

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Application of Roeslein)	
Alternative Energy Services, LLC for a)	<u>File No. GE-2021-0049</u>
Permanent Waiver From Certain Provisions)	
of 20 CSR 4240-40.030)	

RESPONSE OF RAES TO STAFF RECOMMENDATION

COMES NOW Roeslein Alternative Energy Services, LLC (“RAES” or “Company”), by and through the undersigned counsel, and for its response to the *Staff Recommendation* respectfully states to the Missouri Public Service Commission (“Commission”) as follows:

1. On August 6, 2020, RAES filed its *Application for Waivers* with the Commission requesting the Commission grant RAES a waiver from Commission regulation 20 CSR 4240-40.030(12)(P) requiring natural gas in a transmission line to be odorized. RAES is constructing an intrastate transmission line to transport renewable natural gas generated at a hog finishing farm in Putnam County, Missouri, to an injection point on the interstate ANR Pipeline, also in Putnam County, Missouri. The renewable natural gas is refined from biogases collected in the existing lagoons on the Whitetail Farm and will be transported on the transmission line to the injection point on the ANR Pipeline. The Whitetail line will also be used to transport renewable natural gas from the Locust Ridge, South Meadows, and Green Hills farms, to be injected into the Whitetail Line at the Whitetail Farm. The *Application* requests the Commission grant RAES a permanent waiver from the odorization requirement because ANR’s FERC tariff prohibits the injection of odorized gas into the pipeline system.

2. On December 8, 2020, Staff filed its *Staff Recommendation* and

Memorandum in this case. Staff recommends the Commission approve RAES' waiver request subject to six (6) conditions:

1. RAES may not serve any Missouri customers from this pipeline without prior Commission approval;
2. RAES shall conduct leakage surveys and patrols along the entire length of the pipeline at intervals not exceeding four and one-half (4½) months, but at least four (4) times per calendar year;
3. RAES shall conduct a class location study of the RAES transmission pipeline annually, notifying Commission Staff of any class location changes within 30 days of discovery;
4. Whenever RAES is made aware (through notification by Missouri One Call, or other source) that its pipeline lies within the area described in the notice of excavation, or is within two (2) feet of such area, in addition to following the requirements of RSMo Chapter 319 to locate its line, RAES will have personnel onsite monitoring for damages to its pipeline during excavation work.
5. RAES shall notify Commission Staff at least 60 days prior to the start of construction of any new gas pipelines that would convey gas from the Green Hills, South Meadows, and/or Locust Ridge Farm to the Whitetail Farm.
6. This waiver of compliance is only applicable to combustible gas transported in the approximately 3.79 mile long intrastate gas transmission pipeline described in the RAES application. In the event any additional pipeline is connected to this pipeline, RAES must seek a modification of this waiver.

Memorandum, p. 10-11.


3. Also, on December 10, 2020, the Commission issued its *Order Directing Responses to Staff Recommendation* ("Order"), directing parties to file any response to the *Staff Recommendation* no later than December 21, 2020.

4. RAES has reviewed the *Staff Recommendation* and *Memorandum* and states that it has no objection to the Commission approving the permanent waiver

requested in the *Application* subject to the six (6) conditions requested by Staff and set forth above.

WHEREFORE, RAES respectfully requests the Commission issue an Order approving the *Application* and waiver from the requirements of Commission Rule 20 CSR 4240-40.030(12)(P) as requested therein, subject to the six (6) conditions requested by Staff; and for such other relief as the Commission deems just and proper.

Respectfully submitted,



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ATTORNEYS FOR ROESLEIN
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CERTIFICATE OF SERVICE

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