health and/or safety hazard to Utility employees, customers, and/or the public or that would cause Gas to be unmarketable.

34. Million Standard cubic feet per day (MMScfd or MMScf/d)

Volumetric flow rate of Gas measured in millions of standard cubic feet per Day.

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RULE NO. 22

Sheet 12

STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)

B. DEFINITIONS (Continued)

35. OEHHA

Office of Environmental Health Hazard Assessment of the California Environmental Protection Agency.

36. Raw Product Gas or Feedstock Gas

Gas from biogenic or other renewable sources, such as Biogas, biomass, or power to Gas from renewable electricity, before conditioning or upgrading to comply with this Rule's Gas quality specifications

37. Receipt Point(s) or Points of Receipt

The place(s) where Interconnector delivers, or has delivered on its behalf, Gas into the Utility's pipeline system.

38. Renewable Gas

Gas from biogenic or other renewable sources, such as Biogas, biomass, or power to Gas from renewable electricity that has been conditioned or upgraded to comply with this Rule's Gas quality specifications, including Biomethane.

39. Renewable Gas Interconnector or Supplier (Interconnector)

Party physically interconnecting or interconnected with the Utility and effectuates the delivery of Renewable Gas through new or modified facilities, including any third-party delivering renewable gas into the utility pipeline either directly or through one or more intermediary pipelines, and effectuates the delivery of Renewable Gas through new or modified facilities.

40. Takeaway Capacity

Utility's physical takeaway capability downstream of the outlet of the Utility Facilities at the Interconnection Point. Takeaway Capacity for any particular day may be affected by physical flows from other Receipt Points, physical pipeline and/or storage conditions for that Day, and end-use demand on the Utility's pipeline system, and will be solely determined by the Utility.



RULE NO. 22

Sheet 13

STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)

B. DEFINITIONS (Continued)

41. Thousand Standard cubic feet per day (MScfd or MScf/d)

Volumetric flow of Gas measured in thousands of standard cubic feet per day.

42. Trigger Level

The concentration or measured value of a Constituent requiring additional periodic testing and analysis.

43. Upper Action Level

The concentration or measured value of a Constituent requiring an immediate shut-off of Renewable Gas supply.

44. Utility Facilities

Facilities owned and operated by Utility, including but not limited to, pipelines, appurtenant facilities, meters, regulators, quality measurement, other equipment and related system upgrades at and from the Interconnection Point, for receipt into Utility's pipeline system in the State of California pursuant to the Utility's interconnection agreement.

45. Wobbe Index

HHV / ( $\sqrt{\text{Relative Density}_{\text{real}}}$ ) as defined in Section 2.20 in the 2009 American Gas Association (AGA) Report No. 5 Natural Gas Energy Measurement.

C. APPLICABILITY / OPEN ACCESS

1. Applicability

The Utility shall provide nondiscriminatory open access to its system to any party for the purpose of physically interconnecting with the Utility and effectuating the delivery of Renewable Gas, subject to the terms and conditions set forth in this Rule and the Utility's applicable interconnection, operating, and balancing agreements.

RULE NO. 22

Sheet 14

STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)

C. APPLICABILITY / OPEN ACCESS (Continued)

2. End Use Customer Priority

The interconnection and physical flows shall not jeopardize the integrity of, or interfere with, the normal operation of the Utility's pipeline system and provision of service to its End Use Customers.

3. Scheduling and Nominations

The Receipt Point shall be established as a transportation scheduling point, pursuant to the provisions of Utility's transportation of customer owned Gas tariff.

4. Interconnect Capacity and Takeaway Services

The maximum physical capacity of the interconnection will be determined by the sizing of the Receipt Point components, including the metering and odorization capacities, but is not the capacity of the Utility's pipeline system to transport gas away from the Interconnection Point and is not, nor is it intended to be, any commitment by the Utility of Takeaway Capacity. The Utility separately provides takeaway services, including the option to expand system capacity to increase takeaway services, through its otherwise applicable tariffs.

5. Daily Available Receipt Capacity

The available receipt capacity for any particular day may be affected by physical flows from other Points of Receipt, physical pipeline and storage conditions for that day, and end-use demand on the Utility's pipeline system.

6. Pressure Regulation and Flow

Interconnector's Facilities shall be designed, installed, and operated to protect Utility's pipeline system from exposure to pressures in excess of Utility's then current maximum allowable operating pressure and operating pressures at the Interconnection Point.

Interconnector shall monitor discharge pressure and temperature to limit and shut down, or otherwise control, its compression to ensure that it does not cause any damage to the Utility Facilities.

RULE NO. 22

Sheet 15

STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)

C. APPLICABILITY / OPEN ACCESS (Continued)

6. Pressure Regulation and Flow (Continued)

Interconnector shall ensure that compression does not adversely affect or impair the accuracy of Utility measurement equipment at the Interconnect Point. Interconnector shall eliminate compressor-induced pulsation or vibration in compliance with American Petroleum Industry Standards before Gas is delivered at the Interconnection Point. The Utility shall not be required to accept delivery of Interconnector's Gas if compressor-induced pulsation or vibration exists.

7. Compliance with Utility's Tariffs

Interconnector's Gas supply at the Interconnection Point shall comply with all Utility tariffs, including Gas quality specification, sampling and testing methods and nomination procedures, except as permitted under the Pipeline Blending Exception Study procedures of this Rule.

8. Authorization Required to Operate

The Interconnector and Utility shall execute interconnection, operating and balancing agreements prior to any performance, including, but not limited to, final interconnection and gas flow.

9. Separate Agreements Required for Other Services

An Interconnector requiring other Gas services from Utility, including, but not limited to, Utility intrastate transportation service, must enter into agreements with Utility for such services in accordance with Utility's CPUC-approved tariffs.

10. Services Under This Rule Limited to Interconnection

Interconnection with Utility's pipeline system under this Rule does not provide Interconnector any rights to use Utility's pipeline system for the transportation or selling of Gas, nor does it limit those rights.

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RULE NO. 22

**STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)**

**K. RENEWABLE GAS QUALITY AND SPECIFICATIONS (Continued)**

Table 1 Maximum Constituent Concentrations								
Renewable Gas Injection Constituents				Testing for Gas Source				
	Trigger Level mg/m <sup>3</sup> (ppm <sub>v</sub> )	Lower Action Level mg/m <sup>3</sup> (ppm <sub>v</sub> )	Upper Action Level mg/m <sup>3</sup> (ppm <sub>v</sub> )	Non-Hazardous Landfill	Dairies	Sewage Treatment	Food/Green	Other
<b>Base Gas Quality Specifications<sup>a</sup></b>				■	■	■	■	■
<b>Health Protective Constituents (HPC) – Cancer risk<sup>b</sup></b>								
Arsenic	0.0020 (0.0006)	0.0040 (0.0013)	0.010 (0.0031)	■				■
1,4-Dichlorobenzenes	4.3 (0.69)	42 (6.75)	100 (16.07)	■	■	■	■	■
Cadmium	0.0020 (0.0004)	0.0032 (0.0007)	0.0080 (0.0017)		■	■		■
Chromium <sup>d</sup>	0.0020 (0.0009)	0.0048 (0.0022)	0.012 (0.0055)	■		■		■
Ethylbenzene	20 (4)	190 (42)	490 (109)	■	■	■	■	■
N-nitroso-di-n-propylamine	0.028 (0.01)	0.24 (0.04)	0.61 (0.11)		■			■
Vinyl Chloride	0.63 (0.24)	6.3 (2.38)	15 (5.67)	■	■	■	■	■
<b>Health Protective Constituents (HPC) - Non-Cancer risk<sup>b</sup></b>								
Antimony	0.062 (0.01)	0.62 (0.12)	3.1 (0.6)	■				■
Silicon Compounds (as Si) <sup>f</sup>	0.49 (0.41)	5.0 (4.2)	25 (21.0)	■	■	■	■	■
Hydrogen Sulfide <sup>e</sup>	63 (44)	860 (596)	4,300 (2,978)	■	■	■	■	■
Lead	0.047 (0.005)	0.47 (0.054)	2.3 (0.262)	■		■		■
Alkyl Thiols (Mercaptans) <sup>e</sup>	- (17)	- (170)	- (860)	■	■	■	■	■
Chlorocarbons (as CL) <sup>f</sup>	4.9 (3)	50 (33)	250 (167)	■	■	■	■	■
Iuorocarbons (as F) <sup>f</sup>	7.4 (9)	75 (93)	370 (460)	■			■	■

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RULE NO. 22

Sheet 35

**STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)**

**K. RENEWABLE GAS QUALITY AND SPECIFICATIONS (Continued)**

Table 1 (Continued) Maximum Constituent Concentrations								
Renewable Gas Injection Constituents				Testing for Gas Source				
	Trigger Level	Lower Action Level	Upper Action Level	Hazardous Landfill Non-	Dairies	Sewage Treatment	Food/Green	Other
<b>Integrity Protective Constituents (IPC)<sup>c</sup></b>								
Ammonia	3 mg/m <sup>3</sup> (4 ppm <sub>v</sub> )	7 mg/m <sup>3</sup> (10 ppm <sub>v</sub> )	18 mg/m <sup>3</sup> (25 ppm <sub>v</sub> )	■	■	■	■	■
Carbon Monoxide	0.03% (300 ppm <sub>v</sub> )	TBD	TBD					■ <sup>j</sup>
Hydrogen <sup>i</sup>	0.10% (1000 ppm <sub>v</sub> )	1.0% <sup>5</sup> (10,000 ppm <sub>v</sub> )	5.0% <sup>5</sup> (50,000 ppm <sub>v</sub> )	■	■	■	■	■
Mercury	0.08 mg/m <sup>3</sup> (0.01 ppm <sub>v</sub> )	TBD <sup>g</sup>	TBD <sup>g</sup>	■	■	■	■	■
Siloxanes <sup>h</sup>	0.05 mg Si/m <sup>3</sup> (0.04 ppm <sub>v</sub> )	0.1 mg Si/m <sup>3</sup> (0.08 ppm <sub>v</sub> )	0.3 mg Si/m <sup>3</sup> (0.25 ppm <sub>v</sub> )	■	■	■	■	■
<b>Notes:</b> a. Base Utility Gas Specifications are identified in K1. b. Health Protective Constituents (HPC) are shown in Table 2 of the 2023 CARB/OEHHA AB1900 Supplemental Report. c. Integrity Protective Constituents are shown in Section 4.4.3.3 of D.14-01-034 and identified as integrity protective constituents. d. Evaluate as only total chromium. e. Testing requirement will be the stricter of the stated Renewable Gas values or other tariff requirements. f. The compounds for these chemical classes per Appendix A and Section 4.4 of the 2023 CARB/OEHHA AB1900 Supplemental Report or newest published version. g. The Lower and Upper Action Levels are specific to Biomethane pursuant to Decision 22-12-057 and will be reviewed in the next update proceeding. h. The Interconnector that meets this Rule's Section K.4.b certification requirements shall have reduced siloxanes testing requirements per K.5.e.ii.a. i. Lower Action Level and Upper Action Level is specific to the by-product of the biomethane production process and is not intended as a pure hydrogen blending limit. j. Carbon Monoxide will be tested in Bio-SNG only.								

RULE NO. 22

Sheet 36

**STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)**

**K. RENEWABLE GAS QUALITY AND SPECIFICATIONS (Continued)**

Table 2 Cancer and non-Cancer Risk Management Thresholds for Constituents			
Risk Management Levels	Potential Cancer Risk (Chance in a million)	Non-Cancer Total Hazard Quotient	Action
Trigger Level <sup>a</sup>	≥1	≥0.1	Periodic Testing Required
Lower Action Level <sup>b</sup>	≥10	≥1	Supply shut-in and repair after three exceedances in 12 months in which deliveries occur
Upper Action Level <sup>b</sup>	≥25	≥5	Immediate supply shut-in and repair

<sup>a</sup> Applies to individual Constituent concentrations  
<sup>b</sup> Applies to the sum of all Constituent concentrations over the Trigger Level.

3. RESERVED

4. Interconnector Renewable Gas Source Certification

a. Non-Hazardous Waste Facility

Renewable Gas sourced from Hazardous Waste Landfills will not be knowingly purchased, accepted into or transported on the pipeline system.

i. Interconnector must certify and provide documentation or other suitable proof that: the Renewable Gas source feedstock was not derived or collected from a Hazardous Waste Facility, as that term is defined in Section 25117.1 of the California Health and Safety Code, as may be amended from time to time, and Interconnector is in compliance with the following Health and Safety Code Sections 25421(g)(1) and (2), as they may be amended from time to time.

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RULE NO. 22

Sheet 37

STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)

K. RENEWABLE GAS QUALITY AND SPECIFICATIONS (Continued)

4. Interconnector Renewable Gas Source Certification (Continued)

b. Siloxanes

To qualify for reduced siloxanes testing, Interconnector must execute Utility's certification attesting that:

- i. Interconnector's Biogas is sourced only from dairy, animal manure, agricultural waste, forest residues, and/or commercial food processing waste;
- ii. Products containing siloxanes are not used at Interconnector's Facilities in any way that allow siloxanes to enter the Biogas and/or Biomethane and
- iii. Interconnector shall notify Utility within 30 days of discovery, in accordance with the notice provision of the associated interconnection agreement, that the certifications set forth in the above paragraphs are no longer true.

5. Testing

a. Source Feedstock Based Testing

Testing shall be determined according to the source feedstock per Table 1 above. The interconnector shall specify their source feedstock. For facilities utilizing multiple gas sources or co-digestion, where smaller amounts of different gas source types are utilized to increase methane production, the facility will be required to test for all of the COCs for each source feedstock utilized.

Testing for the Health Protective Constituents shall be by the recommended methods specified in Table V-4 of the 2023 CARB/OEHHA AB1900 Supplemental Report or newest published version. Testing for Integrity Protective Constituents shall be by the sample method and lab test methods listed in Table 3 below. Feedstock Based Testing, as described in this section, also applies to any new gas source supplying Renewable Gas upstream of an existing gas interconnection point.

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RULE NO. 22

Sheet 38

**STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)**

**K. RENEWABLE GAS QUALITY AND SPECIFICATIONS (Continued)**

**Table 3  
Test Methods for Integrity Protective Constituents**

Constituent of Concern	Sample Method	Lab Test Method
Ammonia	Collect samples in sulfuric acid treated silica gel sorbent tubes (NIOSH Method 6015)	Visible spectrophotometry (NIOSH Method 6015)
	Collect samples in glass tubes containing carbon beads impregnated with sulfuric acid (OSHA Method ID-188)	Ion chromatography conductivity detector IC/CD (OSHA Method ID-188)
	Bubbled through impinger system containing sulfuric acid and silica gel (South Coast Air Quality Management District Method 207.1)	Ion specific electrode ISE (South Coast Air Quality Management District Method 207.1)
	Collect samples in Tedlar bag or inert cylinders	Gas chromatograph/nitrogen chemiluminescence detector GC-NCD
<u>Carbon Monoxide</u>	<u>Collect samples in cylinders or canisters</u>	<u>Gas Chromatograph GC (EPA 3C, ASTM Methods D1946 or D7833)</u>
Hydrogen	Collect samples in cylinders or canisters	Gas Chromatograph GC (EPA 3C, ASTM Methods D1945, D1946 or D7833)
Mercury <sup>a</sup>	Bubble through aqueous acidic solution of hydrogen peroxide and aqueous acidic solution of potassium permanganate (EPA Method 29)	Cold vapor atomic absorption spectroscopy CVAAS (EPA Method 29, EPA Compendium Method IO-3.5)
	Collect samples on gold-coated silica beads (ASTM Method D5954)	Atomic absorption spectroscopy AAS (ASTM Method D5954)
	Collect samples on gold-coated silica sand trap (ASTM Method D6350)	Atomic fluorescence spectroscopy AFS (ASTM Method D6350)
Siloxanes <sup>b</sup>	Collect samples in cylinders or through sorbent tubes (ASTM Method D8230) or through impingers containing methanol solution.	Gas chromatograph/mass spectrometer GC/MS or gas chromatograph/atomic emission detector GC/AED (ASTM Method D8230) or gas chromatograph/ion mass spectrometer GC/IMS (ASTM Method D8455)
Biologicals	Flow samples through filtration funnel and collect on 0.2 um filters.	qPCR for APB, IOB, SRB

- a. Mercury represents total mercury, not only elemental mercury.  
b. Siloxanes is a total value inclusive of Trimethylsilanol, Hexamethyldisiloxane (L2), Octamethyltrisiloxane (L3), Decamethyltetrasiloxane (L4), Dodecamethylpentasiloxane (L5), Hexamethylcyclotrisiloxane (D3), Octamethylcyclotetrasiloxane (D4), Decamethylcyclopentasiloxane(D5), and Dodecamethylcyclohexasiloxane(D6).  
c. Acronyms:  
ASTM                    ASTM International  
EPA                      Environmental Protection Agency  
NIOSH                  National Institute for Occupational Safety & Health



RULE NO. 22

Sheet 40

STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)

K. RENEWABLE GAS QUALITY AND SPECIFICATIONS (Continued)

5. Testing (Continued)

b. Testing Responsibility

i. Interconnector Pre-Injection and Restart Procedure Testing

Pre-injection and Restart Procedure testing for gas quality will be performed by the Interconnector using independent certified third-party laboratories. The Utility shall be notified of the sampling a minimum of five business days in advance and have the option to observe the samples being taken.

ii. Utility Period Testing

The Utility will collect the samples and send the samples to an independent certified laboratory for Constituent analyses. The results will be shared with the Interconnector within two weeks of the Utility receiving the data. If it is agreed to by both parties, the Interconnector can be the periodic testing entity at the interconnection.

c. Cost Responsibility

Interconnector is responsible for Pre-Injection, Periodic Testing and Restart testing costs. If requested, any retesting for validation of results shall be done at the cost of the entity requesting the retest.

d. Utility Discretionary Testing

This Rule does not prohibit the Utility from engaging in discretionary gas or facility testing on its system at Utility's expense.

e. Pre-Injection Testing Procedure

Interconnector will conduct two successful tests for all Constituents over a two to four-week period, at least two weeks apart.

RULE NO. 22

Sheet 41

STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)

K. RENEWABLE GAS QUALITY AND SPECIFICATIONS (Continued)

5. Testing (Continued)

e. Pre-Injection Testing Procedure (Continued)

i. Health Protective Constituents (Continued)

If during the pre-injection testing, any Health Protective Constituents are found at or above the Trigger Level, the collective potential cancer or non-cancer risk must be calculated. The collective potential cancer or non-cancer risk is calculated by summing the individual risk for each Health Protective Group 2 Compound.

If the collective potential cancer risk or non-cancer risk is at or above the Lower Action Level (the cancer risk Lower Action Level is  $\geq 10$  in a million and the non-cancer risk Lower Action Level is a Hazard Index of  $\geq 1$ ), the Renewable Gas cannot be accepted or transported by the Utility's pipeline system

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

If all the Health Protective Constituents are below the Trigger Level or the collective potential cancer risk and non-cancer risk from the Group 2 Compounds are below the Lower Action Level in both pre-injection tests, the Renewable Gas may be injected into the pipeline system subject to all other requirements set forth in this Rule.

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.

RULE NO. 22

Sheet 42

STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)

K. RENEWABLE GAS QUALITY AND SPECIFICATIONS (Continued)

5. Testing (Continued)

e. Pre-Injection Testing Procedure (Continued)

ii. Integrity Protective Constituents (Continued)

a) Reduced Siloxanes Testing

Pursuant to Section K.4.b of this Rule, 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 siloxanes are above the Trigger 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.
- (iii) 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 Trigger 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.
- (ii) To ensure Renewable Gas is commercially free of biologicals (>0.2 microns), 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 Renewable Gas may be injected into the Utility's system subject to all other requirements set forth in this Rule.

RULE NO. 22

Sheet 43

STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)

K. RENEWABLE GAS QUALITY AND SPECIFICATIONS (Continued)

5. Testing (Continued)

f. Periodic Testing

i. Group 1 Compounds

- a) Group 1 Compounds will be tested once every 12-month period in which injection occurs.
- b) Any Group 1 Compounds with a concentration below the Trigger Level for two consecutive annual tests will be tested once every two-year period in which injection occurs.
- c) A Group 1 Compound will become a Group 2 Compound if testing indicates a concentration at or above the Trigger Level and will be tested quarterly.

ii. Group 2 Compounds

- a) Testing for Group 2 Compounds will be quarterly (at least once every three- month period in which injection occurs).
- b) Any Group 2 Compound with a concentration below the Trigger Level in four consecutive quarterly tests will become a Group 1 Compound and will be tested once every 12-month period in which injection occurs.
- c) If any constituent is above the Upper Action Level, the Renewable Gas shall be shut-in until the concentration level is below the Lower Action Level, after which it will be subject to the Section K.5.g. Restart Procedure.

iii. Collective risk from Cancer and Non-Cancer Health Protective Constituents

a) Cancer Risk

The collective potential cancer risk for Group 2 Compounds is determined by summing the individual potential cancer risk for each cancer Constituent of Concern. Specifically, the cancer risk is calculated using the ratio of the concentration of the Constituent in the Renewable Gas to the health protective ("trigger") concentration value corresponding to one in a million cancer risk for that specific Constituent and then summing the risk for all the Group 2 Compounds. (for reference, see CARB/OEHHA Report submitted in R.13-02-008, p. 67)

RULE NO. 22

Sheet 44

STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)

K. RENEWABLE GAS QUALITY AND SPECIFICATIONS (Continued)

5. Testing (Continued)

f. Periodic Testing (Continued)

iii. Collective risk from Carcinogenic and Non-carcinogenic Health Protective Constituents (Continued)

b) Non-Cancer Risk

The collective non-cancer risk is calculated using the ratio of the concentration of the constituent in Renewable Gas to the health protective concentration value corresponding to a hazard quotient of 0.1 for that specific non-cancer constituent, then multiplying the ratio by 0.1, and then summing the non-cancer chronic risk for these Group 2 compounds. (for reference, see CARB/OEHHA Report submitted in R.13-02-008, p. 67)

c) If the result is at or above the Lower Action Level on three occurrences in a 12-month period, the Renewable Gas shall be immediately shut-in until the levels are below the Lower Action Level, after which it will be subject to the Restart Procedures.

f) If the collective risk from Cancer risk or Non-cancer risk Constituents, is at or above the Upper Action Level, the Renewable Gas shall be shut-in until the concentration is below the Lower Action Level, after which it will be subject to the Restart Procedures.

g) If Interconnector's Renewable Gas is refused in accordance with this Rule, testing for all Group 1 and Group 2 Compounds will then be performed according to the Restart Procedure.

RULE NO. 22

Sheet 45

STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)

K. RENEWABLE GAS QUALITY AND SPECIFICATIONS (Continued)

5. Testing (Continued)

f. Periodic Testing (Continued)

iv. Integrity Protective Constituents

- a) Constituents shall be tested once every 12-month period in which injection occurs.
- b) Any Constituent with a concentration at or below the Trigger Level during two (2) consecutive annual periodic tests shall be tested once every two-year period in which injection occurs.
- c) If periodic testing demonstrates that any Constituent is above the Trigger Level, then it will be tested quarterly.
- d) If the Constituent is above the Trigger Level, then it will be tested quarterly until there are four (4) consecutive quarterly tests at or below the Trigger Level, then it will be reduced to once every 12-month period in which deliveries occur.
- e) When any Constituent is above the Lower Action Level three times in a 12- month period, the Renewable Gas shall be immediately shut-in and subject to Restart Procedures set forth in Section K.5.g. of this Rule.
- f) When any Constituent is above the Upper Action Level, the Renewable Gas shall be immediately shut-in and subject to Restart Procedures set forth in Section K.5.g. of this Rule.

g. Restart Procedure

- i. Interconnector will repeat the Pre-Injection Testing Procedure until one successful test of all Constituents is completed, when any of the following occurs:
  - a) There is a change in the Gas source at the facility or a change of the Gas processing equipment design (other than for functional equivalence) that the Commission determines will potentially increase the level of any Constituent over the previously measured baseline levels.

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RULE NO. 22

Sheet 46

STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)

K. RENEWABLE GAS QUALITY AND SPECIFICATIONS (Continued)

5. Testing (Continued)

g. Restart Procedure (Continued)

b) A shut-in of the Renewable Gas into the pipeline because there are three exceedances of the Lower Action Level in a 12-month period of the same Constituent.

c) A shut-in of the Renewable Gas into the pipeline because a Constituent concentration or the collective cancer or non-cancer risk is above the Upper Action Level.

ii. After re-starting Renewable Gas deliveries, Periodic Testing will resume based on the results of the successful test.

h. Reporting and Record Keeping Requirements

Reporting and Record Keeping will be in compliance with D.14-01-034 and the CARB/OEHHA Report and includes the following:

i. Pre-injection testing results shall be provided by Interconnector to the Utility within five days of receiving the data.

ii. Startup test results from the initial successfully completed Pre-injection testing shall be provided to Commission within 30 days of receiving the test data by the testing entity (Utility or Interconnector).

iii. Maintain records of all test results for 3 years from the date when the tests were conducted by the testing entity (Utility or Interconnector).

iv. Annual report to Commission: all test data, production rate, monitoring parameters, and shutoff events.

v. If the Utility is the testing entity, test results shall be provided by Utility to the Interconnector within two weeks of receiving the data. Test data that results in a shut-in shall be provided by Utility to the Interconnector within 24 hours of receiving the data.

vi. If the Interconnector is the testing entity, the Interconnector shall provide the above information to the Utility within two weeks of receiving the data. Test data that would result in a shut-in will be provided by Interconnector to the Utility within 24 hours of receiving the data.

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RULE NO. 22

Sheet 47

STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)

L. PIPELINE BLENDING EXCEPTION STUDY (BLENDING STUDY)

1. Intent

In an effort to encourage interconnections of Renewable Gas to Utility pipelines as ordered in D.19-05-018, the Utility will review and consider each blending request thoroughly and make a determination regarding each request. Blending exception requests will be accepted if the Renewable Gas is interchangeable with historical or contractual Gas supplies after blending and will not cause increased risk or safety concerns to the Utility's employees, downstream customers or pipeline. The Interconnector requesting the Blending Study will be responsible for the cost for the Utility to conduct the Blending Study and provide a determination.

2. Interconnector Blending Study Request

Interconnector may request a Blending Study to determine the Utility's downstream blending capability from an Interconnection Point, or proposed Interconnection Point, and the associated Utility monitoring and equipment enhancement costs, if any to be borne by Interconnector.

Interconnector may request an exception to the Gas quality and Heating Value standards established in this rule for a Receipt Point to allow blending in the pipeline of conditioned or upgraded Raw Product Gas or Biogas that does not meet all gas specifications at the Interconnection Point to achieve pipeline gas quality specifications.

Interconnector may initiate a Blending Study request as part of the Interconnection Screening or a subsequent Preliminary or Detailed Engineering Study.

The Blending Study will evaluate feasibility of blending to determine interchangeability with historical or contractual Gas supplies and the increased risk or safety concerns to the Utility's employees, downstream customers or pipeline.

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RULE NO. 22

Sheet 48

STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)

L. PIPELINE BLENDING EXCEPTION STUDY (BLENDING STUDY) (Continued)

2. Interconnector Blending Study Request (Continued)

The Utility will evaluate whether it is safe to authorize blending following receipt of the request that shall include the following:

- a. Desired interconnect location(s) on the Utility's system
- b. Maximum and minimum flow rates, including seasonal variations, if appropriate
- c. Maximum concentrations of all Constituents listed within this Rule
- d. Maximum and minimum Heating Value and Wobbe Index
- e. Ability of Interconnector to accept limits on flow rates
- f. Reason for request
- g. Information collected from Interconnection Request

3. Utility Evaluation

If blending is requested, the Utility will evaluate requests for safely blending into the pipeline to determine whether injection of any new or modified supply source can be safely injected into the Utility's pipeline system. At a minimum, the Utility will consider the following factors when determining whether an exception can be allowed:

- a. Flow rates and directional consistency of receiving pipeline(s), including daily and seasonal variations.
- b. Historical Gas composition and contractual Gas quality specification at the Utility's receipt points and area of influence for purposes of determining impact on a Btu District.
- c. Current and expected future composition of Gas supplies at the Utility's Receipt Points for the purpose of determining interchangeability on customers' end use equipment and the pipeline system's future capability to accommodate supplies.

RULE NO. 22

Sheet 49

STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)

L. PIPELINE BLENDING EXCEPTION STUDY (BLENDING STUDY) (Continued)

3. Utility Evaluation (Continued)

- d. Potential for increased internal corrosion threat at and through the Receipt Point, Receipt Point pipeline lateral and receiving pipelines due to Gas composition.
- e. Current and future customers in receiving pipeline flow rate, distance to these customers, time to first receiving customer, and anticipated downstream Gas demand growth.
- f. Maximum time and distance required for complete mixing to occur under all pipeline flow conditions.
- g. The design, operation, and overall condition of the receiving pipeline(s), including any sensitivities to Gas Constituents.
- h. Additional monitoring, control, and/or mixing equipment that may be required to verify and ensure that adequate blending has occurred in the receiving pipeline system.

A request for gas quality exception will be undertaken as part of the Interconnection Screening or subsequent Preliminary and Detailed Engineering Studies upon receipt of all requested information. The evaluation will be completed within 30 additional business days.

4. Utility Report

Utility shall provide the Interconnector, within thirty (30) business days, with the acceptance or denial of blending request with the associated Interconnection Screening or subsequent Preliminary and Detailed Engineering Studies.

The Utility will notify the Energy Division of each request for exception, and state whether the request is granted or denied along with reason for denial.

RULE NO. 22

Sheet 50

STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)

L. PIPELINE BLENDING EXCEPTION STUDY (BLENDING STUDY) (Continued)

4. Utility Report (Continued)

a. Acceptance

For each granted request, the Utility shall provide a determination of the following:

- i. Volumetric flow rate: Authorized volume for blending, or a specific volume that is less than requested, and the conditions under which flow will be limited or otherwise restricted;
- ii. Length of time authorization valid: How long authorization for blending in the pipeline is valid before it must be re-evaluated; and
- iii. Special conditions: Any restrictions, special conditions, and/or special equipment, as determined by the Utility, required to grant acceptance.

b. Denial

If denied, a written explanation of the basis for denial and all engineering evaluations and calculations prepared to evaluate the request will be provided to the Interconnector. The explanation may include, but not be limited to:

- i. Historical pipeline flow profiles and proposed Interconnector flow
- ii. Historical compositions or contractual gas quality value used in the analysis
- iii. Customer and/or safety impact

Information is subject to a non-disclosure agreement for confidential information, if any.

5. Utility Right to Re-evaluate and Rescind Blending

The Utility shall have the continuing right at any time to re-evaluate, revise, and potentially rescind, the granted exception allowing for blending in the pipeline due to insufficient flow, ongoing operations, changes in the way the Utility manages the operation of its system, or requirements in accordance with the Utility's CPUC-approved tariffs.

RULE NO. 22

Sheet 51

STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)

M. DISCONTINUANCE AND TERMINATION

Discontinuance of use and/or termination will be administered pursuant to the terms of the Interconnector and Utility interconnection agreement.

N. DISPUTE RESOLUTION

1. The Commission shall have initial jurisdiction to interpret, add, delete, or modify any provision of this Rule and/or tariff ("Interconnection Tariff") and to resolve disputes regarding Utility's performance of its obligations under the Interconnection Tariff pursuant to this Rule.
2. Any dispute arising between Utility and Interconnector (individually referred to as "Party" and collectively "the Parties") regarding Utility's or Interconnector's performance of its obligations under the Interconnection Tariffs shall be resolved according to the following procedures:
  - a. The dispute shall be documented in a written notice by the aggrieved Party to the other Party containing the relevant known facts pertaining to the dispute, the specific dispute and the relief sought, and express written notice by the aggrieved Party that it is invoking the procedures under this Section. The written notice shall be sent to the Party's email address and physical address set forth in any interconnection agreement between the Parties or the Interconnection Request, if there is no interconnection agreement. The receiving Party shall acknowledge the written notice within ten (10) Days of its receipt.
  - b. The Parties shall negotiate in good faith to resolve the dispute. If a resolution is not reached in forty-five (45) Days from the date of the written notice, either 1) a Party may request to continue negotiations for an additional forty-five (45) Days or 2) the Parties may by mutual agreement make a written request for mediation to the Alternative Dispute Resolution (ADR) Coordinator in the Commission's administrative law judge (ALJ) Division. The request may be submitted by electronic mail to [adr\\_program@cpuc.ca.gov](mailto:adr_program@cpuc.ca.gov). The dispute and its resolution shall be governed by the Commission's ADR rules and procedures. Alternatively, both Parties by mutual agreement may request mediation from an outside third-party mediator with costs to be shared equally between the Parties.

RULE NO. 22

Sheet 52

STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)

N. DISPUTE RESOLUTION (Continued)

3. If resolution is not reached pursuant to this Section N., either Party may file a formal complaint before the Commission pursuant to California PUC section 1702 and Article 4 of the Commission's Rules of Practice and Procedure. Nothing in this section shall be construed to limit the rights of any Party to exercise rights and remedies under applicable Commission decision, order, rule or regulation.
4. Pending resolution of any dispute under this Section, the Parties shall proceed diligently with the performance of their respective obligations under the Interconnection Tariffs, unless the related agreements have been terminated. Disputes as to the Interconnection Request and implementation of this Section shall be subject to resolution pursuant to the procedures set forth in this Section.
5. Guidance can be provided in letter form by the Director of Energy Division or designated delegate.
6. Notwithstanding anything to the contrary set forth in this Section N, if Utility and Interconnector are parties to one or more of the agreements relating to the interconnection to the Utility's pipeline system, and any such agreement(s) includes a dispute resolution procedure, the dispute resolution procedure set forth in such agreement(s) shall control over the dispute resolution procedure set forth in this Section N.

**ADVICE LETTER NO. 1322**  
**ATTACHMENT B**

Tariff Sheet Redlines

RULE NO. 22

Sheet 1

STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM

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RULE NO. 22

Sheet 7

STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)

B. DEFINITIONS

6. Btu Zone or Area

A physically identifiable area of the gas transmission and/or distribution system in which the heating value of the Gas is measured and is representative of the entire area.

7. California Producer or Production

An entity which interconnects with the Utility's pipeline system to deliver Gas produced in California.

8. CARB

California Air Resources Board of the California Environmental Protection Agency.

9. CARB/OEHHA Report

The report entitled Recommendations to the California Public Utilities Commission Regarding Health Protective Standards for the Injection of Renewable Natural into the Common Carrier Pipeline, prepared by Staff of the California Air Resources Board and the Office of Health Hazard Assessment. The CARB/OEHHA Report was submitted in Rulemaking (R.)13-02-008 and adopted in Decision (D.) 14-01-034. In addition, CARB/OEHHA submitted a Supplemental Report in 2023 updating health protective constituents and limits.

10. Clean Renewable Hydrogen

Hydrogen which is produced through a process that results in a lifecycle (i.e., well-to-gate) greenhouse gas emissions rate of not greater than 4 kilograms of CO<sub>2</sub>e per kilogram of hydrogen produced and does not use fossil fuel as either a feedstock or production energy source.

11. Commission (CPUC)

The Public Utilities Commission of the State of California, sometimes referred to as the Public Utilities Commission (PUC), CPUC, or Commission.

RULE NO. 22

Sheet 9

STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)

B. DEFINITIONS (Continued)

19. Gas

Any mixture of combustible and non-combustible gases used to produce heat by burning that can be accepted into a Utility pipeline without any compromise to operational safety or integrity. It shall include, but not be limited to, natural gas, renewable gas, biomethane, manufactured gas, or a mixture of any or all of the above. It shall meet the Utility's quality specifications, tariffs, rules, and other applicable regulations.

20. Gas Source or Source Feedstock

Sources from which biogas can be produced as identified in Table 1 Maximum Constituent Concentrations:

- Landfills – Biogas derived from Non-Hazardous landfills designated for solid-waste collection from residential, industrial, and commercial entities (Class III landfills as defined in Title 27 of CA Code of Regulations).
- Dairies – Biogas derived from the organic waste produced by dairy operations.
- Sewage Treatment – Biogas derived from the solids removed in wastewater treatment processes.
- Food/Green – Biogas derived from plants, animals, or micro-organisms consumed as food for humans or animals, including any mixed-in biodegradable organic material such as food-soiled paper or cardboard, food wrappers, and egg cartons, and from biodegradable organic material resulting from yard, landscaping, forestry and agricultural activities, consisting of leaves, grass, shrubs, plants, branches, and stumps.
- Other – Biogas derived from other feedstock sources not defined above.

20-21. Group 1 Compound

Any Health Protective Constituent with a concentration below the Trigger Level.

21-22. Group 2 Compound

Any Health Protective Constituent with a concentration at or above the Trigger Level.

SOUTHWEST GAS CORPORATION  
P.O. Box 98510  
Las Vegas, Nevada 89193-8510  
California Gas Tariff

Canceling \_\_\_\_\_  
\_\_\_\_\_

Cal. P.U.C. Sheet No. \_\_\_\_\_  
Cal. P.U.C. Sheet No. \_\_\_\_\_

~~22-23~~. 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 California Department of Toxic Substances Control.

~~23-24~~. Health Protective Constituents

1. Carcinogenic (cancer risk): Any Constituent determined by the State of California to cause cancer, as listed below in Table 1, Maximum Constituent Concentrations.
2. Non-carcinogenic (non-cancer risk or chronic risk): Any Constituent determined by the State of California to cause non-cancer health risk, as listed below in Table 1, Maximum Constituent Concentrations.

Advice Letter No. \_\_\_\_\_  
Decision No. \_\_\_\_\_

Issued by  
Amy L. Timperley  
Chief Regulatory Officer

Date Filed \_\_\_\_\_  
Effective \_\_\_\_\_  
Resolution No. \_\_\_\_\_

RULE NO. 22

Sheet 10

STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)

B. DEFINITIONS (Continued)

23. 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 California Department of Toxic Substances Control.

24. Health Protective Constituents

1. Carcinogenic (cancer risk): Any Constituent determined by the State of California to cause cancer, as listed below in Table 1, Maximum Constituent Concentrations.

2. Non-carcinogenic (non-cancer risk or chronic risk): Any Constituent determined by the State of California to cause non-cancer health risk, as listed below in Table 1, Maximum Constituent Concentrations.

23-25. Heating Value

Total heating value of the gas normally measured on a gross dry higher heating value (HHV) basis (unless otherwise specified), and is defined as the number of British Thermal Units (Btu) evolved by the complete combustion, at constant pressure, of one standard cubic foot of gas with air, the temperature of the gas, air and products of combustion being 60 degrees Fahrenheit and all of the water formed by the combustion reaction being condensed to the liquid state.

24-26. Integrity Protective Constituents

Constituents that may impact the integrity of the Utility's pipeline system as listed in Table 1 Maximum Constituent Concentrations.

25-27. Interconnect Capacity

The metering, regulation and odorization daily capacity of the Utility Facilities, which is not necessarily the Takeaway Capacity and is not, nor is it intended to be, any commitment by Utility of Takeaway Capacity.

26-28. Interconnection Point

SOUTHWEST GAS CORPORATION  
P.O. Box 98510  
Las Vegas, Nevada 89193-8510  
California Gas Tariff

Canceling \_\_\_\_\_ Cal. P.U.C. Sheet No. \_\_\_\_\_  
\_\_\_\_\_ Cal. P.U.C. Sheet No. \_\_\_\_\_

The point where the Utility Facilities and Interconnector's Facilities physically interconnect for delivery of Gas by Interconnector to, and receipt thereof by, Utility.

27-29. Interconnector's Facilities

The Gas pipeline facilities constructed and operated by an Interconnector up to the Interconnection Point.

28-30. Issued for Construction (IFC)

Drawings and documents which are used for construction work and activities.

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Decision No. \_\_\_\_\_

Issued by  
Amy L. Timperley  
Chief Regulatory Officer

Date Filed \_\_\_\_\_  
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Resolution No. \_\_\_\_\_

RULE NO. 22

Sheet 11

STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)

B. DEFINITIONS (Continued)

24-31. Local Government Entity Renewable Gas Interconnector (Government Entity)

A city or county as defined by Article XI of the California Constitution.

25-32. Lower Action Level

The concentration or measured value of a Constituent, used to screen Renewable Gas during the initial gas quality review and ongoing periodic testing, requiring a shut-off of Renewable Gas supply if exceeded three times in a 12-month period.

26-33. Merchantability

The ability to purchase, sell, or market Gas. The Gas shall not contain dust, sand, dirt, gums, oils, microbes, bacteria, pathogens and/or other substances at levels that would be injurious to Utility facilities or which would present a health and/or safety hazard to Utility employees, customers, and/or the public or that would cause Gas to be unmarketable.

27-34. Million Standard cubic feet per day (MMScfd or MMScf/d)

Volumetric flow rate of Gas measured in millions of standard cubic feet per Day.

28-35. OEHHA

Office of Environmental Health Hazard Assessment of the California Environmental Protection Agency.

29-36. Raw Product Gas or Feedstock Gas

Gas from biogenic or other renewable sources, such as Biogas, biomass, or power to Gas from renewable electricity, before conditioning or upgrading to comply with this Rule's Gas quality specifications.



RULE NO. 22

Sheet 12

STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)

B. DEFINITIONS (Continued)

37. Receipt Point(s) or Points of Receipt

The place(s) where Interconnector delivers, or has delivered on its behalf, Gas into the Utility's pipeline system.

38. Renewable Gas

Gas from biogenic or other renewable sources, such as Biogas, biomass, or power to Gas from renewable electricity that has been conditioned or upgraded to comply with this Rule's Gas quality specifications, including Biomethane.

39. Renewable Gas Interconnector or Supplier (Interconnector)

Party physically interconnecting or interconnected with the Utility and effectuates the delivery of Renewable Gas through new or modified facilities, including any third-party delivering renewable gas into the utility pipeline either directly or through one or more intermediary pipelines, and effectuates the delivery of Renewable Gas through new or modified facilities.

40. Takeaway Capacity

Utility's physical takeaway capability downstream of the outlet of the Utility Facilities at the Interconnection Point. Takeaway Capacity for any particular day may be affected by physical flows from other Receipt Points, physical pipeline and/or storage conditions for that Day, and end-use demand on the Utility's pipeline system, and will be solely determined by the Utility.

41. Thousand Standard cubic feet per day (MScfd or MScf/d)

Volumetric flow of Gas measured in thousands of standard cubic feet per day.

42. Trigger Level

The concentration or measured value of a Constituent requiring additional periodic testing and analysis.

RULE NO. 22

Sheet 13

STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)

B. DEFINITIONS (Continued)

43. Upper Action Level

The concentration or measured value of a Constituent requiring an immediate shut-off of Renewable Gas supply.

44. Utility Facilities

Facilities owned and operated by Utility, including but not limited to, pipelines, appurtenant facilities, meters, regulators, quality measurement, other equipment and related system upgrades at and from the Interconnection Point, for receipt into Utility's pipeline system in the State of California pursuant to the Utility's interconnection agreement.

45. Wobbe Index

HHV / ( $\sqrt{\text{Relative Density}_{\text{real}}}$ ) as defined in Section 2.20 in the 2009 American Gas Association (AGA) Report No. 5 Natural Gas Energy Measurement.

C. APPLICABILITY / OPEN ACCESS

1. Applicability

The Utility shall provide nondiscriminatory open access to its system to any party for the purpose of physically interconnecting with the Utility and effectuating the delivery of Renewable Gas, subject to the terms and conditions set forth in this Rule and the Utility's applicable interconnection, operating, and balancing agreements.

2. End Use Customer Priority

The interconnection and physical flows shall not jeopardize the integrity of, or interfere with, the normal operation of the Utility's pipeline system and provision of service to its End Use Customers.

RULE NO. 22

Sheet 14

STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)

C. APPLICABILITY / OPEN ACCESS (Continued)

2. End Use Customer Priority

The interconnection and physical flows shall not jeopardize the integrity of, or interfere with, the normal operation of the Utility's pipeline system and provision of service to its End Use Customers.

2.3. Scheduling and Nominations

The Receipt Point shall be established as a transportation scheduling point, pursuant to the provisions of Utility's transportation of customer owned Gas tariff.

3.4. Interconnect Capacity and Takeaway Services

The maximum physical capacity of the interconnection will be determined by the sizing of the Receipt Point components, including the metering and odorization capacities, but is not the capacity of the Utility's pipeline system to transport gas away from the Interconnection Point and is not, nor is it intended to be, any commitment by the Utility of Takeaway Capacity. The Utility separately provides takeaway services, including the option to expand system capacity to increase takeaway services, through its otherwise applicable tariffs.

4.5. Daily Available Receipt Capacity

The available receipt capacity for any particular day may be affected by physical flows from other Points of Receipt, physical pipeline and storage conditions for that day, and end-use demand on the Utility's pipeline system.

5.6. Pressure Regulation and Flow

Interconnector's Facilities shall be designed, installed, and operated to protect Utility's pipeline system from exposure to pressures in excess of Utility's then current maximum allowable operating pressure and operating pressures at the Interconnection Point.

Interconnector shall monitor discharge pressure and temperature to limit and shut down, or otherwise control, its compression to ensure that it does not cause any damage to the Utility Facilities.

RULE NO. 22

Sheet 15

STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)

C. APPLICABILITY / OPEN ACCESS (Continued)

6. Pressure Regulation and Flow (Continued)

Interconnector shall ensure that compression does not adversely affect or impair the accuracy of Utility measurement equipment at the Interconnect Point. Interconnector shall eliminate compressor-induced pulsation or vibration in compliance with American Petroleum Industry Standards before Gas is delivered at the Interconnection Point. The Utility shall not be required to accept delivery of Interconnector's Gas if compressor-induced pulsation or vibration exists.

7. Compliance with Utility's Tariffs

Interconnector's Gas supply at the Interconnection Point shall comply with all Utility tariffs, including Gas quality specification, sampling and testing methods and nomination procedures, except as permitted under the Pipeline Blending Exception Study procedures of this Rule.

8. Authorization Required to Operate

The Interconnector and Utility shall execute interconnection, operating and balancing agreements prior to any performance, including, but not limited to, final interconnection and gas flow.

9. Separate Agreements Required for Other Services

An Interconnector requiring other Gas services from Utility, including, but not limited to, Utility intrastate transportation service, must enter into agreements with Utility for such services in accordance with Utility's CPUC-approved tariffs.

10. Services Under This Rule Limited to Interconnection

Interconnection with Utility's pipeline system under this Rule does not provide Interconnector any rights to use Utility's pipeline system for the transportation or selling of Gas, nor does it limit those rights.

RULE NO. 22

Sheet 34

**STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)**

**K. RENEWABLE GAS QUALITY AND SPECIFICATIONS (Continued)**

Table 1 Maximum Constituent Concentrations									
Renewable Gas Injection Constituents				Testing for Gas Source					
	Trigger Level	Lower Action Level	Upper Action Level	Hazardous Non-Landfill	Dairies	Sewage Treatment	Food/Green	Other <sup>4</sup>	
	<u>mg/m<sup>3</sup></u> <u>(ppmv)</u>	<u>mg/m<sup>3</sup></u> <u>(ppmv)</u>	<u>mg/m<sup>3</sup></u> <u>(ppmv)</u>						
<b>Base Gas Quality Specifications<sup>a1</sup></b>				■	■	■	■	■	
<b>Health Protective Constituents (HPC) – <u>Carcinogenic<sup>2</sup>Cancer risk<sup>b</sup></u></b>									
Arsenic	<u>0.002019</u> <u>mg/m<sup>3</sup></u> <u>(0.0006)</u> <u>ppmv</u>	<u>0.004019</u> <u>mg/m<sup>3</sup></u> <u>(0.00136)</u> <u>ppmv</u>	<u>0.48-010</u> <u>mg</u> <u>/m<sup>3</sup></u> <u>(0.15-031)</u> <u>ppmv</u>	■					■
<u>1,4p-</u> Dichlorobenzenes	<u>5.74.3</u> <u>mg/m<sup>3</sup></u> <u>(0.6995)</u> <u>ppmv</u>	<u>4257</u> <u>mg/m<sup>3</sup></u> <u>(6.7539.5)</u> <u>ppmv</u>	<u>10040</u> <u>mg/m<sup>3</sup></u> <u>24(16.07)</u> <u>ppmv</u>	■	■	■	■		■
<u>Cadmium</u>	<u>0.0020</u> <u>(0.0004)</u>	<u>0.0032</u> <u>(0.0007)</u>	<u>0.0080</u> <u>0.0017</u>		■	■			■
<u>Chromium<sup>d</sup></u>	<u>0.0020</u> <u>(0.0009)</u>	<u>0.0048</u> <u>(0.0022)</u>	<u>0.012</u> <u>(0.0055)</u>	■		■			■
Ethylbenzene	<u>26</u> <u>mg/m<sup>3</sup></u> <u>6.0</u> <u>ppmv(4)</u>	<u>260</u> <u>mg/m<sup>3</sup></u> <u>190</u> <u>60</u> <u>ppmv(42)</u>	<u>650</u> <u>mg/m<sup>3</sup></u> <u>490</u> <u>150</u> <u>ppmv(109)</u>	■	■	■	■		■
N-nitroso-di-n-propylamine	<u>0.033</u> <u>mg/m<sup>3</sup></u> <u>0.028</u> <u>0.006</u> <u>ppmv(0.01)</u>	<u>0.33</u> <u>mg/m<sup>3</sup></u> <u>0.24</u> <u>0.06</u> <u>ppmv(0.04)</u>	<u>0.81</u> <u>mg/m<sup>3</sup></u> <u>0.61</u> <u>0.15</u> <u>ppmv(0.11)</u>	■	■				■
Vinyl Chloride	<u>0.84</u> <u>mg/m<sup>3</sup></u> <u>0.63</u> <u>0.33</u> <u>ppmv(0.24)</u>	<u>8.4</u> <u>mg/m<sup>3</sup></u> <u>6.3</u> <u>(2.38)3.3</u> <u>ppmv</u>	<u>21</u> <u>mg/m<sup>3</sup></u> <u>15</u> <u>8.3</u> <u>ppmv(5.67)</u>	■	■	■	■		■
<b>Health Protective Constituents (HPC) - <u>Non-Cancer risk<sup>b</sup>Carcinogenic<sup>2</sup></u></b>									
Antimony	<u>0.600.062</u> <u>mg/m<sup>3</sup></u> <u>0.12(0.01)</u> <u>ppmv</u>	<u>6.0</u> <u>mg/m<sup>3</sup></u> <u>0.62</u> <u>4.2</u> <u>ppmv(0.12)</u>	<u>30</u> <u>mg/m<sup>3</sup></u> <u>3.1</u> <u>6.4</u> <u>ppmv(0.6)</u>	■					■
<u>Copper</u> <u>Silicon</u>	<u>0.490.060</u>	<u>5.00.60</u>	<u>253.0</u> <u>mg/m<sup>3</sup></u>	■	■	■	■		■

Canceling \_\_\_\_\_

Cal. P.U.C. Sheet No. \_\_\_\_\_  
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<u>Compounds</u> <u>(as Si) f</u>	<u>mg/m<sup>3</sup></u> <u>(0.41)0.02</u> <u>ppmv</u>	<u>mg/m<sup>3</sup></u> <u>(4.2)0.23</u> <u>ppmv</u>	<u>(21.0)1.2</u> <u>ppmv</u>					
Hydrogen Sulfide <sup>e6</sup>	<u>30 mg/m<sup>3</sup>63</u> <u>22 ppmv(44)</u>	<u>300</u> <u>mg/m<sup>3</sup>860</u> <u>216</u> <u>ppmv(596)</u>	<u>1,500</u> <u>mg/m<sup>3</sup>4,300</u> <u>1,080</u> <u>ppmv(2,978)</u>	■	■	■	■	■
Lead	<u>0.075</u> <u>mg/m<sup>3</sup>0.047</u> <u>0.009</u> <u>ppmv(0.005)</u>	<u>0.75</u> <u>mg/m<sup>3</sup>0.47</u> <u>0.09</u> <u>ppmv(0.054)</u>	<u>3.8</u> <u>mg/m<sup>3</sup>2.3</u> <u>0.44</u> <u>ppmv(0.262)</u>	■		■		■
Alkyl Thiols (Mercaptans) <sup>e6</sup>	<u>-</u> <u>12 ppmv(17)</u>	<u>- 120</u> <u>ppmv(170)</u>	<u>- 640</u> <u>ppmv(860)</u>	■	■	■	■	■
<u>MethacroleinChloroc</u> <u>arbons</u> <u>(as CL) f</u>	<u>4.91.1</u> <u>mg/m<sup>3</sup></u> <u>(3)0.37</u> <u>ppmv</u>	<u>5011 mg/m<sup>3</sup></u> <u>(33)3.7 ppmv</u>	<u>25053</u> <u>mg/m<sup>3</sup></u> <u>(167)18</u> <u>ppmv</u>	■	■	■	■	■
<u>TolueneFluorocarbo</u> <u>ns (as F) f</u>	<u>7.4904</u> <u>mg/m<sup>3</sup></u> <u>(9)240 ppmv</u>	<u>759,000</u> <u>mg/m<sup>3</sup></u> <u>(93)2,400</u> <u>ppmv</u>	<u>37045,000</u> <u>mg/m<sup>3</sup></u> <u>(460)12,000</u> <u>ppmv</u>	■			■	■

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Vice President  
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**STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)**

**K. RENEWABLE GAS QUALITY AND SPECIFICATIONS (Continued)**

Table 1 (Continued) Maximum Constituent Concentrations								
Renewable Gas Injection Constituents				Testing for Gas Source				
	Trigger Level	Lower Action Level	Upper Action Level	Landfill Non-Hazardous	Dairies	Sewage Treatment	Food/Green	Other <sup>i</sup>
<b>Integrity Protective Constituents (IPC)<sup>c3</sup></b>								
Ammonia	0.0004% (3 mg/m <sup>3</sup> ) (4 ppm <sub>v</sub> )	0.001% (7 mg/m <sup>3</sup> ) (10 ppm <sub>v</sub> )	0.0025% (18 mg/m <sup>3</sup> ) (25 ppm <sub>v</sub> )	■	■	■	■	■
Carbon Monoxide	0.03% (300 ppm <sub>v</sub> )	TBD	TBD					■ <sup>j</sup>
Hydrogen <sup>i</sup>	0.10% (1000 ppm <sub>v</sub> )	1.0% <sup>5</sup> (10,000 ppm <sub>v</sub> )	5.0% <sup>5</sup> (50,000 ppm <sub>v</sub> )	■	■	■	■	■
Mercury	0.08 mg/m <sup>3</sup> (0.01 ppm <sub>v</sub> )	TBD <sup>g5</sup>	TBD <sup>g5</sup>	■	■	■	■	■
Siloxanes <sup>h</sup>	0.05 mg Si/m <sup>3</sup> (0.04 ppm <sub>v</sub> )	0.1 mg Si/m <sup>3</sup> (0.08 ppm <sub>v</sub> )	0.3 mg Si/m <sup>3</sup> (0.25 ppm <sub>v</sub> )	■	■	■	■	■

**Notes:**

a. Base Utility Gas Specifications are identified in K1.

b. Health Protective Constituents (HPC) are shown in Table ~~V-32~~ of the 2023 CARB/OEHHA AB1900 Supplemental Report.

c. Integrity Protective Constituents are shown in Section 4.4.3.3 of D.14-01-034 and identified as pipeline-integrity protective constituents.

d. Evaluate as only total chromium.

~~e. 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").~~

e. Testing requirement will be the stricter of the stated Renewable Gas values or other tariff requirements.

f. The compounds for these chemical classes per Appendix A and Section 4.4 of the 2023 CARB/OEHHA AB1900 Supplemental Report or newest published version.

~~e.g.~~ The Lower and Upper Action Levels are specific to Biomethane pursuant to Decision 22-12-057 and will continue to be reviewed in the next update proceeding.

h. The Interconnector that meets this Rule's Section K.4.b certification requirements shall have reduced siloxanes testing requirements per K.5.e.ii.a. 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, the full siloxanes testing requirements will apply as described in this Rule.

i. Lower Action Level and Upper Action Level is specific to the by-product of the biomethane production process and is not intended as a pure hydrogen blending limit.

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fj. Carbon Monoxide will be tested in Bio-SNG only.

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Chief Regulatory Officer

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STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)

K. RENEWABLE GAS QUALITY AND SPECIFICATIONS (Continued)

**Table 2**  
**Collective Risk from Carcinogenic Cancer and Non-Cancer Risk Management Thresholds for carcinogenic Constituents**

<b>Risk Management Levels</b>	<b><u>Potential Risk from Carcinogenic Cancer Risk Constituents</u></b> (Chances in a million)	<b><u>Hazard Index from Non-Cancer Total Hazard Quotient Carcinogenic Constituents</u></b>	<b>Action</b>
Trigger Level <sup>a1</sup>	≥ <del>1.0</del>	≥0.1	Periodic Testing Required
Lower Action Level <sup>b2</sup>	≥ <del>10.0</del>	≥ <del>1.0</del>	<del>Biomethane Gas</del> supply shut-in and repair after three exceedances in 12 months in which deliveries occur
Upper Action Level <sup>b3</sup>	≥ <del>25.0</del>	≥ <del>5.0</del>	Immediate supply shut-in and repair

<sup>a1</sup> Applies to individual Constituent concentrations  
<sup>b2</sup> Applies to the sum of all Constituent concentrations over the Trigger Level.  
<sup>b3</sup> ~~Applies to individual Constituent concentrations or to the sum of all Constituent concentrations over the Trigger Level.~~

3. RESERVED

4. Interconnector Renewable Gas Source Certification

a. Non-Hazardous Waste Facility

Renewable Gas sourced from Hazardous Waste Landfills will not be knowingly purchased, accepted into or transported on the pipeline system.

i. Interconnector must certify and provide documentation or other suitable proof that: the Renewable Gas source feedstock was not derived or collected from a Hazardous Waste Facility, as that term is defined in Section 25117.1 of the California Health and Safety Code, as may be amended from time to time, and Interconnector is in compliance with the following Health and Safety Code Sections 25421(g)(1) and (2), as they may be amended from time to time.

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STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)

K. RENEWABLE GAS QUALITY AND SPECIFICATIONS (Continued)

4. Interconnector Renewable Gas Source Certification (Continued)

b. Siloxanes

To qualify for reduced siloxanes testing, Interconnector must execute Utility's certification attesting that:

- i. Interconnector's Biogas is sourced only from dairy, animal manure, agricultural waste, forest residues, and/or commercial food processing waste;
- ii. Products containing siloxanes are not used at Interconnector's Facilities in any way that allow siloxanes to enter the Biogas and/or Biomethane and
- iii. Interconnector shall notify Utility within 30 days of discovery, in accordance with the notice provision of the associated interconnection agreement, that the certifications set forth in the above paragraphs are no longer true.

5. Testing

a. Source Feedstock Based Testing

Testing shall be determined according to the source feedstock per Table 1 above. The interconnector shall specify their source feedstock. For facilities utilizing multiple gas sources or co-digestion, where smaller amounts of different gas source types are utilized to increase methane production, the facility will be required to test for all of the COCs for each source feedstock utilized.

-Testing for the Health Protective Constituents shall be by the recommended methods specified in Table V-4 of the 2023 CARB/OEHHA AB1900 Supplemental Report submitted in or newest published version R.13-02-008 as approved by D.14-01-034 or an equivalent national standard test. Testing for Integrity Protective Constituents shall be by the sample method and lab test methods listed in Table 3 below national standard test methods or equivalent. Feedstock Based Testing, as described in this section, also applies to any new gas source supplying Renewable Gas upstream of an existing gas interconnection point.

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b. Testing Responsibility

i. Interconnector Pre-Injection and Restart Procedure Testing

Pre-injection and Restart Procedure testing for gas quality will be performed by the Interconnector using independent certified third-party laboratories. The Utility shall be notified of the sampling a minimum of five business days in advance and have the option to observe the samples being taken.

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**STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)**

**K. RENEWABLE GAS QUALITY AND SPECIFICATIONS (Continued)**

<b>Table 3 Test Methods for Integrity Protective Constituents</b>		
<b>Constituent of Concern</b>	<b>Sample Method</b>	<b>Lab Test Method</b>
Ammonia	Collect samples in sulfuric acid treated silica gel sorbent tubes (NIOSH Method 6015)	Visible spectrophotometry (NIOSH Method 6015)
	Collect samples in glass tubes containing carbon beads impregnated with sulfuric acid (OSHA Method ID-188)	Ion chromatography conductivity detector IC/CD (OSHA Method ID-188)
	Bubbled through impinger system containing sulfuric acid and silica gel (South Coast Air Quality Management District Method 207.1)	Ion specific electrode ISE (South Coast Air Quality Management District Method 207.1)
	Collect samples in Tedlar bag or inert cylinders	Gas chromatograph/nitrogen chemiluminescence detector GC-NCD
<u>Carbon Monoxide</u>	<u>Collect samples in cylinders or canisters</u>	<u>Gas Chromatograph GC (EPA 3C, ASTM Methods D1946 or D7833)</u>
Hydrogen	Collect samples in cylinders or canisters	Gas Chromatograph GC (EPA 3C, ASTM Methods D1945, D1946 or D7833)
Mercury <sup>a</sup>	Bubble through aqueous acidic solution of hydrogen peroxide and aqueous acidic solution of potassium permanganate (EPA Method 29)	Cold vapor atomic absorption spectroscopy CVAAS (EPA Method 29, EPA Compendium Method IO-3.5)
	Collect samples on gold-coated silica beads (ASTM Method D5954)	Atomic absorption spectroscopy AAS (ASTM Method D5954)
	Collect samples on gold-coated silica sand trap (ASTM Method D6350)	Atomic fluorescence spectroscopy AFS (ASTM Method D6350)
Siloxanes <sup>b</sup>	Collect samples in cylinders or through sorbent tubes (ASTM Method D8230) or through impingers containing methanol solution.	Gas chromatograph/mass spectrometer GC/MS or gas chromatograph/atomic emission detector GC/AED (ASTM Method D8230) or gas chromatograph/ion mass spectrometer GC/IMS (ASTM Method D8455)
Biologicals	Flow samples through filtration funnel and collect on 0.2 um filters.	qPCR for APB, IOB, SRB

- a. Mercury represents total mercury, not only elemental mercury.  
b. Siloxanes is a total value inclusive of Trimethylsilanol, Hexamethyldisiloxane (L2), Octamethyltrisiloxane (L3), Decamethyltetrasiloxane (L4), Dodecamethylpentasiloxane (L5), Hexamethylcyclotrisiloxane (D3), Octamethylcyclotetrasiloxane (D4), Decamethylcyclopentasiloxane(D5), and Dodecamethylcyclohexasiloxane(D6).  
c. Acronyms:  
ASTM                      ASTM International

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EPA Environmental Protection Agency  
NIOSH National Institute for Occupational Safety & Health

Advice Letter No. 864 Issued by ~~John P. Hester~~ Amy L. Timperley Date Filed March 23, 2011  
Decision No. \_\_\_\_\_ ~~Senior Vice President~~ Chief Regulatory Officer April 24, 2011 Effective  
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STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)

K. RENEWABLE GAS QUALITY AND SPECIFICATIONS (Continued)

5. Testing (Continued)

b. Testing Responsibility (Continued)

ii. Utility Period Testing

The Utility will collect the samples and send the samples to an independent certified laboratory for Constituent analyses. The results will be shared with the Interconnector within two weeks of the Utility receiving the data. If it is agreed to by both parties, the Interconnector can be the periodic testing entity at the interconnection.

c. Cost Responsibility

Interconnector is responsible for Pre-Injection, Periodic Testing and Restart testing costs. If requested, any retesting for validation of results shall be done at the cost of the entity requesting the retest.

d. Utility Discretionary Testing

This Rule does not prohibit the Utility from engaging in discretionary gas or facility testing on its system at Utility's expense.

e. Pre-Injection Testing Procedure

Interconnector will conduct two successful tests for all Constituents over a two to four-week period, preferably, at least two weeks apart.

i. Health Protective Constituents

If during the pre-injection testing, any Health Protective Constituents are found at or above the Trigger Level, the collective potential cancer or non-cancer risk must be calculated. The collective potential cancer or non-cancer risk is calculated by summing the individual risk for each Health Protective Group 2 Compound.

If the collective potential cancer risk or non-cancer risk is at or above the Lower Action Level (the cancer risk Lower Action Level is  $\geq 10$  in a million and the non-cancer risk Lower Action Level is a Hazard Index of  $\geq 1$ ), the Renewable Gas cannot be accepted or transported by the Utility's pipeline system.

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STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)

K. RENEWABLE GAS QUALITY AND SPECIFICATIONS (Continued)

5. Testing (Continued)

e. Pre-Injection Testing Procedure (Continued)

i. Health Protective Constituents (Continued)

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

If all the Health Protective Constituents are below the Trigger Level or the collective potential cancer risk and non-cancer risk from the Group 2 Compounds are below the Lower Action Level in both pre-injection tests, the Renewable Gas may be injected into the pipeline system subject to all other requirements set forth in this Rule.

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 of this Rule, 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.

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STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)

K. RENEWABLE GAS QUALITY AND SPECIFICATIONS (Continued)

5. Testing (Continued)

e. Pre-Injection Testing Procedure (Continued)

ii. Integrity Protective Constituents (Continued)

a) Reduced Siloxanes Testing (Continued)

~~(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 Trigger 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.

~~(iiv)~~ 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 Trigger 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.

(ii) To ensure Renewable Gas is commercially free of biologicals (>0.2 microns), 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 Renewable Gas may be injected into the Utility's system subject to all other requirements set forth in this Rule.

f. Periodic Testing

i. Group 1 Compounds



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- a) Group 1 Compounds will be tested once every 12-month period in which injection occurs.

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STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)

K. RENEWABLE GAS QUALITY AND SPECIFICATIONS (Continued)

5. Testing (Continued)

f. Periodic Testing (~~Continued~~)

i. Group 1 Compounds (~~Continued~~)

b) Any Group 1 Compounds with a concentration below the Trigger Level for two consecutive annual tests will be tested once every two-year period in which injection occurs.

c) A Group 1 Compound will become a Group 2 Compound if testing indicates a concentration at or above the Trigger Level and will be tested quarterly.

ii. Group 2 Compounds

a) Testing for Group 2 Compounds will be quarterly (at least once every three-month period in which injection occurs).

b) Any Group 2 Compound with a concentration below the Trigger Level in four consecutive quarterly tests will become a Group 1 Compound and will be tested once every 12-month period in which injection occurs.

c) If any constituent is above the Upper Action Level, the Renewable Gas shall be shut-in until the concentration level is below the Lower Action Level, after which it will be subject to the Section K.5.g. Restart Procedure.

iii. Collective risk from ~~Carcinogenic-Cancer~~ and Non-~~carcinogenic-Cancer~~ Health Protective Constituents

a) Cancer Risk

The collective potential cancer risk for Group 2 Compounds is determined by summing the individual potential cancer risk for each ~~carcinogenic-cancer~~ Constituent of Concern. Specifically, the cancer risk is calculated using the ratio of the concentration of the Constituent in the Renewable Gas to the health protective ("trigger") concentration value corresponding to one in a million cancer risk for that specific Constituent and then summing the risk for all the Group 2 Compounds. (for reference, see CARB/OEHHA Report submitted in R.13-02-008, p. 67)

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STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)

K. RENEWABLE GAS QUALITY AND SPECIFICATIONS (Continued)

5. Testing (Continued)

f. Periodic Testing (Continued)

iii. Collective risk from Carcinogenic and Non-carcinogenic Health Protective Constituents (Continued)

b) Non-Cancer Risk

The collective non-cancer risk is calculated using the ratio of the concentration of the constituent in Renewable Gas to the health protective concentration value corresponding to a hazard quotient of 0.1 for that specific non-~~carcinogenic~~-cancer constituent, then multiplying the ratio by 0.1, and then summing the non-cancer chronic risk for these Group 2 compounds. (for reference, see CARB/OEHHA Report submitted in R.13-02-008, p. 67)

c) If the result is at or above the Lower Action Level on three occurrences in a 12-month period, the Renewable Gas shall be immediately shut-in until the levels are below the Lower Action Level, after which it will be subject to the Restart Procedures.

~~d) If quarterly testing over four consecutive tests demonstrates that the collective risk from Carcinogenic and Non-carcinogenic Constituents is below the Lower Action Level, then the testing period will change to once every 12-month period during which injection occurs for each Constituent in the group.~~

~~e) If annual testing demonstrates that collective risk from Carcinogenic and Non-carcinogenic Group 2 Compounds is at or above the Lower Action Level, then testing will revert to quarterly.~~

~~f) If the collective risk from Carcinogenic-Cancer risk or Non-carcinogenic-cancer risk Constituents, is at or above the Upper Action Level, the Renewable Gas shall be shut-in until the concentration is below the Lower Action Level, after which it will be subject to the Restart Procedures.~~

~~g) If Interconnector's Renewable Gas is refused in accordance with this Rule, testing for all Group 1 and Group 2 Compounds will then be performed according to the Restart Procedure.~~

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STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)

K. RENEWABLE GAS QUALITY AND SPECIFICATIONS (Continued)

5. Testing (Continued)

f. Periodic Testing (Continued)

iv. Integrity Protective Constituents

- a) Constituents shall be tested once every 12-month period in which injection occurs.
- b) Any Constituent with a concentration at or below the Trigger Level during two (2) consecutive annual periodic tests shall be tested once every two-year period in which injection occurs.
- c) If periodic testing demonstrates that any Constituent is above the Trigger Level, then it will be tested quarterly.
- d) If the Constituent is above the Trigger Level, then it will be tested quarterly until there are four (4) consecutive quarterly tests at or below the Trigger Level, then it will be reduced to once every 12-month period in which deliveries occur.
- e) When any Constituent is above the Lower Action Level three times in a 12- month period, the Renewable Gas shall be immediately shut-in and subject to Restart Procedures set forth in Section K.5.g. of this Rule.

f) When any Constituent is above the Upper Action Level, the Renewable Gas shall be immediately shut-in and subject to Restart Procedures set forth in Section K.5.g. of this Rule.

g. Restart Procedure

- i. Interconnector will repeat the Pre-Injection Testing Procedure until one successful test of all Constituents is completed, when any of the following occurs:
  - a) There is a change in the Gas source at the facility or a change of the Gas processing equipment design (other than for functional equivalence) that the Commission determines will potentially increase the level of any Constituent over the previously measured baseline levels.

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STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)

K. RENEWABLE GAS QUALITY AND SPECIFICATIONS (Continued)

5. Testing (Continued)

g. Restart Procedure (Continued)

b) A shut-in of the Renewable Gas into the pipeline because there are three exceedances of the Lower Action Level in a 12-month period of the same Constituent.

c) A shut-in of the Renewable Gas into the pipeline because a Constituent concentration or the collective cancer or non-cancer risk is above the Upper Action Level.

ii. After re-starting Renewable Gas deliveries, Periodic Testing will resume based on the results of the successful test.

h. Reporting and Record Keeping Requirements

Reporting and Record Keeping will be in compliance with D.14-01-034 and the CARB/OEHHA Report and includes the following:

i. Pre-injection testing results shall be provided by Interconnector to the Utility within five days of receiving the data.

ii. Startup test results from the initial successfully completed Pre-injection testing shall be provided to Commission within 30 days of receiving the test data by the testing entity (Utility or Interconnector).

iii. Maintain records of all test results for 3 years from the date when the tests were conducted by the testing entity (Utility or Interconnector).

iv. Annual report to Commission: all test data, production rate, monitoring parameters, and shutoff events.

v. If the Utility is the testing entity, test results shall be provided by Utility to the Interconnector within two weeks of receiving the data. Test data that results in a shut-in off shall be provided by Utility to the Interconnector within 24 hours of receiving the data.

vi. If the Interconnector is the testing entity, the Interconnector shall provide the above information to the Utility within two weeks of receiving the data. Test data that would result in a shut-in will be provided by Interconnector to the Utility within 24 hours of receiving the data.

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STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)

L. PIPELINE BLENDING EXCEPTION STUDY (BLENDING STUDY)

1. Intent

In an effort to encourage interconnections of Renewable Gas to Utility pipelines as ordered in D.19-05-018, the Utility will review and consider each blending request thoroughly and make a determination regarding each request. Blending exception requests will be accepted if the Renewable Gas is interchangeable with historical or contractual Gas supplies after blending and will not cause increased risk or safety concerns to the Utility's employees, downstream customers or pipeline. The Interconnector requesting the Blending Study will be responsible for the cost for the Utility to conduct the Blending Study and provide a determination.

2. Interconnector Blending Study Request

Interconnector may request a Blending Study to determine the Utility's downstream blending capability from an Interconnection Point, or proposed Interconnection Point, and the associated Utility monitoring and equipment enhancement costs, if any to be borne by Interconnector.

Interconnector may request an exception to the Gas quality and Heating Value standards established in this rule for a Receipt Point to allow blending in the pipeline of conditioned or upgraded Raw Product Gas or Biogas that does not meet all gas specifications at the Interconnection Point to achieve pipeline gas quality specifications.

Interconnector may initiate a Blending Study request as part of the Interconnection Screening or a subsequent Preliminary or Detailed Engineering Study.

The Blending Study will evaluate feasibility of blending to determine interchangeability with historical or contractual Gas supplies and the increased risk or safety concerns to the Utility's employees, downstream customers or pipeline.

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STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)

L. PIPELINE BLENDING EXCEPTION STUDY (BLENDING STUDY) (Continued)

2. Interconnector Blending Study Request (Continued)

The Utility will evaluate whether it is safe to authorize blending following receipt of the request that shall include the following:

- a. Desired interconnect location(s) on the Utility's system
- b. Maximum and minimum flow rates, including seasonal variations, if appropriate
- c. Maximum concentrations of all Constituents listed within this Rule
- d. Maximum and minimum Heating Value and Wobbe Index
- e. Ability of Interconnector to accept limits on flow rates
- f. Reason for request
- g. Information collected from Interconnection Request

3. Utility Evaluation

If blending is requested, the Utility will evaluate requests for safely blending into the pipeline to determine whether injection of any new or modified supply source can be safely injected into the Utility's pipeline system. At a minimum, the Utility will consider the following factors when determining whether an exception can be allowed:

- a. Flow rates and directional consistency of receiving pipeline(s), including daily and seasonal variations.
- b. Historical Gas composition and contractual Gas quality specification at the Utility's receipt points and area of influence for purposes of determining impact on a Btu District.
- c. Current and expected future composition of Gas supplies at the Utility's Receipt Points for the purpose of determining interchangeability on customers' end use equipment and the pipeline system's future capability to accommodate supplies.

RULE NO. 22

Sheet  
479

STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)

L. PIPELINE BLENDING EXCEPTION STUDY (BLENDING STUDY) (Continued)

3. Utility Evaluation (Continued)

- d. Potential for increased internal corrosion threat at and through the Receipt Point, Receipt Point pipeline lateral and receiving pipelines due to Gas composition.
- e. Current and future customers in receiving pipeline flow rate, distance to these customers, time to first receiving customer, and anticipated downstream Gas demand growth.
- f. Maximum time and distance required for complete mixing to occur under all pipeline flow conditions.
- g. The design, operation, and overall condition of the receiving pipeline(s), including any sensitivities to Gas Constituents.
- h. Additional monitoring, control, and/or mixing equipment that may be required to verify and ensure that adequate blending has occurred in the receiving pipeline system.

A request for gas quality exception will be undertaken as part of the Interconnection Screening or subsequent Preliminary and Detailed Engineering Studies upon receipt of all requested information. The evaluation will be completed within 30 additional business days.

4. Utility Report

Utility shall provide the Interconnector, within thirty (30) business days, with the acceptance or denial of blending request with the associated Interconnection Screening or subsequent Preliminary and Detailed Engineering Studies.

The Utility will notify the Energy Division of each request for exception, and state whether the request is granted or denied along with reason for denial.



RULE NO. 22

Sheet  
4850

STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)

L. PIPELINE BLENDING EXCEPTION STUDY (BLENDING STUDY) (Continued)

4. Utility Report (Continued)

a. Acceptance

For each granted request, the Utility shall provide a determination of the following:

- i. Volumetric flow rate: Authorized volume for blending, or a specific volume that is less than requested, and the conditions under which flow will be limited or otherwise restricted;
- ii. Length of time authorization valid: How long authorization for blending in the pipeline is valid before it must be re-evaluated; and
- iii. Special conditions: Any restrictions, special conditions, and/or special equipment, as determined by the Utility, required to grant acceptance.

b. Denial

If denied, a written explanation of the basis for denial and all engineering evaluations and calculations prepared to evaluate the request will be provided to the Interconnector. The explanation may include, but not be limited to:

- i. Historical pipeline flow profiles and proposed Interconnector flow
- ii. Historical compositions or contractual gas quality value used in the analysis
- iii. Customer and/or safety impact

Information is subject to a non-disclosure agreement for confidential information, if any.

5. Utility Right to Re-evaluate and Rescind Blending

The Utility shall have the continuing right at any time to re-evaluate, revise, and potentially rescind, the granted exception allowing for blending in the pipeline due to insufficient flow, ongoing operations, changes in the way the Utility manages the operation of its system, or requirements in accordance with the Utility's CPUC-approved tariffs.

RULE NO. 22

Sheet  
4951

STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)

M. DISCONTINUANCE AND TERMINATION

Discontinuance of use and/or termination will be administered pursuant to the terms of the Interconnector and Utility interconnection agreement.

N. DISPUTE RESOLUTION

1. The Commission shall have initial jurisdiction to interpret, add, delete, or modify any provision of this Rule and/or tariff ("Interconnection Tariff") and to resolve disputes regarding Utility's performance of its obligations under the Interconnection Tariff pursuant to this Rule.
2. Any dispute arising between Utility and Interconnector (individually referred to as "Party" and collectively "the Parties") regarding Utility's or Interconnector's performance of its obligations under the Interconnection Tariffs shall be resolved according to the following procedures:
  - a. The dispute shall be documented in a written notice by the aggrieved Party to the other Party containing the relevant known facts pertaining to the dispute, the specific dispute and the relief sought, and express written notice by the aggrieved Party that it is invoking the procedures under this Section. The written notice shall be sent to the Party's email address and physical address set forth in any interconnection agreement between the Parties or the Interconnection Request, if there is no interconnection agreement. The receiving Party shall acknowledge the written notice within ten (10) Days of its receipt.
  - b. The Parties shall negotiate in good faith to resolve the dispute. If a resolution is not reached in forty-five (45) Days from the date of the written notice, either 1) a Party may request to continue negotiations for an additional forty-five (45) Days or 2) the Parties may by mutual agreement make a written request for mediation to the Alternative Dispute Resolution (ADR) Coordinator in the Commission's administrative law judge (ALJ) Division. The request may be submitted by electronic mail to [adr\\_program@cpuc.ca.gov](mailto:adr_program@cpuc.ca.gov). The dispute and its resolution shall be governed by the Commission's ADR rules and procedures. Alternatively, both Parties by mutual agreement may request mediation from an outside third-party mediator with costs to be shared equally between the Parties.

RULE NO. 22

Sheet  
5052

STANDARD RENEWABLE GAS INTERCONNECTIONS  
TO THE UTILITY'S PIPELINE SYSTEM (Continued)

N. DISPUTE RESOLUTION (Continued)

3. If resolution is not reached pursuant to this Section N., either Party may file a formal complaint before the Commission pursuant to California PUC section 1702 and Article 4 of the Commission's Rules of Practice and Procedure. Nothing in this section shall be construed to limit the rights of any Party to exercise rights and remedies under applicable Commission decision, order, rule or regulation.
4. Pending resolution of any dispute under this Section, the Parties shall proceed diligently with the performance of their respective obligations under the Interconnection Tariffs, unless the related agreements have been terminated. Disputes as to the Interconnection Request and implementation of this Section shall be subject to resolution pursuant to the procedures set forth in this Section.
5. Guidance can be provided in letter form by the Director of Energy Division or designated delegate.
6. Notwithstanding anything to the contrary set forth in this Section N, if Utility and Interconnector are parties to one or more of the agreements relating to the interconnection to the Utility's pipeline system, and any such agreement(s) includes a dispute resolution procedure, the dispute resolution procedure set forth in such agreement(s) shall control over the dispute resolution procedure set forth in this Section N.



# 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:  
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:

## ENERGY Advice Letter Keywords

Affiliate	Direct Access	Preliminary Statement
Agreements	Disconnect Service	Procurement
Agriculture	ECAC / Energy Cost Adjustment	Qualifying Facility
Avoided Cost	EOR / Enhanced Oil Recovery	Rebates
Balancing Account	Energy Charge	Refunds
Baseline	Energy Efficiency	Reliability
Bilingual	Establish Service	Re-MAT/Bio-MAT
Billings	Expand Service Area	Revenue Allocation
Bioenergy	Forms	Rule 21
Brokerage Fees	Franchise Fee / User Tax	Rules
CARE	G.O. 131-D	Section 851
CPUC Reimbursement Fee	GRC / General Rate Case	Self Generation
Capacity	Hazardous Waste	Service Area Map
Cogeneration	Increase Rates	Service Outage
Compliance	Interruptible Service	Solar
Conditions of Service	Interutility Transportation	Standby Service
Connection	LIEE / Low-Income Energy Efficiency	Storage
Conservation	LIRA / Low-Income Ratepayer Assistance	Street Lights
Consolidate Tariffs	Late Payment Charge	Surcharges
Contracts	Line Extensions	Tariffs
Core	Memorandum Account	Taxes
Credit	Metered Energy Efficiency	Text Changes
Curtable Service	Metering	Transformer
Customer Charge	Mobile Home Parks	Transition Cost
Customer Owned Generation	Name Change	Transmission Lines
Decrease Rates	Non-Core	Transportation Electrification
Demand Charge	Non-firm Service Contracts	Transportation Rates
Demand Side Fund	Nuclear	Undergrounding
Demand Side Management	Oil Pipelines	Voltage Discount
Demand Side Response	PBR / Performance Based Ratemaking	Wind Power
Deposits	Portfolio	Withdrawal of Service
Depreciation	Power Lines	