



**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

FILED

07-31-12
09:54 AM

In the Matter of the Application of
Southern California Gas Company (U 904
G) to Establish a Biogas Conditioning &
Upgrading Services Tariff

Application 12-04-024
(Filed April 25, 2012)

**MOTION FOR PARTY STATUS
OF AGRICULTURAL ENERGY CONSUMERS ASSOCIATION**

Michael Boccadoro
For AGRICULTURAL ENERGY
CONSUMERS ASSOCIATION
925 L Street, Suite 800
Sacramento, CA 95814
Telephone: (916) 441-4383
Facsimile: (916) 441-4132
E-mail: mboccadoro@dolphingroup.org

Ann L. Trowbridge
DAY CARTER & MURPHY LLP
3620 American River Drive, Suite 205
Sacramento, CA 95864
Telephone: (916) 570-2500, ext. 103
Facsimile: (916) 570-2525
E-mail: atrowbridge@daycartermurphy.com
**Attorneys for Agricultural Energy
Consumers Association**

July 31, 2012

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

In the Matter of the Application of
Southern California Gas Company (U 904
G) to Establish a Biogas Conditioning &
Upgrading Services Tariff

Application 12-04-024
(Filed April 25, 2012)

**MOTION FOR PARTY STATUS
OF AGRICULTURAL ENERGY CONSUMERS ASSOCIATION**

Pursuant to Rule 1.4 of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission or CPUC), Agricultural Energy Consumers Association (AECA) moves for party status in this proceeding.

1. Agricultural Energy Consumers Association

AECA is an incorporated nonprofit association registered with the California Secretary of State (C1682808). AECA is authorized pursuant to its articles of incorporation and bylaws to represent and advocate the interests of agricultural customers of electrical and gas utilities in California. AECA is not established or formed by a local government entity for the purpose of participating in Commission proceedings, although it does have some public water agencies as members. At the present time, AECA's members include individual producers, processors, produce cooling operations, agricultural water agencies and member agricultural associations. The vast majority of these members are direct customers of Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas and Electric Company, and Southern California Gas Company.¹

2. Basis for Interest

In its Application to Establish a Biogas Conditioning & Upgrading Services Tariff (Application), Southern California Gas Company (SCG) proposes a new service "to meet the current and future needs of biogas producers seeking to upgrade their biogas for pipeline injection, onsite power generation or compressed natural gas (CNG) vehicle fueling stations." Under this proposal, SCG would install and operate a biogas conditioning/operating facility on or adjacent to a customer's premises to process and upgrade raw biogas.

¹ The agricultural associations' members are not direct customers of the utilities but collectively represent thousands of agricultural customers.

AECA members include dairies and other agricultural entities who are interested in development of a viable biogas market. AECA has actively participated in various CPUC proceedings where issues of import to the biogas industry have been considered.

Over the last decade, there has been significant attention and public policy focused on the concept of widespread biogas projects at California dairies, food processing facilities, and sanitation agencies, and the potential of such projects to produce renewable energy and capture and reduce greenhouse gas (GHG) emissions. Interest in biogas projects has increased in recent years as state policymakers identify opportunities to reduce GHG emissions under the landmark “Global Warming Solutions Act of 2006” (AB 32). Despite this clear interest, fewer than two dozen dairies in California have installed methane digesters. Today, fewer than half of these digesters still operate. Several wastewater agencies have also pursued biogas projects, but technology implementation is not widespread. Various obstacles, including the capital costs of infrastructure required for biogas conditioning and a lack of proper price signals, contribute to this result. The biogas conditioning and upgrading services tariff proposed in the Application could provide an important tool to help resolve some of the current obstacles to the desired deployment of biogas technology.

AECA members are gas and retail electric customers who will be directly affected by the biogas conditioning and upgrading services tariff proposed in the Application. As a representative of agricultural interests, AECA’s interests differ from those of other current participants in this proceeding. Accordingly, AECA seeks to participate in this proceeding to make sure the interests of its members in development of a viable biogas market, and in just and reasonable rates, and efficient, reliable service, are represented.

AECA is still reviewing and analyzing the Application. Preliminarily, AECA has identified the following issues it expects to address in this proceeding: (1) the need for the proposed biogas conditioning and upgrading service, (2) cost allocation, and (3) any other issues that may be raised in this proceeding that affect the agricultural sector.

AECA’s participation in this proceeding will not prolong or delay this proceeding, nor will it adversely impact the interests of existing parties. Conversely, the interests of AECA’s members will be adversely impacted if this motion is not granted.

3. Service

All pleadings and other communications in connection with this proceeding should be served as follows:

Michael Boccadoro
For AGRICULTURAL ENERGY
CONSUMERS ASSOCIATION
925 L Street, Suite 800
Sacramento, CA 95814
Telephone: (916) 441-4383
Facsimile: (916) 441-4132
E-mail: mboccadoro@dolphingroup.org

Ann L. Trowbridge
DAY CARTER & MURPHY LLP
3620 American River Drive, Suite 205
Sacramento, California 95864
Telephone: (916) 570-2500, ext. 103
Facsimile: (916) 570-2525
E-mail: atrowbridge@daycartermurphy.com

4. Conclusion

Based on the foregoing, AECA respectfully requests that the Commission grant AECA party status in this proceeding and allow it to fully participate in this proceeding.

DATED: July 31, 2012

DAY CARTER & MURPHY LLP

By: /s/ Ann L. Trowbridge

Ann L. Trowbridge
DAY CARTER & MURPHY LLP
3620 American River Drive, Suite 205
Sacramento, California 95864
Telephone: (916) 570-2500, ext. 103
Facsimile: (916) 570-2525
E-mail: atrowbridge@daycartermurphy.com
**Attorneys for Agricultural Energy Consumers
Association**