

MO Docket Sheet GX-2024-0326 – Renewable Natural Gas

Comments from

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1. (D) Renewable Natural Gas Rate Adjustment Mechanism (RNGRAM)

Please consider allowing costs for gas distribution operators for specialized full time technicians to maintain the BTU, moisture, SCADA, and other analytical equipment necessary to ensure gas is with in contract specifications.

2. (D) An explanation of how the utility will match generation with customer usage, be it on a retrospective or percentage basis;

Note, hydrogen has a much lower BTU content than fossil natural gas. Blending should be limited to no more than 10% hydrogen. The AGA has yet to make an official recommendation.

Odorization facilities may need to be installed and/or odorization control considered.

2. (G) A description of the RNG plant operation;

The RNG operator shall submit their operations plan for self shut in during equipment malfunctions, RNG process upsets, potential instrumentation reading differences (ex. RNG BTU equipment registers 980 mmBTU and the gas utility BTU equipment registers 940 mmBTU).

This is to prevent low quality and potentially deleterious gas from entering the distribution system. Currently, natural gas in Missouri is considered a “dry gas” or non-corrosive gas per DOT 192.903 and 192.927.

Additional comments

1. RNG Interconnection standards are needed, and most likely should be developed by the MOPSC in conjunction with gas operating companies. Developers play a large role in the RNG landscape. RNG interconnection standards should be similar to normal transmission pipeline interconnection standards, and these should include items pertinent to the specific RNG being supplied. At a minimum gas operating companies should be able to recover their costs associated with the physical RNG interconnect including:

BTU analyzers, moisture analyzers, oxygen, total sulfur, hydrogen sulfide, instrumentation building, metering, flow control valve, shut in valve, SCADA, over pressure protection, odorization, down

stream internal corrosion monitoring probes, and other equipment that may be particular to the type of RNG process.

2. The gas operating companies may not be able to take all of the RNG at the nearest location. The gas operating companies should have the discretion to identify the receiving location. These additional costs should be borne by the RNG supplier/developer.