

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA



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ADMINISTRATIVE LAW JUDGE COLIN RIZZO, presiding

Application of Southern California
Gas Company (U 904 G) and San Diego
Gas & Electric Company (U 902 G) for
Renewable Natural Gas Tariff.

) PREHEARING
) CONFERENCE
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) Application
) 19-02-015
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REPORTERS' TRANSCRIPT
San Francisco, California
June 18, 2019
Pages 1 - 35
PHC

Reported by: Andrea Ross, CSR No. 7896
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I N D E X

PARTY STATUS GRANTED

Environmental Defense Fund	5
Coalition for Renewable Natural Gas	6
Leadership Counsel for Justice and Accountability	7

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SAN FRANCISCO, CALIFORNIA
JUNE 18, 2019 - 10:00 A.M.
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ADMINISTRATIVE LAW JUDGE RIZZO: We will be on the record. The Commission will come to order. This is the time and place for the Prehearing Conference in Application 19-02-015, the Application of Southern California Gas Company and San Diego Gas & Electric Company for Renewable Natural Gas Tariff.

I am Colin Rizzo and I am the assigned administrative law judge to this proceeding. Commissioner Clifford Rechtschaffen is the assigned Commissioner in this proceeding. Commissioner Rechtschaffen's schedule did not permit him to join us today, but his adviser, Sandy Goldberg, is present with us in the room. I will be discussing the matters from today's PHC with the commissioner.

Today's agenda includes the following four topics: First, I will address appearances, which I've received some motions for party status; second, there will be a tentative schedule discussed for this proceeding, a tentative scope for this proceeding, the categorization and need for

1 hearings, and then I ask for some
2 housekeeping items right now.

3 First, please turn off your mobile
4 phones. Please speak slowly and clearly. Do
5 not speak to one another so our court
6 reporters are able to record this prehearing
7 conference clearly. The first time you speak
8 please identify yourself and your
9 organization. That also includes each time
10 you speak.

11 Let's now move to the service list
12 and party status. I received some motions
13 for party status, which I will now address.
14 First, I have Larissa Koehler from the
15 Environmental Defense Fund.

16 MS. KELLY: Yes, your Honor, my name is
17 Beth Kelly, K-e-l-l-y. I am here on behalf
18 of Larissa Koehler, L-a-r-i-s-s-a, Koehler,
19 K-o-e-h-l-e-r. She will be attorney of
20 record for Environmental Defense Fund. I am
21 here on her behalf today.

22 ALJ RIZZO: Does the Environmental
23 Defense Fund intend to file testimony and
24 sponsor witnesses or is this an information
25 only?

26 MS. KELLY: We intend to participate
27 fully in this proceeding.

28 ALJ RIZZO: Okay. Your motion for

1 party status is granted.

2 MS. KELLY: Thank you, your Honor.

3 (Environmental Defense Fund was
4 granted Party Status.)

5 ALJ RIZZO: Next I have Samuel Wade for
6 the Coalition for Renewable Natural Gas.

7 Mr. Wade.

8 MR. WADE: Thank you, your Honor, Sam
9 Wade with the Coalition for Renewable Natural
10 Gas requesting party status.

11 The RNG Coalition is a
12 California-based nonprofit organization
13 representing and providing public advocacy
14 and education for the renewable natural gas
15 industry. We advocate for the increased
16 deployment, development, and utilization of
17 RNG and availability of domestic renewable
18 clean fuel and energy in California and
19 across North America.

20 As such, our approximately 200
21 members have a keen interest in voluntary
22 tariffs to incent the purchase of renewable
23 natural gas, such as the ones being proposed
24 by SoCalGas and SDG&E in this proceeding.

25 ALJ RIZZO: Mr. Wade, do you intend to
26 participate in the proceeding like by
27 sponsoring testimony and filing briefs or is
28 this information only?

1 MR. WADE: We intend to fully
2 participate, your Honor.

3 ALJ RIZZO: Your motion for party
4 status is granted.

5 (Coalition for Renewable Natural Gas
6 was granted Party Status.)

7 ALJ RIZZO: Finally, I have Mr. Vespa
8 with the Leadership Counsel for Justice and
9 Accountability.

10 MR. VESPA: Yes, Matt Vespa. I am
11 representing Sierra Club and Leadership
12 Counsel for Justice and Accountability in
13 this proceeding. Sierra Club is already a
14 party and I'm moving for party status for
15 Leadership Counsel.

16 Leadership Counsel is an
17 environmental and social justice organization
18 based in the San Joaquin and East Coachella
19 Valley that works to develop healthy and
20 sustainable communities and address the stark
21 inequalities that impact California's
22 low-income, rural regions.

23 Leadership Counsel does intend to
24 participate in this proceeding and bring the
25 perspective of low-income rural communities
26 to the proposal and address equity and
27 environmental concerns with the proposed
28 tariff.

1 ALJ RIZZO: Do they intend to sponsor
2 testimony?

3 MR. VESPA: Yes.

4 ALJ RIZZO: Your motion for party
5 status is granted.

6 (Leadership Counsel for Justice and
7 Accountability was granted Party
8 Status.)

9 ALJ RIZZO: Are there any other parties
10 who have not filed a motion for party status
11 present in the room that wish to file status?

12 (No response.)

13 ALJ RIZZO: Seeing none, we'll move on
14 to the scope and categorization of this
15 proceeding. A scoping ruling will be issued
16 in this proceeding. It will address the
17 issues, the schedule, and the categorization.
18 With respect to categorization, this
19 application has been preliminarily identified
20 in accordance with Public Utilities Code
21 Section 1701.1 that this should be rate
22 setting as defined in Rule 1.3(f) of our
23 Rules of Practice and Procedure.

24 Does anyone disagree with this
25 preliminary determination at this point?

26 (No response.)

27 ALJ RIZZO: Seeing none, next we will
28 discuss hearings. Some parties expressed the

1 need for hearings. If we were to conduct
2 hearings, I am proposing no more than one or
3 at most two days of hearings. Based on the
4 filings, I think hearings are only
5 appropriate if there are disputed issues of
6 material fact.

7 Should such issues be identified in
8 the testimony, I will allow parties to file a
9 motion to make a request for hearing which
10 would clearly state which issues of material
11 fact are in dispute. I will discuss the
12 schedule for hearings when we get to that
13 part of this proceeding.

14 At this point, though, does anyone
15 have any comment to make regarding hearings
16 that I have not stated already?

17 MS. KELLY: Yes.

18 ALJ RIZZO: Ms. Kelly.

19 MS. KELLY: Thank you. Beth Kelly,
20 EDF. We believe that workshops and comments
21 will be sufficient. It's likely that
22 evidentiary hearings will not be necessary.
23 Thank you.

24 ALJ RIZZO: Thank you.

25 MR. VESPA: Your Honor, Matt Freedman
26 on behalf of The Utility Reform Network.
27 Based on the material we've received to date,
28 both in the form of testimony from the

1 applicants and responses to data requests, we
2 expect there to be significant disputes of
3 material fact. In particular, we believe
4 there are many key details of the program
5 proposal that have been omitted by the
6 applicant and to the extent that those
7 details are not clarified in additional
8 testimony that is provided, we believe that
9 hearings will be necessary to better
10 understand the actual proposal in front of
11 the Commission.

12 ALJ RIZZO: Right. So at that point
13 after the testimony comes in, the parties can
14 file a motion and then I will reserve dates
15 for hearings on the calendar so that should
16 we need them, they'll be there.

17 At this point I'm not saying
18 hearings are not going to happen. I'm just
19 saying that there will be a time for the
20 parties to file a motion to make that request
21 should the testimony come back without any
22 clarifying response.

23 Are there any other comments parties
24 would like to make on hearings?

25 (No response.)

26 ALJ RIZZO: Hearing none, Ex Parte
27 Rules: This application was preliminarily
28 determined to be ratesetting and,

1 accordingly, ex parte communications are
2 restricted to the requirements set forth in
3 Rule 8.2 of the Rules.

4 For complete guidance of the
5 Commission's ex parte rules, parties should
6 familiarize themselves with Article 8 of the
7 Commission's Rules of Practice and
8 Proceeding.

9 Now I will turn to Scope. The
10 assigned commissioner's Scoping Memo will
11 solidify the issues that will be addressed in
12 this application, but I have read your
13 filings and I will summarize the issues that
14 parties have identified as relevant within
15 the scope.

16 First, and then I will identify the
17 subissues, are whether or not the Commission
18 should authorize Southern California Gas and
19 San Diego Gas & Electric to establish a new
20 optional procurement tariff for residential
21 and core commercial industrial customers to
22 be sourced with renewable natural gas.

23 Subpoint A, sourcing of the
24 renewable natural gas procurement for
25 participants:

26 What supply sources are likely to be
27 used under the program?

28 What portion of these sources will

1 be physically located within the state or
2 near the state?

3 Second, how will Southern California
4 Gas and San Diego Gas & Electric prioritize
5 the limited amount of biogas that can become
6 pipeline quality biomethane for Renewable
7 Natural Gas so that it is used for
8 applications that are most difficult to
9 convert to carbon neutral fuel sources?

10 Third, how much renewable natural
11 gas should be procured from inside California
12 to provide the greatest benefit to
13 Californians?

14 Fourth, whether the renewable
15 natural gas product should be sourced from
16 both existing or new facilities or both?

17 Subpoint 1(b)(i), what tariff
18 provisions should the Commission require to
19 ensure the renewable natural gas the
20 utilities' supply is carbon neutral or carbon
21 beneficial?

22 2) Does the voluntary biomethane
23 procurement program provide for robust
24 verification protocols that ensure contracted
25 biomethane is actually captured, tracked, and
26 not double-counted by other biomethane
27 procurement programs?

28 3) How should the voluntary

1 biomethane procurement program accurately
2 calculate the greenhouse gas benefits of
3 contracted biomethane?

4 4) Does the voluntary biomethane
5 procurement program provide specific
6 environmental benefits within the state of
7 California?

8 Second issue, whether the source of
9 the program funding is appropriate; third,
10 whether the costs and objectives of the
11 application are reasonable and in the
12 interests of ratepayers; fourth, whether or
13 not the Commission should authorize Southern
14 California Gas and San Diego Gas & Electric
15 to modify the bills to charge opt-in
16 customers the prevailing tariff rate of
17 renewable natural gas for the portion of the
18 customer's usage that has been elected;

19 Five, whether or not the Commission
20 should authorize Southern California Gas and
21 San Diego Gas & Electric to report
22 incremental costs directly attributable to
23 the optional tariff program for recovery from
24 program participants;

25 Six, whether or not the Commission
26 should authorize Southern California Gas and
27 San Diego Gas & Electric to establish new,
28 two-way balancing account, which would

1 balance recorded costs of renewable natural
2 gas, incremental administrative costs
3 directly attributable to the program, and
4 revenues received from customers for the
5 portion of their bill that is attributed to
6 renewable natural gas;

7 Seven, whether or not the Commission
8 should authorize San Diego Gas & Electric to
9 file an advice letter to update its
10 anticipated costs for the program
11 implementation prior to the program
12 beginning, which it currently believes will
13 occur in 2022?

14 Marketing: How will the utilities'
15 marketing materials transparently communicate
16 the effects of biomethane procurement and who
17 should bear the marketing costs?

18 Nine, Safety: Whether the addition
19 of renewable natural gas resources to the
20 utilities' natural gas distribution
21 infrastructure would require any capital
22 infrastructure investments or safety
23 improvements and enhancements?

24 And finally, 10, Core Transport
25 Agents: Whether a renewable natural gas
26 customer, subject to the mandatory one- or
27 two-year initial commitment period under the
28 application's proposal would have to wait

1 until that period has elapsed before
2 switching to core transport agent service and
3 how the proposed program's 60-day
4 "cooling-off period" affects core transport
5 agent's customers who sign up for the
6 renewable natural gas program decide that
7 within the 60-day period not to participate
8 in the program should, after all, but have
9 already identified their CTAs that they would
10 return to utility service;

11 And how would SoCalGas and San Diego
12 Gas & Electric's different minimum load
13 requirements affect a CTA's compliance with
14 the utilities' requirements, if a CTA
15 customer switches to utility service for the
16 renewable natural gas program.

17 Does anyone have any comments?

18 MS. KELLY: Your Honor, on behalf of
19 EDF, one question that we would like to raise
20 is whether this program should be focused on
21 nonresidential customers, specifically those
22 that are the hardest to reach, areas where
23 electrification is not a viable strategy for
24 decarbonization. This would include electric
25 generators, large industrial customers that
26 require heat, for example.

27 Another element related to your
28 Honor's point on marketing is whether

1 SoCalGas should be directed to market
2 concurrently its load reduction programs
3 including energy efficiency and demand
4 response to ensure that participating
5 customers are efficient with this more
6 expensive fuel.

7 We ask that the Commission consider
8 how the CARE discount may be impacted. And
9 to the extent that SoCalGas targets specific
10 neighborhoods for the voluntary tariff, EDF
11 requests that the scope of the proceeding
12 include rules to conduct leak detection and
13 mitigation work in those locations.

14 In the event that customers that
15 volunteer for this tariff are determined not
16 to be eligible for programs here, EDF
17 encourages coordination with the Building
18 Decarbonization Rulemaking, R. 19-01-011.
19 Thank you, your Honor.

20 ALJ RIZZO: Thank you. We'll go to
21 Ms. O'Hara from the Public Advocates Office
22 and then?

23 MS. LEVIN: Julia Levin with the
24 Bioenergy Association of California.

25 ALJ RIZZO: All right, Ms. O'Hara.

26 MS. O'HARA: Good morning. I have two
27 clarifying questions. The first is in
28 regards to whether the proposed tariff

1 provides emissions reductions. I would like
2 to know whether or not that includes whether
3 the proposed tariff should result in
4 emissions reductions.

5 ALJ RIZZO: So that would be captured
6 in RGHC accounting I think, but we can
7 clarify that in the Scoping Memo. Thank you,
8 Ms. O'Hara, and then did you have another
9 one?

10 MS. O'HARA: Yes, I have a second one.

11 ALJ RIZZO: Okay.

12 MS. O'HARA: It relates to cost
13 recovery. I'm wondering if that issue also
14 includes whether the benefits of any reduced
15 compliance credit should be passed onto
16 participants.

17 ALJ RIZZO: Okay, noted. Thank you.

18 Ms. Levin?

19 MS. LEVIN: Yes. We strongly support
20 the concept of the tariff. We agree that the
21 issues that you've identified and were
22 identified in the opening comments are very
23 important to clarify. We wanted to add a few
24 others.

25 From the biomat proceeding on the
26 electricity side, as well as pipeline biogas
27 proceeding, R. 13-02-008, it's become clear
28 that it's important to clarify from the

1 outset who owns the environmental attributes
2 since this is a program intended to provide
3 environmental and climate change benefits.
4 So if the utilities purchase the gas or have
5 a tariff to purchase the renewable gas, do
6 they also receive all the environmental
7 attributes. We found in other related
8 proceedings that has to be clarified at the
9 beginning.

10 We agree that the environmental
11 benefits and the climate benefits should
12 accrue to California and so it is very
13 important to put the emphasis of this tariff
14 on in-state sources, especially those sources
15 that will reduce the most urgent climate
16 pollutants, which are short-lived climate
17 pollutants, to help meet the requirements of
18 state law SB 1383, which passed in 2016.

19 We also believe that they should
20 provide that benefit to air quality and other
21 environmental issues in addition to
22 environmental issues.

23 The last issue that has come up in
24 the pipeline biogas proceeding is the need to
25 maintain a competitive market. There are
26 private gas marketers in the market in
27 California. We think that helps to keep
28 downward pressure on prices, and so we think

1 that whatever tariff is adopted needs to be
2 done in a way that doesn't prevent the
3 opportunity for a competitive market for
4 renewable gas -- actually, I'm sorry, one
5 more area.]

6 In the pipeline biogas proceeding
7 R.13-02-008, the Commission is considering
8 right now what the definition of renewable
9 gas is, and it would be helpful to know
10 whether that definition will be the one
11 applied in this proceeding in this tariff or
12 if you are going to revisit that definition
13 or not; but, that is another really important
14 issue to determine what the scope of the
15 tariff will be.

16 ALJ RIZZO: Thank you, Ms. Levin.

17 Did I see another hand?

18 Mr. Elliott.

19 MR. HENRY: It's Mr. Henry, but that
20 happens all the time.

21 ALJ RIZZO: Mr. Henry, I'm sorry. I
22 apologize.

23 MR. HENRY: So I have a few points
24 here.

25 ALJ RIZZO: I'm sorry, Mr. Henry. Can
26 you --

27 MR. HENRY: Yes. Sorry. Mr. Elliott
28 Henry for SoCalGas and San Diego Gas &

1 Electric Company, the applicants.

2 I have a -- a few items here that
3 your Honor read and the other parties have
4 stated that I wanted to comment on on the
5 record. I'll stick to sort of just the
6 fewest that I feel like are the most
7 important.

8 First, your Honor, there was a --
9 one of the points in -- in the -- it sounds
10 like the anticipated scope is the focus on
11 RNG going to the most difficult sources to
12 convert. That was one of the first points
13 your Honor had. I wasn't writing down the
14 numbering.

15 ALJ RIZZO: Yeah.

16 MR. HENRY: As we said in our reply to
17 comments and protests and also our comments
18 in the -- in our prehearing conference
19 statement, we feel like the question of
20 whether RNG should be focused on just
21 specific areas and not something that should
22 be made to ordinary customers is something
23 that they can participate in in order to feel
24 like they're doing something extra to help
25 the environment when they're -- when they're
26 consuming gas, we feel like that's a --
27 there's a much broader policy question there
28 that is well outside the scope of what we --

1 we think of as a fairly simple and -- and
2 hopefully straightforward voluntary tariff.
3 So we would recommend that that broader
4 policy question be dealt in some broader
5 proceeding that covers those issues.

6 The second point I wanted to make,
7 there was a -- a -- one of your points
8 about -- your Honor's points about the
9 marketing effects -- or marketing showing the
10 effects of procurement, and that's something
11 that I understand, your Honor, that the
12 marketing materials may be something that's
13 appropriate for this proceeding, but the way
14 that's phrased makes it seem like something
15 that isn't done in other contexts, such as
16 with RPS -- for example, with the electric
17 side, I don't believe marketing materials --
18 if this is what your Honor intended with
19 this -- this particular scoping issue, I
20 don't believe that those materials will talk
21 about all of the different positive and
22 negative potential effects from procurement
23 from some sort of renewable source. I feel
24 like that point may be something that's --
25 suggests something outside the scope of this
26 proceeding, although I do understand, as I
27 said, of marketing materials and what they
28 may look like as part of this proceeding,

1 that's okay. It's just the way it was
2 phrased suggests something different, as I
3 heard it; and if I misheard it, then I
4 apologize, your Honor.

5 And then the -- I guess, the last --
6 the last point I wanted to -- to make is, you
7 know, we understand that -- that sourcing
8 will obviously be something within the scope
9 here. The -- your Honor and some of the
10 other parties have mentioned this focus on
11 benefits in California, and, you know, we --
12 we wholly anticipate that there will be
13 benefits in California, but we don't think
14 that we should just take a myopic view of
15 only gas coming from a California source as
16 the only kind of RNG that has any sort of
17 value. And so I would just respectfully
18 request that however -- however these scoping
19 points are phrased they not suggest that
20 that's the only thing that matters, is
21 whether the RNG comes from somewhere in
22 California.

23 Those are the three points I just
24 wanted to mention, your Honor.

25 ALJ RIZZO: Thank you, Mr. Henry.

26 MR. VESPA: Can I respond to some of
27 those?

28 ALJ RIZZO: You may, Mr. Vespa.

1 MR. VESPA: Matt Vespa for Sierra
2 Club/Leadership Counsel.

3 With regard to eligibility, who's
4 eligible, we feel like that should be in
5 scope. One concern we have with the program
6 is there could be marketing to residential
7 customers which have much more effective
8 electrification options that this marketing
9 might dissuade them from adopting, and
10 thereby undermining climate progress. So
11 it's something we want to address and have
12 considered in this proceeding.

13 With regard to marketing, you know,
14 having seen some of SoCalGas' past marketing
15 in RNG where it's depicted as an
16 environmentally beneficial green product,
17 there are local communities in the Central
18 Valley that are overburdened with groundwater
19 contamination and air pollution, you know,
20 much of which stems from this industrial
21 agriculture and these large manure ponds,
22 and, you know, we have equity issues
23 associated with how this is discussed, how
24 this is marketed, and find it fundamentally
25 problematic for certain customers to be sold
26 something that is purportedly environmentally
27 beneficial, you know, when that is on the
28 backs of rural communities dealing with the

1 actual consequences of those methane
2 lagoons -- or the manure lagoons. So it
3 isn't something -- we want that voice to be
4 heard, and we want that in scope.

5 ALJ RIZZO: Thank you, Mr. Vespa.

6 Any other comments?

7 MR. HENRY: I think I would just -- a
8 brief response, your Honor, if I may --

9 ALJ RIZZO: That's fine.

10 MR. HENRY: -- to the last point.

11 You know, the existence of whatever
12 sort -- whatever sort of the -- the dairies
13 that are currently in the state and so on and
14 so forth and the trash that's currently in
15 the state, those are going to be there
16 regardless of whether we have our RNG tariff.
17 I feel like looking at that sort of, you
18 know, social justice and equality issue,
19 generally speaking, I think is very
20 important, but this is just about whether
21 SoCalGas and SDG&E can acquire RNG to --
22 to -- to provide to their customers, not on
23 whether whatever sort of practices and
24 whatnot are going on with where the RNG is
25 procured. That seems like something that's
26 out -- should be outside the scope, your
27 Honor.

28 ALJ RIZZO: Thank you, Mr. Henry.

1 Any other parties, any comments?

2 (No response.)

3 ALJ RIZZO: Okay. We'll move on to the
4 schedule.

5 The applicant and parties have
6 proposed tentative schedules in their initial
7 filings. I think I calibrated the schedule
8 to still hit the target that the applicant
9 initially set.

10 So preliminarily, the assigned
11 commissioner's scoping memo will set a final
12 schedule for this proceeding, but it appears
13 reasonable that a scoping ruling could be
14 issued in July, with intervenor testimony
15 served mid-August, with rebuttal testimony
16 served early September. At that point, I'd
17 like to receive a motion from the parties if
18 certain facts are still in dispute and they
19 need -- and you need hearings. At that
20 point, you would file the motion. We would
21 go through evidentiary hearings, which would
22 occur the week of October 7th through the
23 11th, with opening briefs filed early
24 October, reply briefs filed early October,
25 and a voting meeting decision in January of
26 2020.

27 Mr. Vespa?

28 MR. VESPA: Yeah, Matt Vespa for Sierra

1 Club and Leadership Counsel.

2 We have fundamental concerns we
3 expressed in our protest and in the
4 prehearing conference statement that the
5 application is just fundamentally inadequate
6 on key points around --

7 THE REPORTER: I'm sorry. Around?

8 MR. VESPA: Fundamentally inadequate on
9 key points around incrementality and
10 verification and sourcing, and it's difficult
11 to provide testimony with no detail of what
12 the applicant attempts to do on these issues.
13 And so, you know, I would ask -- I think you
14 outlined a good set of scoping memo
15 questions. I would ask that the applicant
16 file amended direct testimony addressing
17 those points so we actually have something to
18 respond to, because right now they're just
19 avoiding it entirely. And so this is just --
20 it almost feels like they're workshopping an
21 idea. I mean this is not a vetted
22 application, so it makes it challenging to
23 even know what we're actually deciding when
24 they give no information in their
25 application.

26 ALJ RIZZO: Okay. Noted, Mr. Vespa.
27 Thank you.

28 And state your name for the record.

1 MR. FREEDMAN: Matt Freedman on behalf
2 of The Utility Reform Network.

3 I want to echo what Mr. Vespa just
4 said. Absent really key details about how
5 procurement will occur and what metrics will
6 be used to assess actual environmental
7 benefits in the application as it stands, we
8 expect the primary showing of the applicants
9 to really come in their rebuttal testimony of
10 the schedule, which would leave us forced to
11 conduct additional discovery after rebuttal
12 testimony and to really flesh out the key
13 issues in hearings. We believe this puts
14 intervenors at a disadvantage in this case.
15 We don't know exactly what it is that we're
16 assessing until very late in the game, which
17 is why it makes sense for the applicants to
18 provide additional details early so that the
19 testimony from intervenors can be
20 well-informed by the actual facts being
21 presented.

22 ALJ RIZZO: Okay. And do you -- a
23 question for Sierra Club and TURN: Are
24 you -- you have conducted preliminary
25 discovery already?

26 MR. VESPA: Uh-huh.

27 MR. FREEDMAN: Yes.

28 ALJ RIZZO: And do you intend to do

1 more discovery?

2 MR. FREEDMAN: Yes.

3 MR. VESPA: Yes. At the same time, I
4 mean there's no details. I mean discovery
5 lessons can come from anywhere. You know,
6 they cite to a regulation in the
7 cap-and-trade program on incrementality,
8 which is completely, you know, a different
9 regulatory regime. They don't really have
10 much to say on carbon accounting. So I mean
11 these are details we need to have to assess
12 the application. So you can do discovery,
13 but it's -- it seems like they're open to
14 pretty much anything, and provide no details.
15 So I don't know how much further in my
16 discovery I can go, because they haven't
17 thought this through.

18 ALJ RIZZO: Okay. And then you're
19 requesting an amended -- amended testimony
20 answering some of the questions that --

21 MR. VESPA: I would issue the scoping
22 memo, and then have amended testimony that
23 they answer on all those questions, which
24 then gives us something to reply to --

25 ALJ RIZZO: Okay.

26 MR. VESPA: -- in our testimony.

27 ALJ RIZZO: And Mr. Elliott?

28 Mr. Henry? I'm sorry.

1 MR. HENRY: That's okay, your Honor. I
2 would start by responding that, respectfully,
3 my colleagues here have -- part of the issue
4 is they've assumed that the program that we
5 proposed should comply with other unrelated
6 regulations and legislation on the electric
7 side and SB 1440, and that's not the program
8 that we're proposing here. So they assume --
9 in their response to the -- or their
10 protests, they assume that that was what we
11 were proposing, and said we didn't comply
12 with those requirements, and that we should
13 need to show all of this information; but,
14 that's not the program that we're proposing.
15 We are proposing a program that, on the
16 procurement side, would allow for
17 flexibility, and -- and that's why we didn't
18 say in our application that we're only going
19 to -- going to procure gas from dairies in
20 California, because that was not what we were
21 proposing.

22 And I would also say that these
23 issues that they've raised just now, they've
24 explained that through discovery they've
25 gotten the answers to some of these
26 questions. We explained how -- that we're
27 keeping the flexibility for ourselves to
28 procure gas where we wanted to, and we were

1 keeping -- and that we explained how we
2 planned to account for reductions in -- based
3 on the cap-and-trade apparatus that's in
4 place. So we can respond to discovery on
5 these -- these questions.

6 And then in the application, no one
7 anticipates every single issue that's going
8 to come up in the scope -- in a scoping memo
9 or anything like that. That's what
10 discovery's for, that's what testimony's for.
11 I believe Ms. -- I can't -- was it Ms. Kelly
12 or one of -- I'm sorry. I didn't -- can't
13 see the cards very well, but one of the other
14 attorneys present -- you know, I believe it
15 was Ms. Kelly -- suggested maybe having a
16 workshop to work through these issues.
17 Something like that is understandable. I
18 think having to re-file an application
19 because we didn't anticipate some of the
20 scoping issues would set back every
21 application that's ever -- ever filed.

22 MR. VESPA: These are fundamental
23 concerns. Incrementality and verification
24 are fundamental to any type of voluntary
25 tariff program, and there is nothing in the
26 application on this --

27 ALJ RIZZO: Okay.

28 MR. VESPA: -- period.

1 ALJ RIZZO: So I appreciate the
2 positions the parties have taken, and that --
3 that the scoping memo will come out with a
4 schedule that is calibrated, again, to what
5 the parties have -- the applicant filed and
6 what the parties responded to, as well as
7 some of these issues with facts that are in
8 dispute. So we will -- we'll -- we'll
9 revisit it with the record we've established
10 here.

11 So are there any other comments from
12 the parties? I see a hand.

13 MS. LEVIN: Julia Levin with the
14 Bioenergy Association of California.

15 I actually have a question for the
16 applicants, which is -- and I understand --
17 I'm sorry. The attorney for SoCalGas said
18 you don't want to limit to in-state
19 biomethane or renewable gas, but are you okay
20 limiting the application to at least biogas
21 and renewable gas that meets the requirements
22 of 399.12.6, which is not limited to
23 in-state, but it means it actually has to be
24 delivered and provide benefits to
25 California's environment? Because I think
26 if -- if we don't even know that parameter,
27 it's going to be proposed that that really
28 does open this up to a very different kind of

1 tariff.

2 ALJ RIZZO: Okay. So it sounds like
3 there are some questions that parties have
4 with -- with just the tariff's application
5 within -- which is in-state, generally. So
6 again, the -- the question's on the record,
7 Ms. Levin, and the scoping memo will solidify
8 the issues that hopefully will cover all of
9 this, and then we will look at weaving in
10 workshops in addition to hearings and as well
11 as I'm encouraging the parties to just
12 conduct discovery to the extent that they can
13 get results between now and at that time.
14 But, I will work in some time for a workshop
15 into the schedule. Again, I will have to go
16 over this with Commissioner Rechtschaffen,
17 and the -- you know, we'll -- we'll rectify
18 these. So I appreciate everyone's comments
19 on it.

20 Does anyone else have any issues for
21 the schedule that they'd like to bring up at
22 this point?]

23 MR. VESPA: Yeah, Matt Vespa again.
24 I'm confused and concerned about a workshop.
25 I don't know if that material is entered into
26 the record. I would just much rather see
27 amended testimony that we can actually
28 scrutinize and respond to than a workshop.

1 ALJ RIZZO: Okay.

2 MR. VESPA: Which I don't think in this
3 case would be effective.

4 ALJ RIZZO: Right. I'm not saying a
5 workshop would take away the amended
6 testimony.

7 MR. VESPA: Okay.

8 ALJ RIZZO: I'm saying that it's an
9 option along with hearings.

10 MR. VESPA: Yeah.

11 ALJ RIZZO: So I just --

12 MR. VESPA: Thank you.

13 ALJ RIZZO: -- to clarify that point.

14 Mr. Henry, you've received some
15 feedback from parties. Do you have any
16 comments you'd like to make before we close?

17 MR. HENRY: No. I think just briefly,
18 as I think I said at some point, your Honor,
19 we intended this to be a simple RNG tariff
20 option which customers could opt into. We
21 were hoping to try to keep it as much that
22 way as possible. We understand there are
23 other issues that other parties have
24 questions about and would like to dig into
25 more.

26 We're totally open to that in
27 discovery and hopefully even collaborating
28 some with the parties to try to come up with

1 something that more folks are happy with,
2 your Honor.

3 ALJ RIZZO: Okay.

4 MR. HENRY: That's all I have to say.

5 ALJ RIZZO: Thank you.

6 Anyone else before we close?

7 (No response.)

8 ALJ RIZZO: All right, if there are no
9 other issues that parties believe need to be
10 addressed at this point, then we will close.
11 I thank you for your attendance and your
12 participation. A Scoping Memo will be
13 issued. This prehearing conference is now
14 adjourned. We are off the record.

15 (Whereupon, at the hour of 10:34
16 a.m., this matter having been
17 concluded, the Commission then
18 adjourned.)]

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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

CERTIFICATION OF TRANSCRIPT OF PROCEEDING
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CSR NO. 7896


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